Aligning City’s Quality and Standards Framework to Internal and External Drivers – Draft Reviewed Policies

Summary

The launch of City’s Vision and Strategy 2026 with a new set of strategic ambitions focusing on progression, student satisfaction and employability necessitated a review of the Education and Student Strategy to ensure appropriate alignment. Concurrently, the passing of the Higher Education and Research Act (2017) included initiatives designed to encourage the enhancement of quality in teaching, learning and research across the sector. The Competition and Markets Authority (CMA) has oversight of consumer protection law and its application to the higher education sector, and the Office for Students has been introduced, taking up its role as the higher education regulator in April 2018.

It is against this landscape of internal and external change that a review of City’s quality and standards framework was necessary, building on and strengthening existing practice whilst focusing on the student experience and outcomes. Four policies were identified to be simultaneously reviewed: Programme Approval, Programme Amendments, Periodic Review and Programme Suspension/Termination.

Consultation with Schools and the Students’ Union has now taken place, and this paper outlines the revised policies, and included plans for their implementation.

Recommended actions

Educational Quality Committee is asked to:

- discuss the revised policies and guidance
- recommend the policies to Senate for approval
- note the proposed reporting arrangements
- note that revisions will be made Annual Programme Policy and Guidance to align them with the updated policies following Senate approval
Aligning City’s Quality Assurance and Standards Framework to Internal and External Drivers – Draft Reviewed Policies

1) Purpose

The purpose of this paper is to update the Educational Quality Committee on the ongoing work to align City’s quality assurance and standards framework with our Vision and Strategy 2026, the refresh of the Education and Student Strategy and the recent rapid change in the external regulatory landscape. The work has been undertaken with reference to the quality assurance implications of the Teaching Excellence and Student Outcomes Framework (TEF), Competition and Markets Authority (CMA) compliance and the requirements of the HEFCE Annual Provider Review (APR). HEFCE’s revised approach to quality assurance from 2016/17 included significant reform and encouraged self-regulation, underpinned by the view that ‘quality’ is part of an overall approach to regulation and cannot in future be considered separately. This review also ensured that alignment to City’s Credit Framework is included as a consideration for programme approval, amendment and periodic review.

2) Policy Review Process

In response to the different internal and external drivers Student and Academic Services did an initial analysis which identified four policies (Programme Approval, Programme Amendment, Periodic Review and Programme Termination/Suspension) to be reviewed as a priority. These policies are closely related and have CMA implications due to communicating changes within programmes to students.

In September 2017, the Education and Student Committee approved the scope of the review and the Boards of Studies consultation paper. Consultation was then undertaken with Boards of Studies, School PARCs, the Students’ Union and School quality teams.

Initial alignment of the Annual Programme Evaluations (APEs) form has taken place to capture relevant information aligning with the strategy. This will be kept under review alongside this project.

3) Policy Review – proposed changes

Student and Academic Services received detailed responses from all of the Schools and LEaD. Student and Academic Services have drafted revised policies and guidance for the four policies. These drafts reflect on the comments made during the consultation, sector best practice and ensuring alignment to external requirements. The policies also note the previous comments made by the Education and Student Committee on ensuring that KPIs such as progression and data are embedded within these processes, as well as expanding the policy and guidance on programme approval regarding flexible course delivery. The policies have also been reviewed to provide more detail, going beyond just principles.

One of the key aims of the revisions is to simplify the guidance and make it more accessible to both staff and students.
The draft policies and guidance have been circulated to the Associate Deans (Education) and School Quality Teams for comment, and appropriate subsequent changes have been made, including increasing the emphasis on Programme Directors/Teams consulting with their School Quality Teams for the different processes, and expanding information on PSRB engagement.

4) Programme Approval Policy

The current policy and guidance can be accessed here: https://goo.gl/fJNqCB

Hybrid Programme Approval System

The review of the Programme Approval Policy encapsulated a review of the piloted Programme Approval system in Cass. The key features of the pilot process were:

- The two formal School Programme Approval and Review Committee (PARC) stages were combined with University-level consideration at University Programme Approval Committee (UPAC)
- Programme Teams were invited to attend and present at UPAC Stage 1. Previously they only attended UPAC Stage 2 meetings.
- The role of the External Advisor was still to scrutinise the proposed programme from an external perspective, however, instead of attending Stage 2 PARC and writing a written report for Stage 2 UPAC, they attended the Stage 2 UPAC as a panel member.

Partnership proposals were not included in the pilot process as this type of provision involves a higher level of risk.

An overview of the processes be found below:

Under both processes, sign-off from the Chair must be obtained before the next stage of the process may begin. This involves the Programme Team meeting any conditions set by the panel. Similarly, for both processes, advertisement of the
proposed programme cannot begin until sign off by the Chair of Stage 1 has been obtained.

Based on the feedback received from those involved in the pilot process, and input from other Schools it is proposed that a hybrid approach be adopted.

The system would be modelled:

- Stage 1 UPAC (Strategic and Resourcing)
  - The formal submission would maintain the requirement of a sign-off from the Dean of the School and Finance.
- Stage 2 PARC (Programme content)
- Stage 2 UPAC

By removing Stage 1 PARC this should allow programmes to be more responsive to sector changes and adapt accordingly, whilst still ensuring appropriate strategic oversight and resourcing needs from the Dean and Finance.

Schools had raised concerns that the piloted process removed School input and oversight by losing both PARC stages, as well as allowing full developmental input. The proposed hybrid system therefore still enables School input, development and oversight.

Programme Director attendance at UPAC

During the piloted process the Programme Director attended UPAC in order to provide clarification and answer queries. This was regarded by all as a sensible addition to the policy.

Role of the external advisor

Under the current model of programme approval the external advisor provides a written report to PARC providing their views, this enables development of the programme with an external view point. In the piloted process the external advisor instead sat as a member of Stage 2 UPAC, giving externality to the formal approval of the programme.

It is proposed within the revised policy to adopt a hybrid process for the external advisor. The external advisor would write a written report for PARC, and then attend the Stage 2 UPAC as a member. This would enable the external advisor to reflect on the changes made by the programme team in response to the written report.

Guidance

It is acknowledged that the current guidance is not easily accessible for those undertaking new programme approval. The guidance has been simplified, whilst clarifying the expectations of the programme team at each stage, in particular the required timing for different paperwork for the stages.

The current documents have been rationalised into a single revised Guidance:

- Programme Approval Guidance
- Programme Approval Framework
- Guidance for External Advisers
The “Guidance for market research considerations” has previously been incorporated into the Stage 1 template form.

Stage 2 Form

As part of the revisions to the Stage 2 form it is proposed to include a requirement for module and assessment mapping of assessment. Programme Teams are advised to work with LEaD during the development of their submission, ensuring authentic and robust assessment methods that align to the learning outcomes.

5) Programme Amendments Policy

The current policy and guidance can be accessed here: https://goo.gl/fJNqCB

Annual Amendment Form

It was acknowledged that in most Schools there was no systematic monitoring of cumulative change on a programme. Therefore there was the risk that individual changes were being made to modules within a programme without a holistic oversight to ensure that the programme was not undergoing a large amount of change.

After a trial in the School of Arts and Social Sciences this year it is proposed that Programme Directors submit all minor and major amendments on one Amendment Form to their School PARC. This then allows holistic oversight of the programme for PARC to provide appropriate scrutiny of the changes. For example, this will include an opportunity to consider the impact of proposed changes to type, timing or volume of assessment on the overall assessment strategy for the programme.

Due to the increased oversight by the CMA and the stricter deadlines on when changes can take place, having an annual form would allow for Schools to have tighter control of amendments to ensure regulatory compliance and ensuring that students and applicants are provided with timely and accurate information on programme amendments.

The revised policy includes contingency for “unforeseen circumstances”, but with tighter wording around what would be accepted for late amendment approval.

The annual amendment form would be appended to the programme’s next APE as an ongoing record of changes to the programme and an opportunity for the programme team to reflect on the impact of changes made, both during the APE and Periodic processes.

Clarification on Major Amendment categorisation

The current policy is ambiguous in how the major amendment category should be utilised, in particular the wording around a threshold of change of 30% to the programme. This wording has now been removed and the wording updated to make it clearer that the route of approval for major amendments is required when there is
significant change to the programme which would affect the programme learning outcomes or title.

Clarification on suspension of a module

Under the current policy it is left ambiguous how long a module may be suspended for. This has resulted in a number of programmes having a large number of suspended modules that have not been used for many years. Therefore the revised policy introduces that all suspended modules will be automatically terminated after 3 years if they are not re-introduced in that time. This then allows programme records to be kept up to date and clear.

Guidance

The Guidance for Programme Amendments has been revised to rationalise the current information, making it more accessible for Programme Teams. Under the current Guidance the information on “Guidance on the Application of Consumer Law” was a separate document, this has now been incorporated into one document.

Programme Amendment Form

After approval of the Policy and Guidance the Programme Amendment Form will be revised to incorporate the proposed changes. The Form will also be moved online to make the process more accessible and allowing for easier administration.

6) Periodic Review Policy

The current policy and guidance can be accessed here: https://goo.gl/m8qhJt

5-yearly cycle of review

The sector standard practice is for periodic reviews to occur on a 5-yearly cycle. This also then matches the standard timeline for PSRB reviews. Therefore the policy has been updated to reduce the time between periodic reviews from 6 to 5 years. Student and Academic Services have developed the Periodic Review schedule based on this change.

Year-on reporting moved to APE process

Under the current Periodic Review Policy it was an expectation that programme teams provide a year-on report to PARC outlining the changes that had been made as a result, and providing an update on their action plan. However, there was no formal template for these reports, and members of PARC reported being unsure how to robustly monitor the development. It was also acknowledged that one-year was not sufficient to observe if the changes that had been made were beneficial to the programme.

In the revised policy to respond to these concerns, and to reduce unnecessary duplication, the reporting of developments arising from periodic review will be embedded within the Annual Programme Evaluation (APE) process. The APE template already has an area for reporting developments and action planning within it, therefore allowing for easy alignment of the two processes. By embedding the
ongoing reporting into the APEs this also allows PARC to have a more robust overview of the ongoing development of the programme.

**Guidance**

The guidance has been developed to more succinctly provide an overview of the expectations of programme teams and panels. More specific guidance has also been included to better articulate the roles of the Periodic Review Secretary and the School administration.

It is proposed to maintain the short 1-2 page guides for Periodic Review Chairs, Student Panel Members, External Panel Members and Students separately to the core Guidance.

**7) Programme Termination/Suspension Policy**

The current policy and guidance can be accessed here: https://goo.gl/BBoSva

**Formal sign-off required from Associate Dean (Education)**

The current form for terminating or suspending a programme requires sign-off from the Dean. However, it was felt that for more robust oversight of the educational impacts on terminating/suspending a programme it would be beneficial to have the Associate Dean (Education), or equivalent, sign off before the Dean.

**Clarification on automatic removal of suspended programmes**

Under the current policy there is no automatic removal of suspended programmes after a certain period, so there are a substantial number of suspended programmes that have not been re-introduced. Under the revised policy it has now been clarified that where any programme has not been re-introduced within 3 years, it will automatically be terminated.

**Clarification on re-instating suspended programmes**

The current policy states how a programme can be terminated or suspended, but does not state how a programme can be re-introduced. The revised policy therefore states that re-introduction of a programme will require the required paperwork being submitted to Stage 1 UPAC only for approval if no other changes are being made to the programme.

For cases where there are proposed changes to the programme then it is expected that the full programme approval process will be utilised.

**Guidance and Forms**

The Guidance has been rationalised to make the process slightly more accessible.

The forms for Termination and Suspension have been separated to make it clearer which is being proposed. The information required is however the same.
8) Approval and implementation

The revised policies and guidance have been presented to the Associate Deans (Education) Forum for initial comment and feedback. The policies and guidance were also circulated to the School Quality Teams for comment. Revisions were then made prior to submission to the Educational Quality Committee. If approved by the Educational Quality Committee, the policies will be presented to Senate in May for formal approval.

The revised policies and guidance will be implemented for the 2018/19 academic year. To ensure that programme directors and school quality teams are aware of changes Student and Academic Services have identified a number of methods of training and communication:

- **Guidance** – the guidance has been updated to be streamlined and user friendly.
- **Quality Forum** – Student and Academic Services will run a session for School Quality Teams on the key changes to the policies and guidance.
- **Workshops** –
  - Workshops will be run for programme teams looking to introduce new programmes, outlining the approval process and best practice.
  - Workshops will be run for UPAC panel members to outline changes and training will be provided for new UPAC members.
  - Workshops will be run for programme teams undergoing periodic review to help guide them through the process, in particular focusing on how to run a productive development day and write a reflective report. Training will be provided for Periodic Review panel members.

9) Reporting

The four policies underpin essential quality assurance processes, and therefore it is appropriate that reporting on each policy is undertaken annually to ensure that they are being utilised robustly, with appropriate oversight. The table below outlines where each policy will be reported.

<table>
<thead>
<tr>
<th>Policy</th>
<th>Initial Reporting</th>
<th>Final Reporting</th>
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</thead>
</table>
| Programme Approval      | **Educational Quality Committee**
  - Annual oversight of the process, including number of new programmes and breadth of new provision.
  - Includes key themes that have arisen, in particular around conditions and recommendations that have been made.
  - Identification of areas of interest for Education and Student Committee. |
|                         | **Senate**
  - Annual oversight report, similar to EQC.                                    |
|                         | **Council**
<table>
<thead>
<tr>
<th>Programme Amendments</th>
<th>Educational Quality Committee</th>
<th>Senate</th>
<th>Council</th>
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<tbody>
<tr>
<td></td>
<td>Annual oversight of the process, including number of amendments</td>
<td>Annual oversight report, similar to EQC.</td>
<td>Embedded in the Annual Quality Assurance Report to Council.</td>
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<tr>
<td></td>
<td>Includes key themes that have arisen across programmes.</td>
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<td></td>
<td>Identification of areas of interest for Education and Student Committee.</td>
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<td></td>
<td>The record of programme amendments would be appended to the APE for reflective analysis during the APE and Periodic Review processes.</td>
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<table>
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<tr>
<th>Periodic Review</th>
<th>Educational Quality Committee</th>
<th>Senate</th>
<th>Council</th>
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<tbody>
<tr>
<td></td>
<td>Annual oversight of the process, including which programmes were reviewed and the outcomes.</td>
<td>Annual oversight report, similar to EQC.</td>
<td>Embedded in the Annual Quality Assurance Report to Council.</td>
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<tr>
<td></td>
<td>Includes key themes that have arisen across programmes.</td>
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<tr>
<td></td>
<td>EQC will also receive the annual report on UG, and PGT APEs, which, moving forward, will include oversight of Programme Teams embedding their Periodic Review Action Plans into their APEs.</td>
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<tbody>
<tr>
<td></td>
<td>Annual oversight of the process, including which programmes have been terminated or suspended.</td>
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<td>Embedded in the Annual Quality Assurance Report to Council.</td>
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**Recommended actions**

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- **note** the proposed reporting arrangements
• note that revisions will be made Annual Programme Policy and Guidance to align them with the updated policies following Senate approval

Dr Alexander Rhys
Development Co-ordinator (Quality)
March 2018