

European School of Economics Quality and Standards Review Report

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of Economics

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Executive summary

For provider seeking registration with the Office for Students (OfS), the OfS will assess a provider's application and the relevant evidence to determine whether they satisfy the initial registration conditions applicable to them.

The OfS appointed a review team in October 2023 to conduct the Quality and Standards Review (QSR). The team consisted of two academic expert assessors. The OfS also appointed a member of OfS staff to coordinate the review. The team was asked to give their advice and judgements about ESE's compliance with seven relevant core practices of the Quality Code.

This report does not represent any decision by the OfS in respect of compliance with the initial conditions of registration B1, B2, B4 and B5.

1. The OfS arranged for a QSR of the European School of Economics (ESE). This was to provide it with evidence to decide whether ESE complies with initial conditions and a risk assessment against ongoing conditions.
2. The OfS made changes to its initial and ongoing conditions of registration relating to quality and standards on 1 May 2022.¹ However, under transitional arrangements, the registration process for providers with a live registration application between 1 March and 30 April 2022 involves:
 - a decision by the OfS about whether the provider complies with the initial conditions of registration B1, B2, B4 and B5, which were in place at the time of the provider's application
 - a risk assessment in relation to the revised ongoing conditions of registration B1, B2, B4 and B5, which would apply upon the successful registration of the provider.²
3. For providers that had a live registration application between 1 March and 30 April 2022, a Quality and Standards Review (QSR) is normally conducted. This provides the OfS with evidence to decide whether the provider complies with the applicable initial conditions and to inform a risk assessment against ongoing conditions.
4. The previous QSR Guidance produced by the Quality Assurance Agency (QAA) set out that in a QSR a provider would be assessed against all 13 core practices of the QAA's Quality Code. However, the QSRs undertaken by the OfS after 1 April 2023 will only assess against seven core practices. The OfS takes the view that it does not require a review covering all core practices of the Quality Code to inform its assessment. This is in line with the risk-based approach in the regulatory framework and in the interests of minimising regulatory burden.

¹ See [Regulatory framework for higher education in England - Office for Students](#).

² See [Notice of determination of initial and general ongoing conditions of registration \(officeforstudents.org.uk\)](#).

5. The OfS requires all providers applying to its register to meet initial conditions that relate to quality and to standards respectively. It also conducts a risk assessment in relation to the revised ongoing conditions of registration B1, B2, B4 and B5, which would apply upon the successful registration of the provider.
6. The team considered a range of information. This included information:
 - held by the OfS, such as data relating to student outcomes,
 - submitted to the OfS by ESE,
 - gathered from ESE by the review team in the course of its assessment,
 - gathered by the review team during a visit to ESE on 30 April and 1 May, when it had a tour of facilities and met with staff and students.
7. The review team reached the following conclusions relating to the core practices. See the tables that follow.

Table 1: Standards

Ref	Core Practice	Outcome	Confidence	Summary of Reasons
S1	The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks.	Met	Moderate	From the evidence seen, the team considers that the standards set for ESE's courses are consistent with the sector-recognised standards defined in paragraph 342 of the OfS's regulatory framework. The team considers that standards described in the approved programme documentation are set at levels consistent with these sector-recognised standards. ESE's academic regulations and policies support the appropriate maintenance of standards. Assessed student work shows that credit and qualifications are awarded appropriately. Staff have a good understanding of the provider's approach to setting and maintaining standards, though some of the paperwork was not as clear as it could be. The validating partner and external examiners are confident that threshold standards are consistent with the relevant national qualifications framework, and credit and qualifications are awarded only where those threshold standards are met. The review team concludes, therefore, that the core practice is met with a moderate degree of confidence.
S2	The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers.	Met	Moderate	The team considers that, based on the evidence scrutinised, there are sufficient measures in place to ensure that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers. The regulations and course documentation provide appropriate detail of standards, including above the threshold and these are linked to the Frameworks for Higher

Education Qualifications (FHEQ) standards and the Quality Code. Some students at ESE are achieving beyond the threshold level, though the provider said it would like more students to be achieving first class degrees. There are internal systems to ensure work is marked by more than one person to ensure consistency of marking standards. This is further supported by student work that shows students working beyond the threshold level. External examiners and the validating partner support the provider awarding qualifications beyond the threshold level and awarded appropriately. Staff understanding of what is required to achieve beyond the threshold level could be stronger.

The review team concludes, therefore, that the core practice is met with a moderate degree of confidence.

Table 2: Quality

Ref	Core Practice	Outcome	Confidence	Summary of Reasons
Q2	The provider designs and/or delivers high quality courses.	Met	Moderate	The team considers that, based on the evidence scrutinised, ESE has sufficient measures in place to design and deliver high quality courses. It has clear processes in place for the design of high quality courses ensuring they meet appropriate requirements and are consistent across the five campuses. The team concludes that the courses delivered are of high quality because of the lessons that were observed and the positive feedback from students. External examiners and the validating partner report that the courses are of high quality. Leaders articulated what they considered to be high quality. Teaching staff were less clear about what they considered to be high quality. The review team concludes, therefore, that the core practice is met with a moderate degree of confidence.
Q3	The provider has sufficient appropriately qualified and skilled staff to deliver a high quality academic experience.	Met	Moderate	The team concludes that ESE has sufficient staff to deliver a high quality academic experience. The team noted the low number of staff involved in current research but that it is an ambition of ESE to increase its research profile. The team also noted the low number of staff with a teaching qualification and the statement that staff are encouraged to gain a teaching qualification. It nevertheless concludes that ESE has sufficient appropriately qualified and skilled staff. This was supported by lesson observations of teaching by skilled staff. Recruitment and induction processes do not appear to be consistent. However, with the current small number of staff and the appointment of staff who are familiar with ESE, the process appears to be satisfactory because staff are able to perform their roles. Students agreed that they benefited from the professional backgrounds of the

Ref	Core Practice	Outcome	Confidence	Summary of Reasons
				academic staff and from the exceptional administrative and pastoral support provided. The review team concludes, therefore, that the core practice is met with a moderate degree of confidence.
Q4	The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high quality academic experience.	Met	High	The review team's observations led it to conclude that ESE has good facilities and learning resources that serve to ensure a high quality academic experience. The five campus sites all have sufficient teaching space so that the planned increase in student numbers can be accommodated. ESE's plans for delivery and maintenance of facilities, learning resources and student support services are demonstrably linked to the delivery of successful academic and professional outcomes for students. Students appreciate the professional connections of the academic staff, small class sizes and the availability and helpfulness of the support staff. Staff understand their roles and responsibilities for facilities and resources. The review team concludes, therefore, that the core practice is met with a high degree of confidence.
Q5	The provider actively engages students, individually and collectively, in the quality of their educational experience.	Met	High	The team's own observations led it to conclude that ESE has well-developed policies and procedures to actively engage students in the quality of their educational experience. ESE carefully monitors and reacts to student feedback. The team noted examples of changes introduced from student feedback and students are empowered to suggest changes either directly or via their student representatives. Students are invited to give feedback on modules for every course and ESE continues to find new ways to encourage all students to complete the feedback forms. The team spoke to students at length about the

Ref	Core Practice	Outcome	Confidence	Summary of Reasons
				opportunities to provide feedback to the provider. Students felt listened to. The quality assurance processes from the validating partner also ensure and place a high value on using student feedback. The review team concludes, therefore, that the core practice is met with a high degree of confidence.
Q9	The provider supports all students to achieve successful academic and professional outcomes.	Met	High	The team's own observations led it to conclude that ESE supports all students to achieve successful academic and professional outcomes. There is comprehensive support available for all students to enable them to succeed. Close monitoring of the students holistically means ESE can give students support at an early stage. Small class sizes mean students benefit from closer attention. A sample of student work and good completion data provide evidence of student success. ESE places a high value on developing the students' professional skills, contacts and experience. It has a well-developed and effective internship programme which many students highlight as the best aspect of ESE. Other opportunities such as guest lectures, moving between campuses and CV support give students an excellent insight into other professional spheres. The review team concludes, therefore, that the core practice is met with a high degree of confidence.

Introduction and background

Context

8. The European School of Economics (ESE) was founded in Italy, in 1994. ESE offers UK bachelors' degrees, masters' degrees, and specialised short programmes at its centres in central London, Rome, Milan, Florence and Madrid. Undergraduate courses cover marketing, finance, sports management, media and communication, diplomacy, leadership, trade and management. The MSc Business Management courses have pathways in marketing, finance and management. The Masters' of Business Administration course covers entrepreneurship and leadership. Students can transfer between campuses during their courses at any point.
9. ESE delivers degrees awarded by a validating partner, Richmond American University London (RAUL), and it is currently teaching out courses with University of Chichester. The partnership with University of Chichester is terminating, so references in this report to the 'validating partner' refer to RAUL. It has previously had partnerships with University of Hertfordshire, Nottingham Trent University, University of Buckingham, University of Central Europe and New Charter University.
10. ESE is applying to register with the OfS as it considers this will support student recruitment and, in the future, it wishes to apply for Degree Awarding Powers.
11. ESE is a private company limited by shares and its governing body acts as the Board of Directors. Its governing body has the remit to monitor the performance of business development and quality assurance of the school. Responsibility for the strategic plans of ESE and for the deployment of resources rests with the Head of Business Development and Head of Quality and Standards.
12. The Quality Assurance Department provides oversight of academic quality and all policies affecting the academic life of ESE and liaises with academic partners. Academic Departments report on academic quality and standards to the Quality Assurance Department and up to the governing body. The Academic Council is responsible for quality assurance and enhancement of academic standards.

13. The current listing of higher education courses delivered and on offer is as follows. (See Table 3.)

Table 3: Higher education courses delivered and on offer

Course	Levels	Awarding body	Location of study	Student numbers (full-time)	Student numbers (part-time)
Bachelor of Science in Business Administration with specialisations in Finance, Management, Marketing, Media and Communications and Sports Management	4-6	Richmond American University London	London, Milan, Florence, Rome, Madrid	113	0
Bachelor of Science Global Political Science with specialisations in Diplomacy, Leadership and Trade	4-6	Richmond American University London	London, Milan, Florence, Rome, Madrid	3	0
Master of Science Business Management with specialisations in Finance, Management and Marketing	7	Richmond American University London	London, Milan, Florence, Rome, Madrid	13	0
Master of Business Administration in Entrepreneurship and Leadership	7	Richmond American University London	London, Milan, Florence, Rome, Madrid	3	0
Bachelor of Science in Business Administration with specialisations in Finance, Management, Marketing, Media and Communications and Sports Management	4-6	University of Chichester (teaching out)	London, Milan, Florence, Rome, Madrid	57	0

14. ESE is planning to grow student numbers annually upon registration with the OfS. It aims to double student numbers within four years. ESE is projecting 436 students by 2028-29. ESE is planning to offer a Masters' of Business Administration in Film Studies from September 2024. The assessment was undertaken on this basis.

Assessment process

Information gathering

15. The review team gathered a range of information to determine whether ESE met the seven relevant core practices. The review team conducted the assessment according to the process

set out in the OfS's QSR guidance for providers applying to register with the OfS (the Guidance).

16. The review team used information from ESE's QSR submission, from an initial information request, and from a site visit undertaken on 30 April and 1 May 2024.
17. During the site visit the review team:
 - Met with a range of staff, including academic and support staff, and senior staff.
 - Met with students studying at various academic levels.
18. Annex D of the guidance expects review teams to sample certain types of key evidence. The review team used representative sampling to look at a range of assessed student work from the last three years, covering a range of assignment types and all courses operational in 2023-24. The representative approach was taken to reflect the full range of ESE's provision. This was to:
 - test that students' assessed work reflects relevant threshold standards
 - test that marks and awards given to students are reasonably comparable with those achieved in other UK providers
 - test that, where ESE works in partnership with other organisations, the standards of awards are credible and secure
 - test whether ESE gives students comprehensive, helpful and timely feedback.

Explanation of findings

Core Practice S1

The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks.

19. To meet this core practice a provider must ensure that threshold standards for its qualifications are consistent with the relevant national qualifications frameworks. The threshold standards for its qualifications must be articulated clearly and must be met, or exceeded, through the delivery of the qualifications and the assessment of students.
20. The sector-recognised standards that are used in relation to this core practice are those that apply in England, as defined in paragraph 342 of the OfS's regulatory framework published in 2018 (OfS 2018.01). That is, those set out in Table 1, in paragraphs 4.10, 4.12, 4.15, 4.17, 4.18, in paragraphs 6.13 to 6.18 and in the Table in Annex C, in the version of The Frameworks for Higher Education Qualifications for UK Degree Awarding Bodies (FHEQ). These sector-recognised standards apply for this review and represent the threshold academic standards for each level of the FHEQ and the minimum volumes of credit typically associated with qualifications at each level.
21. The review team completed an assessment of this core practice in line with the principles and outcomes set out in the OfS's guidance.

What the evidence shows

22. The key pieces of evidence considered by the review team and what they showed are outlined below.
23. To identify ESE's approach to ensuring threshold standards, the team reviewed Terms of Reference, the Academic Regulations, the module specifications, the programme handbooks, the assessment grids and the assessment standards. The team looked for clear identification of ESE's responsibilities and consistency of approach.
24. ESE is responsible for setting and maintaining academic standards and the programmes are validated by Richmond, American University London. ESE has clear guidance, processes and policy for the design and delivery of programmes and modules. These include the Academic Regulations, the programme handbooks, the module specifications, the assessment standards and assessment grids. These documents explicitly support the identification and assessment of standards at the threshold level, with identified levels of achievement specified. The identification of achievement at the threshold level is clearly linked to, and consistent with, the appropriate FHEQ level descriptors. Once set at validation, external examiners judge whether threshold standards are being achieved at both module and qualification award levels. The validating partner confirms the appointments of the external examiners and has oversight of academic standards through the Academic and Assessment Board as described in the Terms of Reference.

25. To interrogate the robustness and credibility of ESE's plans for ensuring threshold standards, the team considered ESE's academic management and governance arrangements including the key academic frameworks and regulations and a validating partner report.
26. The team reviewed course documentation at programme and module level which articulate academic standards with reference to the appropriate assessment frameworks. The documentation provided appropriate detail of standards and these are linked implicitly to the FHEQ standards. ESE has appropriate academic regulations in place to provide a framework for setting and maintaining standards. The standards documents are complete in their coverage of key areas of programme development and delivery, and are worded effectively. This documentation, and the processes set out, are consistent with and works in line with the processes of the validating partner. The validating partner's review highlights the key academic frameworks and regulations, which provide for assessment to be carried out to the threshold standards.
27. To test that specified threshold standards are consistent with relevant national frameworks, the team reviewed approved course documentation, including programme specifications and programme handbooks for:
 - BSc Business Administration and its specialisations
 - BSc Global Political Science and its specialisations
 - MSc Business Management and its specialisations
 - MBA Entrepreneurship and Leadership.
28. Programme specifications for the BSc and the MSc in Business Administration show a clear understanding of the different threshold levels in the FHEQ and map the skills to the different modules in the programmes. The team concludes that approved programme documentation demonstrates that standards are set at levels consistent with relevant national qualifications frameworks.
29. The team checked whether external examiners confirm that sector-recognised standards are consistent with national qualifications frameworks, and that credits and qualifications are awarded only where those threshold standards have been met. The team considered external examiner reports, the external examiners' handbook and ESE's responses from 2018-2023 to the external examiners contained in annual reviews documentation.
30. External examiners are responsible for:
 - Proofing and approving summative end of term exam papers/assignments.
 - Attending assessment boards.
 - Reviewing samples of student work and the moderated marks.
 - Meeting students, where possible.
 - Providing feedback through an annual report that ESE responds to through actions.

31. The external examiners report proforma explicitly asks whether the provision meets the requirements of their relevant external framework (e.g., frameworks for higher education qualifications; subject benchmark statements). External examiner reports evidence that ESE's approaches to assessment consistently prioritise the student achievement of sector-recognised standards at prescribed levels within the different qualifications. They also show that credits are awarded only on demonstrable achievement of these standards. This is evidenced for example within comments by the external examiner for the marketing modules in 2022, which initially noted poor feedback to some students and in the following year noted this had improved and confirmed that the procedures for marking are rigorous and aligned with UK standards. The external examiners' handbook notes that external examiners receive an action plan from the provider on their report. While the review team did not see any action plans, it saw several examples of external examiner comments being considered as part of the annual programme reviews and follow-up action confirmed. For example, a comment from the external examiner in 2020 on the BSc in Global Political Science noted the consistency of marking had improved since they had commented on it the previous year and after the department had introduced grading discussions between markers before marking. External examiners who met with the review team confirmed that they saw rigorous moderation processes between examiners at the five different campuses and that ESE had implemented any suggestions they made. This is evidence that the external examiner system is one of the means by which the provider ensures threshold standards and these means are functional and effective.
32. To test that students' assessed work reflects the relevant threshold standards, the team sampled coursework from across the range of ESE's provision. To test that staff involved in assessment understand and effectively apply ESE's approach to maintaining threshold standards, the team met with senior staff, academic staff, and professional support staff.
33. The large sample of assessed work reviewed by the team indicates that assessments are at the appropriate level and that qualifications are only awarded when the relevant sector-recognised standards are met. For example, the MSc dissertation marking proforma has a list of key attributes with maximum marks and first and second marker's marks including, for example, for literature reviews and methods. The first and second examiner give a detailed report describing where the student has met the threshold and where they have exceeded it. There is also a detailed description of what is required to meet the threshold and, for example, what is required to gain a distinction at Level 7. In Quantitative Methods for Business Level 4, the exam paper allows students to demonstrate threshold standards asking for definitions and simple calculations. There are also more demanding questions allowing students to demonstrate knowledge and skills beyond the threshold. The feedback to students includes a detailed description of the subject-specific criteria, translatable skills, cognitive skills, practical skills, and knowledge and understanding showing the students what is required at the threshold level and beyond. Students told us that that they were very clear what was needed to achieve threshold standards. The team concluded that the sample of assessed work showed that the relevant threshold standards are met.
34. ESE has academic regulations to support the maintenance of standards at the relevant sector-recognised level. The review team saw evidence of meetings that tracked academic standards across courses and modules. Senior staff were clear in meetings about how academic standards are tracked. From the documentation provided before the visit, the review team found it difficult to follow the quality assurance processes to understand how

they support the setting and maintenance of threshold academic standards for its qualifications, consistent with the relevant national qualifications frameworks. For example, both the Academic Council and the Academic and Assessment Board are responsible for quality assurance and academic standards, but the minutes of the Academic Council did not show this. Also, the Quality Assurance Overview refers to a Quality assurance handbook, but senior staff confirmed that the overview **is** the handbook. Although the documentation could be clearer, the provider has frameworks to support the setting and maintenance of standards at the relevant threshold levels.

35. The team saw detailed programme descriptions included in programme specifications that stated the aims and objectives of the module, Intended Learning Outcomes (ILO), methods and range of assessment, and the contribution that each assessment makes to the final grade. The team's assessment of approved programme documentation shows that all programme learning outcomes fully align with the FHEQ levels and credit requirements and are therefore aligned with sector-recognised standards. There is evidence in the programme specification for the BSc in Business Administration where modules reflect the different FHEQ 4 and 5 levels and the requisite 360 credits for honours-level courses. For example, in Level 6 International Finance students are expected to critically appraise theories determining exchange rates movements and critically analyse the functioning of the international financial system, including modes of regulation. Whereas in Level 4 Introduction to Accounting and Finance students are expected to describe the fundamental differences between debt and equity financing and explain how changes to the capital structure can add value to the firm. The BSc can be distinguished from the MSc at Level 7 where the approved documentation expects students to gain the skills of flexibility and creativity necessary to address challenges presented by a rapidly changing international business environment. For example, in the MSc module 21st Century Advanced Business Structures, students are expected to critically discuss learning organisations, population ecology, and formal and informal organisations. They are also expected to critically evaluate the different assumptions underlying research into the social sciences and the nature and status of research methodology.
36. In meetings with staff, the review team heard clear articulation of the processes for setting, checking and marking assessments, which indicated that staff understood and applied the ESE approach to maintaining standards. The review team heard about the role of the Academic Coordinator on each campus and the use of feedback from staff, students and examiners in the annual course reviews and how this supported the review and maintenance of standards. In discussions with one of the Programme Directors, it was evident that they had clear oversight of all the modules and gave examples of where they had intervened to improve the level of material used in some modules. Lecturing staff who also met with the review team acknowledged the support provided by module leaders and the Academic Coordinators for setting and maintaining standards within the course material and in the assessments.
37. The documents provided from previous years show a number of different proformas for annual reviews and external examiners reports. This may explain some of the difficulties the team had in deciphering the current processes for ensuring that external reviewers are confirming that threshold standards are consistent with national qualification frameworks. The new programme and assessment monitoring forms from the current validating partner are very clear and require explicit reporting on external examiner, student and faculty feedback. Senior staff acknowledged that ESE's partnership with its new validating partner had

strengthened its quality assurance processes. The review team concluded that academic and professional staff understood their role in maintaining standards.

Conclusions

38. From the evidence seen, the team considers that the standards set for ESE's courses are consistent with the sector-recognised standards defined in paragraph 342 of the OfS's regulatory framework. This is because the standards described in the approved programme documentation are set at levels consistent with sector-recognised standards. ESE's academic regulations and policies ensure that ESE maintains standards.
39. The team considers that, based on the evidence scrutinised, there are sufficient measures in place to ensure that the threshold standards for qualifications are consistent with the relevant national qualifications frameworks defined in paragraph 342 of the OfS's regulatory framework. This is because, while the team considers that ESE's academic regulations and policies could be clearer, they are nevertheless comprehensive and consistent with the relevant national qualifications framework, and are ensuring that these standards are maintained. The team considers that staff understand and apply ESE's approach to setting and maintaining standards and that the evidence seen demonstrates the commitment of staff to implementing this approach. Assessed student work demonstrates that ESE and its validating partner only award credit and qualifications where students have met the relevant threshold standards. Therefore, based on its scrutiny of the evidence provided, the team concludes that this core practice is met.
40. The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks. From the evidence seen, the review team considers that the threshold standards set for ESE's courses, as set out in relevant course documentation, policies and procedures, are consistent with national qualifications frameworks. The review team found it challenging to follow how ESE maintains standards from the documentation initially supplied by ESE. However, the team believes the quality assurance processes of the new validating partner, together with ESE's effective leadership and oversight, will lead to a more rigorous and documented approach to setting and maintaining threshold standards. The review team's view is that this core practice is met with a moderate degree of confidence.

Core Practice S2

The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers.

41. To meet this core practice a provider must ensure that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers. The threshold standards for its qualifications must be articulated clearly and must be met, or exceeded, through the course delivery and the assessment of students.
42. The sector-recognised standards that are used in relation to this core practice are those that apply in England, as defined in paragraph 342 of the OfS's regulatory framework published in 2018 (OfS 2018.01). That is, those set out in Table 1, in paragraphs 4.10, 4.12, 4.15, 4.17, 4.18, in paragraphs 6.13-6.18 and in the Table in Annex C, in the version of The Frameworks for Higher Education Qualifications for UK Degree Awarding Bodies (FHEQ). These are sector-recognised standards that apply for this review and represent the threshold academic standards for each level of the FHEQ and the minimum numbers of credit typically associated with qualifications at each level.

What the evidence shows

43. The key pieces of evidence considered by the review team and what they showed are outlined below.
44. The review team considered the academic regulations and specifications, which set out the institutional approach (in conjunction with the validating partner) to the design and delivery of programmes in line with sector-recognised standards. These show achievement of, and beyond, the threshold standards. The academic regulations and specifications provide a framework within which achievement of, and beyond, threshold standards is articulated clearly and these documents are readily available to staff.
45. ESE has clear guidance, processes and policy for the design and delivery of programmes and modules. These include the Academic Regulations, the programme handbooks, the module specifications, the assessment standards and assessment grids. These documents explicitly support the identification and assessment of standards beyond the threshold level, with identified levels of achievement specified for the threshold level and beyond. The identification of achievement beyond the threshold level is clearly linked to, and consistent with, the appropriate FHEQ level descriptors.
46. Course documentation at programme and module level provides appropriate detail of standards and these are linked (either explicitly or implicitly, and recognisably) to the FHEQ standards. The above documentation is consistent with ESE's overall Academic Regulations. There are programme and module specifications that articulate academic standards with appropriate assessment frameworks specified.

47. ESE has appropriate academic regulations in place to provide a framework for setting and maintaining standards. The standards documents are complete in their coverage of key areas of programme development and delivery and effectively expressed. This documentation, and the processes set out, is consistent with and works in conjunction with the processes of the validating partner. The validating partner review highlights the key academic frameworks and regulations which provide for assessment to be carried out to the threshold standards and for achievement beyond that level to be effectively identified and signposted, and assessed appropriately.
48. To test that marks and awards given to students are reasonably comparable with those achieved in other UK providers, the review team studied a large representative sample of student work, which covered all the courses available in 2023-24. The review team looked at the External examiner reports and handbook. They also met with external examiners to check that they or the verifiers confirm that standards beyond the threshold for courses sampled are reasonably comparable with those achieved in other UK providers, and that credit and qualifications are awarded only where those standards have been met. The sampling of assessment briefs and submitted work show that markers differentiate their marking and feedback appropriately (both in the form of marks awarded and feedback to students at an individual or group level).
49. Sampling of student work shows that module leaders moderate assessed work and work is second marked if there is a significant difference in grading, in line with ESE policy. During the review visit, module leader and programme leader role holders indicated that standardisation conversations are held informally and not documented. Sampling of student work shows that assessors recognise achievement beyond the threshold standards and give feedback to students in the form of a mark indicating such achievement as well as in narrative feedback. This is also confirmed by external examiner reports. Assessment material, including briefing material for students, shows that ESE provides students with appropriate guidance on what is required for them to demonstrate achievement beyond the threshold level. Students who the review team met commented that they were aware of the grading criteria for assessed work.
50. External examiner reports indicate that they are satisfied that the threshold standards are clearly set out to students and that student performance is recognised when the standards are met. The reports also confirm that ESE staff recognise, and the external examiners confirm, achievement beyond the threshold standards and that this is fed back to students in narrative form and marks awarded. Discussion with external examiners highlighted examples of feedback to staff with regard to student work and identified examples of staff responding to feedback to ensure that ESE clearly articulates appropriate standards and maintains these in the assessment of submitted work.
51. External examiners have ongoing sight of, and input into, module assessments and content. External examiner reports also confirm that documentation for modules are reasonably comparable with other UK organisations. The validating partner report confirms that documentation meets its requirements. Sampling of assessed work confirmed that the assessments set for students are appropriate for the levels, clearly communicated, and assessed for achievement to, and beyond the threshold standards.

52. The handbook for external examiners provides a framework for the performance of the role. This covers all of the key areas the review team would expect to see and by which external examiners contribute to ensuring that threshold standards are met and achievement beyond them is recognised and recorded appropriately. External examiner reports show that the external examiner process takes account of the threshold standards, and achievement beyond them, in the setting of assessed work and in the marking of this work to those standards. External examiner reports raise some issues for the attention of ESE. Teaching staff and external examiners told the review team that ESE addresses these effectively to maintain standards and recognise students' levels of achievement in relation to them.
53. To check students' understanding of what was expected of them to reach standards beyond the threshold, the review team met with a range of students and analysed student feedback. These students confirmed in meetings during the visit that assessments set out clearly the threshold standards that they must meet to pass as well as the standards that they must meet to demonstrate achievement beyond the threshold standards.
54. To interrogate the robustness of ESE's plans for setting and maintaining comparable standards and to ensure that plans are credible and evidence-based the review team met with senior leaders and looked at examples of how modules are developed.
55. Module leaders and school staff told the review team that they design module delivery and assessment in conjunction with teaching delivery staff. The review team recognises that a collaborative process is better able to ensure that content and delivery supports achievement to, and beyond, the threshold standards. This was supported by the evidence of the module development process that was shared with the review team. External examiners report that they have sight of, and input into the design of assessments in line with their role as set out in the external examiner handbook.
56. To test how well ESE maintains the accuracy of student assessments, the review team met with senior leaders, looked at relevant paperwork and used the samples of student work.
57. Processes for internal quality assurance are set out in the quality handbook and associated review documentation. Staff confirmed during the review visit that they follow these assessment processes in order to ensure that there is a common view (together with external examiner input) of how achievement to, and beyond, the threshold standards is evidenced in assessed work.
58. It was apparent from conversations with provider staff during the visit that staff have a perception that 'in the UK system, we grade out of 75'. This showed a misunderstanding of UK standards beyond the threshold.
59. The provider stated that it would like to award more first class degrees. Analysis of student results showed no first class degrees awarded in three cohorts from 2023 and 2024.
60. Assessment guidance for students clearly sets out the standards to be met and these are consistent with the published assessment grids provided. Within the assessment guidance given to the students there are clear statements that set out how students are given opportunities to demonstrate achievement beyond the threshold standards and this guidance is in line with FHEQ standards. Sampling of assessed student work also confirms that the

work is assessed in line with the stated criteria, including for students who achieved beyond the baseline. The stated criteria are referenced in feedback to students.

Conclusions

61. The team considers that, based on the evidence scrutinised, students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers. The regulations and course documentation provide appropriate detail of sufficient measures in place to ensure standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers. Guidance is consistent with sector-recognised standards set out in the FHEQ and relates to the research processes, use of evidence, critical analysis and presentation of work to, and beyond, the threshold standards.
62. Student work and student feedback to the review team showed they were aware of what was expected at the threshold standard and beyond. Student work was assessed appropriately at the threshold level and beyond. However, it was noted by the review team and the provider that there were few examples of first class degrees being awarded.
63. External examiner and validating partners reports, and a direct sampling of assessments confirm that standards are reasonably comparable with those achieved in other UK providers. Therefore, based on its scrutiny of the evidence provided, the team concludes that this core practice is met with a moderate level of confidence.

Core Practice Q2

The provider designs and/or delivers high quality courses.

What the evidence shows

64. The key pieces of evidence considered by the review team and what they show are outlined below.
65. To assess whether the provider has credible, robust and evidence-based plans for designing high quality courses, the review team met with senior staff and teaching staff and had access to the planning process for developing a module.
66. ESE operates within the framework provided by its agreement with the validating partner. ESE within the scope of that agreement, has regulations and processes which cover the design, approval and validation, and delivery of courses. These include:
 - Academic Regulations, which cover the key areas expected in a policy level document of this type and are consistent with the validating partner agreement.
 - Programme and module specifications, which set out the structure of programmes and module content in line with Quality Code and FHEQ guidance.
 - Assessment grids and assessment criteria, which demonstrate an appropriate mix and level of assessment and alignment with the FHEQ criteria.
 - Quality processes and annual monitoring, which set out a framework for quality monitoring.
 - Student feedback reports and the role of the external examiners with associated reports, which indicate that quality processes are in place, albeit being 'tightened up'.
 - A Teaching and Learning Strategy at a policy level, which covers the key issues the review team would expect to see for the delivery of lessons and programmes of learning in line with appropriate standards.
67. ESE has delivery planning processes which support high quality course development and delivery at the module level. Modules are planned collectively before delivery to ensure consistency across the five campuses. Senior leaders and teaching staff, who met with the review team, described and gave examples of how they had developed modules, drawing on experience of colleagues, student feedback and their own evaluations to improve their practice. This provides teaching staff with a central planning template to base their teaching on, which helps to deliver high quality courses consistently across the five campuses. The review team was shown examples of these planning materials.
68. ESE staff were able to articulate what they see as 'high quality' and a particularly clear response was given by a programme leader. This was supported by the campus manager and Academic Coordinator. All of these staff placed emphasis on the commercially-engaged nature of most of the teaching team. The value of teaching qualifications and skills was seen

as secondary by senior staff, although its importance was acknowledged as a practical skill. Teaching staff were less able to articulate a clear vision of 'high quality'.

69. To test that all elements of the courses sampled are high quality (curriculum design, content and organisation; learning, teaching and assessment approaches) and that the teaching, learning and assessment design will enable students to demonstrate the intended learning outcomes, the review team considered approved course documentation.
70. The team looked in detail at the validation review for the BSc in Global Political Science, which showed that a number of detailed remarks were made by the external panel at validation to improve the course. The minutes of the validation panel show detailed discussions with three students as part of the validation. The review team was also given minutes of Academic Council meetings, which referred to follow-up actions from the review. For example, the team could see that the programme title had been changed to reflect a more inclusive and cutting-edge approach to understanding global politics. A range of new readings and books had been added to the modules to increase its breadth in line with the validating partners' comments.
71. To assess how staff ensure courses are high quality and to assess students' views about quality of the courses sampled, the review team met with students and analysed student feedback from 37 modules. Students confirmed in meetings during the review visit that they perceive the course delivered to be of high quality. Students base much of this perception on the narrative that the teaching staff are professionals actively engaged in their area of expertise and that teaching is a limited activity for them. This reflects the narrative given by centre staff. Student feedback forms are very positive in the main with many showing full scores and few dipping to, and none below, 3 out of 5 in the sample provided. Not all of these forms include free text, and where they did, comments were mainly procedural, relating to issues such as the choice of web communications package. ESE indicated that it does not see this feedback system as optimal and will 'tighten up' the system to require responses via the virtual learning environment (VLE) in future. Staff also note that they see the feedback forms as a formal confirmation of what they already know through close ongoing contact with students.
72. The review team observed teaching of four classes across the two days of the review visit. It saw lesson plans and the practice evidenced during the observations included:
 - A planned and organised session progressing through a set of activities.
 - Involvement of students – both those present in-person and those attending via web presence – with the teacher making explicit efforts to include virtual attendees as well as classroom attendees.
 - Classroom facilities of a good standard including presentation screens, good seating and standard of décor.
73. In observations, the review team saw more than adequate space available for in-person attendees; materials presented well with clear slides and use of other materials such as video clips and signposting to further resources; and appropriate content for the session. A relatively small proportion of the content was dated and some of the areas taught were supported by poorer quality sources such as consultancy reports and financial or business

journalism rather than academic and peer-reviewed content or teaching staff using industry examples and personal anecdotes heavily to support content. Overall, the delivery of the sessions observed was high quality.

74. ESE has small class sizes, allowing for high levels of support and involvement of students in classes. Such practices support quality of delivery to students and this is a stated objective of the leadership team. Classes are held in-person, though if a student is unable to be there, then online access is available. This was noticed in one of the lesson observations.
75. To support high quality delivery, if issues at a cohort level are identified, then ESE offers workshops to support students in a specific area. Students gave specific examples of workshops that supported them in their learning. For example, a workshop on the appropriate and inappropriate use of Artificial Intelligence (AI) within academic study has supported students to use AI effectively.
76. To gain a wider perspective of ESE's approach, the review team met with senior leaders and studied the five-year strategic plan.
77. The ESE Strategic Plan sets out targets for growth across the organisation. Staff regard the developments as realistic with approval for new course areas going to the Academic Council before development, as well as appropriate consultation with the current validating partner. The Business Development Manager noted that the organisation has dealt with larger numbers of students in the past and also indicated that they see the current staffing model as very scalable – giving the specific example of a recent appointment to boost capacity in academic coordination in the London centre. The review team believe the plans are scalable as the delivery is centralised and the provider has considered and made plans for additional staffing and premises.
78. To identify external examiners' or verifiers' views about the quality of the sample of courses, the review team considered external examiner reports, validating partner reports and met with external examiners and the validating partner.
79. The team noted that the external examiners' handbook says 'Examiners should meet students, as part of the process of making a judgement on the quality of the programme'. However, the majority of external examiner reports that the review team received noted that external examiners had not been able to meet with students.
80. External examiners who met with the review team confirmed that they saw rigorous moderation processes between teaching staff and assessors at the five different campuses and that ESE implements any suggestions they made. In particular, they noted that a previous recommendation on feedback to students on how they could do better in their next piece of work had led to improvements.
81. The team saw a progress report on the implementation of recommendations from ESE's validating partner and, in meetings with the review team, the validating partner asserted that it sees rigorous internal and external moderation processes at ESE and that ESE compares favourably with other institutions whose degrees it validates.
82. The team saw a progress report on the implementation of recommendations from ESE's validating partner designed to support and drive forward high quality design and delivery. This

includes, for example, reducing the amount of groupwork at Level 6, improving students' study skills by introducing a workshop in term one of year one, and improving turnaround time for assessed work by introducing informal feedback at a maximum of 14 days after the assessment. Another recommendation from the validating partner (and also a concern for students) was to provide better access to digital databases and ESE had adopted a new library since September 2023.

83. External examiner reports and discussion with external examiners further confirm that there is appropriate module content and assessment design (including opportunities to show achievement beyond the threshold standards) and that assessment standards are made available to external examiners for comment prior to release to students and assessed work is available for sampling. While some issues (referencing practice and nature of sources for example) are mentioned, external examiners also confirm that they see action being taken to address the issues raised. This was also confirmed by ESE staff in meetings during the review visit.
84. External examiner reports and discussion with examiners confirm appropriate assessment design and standards. The External examiner handbook sets out the role clearly at a policy level and external examiners report in discussion that they have access to materials, assessments and students – although some reports mentioned issues with access to students and issues in arranging visits to ESE.
85. Minutes of external examiners' meetings show that the board considers external examiner comments and students' mitigating circumstances. The minutes also show discussions on providing earlier feedback to students on their performance and the introduction of the new form to improve this.

Conclusions

86. The team considers that, based on the evidence scrutinised, ESE designs and delivers high quality courses. It has clear processes in place for the design of high quality courses to ensure they meet appropriate requirements. Programme and module specifications, along with the Teaching and Learning Strategy, support high quality delivery. Internal processes are in place to ensure that high quality courses are consistent across the five campuses.
87. Lesson observations and student feedback support the view that students receive high quality courses. This was supported by external examiners and the validating partner.
88. ESE places a high value on the practical experience of their teaching staff. This is greatly appreciated by the students. Senior leaders were clear about what they consider to be 'high quality'. Teaching staff were less able to articulate this vision. Therefore, based on its scrutiny of the evidence provided, the team concludes that this core practice is met with a moderate level of confidence.

Core Practice Q3

The provider has sufficient appropriately qualified and skilled staff to deliver a high quality academic experience.

What the evidence shows

89. The key pieces of evidence considered by the review team and what they showed are outlined below.
90. To assess whether the provider has credible robust and evidence-based plans for ensuring it has sufficient and appropriately qualified staff to deliver a high quality academic experience, the team reviewed the five-year strategic plan and the projected student numbers.
91. The five-year strategic plan includes a five-year growth plan to increase student numbers by 20 per cent each academic year. Also, the validating partner report in July 2022 noted that the estimate for the London campus for the next year was for 50 per cent more students. The validating partner report asked for a projection of student numbers per campus and the number of new campuses ESE intended to open in 2023-24. ESE provided projected numbers, which show that the overall projected increase across all five existing campuses will be from 175 students in 2024-25 to 436 students in 2029-30. The majority of student numbers will be in BSc Business Administration and smaller numbers in Global Political Science, an MSc and an MBA.
92. In meetings with the campus managers, the review team heard that they were confident that they could manage this increase in student numbers. This is because several of the campuses had previously had larger numbers of students and they had an existing extensive network of contacts available as lecturing staff. The increases in student numbers would be spread over five campuses and incrementally increased over five years. Each campus manager confirmed that they have a list of contacts who they regularly use for enrichment lectures and convinced the team that the recruitment process for new staff could be managed while still maintaining the small class sizes. The majority of the current teaching staff are on part-time contracts of around five hours per week. The team was also told that some of the current teachers had requested to increase their hours. All of this convinced the team that when the planned student numbers increase the teaching staff numbers will increase appropriately.
93. To identify the roles or posts the provider has to deliver a high quality learning experience and whether there are sufficient staff, the team reviewed:
 - the job descriptions of the professional staff
 - the CVs of a sample of staff
 - the list of highest qualification and teaching qualification of all teaching staff.

The team also talked to senior staff.

94. The team reviewed the current list of teaching staff and noted very few teaching qualifications. This is despite the Accreditation Service for International Schools, Colleges and Universities report recommending that all teaching staff obtain a pedagogic qualification at a minimum level of Preparing to Teach in the Lifelong Learning Sector (PTLLS). In the validating partner report it was noted that ESE encouraged lecturers to become members of the Higher Education Academy. The team heard from one lecturer that they were supported to complete a teaching qualification. There appeared to be no tracking of teaching qualifications or membership of the Higher Education Academy or similar. The team saw from the lecturer list, that most lecturing staff are part-time. The overall proportion of staff with PhDs is around 20 per cent. For example, London has three full-time and 11 part-time teaching staff, and three of these staff members have PhDs and one has a teaching qualification. The strategic plan notes an objective to promote and encourage ambitious research and to invest and support people in their research. Discussions with senior staff explained that lecturing staff were encouraged to gain additional qualifications, however on further questioning this appeared to be in their own time. They explained that ESE is a 'self-assessing organism' and that staff keep up-to-date with their field because of their professional employment outside ESE. One member of staff noted that he was a researcher in his role outside ESE. The team considered that the lack of a clear position on teaching qualifications or teaching experience, and the students' comments on the need for teaching support for some staff, meant there could be a risk of the quality of the academic experience dropping as staff numbers increase.
95. The team reviewed the job descriptions of professional staff and, in meetings with students, heard how the professional staff supported a high quality learning experience. The students knew who to talk to for help and advice and appreciated the time, even outside office hours, the support staff gave them. The review team was provided with two job descriptions; one for the campus manager on each campus and one for the Student Services Coordinator. The review team noted that the job description of the Student Services Coordinator included acting as welfare officer but there were no skills required in this area. In the meeting, this was described as a checking up role on students and signposting to external medical and mental health support when needed or for discussions with other ESE colleagues. The review team was told that the support staff were an essential part of the provision and would be increased in line with student numbers.
96. To identify how the provider recruits, appoints and inducts staff to deliver a high quality academic experience, the team reviewed the staff recruitment policy, the staff development policy, talked to the chair of the recruitment panel, and talked to lecturers.
97. The staff recruitment policy briefly outlines the recruitment procedures. The review team were told that most lecturing staff are recruited from their list of contacts, which includes alumni, guest lecturers and previous lecturers. The review team heard both that there was, and there was not, a standard job description for lecturing staff and were not shown one. The review team heard that different criteria were used in the selection of lecturing staff, but that being a good communicator and having strong professional work-based experience was always required. Some staff said two years' teaching experience and experience of UK higher education was essential, others said that a PhD and a teaching qualification was a lower priority. The review team met one new member of lecturing staff who explained that they were running a workshop and shadowing a more senior member of staff. The provider submission notes that prospective faculty staff are expected to deliver at least one trial lecture before

being confirmed as the course lecturer. The review team heard that prospective staff were now required to teach a trial class to improve the recruitment process. The review team considered that the process for recruitment of teaching staff needed to be specified more clearly and then consistently followed, particularly the requirements for teaching experience.

98. The Quality Assurance Overview notes that a classroom observation review is conducted each year. The team saw examples of performance review and peer review documents. The review team heard that peer review was sometimes done by reviewing the lecture videos and sometimes in-person. The review team did not see any systematic schedule of peer reviews. The review team also heard that ESE was considering a new process of peer review whereby all reviews would be done on one particular week so that they became embedded as a normal process for all staff. The team welcomed the tightening up of the peer review process and considered that this should be monitored and involve all teaching staff as specified in the Quality Assurance Overview.
99. The induction process was described as informal and that there are many people around to ask and be guided by. The staff development policy outlines ESE's approach to staff development and the roles and responsibilities of different staff. The Accreditation Service for International Schools, Colleges and Universities report noted the support for staff development as a particular area of strength. The team was told that there are a number of development activities scheduled, including 'Use of AI' and 'How to use lesson plans', which staff are encouraged to attend but without a specific time allocation. The team was told that lecturing staff are not allocated research or scholarship time as part of their mainly part-time contracts and it was not clear whether staff would be paid for the additional hours to attend development activities. The review team considered that not allocating teaching staff paid time to undertake development activities undermined the importance of the development programme.
100. In the meeting with the accrediting partner and the external examiners, the validating partner said that it valued industry experience over qualifications but would expect staff to be qualified to masters' level and that all staff should be working towards fellowship of the Higher Education Academy (HEA). In the validating partner's accreditation report, in response to a question about research and consultancy informing the curriculum, ESE replied that if there was a need for the curriculum to be updated then the Academic Council recommended the lecturer to take personal development courses. ESE also stated that there were a respectable number of ESE faculty members who were involved in research and ESE is planning to add a research section on its website where all the faculty members' research outputs would be collected and published. In the same report ESE was asked how it celebrated and rewarded the best teaching practices. ESE noted that Senior Professors in ESE trained new lecturers about best practices and methods to teach and engage students in class and that ESE did not have a formalised process for rewarding teachers. In the meeting it was confirmed that the external examiners' view was that the teaching staff were up-to-date with the latest professional practice in their subjects. The review team considered that there was a risk that if the current research active staff leaders left, that because there was insufficient emphasis on current research in the recruitment process, the courses may not keep sufficiently up-to-date. The review team also considered that the lack of a commitment to teaching staff gaining a teaching qualification was out-of-line with the expectations of the accrediting body and other UK universities.

101. To identify students' views about staff numbers, and the quality and skills demonstrated in their teaching, the team reviewed the module feedback, the minutes of the student representative committees, met with students and attended four classes.
102. Student views on the quality of the teaching were ascertained from reviewing the module feedback from minutes of student representative meetings and in meetings with students. The module feedback has a section of questions on the lecturer including clarity, knowledge and communication skills of the lecturer and, from the many module feedback forms, this was generally viewed as good. In the student representative meeting minutes, the team could see that students were always given an opportunity to comment on their current modules and raise issues about the teaching. In the meeting with student representatives, they were clear that points they raised about teaching staff were addressed. For example, the students commented that the lecturers provided good and helpful examples to illustrate theory from their professional work-based experiences, but also noted that some of the staff from industry could be given more support to improve their teaching. One student stated that some of the lecturers had less knowledge of pedagogy than others.
103. The team observed four classes and saw the lecturers providing clear slides, illustrated with examples from their own professional work-based practice. Lectures were well paced with sufficient pauses to check if students had any questions. There was good use of video clips and references back to earlier classes. The team also reviewed the module feedback forms for many more classes. The form is an opportunity for each student to rate the lecturer's teaching and, although these are not completed by all students, those that do are in the majority happy with the teaching. From the student representative meeting minutes the team could see that the representatives are asked at each meeting to feedback on how their courses are going. In the majority of reports the students state that they are satisfied. Where there is dissatisfaction expressed, the convenor says they will follow up outside the meeting and there are examples of students in subsequent meetings noting improvements.
104. From observations of teaching and talking to students, the team concluded that teaching staff are mostly delivering a high quality teaching experience and that the students are positive about the individual support, which helps them to engage fully in their learning experience. The review team thought that the provider could do more to support the teaching experience and skills of staff, particularly as the staff numbers are expected to increase.

Conclusions

105. The team's own observations led it to conclude that ESE has sufficient staff to deliver a high quality academic experience. The team noted the low number of staff involved in current research but that it is an ambition of ESE to increase its research profile. The team also noted the low number of staff with a teaching qualification and the statement that staff are encouraged to gain a teaching qualification. Recruitment and induction processes do not always appear to be followed but, with the current small numbers of staff and the appointment of staff who are familiar with ESE, the review team is satisfied that the teaching being delivered is adequate. However, ESE could do more to support the teaching skills of staff. Students agreed that they benefited from the professional work-based backgrounds of the academic staff and the exceptional administrative support from the support staff. Lesson observations showed skilled staff delivering content effectively.

106. Based on the evidence reviewed and meetings with ESE, the review team concludes that it has appropriately qualified and skilled staff who possess appropriate qualifications and experience to deliver a high quality academic experience across the range of subjects required in the courses at ESE. ESE has credible plans for ensuring it has sufficient staff to deliver its planned increase in student numbers. This was checked at all five campuses. ESE has recruitment, appointment and induction procedures but these are not always followed. This means that there is some risk that it will not continue to deliver a high quality academic experience when there are significantly more teaching staff. Based on the evidence assessed, the review team conclude that this core practice is met with a moderate degree of confidence.

Core Practice Q4

The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high quality academic experience.

What the evidence shows

107. The key pieces of evidence considered by the review team and what they showed are outlined below.
108. To identify how ESE's strategies for facilities, learning resources and student support services contribute to delivering a high quality academic experience, the review team considered the Academic Advising System and Student Feedback Policy, met with staff and students, and reviewed the physical resources.
109. The review team read details of the student tutorial system in the Academic Advising System document. However, the review team was told by staff and students that a tutorial system does not exist, but that the Student Services Coordinator does a daily check of students when they are attending classes in the building. Students were clear they felt free to approach both full-time centre staff and teaching delivery staff for support and advice. As numbers increase, this informal system could come under strain and the more formal system as outlined in the Academic Advising Policy would provide a better basis for this support. The review team heard from senior staff that all modules run quizzes every two weeks to check on student progress, so that students falling behind are identified and supported appropriately. Examples of such support include the provision of workshops (at a group level) and individual tutorial support (for language skills, for example). There was variability in students' and staff members' awareness of the quizzes and it appears that such quizzes are not implemented consistently. The review team also heard that attendance is tracked at each class and students are called if they are not attending. There is an 80 per cent attendance requirement. If a student's attendance does not improve, then ESE takes further action. Taken together with the high staff-student ratio, this should help to support attendance and improve student engagement.
110. The provider describes the geographical split of centres as being 'one organisation, with long corridors' and there is frequent and regular contact between centres especially in the academic coordination and quality processes.
111. Teaching rooms seen during tours and in lesson observations were of a good standard of décor, appropriately furnished with no apparent distractions and equipped with appropriate technology to allow the use of presentation software and for students to join classes by virtual presence tools. Centre staff across all five campuses indicated that the rooms are not scheduled heavily, and some are usually available to students who want study space. Students are positive about the spaces that are provided in all campuses. Study spaces for individuals and groups were present in all of the centres with students encouraged to use rooms not being used for teaching, as well as café-type areas which could allow for multiple groups to work simultaneously. Social areas are available to students and can double as study areas or group workspaces. During the London visit and the remote visits, centre management staff confirmed that they had, or had plans to acquire, sufficient teaching space

to support the planned expansion. This was also confirmed by the Business Development Manager.

112. Technology was of a good standard and there was sufficient quantity for current use and (with additional purchases to equip further teaching areas) planned future expansion with large moveable screens and internet connection. There are laptops available for loan if needed but students are expected, and prefer, to use their own technology.
113. Library facilities in each of the centres are split between physical resources and e-resources. Physical resources consist of a small library in each of the centres. This was described during the London review visit as being complementary to the main set of resources for modules, which are provided in digital format. E-resources provide digital copies of key texts and readings via the VLE and also allow access to the online database, which provides students with sufficient resources. The provider has indicated that it intends to add a further database of resources that students can access. ESE has sufficient resources to support a high quality academic experience.
114. To assess whether staff roles are consistent with the delivery of a high quality learning experience the team assessed the job descriptions for the Student Services Coordinator and for the campus manager and the teaching delivery staff.
115. The Student Services Coordinator's primary responsibility is to liaise with students and keep in contact with other staff and the campus manager. The duties include acting as welfare officer, liaising with accommodation agencies and maintaining student files. The requirements for the role do not appear to include any welfare training or experience. The campus manager is a full-time role primarily responsible for overseeing the day-to-day operations of ESE, liaising with external parties, managing staff, ensuring the smooth delivery of programmes, and ensuring the campus remains financially viable. The requirements of the role included Human Resources (HR) management and budgeting skills, and experience in higher education management. These seem to adequately cover the role. There is a significant level of 'informality' to some of the contacts with students and student support processes, with the staff describing regular meetings due to proximity (all based in the same centre) as 'water cooler conversations'. On a similar note, there appears to be a level of informality to the job and role descriptions applied to teaching delivery staff. Some recruitment practices differ across centres and there does not appear to be a formal job description for teaching delivery staff. Within the context though, the staff cover the key functions associated with the teaching role including contributing to module design, customising content for the specific centre, delivering teaching in classes, advising students in relation to the module, and contributing to the design and implementation of assessments. The latter includes marking as set out in the policy documents. The review team concluded that the staff are aware of their roles and responsibilities.
116. To assess whether ESE has credible, robust and evidence-based plans for ensuring that it has sufficient and appropriate facilities, learning resources and student support services to deliver a high quality academic experience, the team reviewed and discussed the current resourcing strategy and future plans with senior staff, and reviewed the ESE five-year Strategic Plan. The team also met with students from across several years of study.

117. Senior staff stated that the provider is confident that growth plans will not impact on the quality of the resources and facilities and that the current model is scalable. They highlighted that the provider has previously dealt with higher numbers of students – slightly lower than the end point of the currently planned expansion. During the visits to centres staff indicated that they either have, or have plans in place to acquire, sufficient physical space to continue to provide appropriate facilities to students. The Business Development Manager and the Centre Managers confirmed that the current space in the centres would accommodate the immediate growth envisaged and one centre indicated that they had agreement in principle to expand premises to an adjacent office area, if required. With regard to staffing, the Business Development Manager and Centre Managers indicated that they saw their current staffing model as scalable for the numbers envisaged in their development plan, with a parallel expansion of full-time staff in centres supporting students as well as teaching delivery staff. They indicated that they did not see a shift to full-time teaching staff as being integral to the expansion, rather that they had an adequate supply chain to provide them with commercially engaged staff, as per the current model. Coordination of increased numbers of teaching delivery staff would necessitate an increase in full-time centre-based support staff and the Business Development Manager and Centre Manager (London) gave the example of a recent appointment of additional academic support staff.
118. The provider's staffing structure is split between full-time professional support staff based in centres and teaching delivery staff who, in the main, work on short term contracts for a limited number of hours per week for the duration of a module or modules.
119. To identify ESE's facilities, learning resources and student support services the team had a guided tour of the VLE and met with members of the staff support team and senior leaders. This was cross-referenced against evidence of meeting minutes, associated committee structures and terms of reference.
120. Student numbers are low and the staff to student ratio allows for a level of one-to-one contact that would not be usual at many other UK organisations. Much of this contact is between students and the full-time professional support staff in centres. For example, the student support officer described regular 'check-ins' on students with unexplained or unanticipated absences being followed up immediately and escalated quickly if the student is not contactable. This provides a level of support, and speed of reaction, beyond that which is found in many UK providers.
121. The review team met with staff to assess whether they tend to regard facilities, learning resources and student support services as sufficient and appropriate, and facilitating a high quality academic experience. The review team also met with students and looked at student feedback to understand their views on facilities, learning resources and student support services and whether these are sufficient and appropriate.
122. Senior staff highlighted how they reviewed book lists and suggested alternatives before the start of teaching each year. They gave an example of a more appropriate textbook being agreed for one of the marketing modules. The review team was also able to see a comprehensive review of books on every module in the annual programme review. Set texts are available on the bookshelves in each campus and other recommended books through the online library. Staff said the campus was well resourced and noted that in the Covid pandemic they had been provided with screens, cameras and masks, as required.

123. Student views are captured through module surveys and in the meetings with student representatives. The module survey asks if the text(s) and other materials were appropriate and there are open questions on how the course can be improved and other comments. The module responses are reviewed by the module coordinators and fed into the annual reviews. For example, the online library has been changed recently and the review team heard from students that it is used extensively. Although there did not appear to be any systematic overview of the students' opinions about the facilities, the students had opportunities to comment if they thought improvements were needed.
124. Students talked positively about the support from staff and noted that the facilities were good on all campuses. Students particularly noted the excellent support to provide them with bespoke internship opportunities and support in CV writing. The review team concluded that staff and students tend to regard facilities, learning resources and student support services as sufficient and appropriate, and facilitating a high quality academic experience.
125. To assess whether evidence from third parties indicate that facilities, learning resources and student support services are sufficient and appropriate, the team reviewed the Accreditation Service for International Schools, Colleges and Universities report and the validating partner accreditation documents.
126. Evidence from third parties indicates that facilities, learning resources and student support services are sufficient and appropriate. The key document submitted in the initial provider submission in respect of facilities is a report from Accreditation Services for International Schools, Colleges and Universities. This report is generally positive and covers the key physical facilities, including health and safety and the standard of maintenance of the facilities.
127. The Accreditation Service for International Schools, Colleges and Universities report undertaken in December 2022 for the London campus commended the premises as being appropriately furnished, maintained and extremely clean. The report also praised the appropriately sized common room, students having access to refreshment facilities, the appropriate range of supporting texts, the library study spaces, IT provision and access to electronic resources.
128. The validating partner report in July 2022 noted that ESE reported that every student has an Academic Tutor and that students all have peer advisers. The review team did not find any evidence from students of these support systems. However, students were very clear about whom they should contact if they needed any support. The report also noted each campus has a lecturer who updates the library on a regular basis, and the review team found that although there was no designated librarian, this activity was happening. The report noted that the VLE had recently been changed and was being changed again in September 2022 to better meet the requirements of cross-campus teaching. Senior staff stated that the VLE was not as good as they wished, and also told us that a new system was being purchased. The team concluded that there is evidence from the Accreditation Service for International Schools, Colleges and Universities report and the validating partner that the facilities and support services are sufficient and appropriate.

Conclusions

129. The team's own observations led it to conclude that ESE has good facilities and learning resources that serve to ensure a high quality academic experience. The five campus sites also have sufficient teaching space so that the planned increase in student numbers can be accommodated. ESE's plans for delivery and maintenance of facilities, learning resources and student support services are demonstrably linked to the delivery of successful academic and professional outcomes for students. Students appreciate the professional connections of the academic staff and the availability and helpfulness of the support staff. Staff understand their roles and responsibilities for facilities and resources. The review team concludes, therefore, that the core practice is met.
130. ESE has sufficient and appropriate resources to deliver a high quality academic experience. The team saw high quality learning spaces in all five campuses and heard from the students that they had sufficient access to learning materials. The recent introduction of the online resource was welcomed by students. The provider had credible plans to increase staff numbers and learning spaces if student numbers increase as planned. Based on the evidence assessed, the review team conclude that this core practice is met with a high degree of confidence.
131. ESE confirmed that the provision of support services was an important aspect of its provision and would be increased in line with student numbers. The team determined that the provider offered sufficient and appropriate student support services to students and that this would continue to be appropriate if numbers of students increase. The provider gave an example of employing additional student support staff in London to maintain its level of service.

Core Practice Q5

The provider actively engages students, individually and collectively, in the quality of their educational experience.

What the evidence shows

132. The key pieces of evidence considered by the review team and what they showed are outlined below.
133. To understand whether the provider has robust and credible plans for engaging students, individually and collectively, in the quality of their educational experience, the review team reviewed the Quality Assurance Overview, Academic Council Minutes, Annual Monitoring reports and Student Feedback Policy, and held meetings with senior staff.
134. The team noted that the Quality Assurance Overview states that 'one of the principles of assuring quality is to take the views of our students into account...We recognise that students can make a valuable contribution to the assurance and assessment of quality within ESE. We are therefore committed to seeking the views of our students and using the feedback gained to improve the quality of their experience.' The Student Feedback Policy notes that feedback from students is gained from student feedback forms and from student representatives at their termly meetings. The policy also notes that the analysis of the student feedback forms part of the Annual Monitoring reviews and of the Academic Council. The minutes of the Academic Council meetings did not show systematic reviews of student feedback. However, the team could see that the Annual Monitoring reviews from the validating partner have a specific section asking for information from student feedback. The review in 2022-23 lists the following response to student feedback:
135. 'ESE has introduced more outside activities for each programme (visits to industry-specialising companies to see how the topics taught in class are put into practice) and included additional study skills classes (especially about referencing and citation) to help students with their assignments and exams preparation. A page dedicated to study skills has been included on the Student Portal, providing students advice on academic reading and writing, citing, writing, time management, use of AI, and on the same page students can now access the online library.'
136. Another example raised by both student representatives and students who met with the team concerned the timeliness of feedback on their submitted work and feeding forward (giving students advice on how to improve future pieces of work). The review team heard in the meeting with senior staff that this was being addressed and also saw reference to it in the Annual Monitoring report 2022-23. This noted that Quality and Academic Governance teams are creating an interim progression report template where Academic Coordinators will include the provisional mark, feedback and feed forward comments to be sent to students within 15 days from the assessment completion date.
137. To investigate if the provider has a clear and effective approach to actively engage students, individually and collectively, in the quality of their educational experience, the review team reviewed student feedback module evaluations, student representative meeting minutes and programme evaluations, and held meetings with staff and students.

138. Students are asked to complete anonymous module evaluation forms on each course on a termly basis. The review team reviewed many examples of student feedback, and the majority were extremely positive. The review team heard that lecturers added their comments onto the summaries of the student feedback for each module. While the review team found some summaries of student feedback that included comments from the lecturer on improvements they would make, the majority did not include any comment from the lecturer. The minutes of Academic Council from August 2023 note that it was agreed that Academic Coordinators would be responsible for students completing the feedback forms in class before week 8 of each module. The review team noted not all courses had a high response rate and asked the programme manager about this. The programme manager noted that they had been trying various approaches to improve the response rate from students and it is now mandatory for students to complete the student response form by week 8 of each module, otherwise access to the VLE is withheld.
139. To investigate if there are examples of the provider changing and improving students' learning experience as a result of student engagement, the review team asked for examples of these in the meeting with the student representatives and examined the annual course reviews.
140. The team asked the students about specific changes introduced because of student feedback. Examples the review team were given included the following. Student representatives asked for changes in a lecturer's teaching and it was noted at the following student representatives' meeting that the teaching had improved. Students raising issues with using the virtual learning platform had led to a new student portal, which is currently being implemented. Students also told us that they would often raise issues with the Academic Coordinator, and she would resolve them. The team concluded that there are examples of the provider improving students' learning experience as a result of student engagement.
141. To understand how students report that the provider engages them in the quality of their educational experience, the review team met with students and student representatives.
142. Each campus organises two student representative meetings a term and minutes were provided. The review team asked student representatives how they were appointed, and they described how students decided amongst themselves who would be their representatives. The minutes did not always show actions taken since the last meeting, but students were clear that the concerns they raised were addressed.
143. The team heard from students and student representatives that the centre staff were accessible and approachable, and that faculty staff were available to give individual feedback. The students noted that their suggestions on improvements to teaching styles were enacted swiftly. The team concluded that the staff engaged the students appropriately in the quality of their educational experience.

Conclusions

144. As described above, the review team considered all of the evidence submitted to form a judgement about whether ESE meets Core Practice Q5. ESE actively engages students, individually and collectively, in the quality of their educational experience. In making this judgement the team followed the process set out in the OfS's QSR guidance for providers applying to register with the OfS and took account of the key statements outlined in Annex E. In so doing the review team ensured that its judgement was consistent with all other assessments and remained outcomes-focused. Where the team reviewed policies and

approaches it was with a view to understanding their effectiveness and whether they deliver, in practice, what they intend to. The team's conclusions, based on the evidence considered, are detailed below.

145. The team's own observations led them to conclude that ESE has well-developed policies and procedures to actively engage students in the quality of their educational experience. ESE carefully monitors and reacts to student feedback and feedback is an integral part of its annual review processes. The team heard about examples of changes introduced from student feedback and students themselves felt empowered to suggest changes either directly or via their student representatives. There is module feedback for every course and ESE continues to find new ways to encourage all students to complete the feedback forms. The review team concludes, therefore, that the core practice is met.
146. The provider actively engages students in the quality of their educational experience. The provider has regular meetings with its student representatives, collects feedback on each module and support staff are in touch with the students on a day-to-day basis. The quality assurance processes from the validating institution demonstrated how student feedback was used in the annual review process, and the review team saw and heard of examples of student feedback being used to improve their experience. Students feel listened to and that their opinions will be considered. The review team's view is that this core practice is met with a high degree of confidence.

Core Practice Q9

The provider supports all students to achieve successful academic and professional outcomes.

What the evidence shows

147. The key pieces of evidence considered by the review team and what they showed are outlined below.
148. ESE arrange and monitor internship opportunities for students (including post-graduation additional internships on occasion). The internships are supported and negotiated in large part through an extensive network of ESE contacts. The initial submission documents outline a system for internships and further detail was added during the review visit. Such internships are negotiated between students, internship providers and ESE as a three-way contract. Staff report, and students confirmed, that students' interest areas are identified and they would then normally be offered a choice of internship opportunities. These involve negotiated and agreed programmes of experience in the internship – within the normal limits of such an experience. Students were very positive about the value of such internships, and the role of the provider in obtaining them. Some stated the quality of the internship programme was the best aspect of ESE. Students confirmed that they are supported in preparing for and undertaking the internships, as well as being monitored during the internship period. The validating partner report also notes the value of the internships provided by ESE.
149. Students told the review team that the academic advisory process of allocated tutors and academic advisers set out by ESE in the pastoral policy did not happen in practice. Students, however, commented that they felt free to approach, and did approach, both full-time centre staff and teaching delivery staff to discuss career aims and get study guidance. The informal support process was also confirmed by the Academic Coordinator and Centre Managers and it was reinforced from their conversations that this is more of an informal process than a fully documented one. The high staff to student ratio means that students are in frequent one-to-one contact with both centre staff and teaching delivery staff. As a result, students are supported with appropriate advice but this is, currently, an ad-hoc process and not the one described in the policy documents.
150. Tutoring services are available to help students with challenging subjects or study strategies. An example was given during the review visit where a student was identified within a lesson observation as having difficulties with language skills. The provider indicated that this had been raised both by their full-time centre staff and by teaching delivery staff and that the student concerned had been approached on the topic and had been offered and had taken up one-to-one additional language support.
151. Library resources are provided by small print collections, digital resources, and research assistance for academic projects and assignments. There is student and staff access to an online library for academic and peer-reviewed materials. Small physical libraries were seen during the two day review visit to the London centre and also during the tours of other centres conducted by web video links. These are not supported by a professional librarian and updating of the print and digital resources for modules falls to individual teaching delivery staff

and module leaders. The Academic Coordinator for the London centre indicated that print materials are additional to core module materials (textbooks and articles), which are, primarily, made available in digital formats in line with student preference. Both students and staff indicated that they had access to an online library and search engine for academic and peer-reviewed materials. Sampling of assessed work prior to the review visit raised the issue of quite limited levels of sources being used in some submitted work and a lower level of use of peer-reviewed and academic materials. This was also mentioned within the external examiner reports provided. The provider indicated during the review visit that they intended to add further academic resources to the online library.

152. The provider referred to workshops on areas including study and computer skills, research methodology and academic writing, preparation for the workplace and creative thinking, and students confirmed that there are such support workshops and seminars. There was no formal programme of workshops provided. The centre staff indicated in conversations during the review visit that such workshops are reactive rather than planned and in many cases with workshops and seminars are being delivered to meet a perceived need for a student group or module (rather than as a pre-planned and scheduled event). There is a page on the provider portal that directs student to support materials on a range of topics.
153. The initial provider submission presented careers materials and a list of job destinations for past students. Students confirmed during meetings in the review visit that they had received support with application processes and CV building. Students were very appreciative of this support and it prepared them well for the internship programme.
154. The Centre Managers and Academic Coordinator stated that they placed high value on the use of guest speakers to add to module delivery and to the wider programme. No specific details were provided of a programme of guest lectures, although reference was made to such events, and their positive value, both by students and centre staff. The use of guest lectures as 'try out' opportunities for potential teaching delivery staff was also mentioned by centre staff, with the London Centre Manager commenting that many alumni reached out to offer to provide such inputs.
155. The levels of achievement being in line with other UK providers are confirmed by lesson observations, sampling of assessed work, and external examiner reports within the context of a defined external examining role. This role is in line with the requirements of the provider and the validating partner.
156. To test whether students were given comprehensive, helpful and timely feedback, the review team looked at assessed work and met with students and staff.
157. Sampling of assessed work provided shows that there is a system in place for providing feedback to students on assessed work submitted. This is in the form of a mark awarded to the work and narrative feedback.
158. The feedback is subject to moderation by the module leader in all cases and, where there are significant differences in marks, to second marking. Such conversations are not transparent to students. The moderation and second marking processes necessarily add to the timescales for the marking of assessed work – although small numbers in classes mean that this initial marking is not as long a process as it could be with larger student numbers. The level of

feedback given varies by subject area and member of teaching delivery staff and this was recognised by full-time academic support staff in the provider. Students said during the review visit meeting that they accepted there would inevitably be a lead time in getting marks back from assessed work. They commented that that they knew feedback was necessarily subject to a lead time after submission and that they knew why this was and accepted that there would be a delay. Where unforeseen circumstances extended the lead time, they were made aware of the delay and accepted this.

159. During our meetings with them, students commented that some staff gave general feedback at a group or individual level (depending on the staff member) prior to confirmed grades and individual feedback being available. Students told the review team that staff practice with regard to feedback varied, with some seeing students individually, some discussing at a group level and some being available to discuss if requested.
160. All of the sampled work had an acceptable level of written feedback although, as noted, some was more detailed than others and some would also have been (as confirmed by students and staff) supplemented by discussion with students, either individually or as a group. Students, however, found the quality of feedback to be variable with some feedback being quite brief and some providing considerably more detail. This was also evident in the work sampled.
161. Discussion with provider staff indicated that timescales for the return of marks (typically two to three weeks) and associated narrative feedback are within what would be regarded as acceptable timings for other UK institutions. Students and teaching delivery staff also commented that feedback is also given on in-class exercises and activities and that students are free to, and will, approach staff for informal feedback.
162. The review team met with students and staff to test whether staff understand their responsibilities and are appropriately skilled and supported, and to assess whether students who have made particular use of student support services regard those services as accessible and effective.
163. Staff (both academic and professional support) understand their role in supporting student achievement, and students tend to agree that they are adequately supported to achieve successful academic and professional outcomes. ESE's staffing model is different to that in many UK institutions in that almost all the teaching delivery staff teach relatively low numbers of hours per week and are on fixed term contracts. Professional support staff (who tend to be full-time employees) are both more numerous, and more involved with individual students and their overall progress (as opposed to their achievement within individual modules).
164. The provider is very clear that they see teaching delivery staff as bringing current experience in their area of expertise to classrooms. They also see these staff as offering networking opportunities to gain internships, new guest speakers and further contacts.
165. Teaching delivery staff confirmed that they saw their role as delivering classes in line with the agreed lesson outlines (produced by the module leader in consultation with the teaching team across centres) and bringing current commercial experience into the classroom. Observations showed examples of such personal experience and current anecdotal or topical content being used in classes. Teaching delivery staff also confirmed that they saw discussions with, and support of students with regard to their own experience to be a part of their role.

166. ESE tracks its students very closely, through the academic boards while students are in study and after students complete their studies. ESE was able to demonstrate a very high proportion of its students (over 90 per cent) complete their studies successfully. ESE maintains contact with their students through a well-developed alumni programme.
167. ESE provided examples of how students are supported if they fall behind. It described several strategies it would use to support a student who was struggling. These included extra tutorial time, additional pastoral support, and discussion around course changes. As a result, students feel very well-supported.
168. Centres provide ongoing pastoral care in line with the policy set out by the provider and also at a very practical level in terms of assisting with travel, accommodation and financial arrangements, both in the process of transfer between centres and during the students' stays in the cities where the centres are based. Centre staff reported responding to requests for practical support from students both within and outside the normal working hours and days of the centres. The student support officer (London) commented that she 'checks in with most students, most days' and is available on site during working hours as well as arranging extra-curricular activities and visits for students.
169. ESE provides extension programmes (ExDuco and Talent Out) which encourage students to develop specific areas of interest based either in entrepreneurial activity or in areas of social good. Students and staff indicated that they valued these opportunities.
170. ESE has clear policies set out to support career preparation and assistance in the application process for graduate programmes and other employment opportunities. Students were very positive about the detailed assistance given to them in building CVs, highlighting appropriate experience and successfully negotiating the detail of recruitment and selection processes.
171. The ability to study in a range of centres is central to the publicity material for the provider and all Centre Managers confirmed that the process is relatively simple, with a transfer normally taking place at the end of a term on completion of a transfer form. This was also confirmed by the Academic Coordinator in London and in other centres. Students were very positive about the opportunities to study at different campuses during their studies. The pastoral care systems and processes also support the ability of students to transfer to centres in different locations with assistance being provided with the practicalities of accommodation and financial arrangements. As noted above, full-time centre staff expect such requests for assistance and respond to them even if outside core working times or days. The student support lead in the London centre said that they 'check in with most students, most days' and that any issues or concerns would be highlighted in such conversations either with her or other members of the full-time centre staff.

Conclusions

172. The team's own observations led it to conclude that ESE supports all students to achieve successful academic and professional outcomes. There is a comprehensive support package available for all students and this enables them to be successful. Close monitoring of the students holistically means support can be given at an early stage. Small class sizes mean students benefit from closer attention. The work students produce and completion data are evidence of students being successful. The review team concludes, therefore, that the core practice is met.

173. ESE places a high value on developing the students' professional skills, contacts and experience. There is a well-developed and very effective internship programme, which many students highlighted as the best aspect of ESE. Other opportunities, such as Ex-Duco, guest lectures, movement between campuses and CV support, give students an excellent insight into other professional spheres. The review team concludes, therefore, that the core practice is met with a high degree of confidence.



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