Degree awarding powers assessment report for MLA College Ltd

Full degree awarding powers assessment

Provider legal name: MLA College Ltd

Provider trading name: MLA College

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Executive summary

Type of assessment:	Quality and standards assessment for full degree awarding powers
For:	MLA College

1. This report represents the conclusions of an assessment for degree awarding powers (DAPs) at MLA College ('the college'). The college is seeking authorisation for Full taught DAPs (for awards up to and including Level 7) in all subjects.

2. To carry out the assessment, the Office for Students (OfS) appointed an assessment team, which included three academic experts and one member of OfS staff. The assessment included an online visit to the college. This report contains the advice and judgement of the team following its assessment.

3. The team concluded that the college met all the criteria for a Full DAPs authorisation (see Table 1). This report does not, however, represent any decision of the OfS to authorise these powers.

Table 1: Summary of findings against the DAPs criteria

Underpinning DAPs criteria	**Summary**
Criterion A: Academic governance	Met
Criterion B1: Regulatory frameworks	Met
Criterion B2: Academic standards	Met
Criterion B3: Quality of the academic experience	Met
Criterion C: Scholarship and the pedagogical effectiveness of staff	Met
Criterion D: Environment for supporting students	Met
Criterion E: Evaluation of performance	Met
Overarching Full DAPs criterion	**Summary**
The provider is a self-critical, cohesive academic community with a proven commitment to the assurance of standards supported by effective quality systems.	Met

Full degree awarding powers assessment

The OfS may authorise a registered higher education provider to grant taught awards, or research awards, or both, under section 42 of the Higher Education and Research Act 2017 (HERA).

A provider that is registered with the OfS and has a three-year track record of delivering higher education, either through an arrangement with a degree awarding body or under its own existing powers to award degrees, can apply for a Full degree awarding powers (Full DAPs) authorisation.[1]

A Full DAPs authorisation will normally be awarded on a time limited basis. At the end of the specified time limited, the provider will be able to apply for an authorisation to grant awards without a time limit. This is referred to as 'indefinite degree awarding powers'.

A provider may seek authorisation for Full DAPs for any or all of the following awards:

- foundation degrees only
- awards up to, and including, bachelors' degrees
- all taught awards
- research awards (if Full DAPs for taught awards are already held or are applied for at the same time).

Providers may apply for these authorisations on a subject-specific basis or covering all subjects. When choosing which level of DAPs authorisation it wishes to apply for, the provider must:

- have no fewer than three consecutive years' experience, immediately preceding the year of application, of delivering courses at a level at least equivalent to the level of DAPs authorisation for which the provider is applying
- meet the criteria set out in paragraph 249 of the OfS regulatory framework for higher education in England (the OfS's regulatory framework).[2]

Assessment and decision-making process

Before making a decision about whether to award a Full DAPs authorisation, the OfS will undertake a Full DAPs assessment. The purpose of a Full DAPs assessment is to gather evidence to inform a judgement on the extent to which a provider's arrangements:

- meet the DAPs criteria, including the overarching criterion for Full DAPs
- provide, and maintain the provision of, higher education of an appropriate quality
- apply, and maintain the application of, appropriate standards to that higher education.

The full requirements of the DAPs criteria are detailed in Annex C of the OfS's regulatory framework.[3]

[1] For a summary of different types of degree awarding powers, see OfS, Degree awarding powers.

[2] See OfS, Regulatory framework for higher education in England.

[3] See OfS regulatory framework Annex C – Guidance on the criteria for the authorisation for DAPs.

OfS officers first undertake an eligibility and suitability assessment of the provider. This initial assessment determines the scope and level of detail of the assessment, and an initial position on whether the assessment should be desk-based or include a visit to the provider.

Assessments for degree awarding powers are conducted by teams, which include academic experts that the OfS has appointed. The outcome of the assessment is typically a report, produced by the assessment team, summarising its findings.

The report is then considered by the OfS's Quality Assessment Committee (QAC). The QAC is responsible for providing advice to the OfS under section 46 of HERA on the quality of and standards applied to the higher education being delivered by providers, for which the OfS is considering granting, varying, or (in certain circumstances) revoking authorisation for DAPs.[4]

After considering the assessment report, the QAC provides advice to the OfS regarding quality and standards.

In making its decision about whether to authorise Full DAPs on the basis sought by the provider, the OfS will have regard to any assessment report and the QAC's advice. The OfS will also consider its own risk assessment of the provider and will have regard to advice received from others where this has been sought. It will also take into account other relevant considerations, such as the OfS's general duties under section 2 of HERA.[5]

Further information

We have published further information about providers seeking New DAPs and Full DAPs in Regulatory advice 12.[6]

4. MLA College is a private limited company specialising in delivering online distance learning degrees, located in Plymouth. Established in 2012 and registered as a higher education provider in England since 2021, the college delivers undergraduate and postgraduate taught courses in sustainability, business, maritime and marine-based subjects.

5. The college initially operated under the University of Plymouth (UoP), before it was purchased by the Institute of Marine Engineering, Science and Technology (IMarEST), then BAU Global and most recently, Global Education Holdings Limited (GEDU). It has worked in partnership with UoP under an academic cooperation agreement since 2015. UoP has awarded and validated the college's degrees at both undergraduate and postgraduate level.

6. In accordance with the OfS's regulatory framework and the guidance on how to apply for DAPs, the college is eligible to be considered for Full taught DAPs (for awards up to and including Level 7) because it has been delivering higher education for more than three years at this level and meets the eligibility criteria set out in paragraph 249 of the OfS's regulatory framework.

7. The OfS appointed an assessment team on 8 March 2024 that consisted of three academic expert assessors and a member of OfS staff. The team was asked to give its advice and

[4] See Gov.UK, Higher Education and Research Act 2017, section 46.

[5] See Gov.UK, Higher Education and Research Act 2017, section 2.

judgements about the quality of, and standards applied to, higher education courses at the college and whether the college meets the DAPs criteria, including the overarching criteria for a Full DAPs authorisation.

8. The team considered a range of information submitted by the college in support of its application for Full DAPs. This report does not represent any decision of the OfS in respect of whether the Full DAPs award the college is seeking should be granted.

9. This report is provisionally scheduled for consideration by the QAC on 16 July 2025. QAC will formulate its advice to the OfS regarding quality and standards at MLA College, having considered this report.

10. The OfS will have regard to this assessment report and QAC's advice when making a decision about whether to grant MLA College Full DAPs on the basis requested. The OfS will also consider its own risk assessment of the college, and will have regard to advice received from others where this has been sought. It will also take into account other relevant considerations, such as the OfS's general duties under section 2 of HERA.

Introduction and background

11. This report represents the conclusions of an assessment for degree awarding powers at MLA College.

12. The college is seeking authorisation for Full taught DAPs (for awards up to and including Level 7) in all subjects following its delivery of higher education since 2012 under, and subsequently in partnership with, UoP.

13. The QAC will consider the report and formulate its advice to the OfS regarding the quality and standards at the college.

14. The OfS will have regard to this assessment report and QAC's advice when making a decision about whether to grant the college Full DAPs on the basis requested. The OfS will also consider its own risk assessment of the college and will have regard to advice received from others where this has been sought. It will also take into account other relevant considerations, such as the OfS's general duties under section 2 of HERA.

Context

15. MLA College is a specialist provider delivering distance learning higher education provision. The college operates its delivery from a purpose-built online platform, with an administrative base in Plymouth.

16. Formed in 2012, the college originated at UoP as the Hydrographic Academy. In 2014, the college was acquired by IMarEST and became the Marine Learning Alliance Limited, before BAU Global purchased a major shareholding in the company in 2019. In 2021, the college became a registered higher education provider in England in its current form as MLA College.

17. BAU Global became the only shareholder in 2022, before the college was acquired by its current owner GEDU in 2023. GEDU owns a number of international education and training providers, with locations including the USA, Canada, Ireland, Germany, France, United Arab Emirates and India.[6]

18. The college specialises in sustainability, business, marine and maritime subject areas, and offers undergraduate and postgraduate top-up taught courses at Levels 6 and 7, including a postgraduate diploma and MSc or MBA by Research Project. These are currently delivered under an academic cooperation agreement with UoP, which has been in place since 2015. The college also offers two access courses in maritime and sustainability, which deliver an introduction to degree level study.

19. The college's provision is focused on working professionals who are looking to progress their career or continue their professional development on a part-time basis. As a result, programme delivery follows an asynchronous, distance learning model via the college's bespoke online learning platform, known as the 'Total Learning Package' (TLP), to allow students to access course materials and study flexibly. The college also offers three intakes

[6] See GEDU, About us.

per academic year, to allow students the option to commence their studies in January, May or September.

20. In addition to its core provision, the college offers bespoke education and training programmes and modules for the marine, maritime and wider sectors. For example, the college has previously supported the development of a distance learning programme for integration in a Professional Training Standard for the Hong Kong Marine Department.

21. The college reports that it works closely with industry membership organisations and professional registration bodies across its core areas, including IMarEST, the Institute of Chartered Shipbrokers and the Engineering Council. Furthermore, the college is an education partner for the City of London's International Training Centre for Authorities and Leaders (CIFAL) training centre. The centre is part of a global network coordinated by the United Nations Institute for Training and Research (UNITAR). The institute 'aspires to build capacity in the maritime sector to create a sustainable future while working towards the Sustainable Development Goals adopted by the United Nations', through offering training opportunities and exchanging best practice.[7]

22. The college reports that it will continue its focus on maritime and sustainability subject areas. It plans to continue to work with professional bodies, including its former shareholder IMarEST, to develop programmes in response to national and international developments and new initiatives, and in line with UK government strategies in the marine sector. It also plans to expand into related fields, such as engineering, in partnership with industry and industry associations.

23. Overall, based on the latest available Size and shape of provision data dashboard, the college had a student population in 2022-23 of 650 students. This included 310 undergraduate students; 50 of these students were part-time and 260 were studying outside the UK. There were 340 postgraduate students; 50 were part-time and 290 were studying outside the UK.[8]

24. The college reported that it currently employs 49 staff, which includes seven full-time teaching staff, 19 associate teaching staff and 19 professional services and learning support staff.

25. On 21 December 2021, the college applied for Full taught DAPs (for awards up to and including Level 7), in all subjects.

26. In accordance with the OfS's regulatory framework and guidance on how to apply for DAPs, the OfS undertook an initial eligibility and suitability assessment of the college.

27. In November 2022, the OfS decided that a Full DAPs assessment should be undertaken to gather and test evidence to inform a judgement about whether the college meets the DAPs criteria and has the ability to:

    - provide, and maintain the provision of, higher education of an appropriate quality

[7] See MLA College, CIFAL London.

[8] Available at OfS, Size and shape of provision data dashboard: Data dashboard.

- apply, and maintain the application of, appropriate standards to that higher education.

28. The DAPs application was referred to the Quality Assurance Agency for Higher Education (QAA) in its role as the Designated Quality Body (DQB) on 1 December 2022.

29. The QAA undertook an initial Full DAPs assessment and shared a summary of its findings with the OfS in March 2023. The initial assessment tests whether the provider has a sufficient level of preparedness, as demonstrated by its self-assessment, to proceed to the scrutiny stage (the main element of the Full DAPs assessment). The QAA recommended that the provider was ready to proceed.

30. From 31 March 2023, the QAA's designation as the DQB was removed.

31. On 9 February 2024, the OfS informed the college of its intention to commence the remainder of the Full DAPs assessment and proceed to the scrutiny stage.

32. The OfS appointed an assessment team on 8 March 2024, which consisted of three academic expert assessors and a member of OfS staff in the following roles:

    - Professor Elaine Limond – committee chair and lead assessor
    - Professor Ian Tuersley – deputy committee chair and assessor
    - Dr Rose Norman – deputy committee chair and assessor
    - Molly Bonser – committee member and assessment coordinator (up to 27 January 2025)
    - Thea Jones – committee member and assessment coordinator (from 27 January 2025).

33. The OfS asked the team to give its advice and judgements about the quality of, and standards applied to, higher education courses at the college and whether the college has met the DAPs criteria, including the overarching criteria for a Full DAPs authorisation.

34. The team considered a range of information submitted by the college in support of its application for Full DAPs.

Assessment process

Information gathering

35. As part of its original application, the college submitted a self-assessment document to the QAA, setting out how it considered it met the DAPs criteria for a Full taught DAPs authorisation.

36. To support the statements made in the self-assessment document, the college also submitted a range of documentary evidence, including course documentation, information related to academic policies and processes, and governance information, to the QAA. After the de-designation of the DQB, the QAA shared this evidence with the OfS during a transitionary period.

37. The college submitted further evidence to the OfS on 29 April 2024.

38. In accordance with the process outlined in the OfS's regulatory framework and the guidance on how to apply for DAPs, the assessment team undertook a desk-based assessment of the college's submission and evidence. Following this, the team requested further evidence from the college, which was submitted on 12 August 2024.

39. As part of the scrutiny activity, the team remotely observed the following meetings:

    - Assessment Committee and interim assessment award board on 5 September 2024
    - Student Experience Group on 9 October 2024
    - Academic Quality and Standards Committee on 14 November 2024
    - College Academic Board on 4 December 2024.

40. The team made a two-day online visit on 1 and 2 October 2024. During the visit, the team received a virtual tour of the college's bespoke virtual learning environment and a presentation about its strategy and approach to delivering higher education provision and programme accreditation. The team also met with members of senior staff, teaching staff, professional services and students.

41. After further assessment of the evidence it had gathered, the team requested additional evidence from the college on two separate occasions. This was submitted on 29 October 2024 and 25 April 2025.

Assessment of DAPs criterion A: Academic governance

Criterion A1: Academic governance

Advice to the OfS

42. The assessment team's view, based on specific consideration of the evidence requirements for this criterion alongside other relevant information, is that the college meets criterion A1: Academic governance because it meets subcriteria A1.1, A1.2, and A1.3.

43. The team's view is that the evidence shows in summary that the college has sound academic governance and management structures that deliver effective academic governance with clear and appropriate lines of accountability. It also has appropriate oversight to ensure that if it decides to work with other organisations, these arrangements will ensure the academic standards and the quality of courses delivered by partner organisations. The college engages students as partners in the academic governance and management of academic standards and quality.

Subcriterion A1.1

A1.1: An organisation granted degree awarding powers has effective academic governance, with clear and appropriate lines of accountability for its academic responsibilities.

Advice to the OfS

44. The assessment team's view, based on its review of evidence, is that the college meets criterion A1.1 because it has effective academic governance with clear and appropriate lines of accountability for its academic responsibilities.

Background

45. The college's principles of governance and the terms of reference for each governance committee are set out in the Governance and management structure.

46. The Board of Directors ('the board') is the most senior decision-making body, with responsibility for establishing the college's strategic direction and mission and ensuring its compliance with statutory duties. The board oversees business strategy, financial soundness, regulatory compliance, and academic governance, ensuring continuous improvement and organisational standards.

47. Under the strategic oversight of the board, the College Executive Group (CEG) is responsible for directing the college and making key decisions for the benefit of the college as a whole. This includes:

    - production of the college strategy for approval by the board
    - monitoring student recruitment and performance
    - monitoring the academic curriculum and staffing

- approving, modifying and terminating academic programmes, training courses and academic partnerships
- ensuring continuous enhancement
- managing risks and maintenance of a risk register.

48. The CEG meets weekly and directs decisions to the board, College Academic Board (CAB) and College Operations Group (COG) as necessary. The CEG also submits formal reports to the board in line with its terms of reference. Membership of the group consists of the Chief Executive Officer, the Rector, Vice-Rector (Academic) and Vice-Rector (Professional Services).

49. The COG is responsible for managing operational matters and related academic quality assurance and enhancement processes, including staffing and resource needs, monitoring and advising on improvements to the student interface, and major operational risks. The group reports to and refers strategic decisions to CEG. Membership includes the Vice-Rector (Professional Services) as chair, Vice-Rector (Academic), and heads of department for academic and professional services, including academic resources, student and programme services and recruitment.

50. The CAB is the college's most senior academic authority, with responsibility for establishing and overseeing the operation of the college's academic framework and the regulations of its validating partner. CAB is also responsible for appointing external examiners and conferring all awards, and reports to CEG. Membership of CAB consists of the Rector as chair, Vice-Rectors (Academic and Professional Services), Academic Registrar, Head of Programme Services and Student Experience Officer.

51. In recognition of the majority of the college's students being mid-career professionals undertaking part-time distance learning, the terms of reference for CAB set out that membership also includes 'Member(s) of the student community (where possible)'. Where no members of the student community are able to attend, a member of the Student Experience team will stand in as a representative. This is discussed further in paragraph 122.

52. CAB is supported in its academic activities by the Academic Quality and Standards Committee (AQSC), Assessment Committee, Interim Assessment and Award Board (IAAB) and Ethics Committee. The college also has a Student Experience Group (SEG), which reports to the AQSC, and an Academic Titles Committee, which reports to CAB.

Reasoning

53. To determine whether the college's higher education mission, strategic direction and associated policies are coherent, published, understood and applied consistently, the assessment team considered the 'MLA Strategic Plan 2023 to 2027'. The plan is published on the website, updated and publicly available. It sets out the college's mission to 'deliver outstanding flexible education and training to promote the conservation and sustainable use of the environment for the advancement of the global community'. To deliver this, one of the college's business aims is 'to become the "go to" global provider of distance and blended learning specialising in education for the sustainability and the marine and maritime sectors'. It plans to achieve this through working collaboratively with the college's local, national and

international academic and industry partnerships and networks, including that of its owner, GEDU.

54. The team found a coherent, understood and consistently applied approach to the college's mission and strategic direction, with alignment between the strategic plan and other associated documentation. For example, at a strategic level, the board's minutes of January 2025 report that a graduation ceremony will be held in Singapore, during Singapore Maritime Week (of which the college is a sponsor), emphasising the global perspective evident in the college strategy. The agenda for the college staff away day notes time spent by college staff on the vision, mission, values and strategy. The team also found that, in meetings with academic and support staff as part of the online visit, staff reiterated the flexibility of the programmes to meet 'global' student requirements, in line with the college's mission.

55. The team saw further evidence of the college's strategic mission in operation at programme level. For example, the programme specification for the college's most recently validated programme, the PGDip Engineering Management, highlights the flexibility of the programme and references the college's 'global focus'. The team also felt the inclusion of the Engineering Council's Accreditation of higher education programmes (AHEP), fourth edition, in the programme mapping, alongside alignment with the subject benchmark statement for engineering (2023) was further evidence of the college's mission to specialise in education for the marine and maritime sectors and to be 'industry aware and responsive to [industry] requirements'.[9]

56. Based on the team's review of the documentation, and meetings with college staff and students, it formed the view that the college's higher education mission, strategic direction and associated policies are coherent, published, understood and applied consistently.

57. To determine how far the college's academic policies support its higher education mission, aims and objectives, the team considered evidence including:

- details of non-standard regulations that apply to the college's existing validated provision
- the college's draft academic framework
- the college's admissions statement and draft admissions policy
- the college's draft recognition of prior learning (RPL) policy
- the college's draft extenuating circumstances policy.

58. The team found that the college's commitment to providing opportunities for 'flexible education and training' are supported by its current and draft academic policies. While the college currently operates in line with UoP's extenuating circumstances policy, it does so with several agreed exceptions for valid claims, to ensure that consideration is given to the college's distance learning and its student body. For example, additional circumstances may be deemed valid in consideration of students who are also working professionals and studying offshore. The team found that the college's draft extenuating circumstances policy also allows for exceptional pressures of work and related circumstances for part-time

[9] Available at QAA, Subject benchmark statement – Engineering.

students in employment, as standard, which aligns with the college's target student market and its needs.

59. The team further found that the college's draft 'Recognition of Prior Learning Policy' details an inclusive approach and vocational entry criteria pathway, referencing 'prior experiential learning'. This is further evidenced in the existing 'Admissions Statement' and demonstrated in the programme review plan.

60. The team considered that this evidence is recognition that vocational experience and differing entry pathways align with the college's strategic plan. A more detailed review of the college's academic policies is provided under criterion B1, along with an expanded discussion of its flexible delivery model.

61. The team therefore formed the view that the college's academic policies support its higher education mission, aims and objectives.

62. To test how far there is clarity and differentiation of function and responsibility at all levels in the college in relation to its academic governance structures and arrangements for managing its higher education provision, the team reviewed:

    - the college's management structure and committee structures
    - associated terms of reference, including for the board and CAB
    - minutes of meetings of the board, CAB, AQSC and SEG.

63. The team also observed meetings of the CAB, AQSC and SEG.

64. Membership of the board, COG and CEG is detailed in the college's governance and management structure. The team found that the document is detailed, with sufficient overlap in members' responsibilities to these forums to ensure cohesive oversight of operational and strategic duties. The roles and responsibilities of the CAB, AQSC and SEG are detailed in their individual terms of reference. The team was satisfied that these also demonstrated sufficient overlap in membership responsibilities and cohesive oversight of academic and strategic matters.

65. The team found that the board's membership comprises the college's Chief Executive Officer (CEO) and Rector in addition to members of the GEDU network such as the CEO, Chief Finance Officer and Director of Global Strategic Planning. The terms of reference state that the board includes an independent chair and a current vacancy for an independent director. Minutes from the board meetings recognise the senior strategic role of this board: for example, the Finance report was presented and discussed, as was the opportunity to have a female science, technology, engineering and mathematics lead on the board to align with the Women in Maritime Scholarship and wider recruitment focus, and the negotiation of the outgoing CEO's resignation period.

66. To supplement the senior experience on the board, the college has recently formed an Independent Advisory Panel (IAP) to provide independent and external advice on its academic provision and governance processes, in line with developments in industry and the higher education sector. The membership includes the chair of the board, a range of senior

professionals from marine and maritime industries, and a UNITAR director. A panel of this nature aligns with the college's strategy which includes a business aim to 'be a provider of choice for delivery of professional development and learning outcomes through industry training programmes'. The team also formed the view that this demonstrated another means of building self-criticality, alongside the continuing 'external partnership' with UoP as a validating partner.

67. The team found that the governance structure shows a clear line of accountability and responsibility moving between operational and strategic. For example, there is clear differentiation between the responsibilities of COG and CAB, with both answerable to CEG, ensuring sufficient coordinated oversight for managing operational and academic matters relating to the college's higher education provision, as discussed in paragraphs 49 to 50. However, the team noted there were limited examples of 'check and challenge' evidencing particularly robust practice. The team considered that the membership of the board, CEG, COG, CAB and each subcommittee is appropriate and includes a range of stakeholders, but minutes, in general, lacked evidence of challenge between members. The team did not feel that this prevented the college from meeting the criterion, but considered this to be a weakness as the minutes did not always effectively demonstrate the practice that was observed during the assessment visit.

68. The team reviewed a range of minutes of meetings of the AQSC from 2021 to 2024, which demonstrated high attendance levels by the membership, opportunities for all to contribute, and appropriate oversight of relevant areas, including programme review, student feedback and programme proposal reviews. These meetings are regular, and minuted for wider distribution. The team found that actions captured in the minutes noted appropriate responsible persons, were clear and were addressed at subsequent meetings.

69. The team also found evidence of matters being reported upwards from subcommittees, with appropriate function and responsibility at each stage, demonstrated for example by the college's decision to recruit paid student representation, and its implementation. The November 2023 AQSC details an escalated point from the recent SEG meeting discussing the desire to look at paid representation to overcome some of the student voice concerns, following set reporting lines. The AQSC records a discussion taking place around the appointment, and an agreement to take the matter to the next CAB meeting. The November 2023 CAB meeting records agreement for the proposal and a requirement to produce terms of reference for the role, which were established in December 2023. The team formed the view that these examples demonstrated an effective process of reporting and timely action, which was appropriate to the level and function of each subcommittee or board.

70. In addition to reviewing the minutes, the team observed a meeting of the AQSC in November 2024. It found the meeting to be well chaired and attended, with opportunities for open and robust discussion. The team witnessed the decision-making authority of CAB and the actions in response to external examiner feedback and input from the student representatives.

71. Based on this review, the team found there was clarity and differentiation of function and responsibility at all levels in the college, in relation to its academic governance structures and arrangements for managing its higher education provision.

72. To establish whether the function and responsibility of the senior academic authority is clearly articulated and consistently applied, the team reviewed the college's governance and management structure and terms of reference, including for the board, CEG, CAB, Assessment Committee, AQSC and SEG.

73. As set out in paragraph 50, CAB is the college's most senior academic authority. It has responsibility for 'establishing and overseeing the operation of the college's academic framework', ensuring that the college's higher education provision is delivered in accordance with the framework's requirements 'and/or regulations of any partner awarding bodies, relevant legislation and external benchmarks'. This includes:

    - promoting and enhancing 'effective student learning, teaching, scholarship and research'
    - advising the CEO and Board of Directors on the development of the college's higher education provision and resource requirements
    - the development, review and approval of regulations, policies and procedures, including for academic appeals and complaints, assessment, admissions
    - conferment of all MLA College awards
    - appointment and removal of external examiners
    - receipt of regular reports on academic standards and quality
    - oversight of student success rates and outcomes.

74. The team considered that the CAB terms of reference are clear and relevant, exclusively focused on academic matters and with an appropriate membership, which now includes one or more programme managers. The minutes of CAB meetings and the team's observation of a CAB meeting in December 2024 further demonstrated effective operation of the CAB in its terms of reference.

75. According to the college's committee structure, as set out in the governance and management structure, three subcommittees report directly to CAB:

    a. AQSC, which is responsible for the quality and enhancement of teaching, learning and assessment for the college's programmes.

    b. The Assessment Committee, which is responsible for ensuring oversight of the college's assessments in line with the validated programme specifications and the IAAB.

    c. The Ethics Committee, which is responsible for ensuring research is conducted ethically and in a way that is legally compliant and in line with the college's values and regulatory frameworks'.

76. The terms of reference for the SEG set out that it also reports directly to CAB, but the latest governance and management structure indicates that this group reports to AQSC. The team would recommend that these documents are reviewed for clarity.

77. The Academic Titles Committee, which reviews and recommends academic titles for staff and external individuals, is not currently included in the committee structure diagram. However, the team noted from its terms of reference that it is expected to report to CAB, and the team also found evidence of this in operation through its review of CAB meeting minutes. Given that it is expected to report to the CAB as the college's senior academic authority, the team formed the view that the Academic Titles Committee should be included in the committee structure diagram for clarity.

78. Through its review of minutes of meetings of the CAB and its subcommittees, the team found evidence that minutes from subcommittee meetings are included as a standing agenda item at CAB meetings and linked to in the CAB meeting minutes. This was also in evidence in the team's observation of the CAB meeting in December 2024.

79. According to its terms of reference, CAB is also required to submit reports to CEG summarising actions it has taken in line with its delegated authority from the board and CEG, monitoring activities and setting out any actions requiring approval. The team sought evidence of how this operates in practice, but the college reported that CEG does not currently maintain formal minutes of its meetings. Instead, discussions and decisions are formally recorded through minutes of other meetings, such as CAB and the board. The team therefore considered CAB minutes from 2022-23 to 2024-25 and Board of Directors minutes from September 2023 to January 2025 to identify this approach in practice, but was unable to find clear evidence of this in operation.

80. The team found one exception to this, in the minutes of the most recent meeting of the board in January 2025, which included an item on Academic Board. The item reflected consideration of the most recent CAB minutes and referred to CAB's confirmation of changes to CEG membership and that there were no current plans to replace the CEO role. The team considered that there is a need for more formal minutes of CEG to be taken, to ensure that important discussions and decisions from this group are recorded. In response to the team's request for minutes of the CEG, the college reported that CEG would meet with a formal agenda and minute its proceedings once a month.

81. Through its review of the minutes of the board and CAB meetings and of reporting between the CAB and its subcommittees, the team formed the view that, while it had identified some inconsistency across the college's governance documentation and weaknesses in how discussions and decisions are formally recorded for the CEG, the function and responsibility of the senior academic authority is clearly articulated and consistently applied.

82. To establish whether there is appropriate depth and strength of academic leadership, the team considered the college's summary organisational chart and CVs of senior staff including the CEO, Rector and vice-rectors (covering academic and professional services).

83. The college's executive team comprises the CEO, Rector, Vice-Rector (Academic) and Vice-Rector (Professional Services). This team is supported by an operational team consisting of heads of department including for Academic Services, Production, Operations, Recruitment and Admissions, and Student and Programme Services. The CEO and Rector are both members of the board.

84. The assessment team observed two structural changes to the college's organisational chart during the scrutiny period. Shortly before the team conducted an online visit, in October 2024, the college's CEO resigned from their post. In a meeting with senior staff, it was reported that the college had no plans to reappoint to the post and that the college's academic governance would continue to run effectively under the oversight of the Rector, who is also the college's accountable officer. Following further discussion of the CEO's resignation with senior staff, the team formed the view that the college's rationale to not appoint a new CEO was appropriate, and would not negatively impact the operation and effectiveness of the college's academic governance or the strength and depth of its academic leadership.

85. In April 2025, the college informed the team that the board had appointed a CEO and Principal. It reported that though the board had confidence in the executive leadership team without the CEO, and had previously identified a 'desire to maintain continuity' in its leadership during this period, the appointment had been made in recognition of the college's increasing strategic ambitions. It further reported that the appointment of a dedicated CEO and Principal would enhance the depth and strength of its leadership in line with its strategic priorities.

86. The team formed the view that, while the initial decision not to reappoint a CEO was made in good faith and with relevant justification, the reality of implementation has informed the update. In the team's view, the college's justification was, on balance, coherent and appropriate, and appears to strengthen and deepen the ability of the college to ensure appropriate governance and oversight.

87. Through its review of online biographies of members of the board, the team found that its membership encompasses a wide range of senior leadership experience across the public sector and industry, in the UK and internationally.[10] This includes leadership roles in international education, business networks and professional bodies.

88. The team further scrutinised the job descriptions and CVs of staff in academic, operational and executive leadership roles, including for the new CEO, Rector, Vice-Rectors and heads of department.[11] The team found that staff hold a range of significant academic and industry knowledge and experience, including marine, maritime and environmental science. For example, both the Vice-Rector (Academic Affairs) and Head of Academic Services have PhDs in the marine and oceanography sectors, and the Vice-Rector (Professional Services) has significant management experience spanning education and the Royal Navy. At programme management level, the programme manager for the Sustainable Maritime Operations programme has nearly 10 years' experience of UK and international curriculum leadership in maritime education, in addition to industry experience in maritime policy and legislation. The Maritime Knowledge and Enterprise Fellow also has significant experience as a seafarer and captain, now applied in their module leadership. Furthermore, the Rector holds several roles in professional industry bodies and organisations, including Chair of the Engineering Council and Vice-President of the RNLI.

[10] See MLA, Board of Directors.

[11] See MLA, Meet the team.

89. The team formed the view, through its review of evidence, that there is appropriate depth and strength of academic leadership across a range of forums and levels in the college structure.

90. To determine how far the college develops, implements and communicates its policies and procedures in collaboration with its staff and students and external stakeholders, the team reviewed the terms of reference, membership and minutes of academic committee meetings with a remit to develop or contribute to the development of academic policies and procedures. These were namely the CAB, AQSC and SEG, and the team also met with academic staff, student support staff and students.

91. The team found that student representation is included in the membership of committees, specifically CAB, AQSC and SEG, where the college's policies and procedures are developed, reviewed and approved. For example, the team observed a CAB meeting that considered an update to the wellbeing policy and provision set out in the student handbook, and noted that there were two student representatives in attendance. The team also observed a meeting of the AQSC, which included three student representatives. Despite their being invited to contribute to the discussion of 'student voice' (although not specifically at other stages), there was limited input from the student representatives at this meeting. The students were also invited to give feedback away from the meeting, if they felt unable to do so in the meeting environment. The team considered this to be helpful support from an inclusivity perspective, but does not necessarily support the effective working of the committee.

92. Furthermore, the minutes of the summer 2024 AQSC meeting, which was attended by a student representative, included items on programme developments, modifications, student voice and changes to the terms of reference for the AQSC to include the Student Engagement Manager. The inclusion of a student representative in the membership of the AQSC is a relatively new development, appearing in the revised terms of reference from July 2024. The team viewed this as a positive step in the college's working in collaboration with students to develop, implement and communicate its policies and procedures.

93. During the two-day online visit, the team engaged with current undergraduates, postgraduates, and recent graduates. The feedback provided predominantly reflected individual experiences rather than broader cohort perspectives. This trend is probably influenced by the distance learning format and modular enrolment structure, which place less emphasis on student interaction and the formation of distinct cohorts. Discussions of operational aspects of the academic provision, such as assessment processes, grading criteria, the use of the TLP and feedback mechanisms, indicated a good level of understanding among participants.

94. During this meeting the students were generally keen to contribute, although the level of analysis, detail and openness of the contributions varied. The assessment team found that several elements of discussion correlated with other meetings, for example a change to the student app that had been implemented because of access issues. However, other issues raised by some students included limited tutor interaction, inability to access the TLP while at sea (this appeared to be an individual concern) and lack of contact with other students.

95. Following the visit, the team observed a SEG meeting. The team considered this an appropriate forum for students to raise concerns like those they had shared during their meeting with the team. Although students had been invited to the meeting, none were in

attendance. The team therefore found it challenging to determine whether students feel insufficiently supported or encouraged to provide clearer feedback, are not fully aware of the available forums, or are simply not engaging with the opportunities provided.

96. During the team's observation of the December CAB meeting, student voice was an agenda item, during which the difficulties of gaining student representation were noted in addition to the steps being taken by the college and evidence of the improvements. This is discussed further throughout subcriterion A1.2.

97. Moreover, the team noted the recent changes implemented by the college to support student voice, through its policies and procedures, including a dedicated Student Experience Officer as a first point of contact for student enquiries, a Student Experience Manager and the introduction of a paid student representative. The Student Experience Manager has been added to the membership of the CAB and AQSC to ensure appropriate feedback and consultation in these forums. This progress was also recognised by UoP in its recent periodic review.

98. The team formed the view that appropriate measures are being implemented, for example the establishment of the SEG, student inclusion at AQSC and paid representatives, but that, as yet, this isn't fully evidenced as embedded on the part of both the college and the student body.

99. In addition to students, the team found evidence of academic and professional services staff being included in the membership of committees, including CAB, AQSC and the Assessment Committee, in which there is development and approval of policies and procedures. For example, both the AQSC and Assessment Committee include programme managers among their members. The AQSC also includes the Student Experience Manager, and the Assessment Committee includes 'other members of academic staff as required'.

100. The team found evidence of staff inclusion in the college's policies and procedures through its committee structures, in particular CAB, SEG and COG, with linked action plans, shared at appropriate AQSC meetings should any modifications be required. Staff also have opportunities to provide programme-specific feedback via the programme review plans, where both data and narrative are supplied, then reported at AQSC.

101. The college reports that it also works closely with its validating partner to develop, implement and communicate key policies and procedures, for example through 'the co-development and approval of key strategic documents such as the Student Protection Plan'. The team also found evidence of contractual review cycles (conducted every five years), and annual reporting of external examiners on college programmes and via validation processes. These all reflect the UoP policies and procedures adopted by the college for the purposes of the current validation partnership.

102. The team found that policies and procedures that are relevant to both internal and external stakeholders are published on the college's website.[12] The student handbook also signposts students, where relevant, to the policies on the college's governance webpage, and the

[12] See MLA, About us: Governance.

welcome pack for new students provides quick links to the student handbook and UoP regulations.

103. The team concluded that the college is actively working to develop, implement and communicate its policies and procedures in collaboration with its staff, students and external stakeholders. Where difficulties in increasing student feedback are identified, the college has clearly demonstrated its intent and commitment to improve in this area.

104. To establish how far the college is likely to successfully manage the responsibilities that would be vested in it were it to be granted DAPs, the team reviewed the current level of autonomy with which it is operating under its validation agreement with UoP.

105. The college reports that it has a significant degree of autonomy under its validating partner. The 'Academic Cooperation Agreement' with UoP, including the 2025 update, specifies that the college operates under a 'business transfer agreement and agreement for services.' Under this agreement, UoP provides approval for specific college programmes and access to services, including producing transcripts and results and processing student appeals and academic offences. The college is responsible for the management, delivery and assessment of the approved programmes, in addition to ensuring the appropriate recruitment and selection of both students and staff. Although UoP must approve the staff selected by the college, these individuals are ultimately employed by the college.

106. The latest financial schedule (2024-25) in relation to the academic cooperation agreement, includes an additional section setting out that the university and college will continue 'working in partnership to identify and provide additional services and resources that can enhance the experience of MLA College students following the award of DAPs', including, for example, access to the library.

107. In the event of a successful application for DAPs, the college has established a comprehensive draft academic framework to be used for the development and delivery of its own awards. The college reported that the framework and accompanying academic regulations would become live on authorisation for DAPs, when it begins the development and validation of new programmes under its own powers. More detailed information on the draft academic framework can be found in paragraph 179.

108. The college intends to continue to deliver any programmes currently validated by UoP, and these will remain under UoP's academic framework. As a result, the college reported that it has not undertaken any transition planning, as any provision it develops under its own DAPs (subject to authorisation) will be gradual and run alongside the programmes validated by UoP.

109. The team viewed this approach as a pragmatic one that minimises disruption for existing students, while also allowing the college to develop its DAPs progressively with new curriculum and student intakes. Furthermore, given that the college's draft academic framework and regulations largely mirror UoP regulations and how the college currently operates, the team was reassured that the college would effectively manage their implementation and any future transition.

110. To demonstrate further readiness, the college undertook an internal mock programme validation exercise to test the process set out in its draft 'Programme Validation, Monitoring

and Review Policy'. The team reviewed the minutes of the mock event and formed the view that it demonstrated sufficient expertise and experience of developing and approving programmes. Further information on the college's programme approval arrangements and the mock validation exercise can be found in paragraph 248.

111. This view was further supported by the team's observations of the Assessment Committee and IAAB, the AQSC and minutes of AQSC meetings, which provided evidence of the college managing programme modifications in response to industry and external examiner feedback, and robust consideration of borderline grades. Furthermore, a sample of programme reviews demonstrates the college's ability to analyse its data, implementing change where necessary: for example, the decision to discontinue the Hydrography programme based on consistent poor recruitment, in favour of a more interdisciplinary approach in response to industry needs.

112. The team noted that the college currently delivers higher education in the specialist areas of marine and maritime education but had applied for Full DAPs in all subject areas. The team discussed this with senior staff at the online visit and determined that the college's request reflects developments in the wider skills and qualifications required in the marine and maritime sectors: for example in leadership and management, as set out in paragraph 22. Though the college has no immediate plans to move into subject areas beyond its current scope, the team was also assured that any future developments would be evolutionary, based on the college's current areas of strength and expertise, rather than a radical shift.

113. As set out in the reasoning in paragraphs 105 to 112, the team has therefore determined that the college has demonstrated its ability to manage its responsibilities through:

- effective implementation of existing academic regulations, policies and procedures.
- preparation of thorough draft documentation for implementation should Full DAPs be awarded, including effective demonstration of draft policy implementation in the mock validation exercise.

Conclusions

114. While the assessment team identified some areas of weakness in the documentary evidence it reviewed, and some challenges to the college in collaborating with students in developing and implementing its policies and procedures, the team concluded that the college, on balance, meets criterion A1.1, as overall the evidence demonstrates that it has effective academic governance, with clear and appropriate lines of accountability for its academic responsibilities.

115. Nevertheless, the team identified a strong recommendation to ensure discussions and decisions of the CEG are formally recorded, reporting lines of the SEG are further clarified and governance and management structure documentation is reviewed to ensure consistency.

Subcriterion A1.2

A1.2: Academic governance, including all aspects of the control and oversight of its higher education provision, is conducted in partnership with its students.

Advice to the OfS

116. The assessment team's view, based on its review of evidence, is that the college meets criterion A1.2 because all aspects of the control and oversight of its higher education provision are conducted in partnership with its students.

Reasoning

117. To determine how far students are individually and collectively engaged in the governance and management of the college and its higher education provision, and supported to be able to engage effectively, the assessment team reviewed:

- the college's governance and management structure
- minutes and the terms of reference for CAB, AQSC and SEG
- evidence of the college's response to student feedback via 'You said, we did', new starter and end of module feedback infographics
- the college's Student experience strategy.

118. The team also observed three committee meetings in which student representatives were present, and met with students and support staff who have responsibility for student support and experience.

119. The college reported in its self-assessment that the nature of its delivery model, designed to enable professionals to study at a distance around work commitments, presents challenges to engaging the student voice through traditional methods, such as attendance at committee meetings. For example, students may have limited access based on geographical location, time zone and offshore work environments.

120. As a result, at the time of the college's initial application for Full DAPs in 2022, the team found that the student voice was represented at committee meetings such as CAB and AQSC by the Student Experience Officer. This officer acted as an 'intermediary between the student and Programme Managers' to help inform decision-making based on student feedback from across the college. CAB and AQSC also included a standing item on student voice or the student experience.

121. The college has implemented several more recent initiatives to increase student engagement. These include:

- rebranding its Student Engagement Committee as the SEG in February 2023
- introducing a student experience strategy
- introducing a dedicated and remunerated student representative role

- recruiting full-time, permanent staff who are dedicated to the student experience, including a Student Experience Manager and Student Experience Officer

- implementing a new student survey platform.

122. As set out in paragraph 91, student representation is now included in the membership of the CAB and two of its subcommittees, AQSC and SEG. The team noted that the wording in the CAB terms of reference regarding the inclusion of students in its membership differs from that of the AQSC and SEG terms of reference. Specifically, it refers to 'Member(s) of the student community (where possible)', as opposed to 'Student Representative(s)', so the team sought to better understand what this means in practice.

123. The college reported that 'where possible' is a caveat in recognition of its non-traditional student body. Its students are often mid-career professionals undertaking distance learning on a part-time basis, sometimes in a different time zone, and are therefore not always available to attend these meetings. It further reported that, where members of the student community are not available to attend CAB meetings, the student body will be represented by a member of the Student Experience team. In this case, the member of staff will share feedback that has been supplied to them by students.

124. Both CAB and AQSC meetings continue to include a standing item on student voice (as discussed in paragraph 120), which provides an update on student survey windows and shares qualitative feedback from students, including any actions that have been or need to be taken, such as updates to guidance videos for Turnitin.[13] The team also noted from its review of minutes of the AQSC that, since the appointment of student representatives (see paragraph 127), there is a dedicated opportunity for such representatives to share comments.

125. The SEG, which was rebranded from the Student Engagement Committee in February 2023, has a remit to enhance the student experience by developing and implementing policies, procedures, guidance and good practice, in line with the college's 'Student Experience Strategy'. According to its terms of reference, the group reports directly to CAB termly, and also considers feedback and makes recommendations on improvements to AQSC.

126. From the 2023-24 academic year, SEG, AQSC and CAB are also responsible for reviewing student survey data, following the implementation of a new survey platform. The team found that this involves identifying trends and analysing specific issues raised by individuals, with both anecdotal and formal student feedback considered at SEG, AQSC and CAB. For example, the June 2024 SEG meeting minutes highlight specific feedback captured via student surveys. The minutes of the July 2024 AQSC meeting provide a link to the SEG minutes and a summary of the student survey results from the last academic year, which is reported to the committee for discussion. The subsequent CAB meeting in July 2024 provides a summary of this student feedback, with data trends and commentary for discussion.

127. To incentivise student engagement, the college introduced a remunerated student representative role in 2023-24, with clearly defined terms of reference outlining its purpose and responsibilities, including to act as a voice for the student body and actively engage in CAB, AQSC and SEG meetings. The role is managed and supported by members of the

[13] Turnitin is an academic integrity software tool, which can be used to detect plagiarism and, to some extent, the use of artificial intelligence.

Student Experience team, with whom the college reports that student representatives meet regularly to discuss issues, share feedback and collaborate on ideas to enhance the student experience. To reflect the college's asynchronous delivery model, and allow flexibility in case students need to defer a module because of work commitments or geographical location, the appointment is on a termly basis to ensure consistent student representation across relevant forums. Staff shared that, although this can impact continuity, it provides an opportunity to engage a wider range of student representatives. The role is remunerated with a £500 bursary, subject to 'appropriate engagement' as set out in the group's terms of reference.

128. The team found that the college initially approved the appointment of two student representatives. While the spring 2024 AQSC and CAB meeting minutes indicate that only one of these representatives was formally appointed and in attendance, the minutes of subsequent meetings revealed that there were between one and three student representatives in attendance at each meeting.

129. Through its observations of committee meetings, the team observed at first hand the challenges of obtaining 'live' student engagement. For example, no student representatives attended the SEG meeting in October 2024, despite being invited. However, the team found that the group referred instead to feedback from student surveys and a 'comment box', which had recently been implemented to supplement student engagement via student representatives.

130. Similarly, in the minutes from a CAB meeting in March 2024, the newly appointed student representative reported that there had been limited engagement from other students in response to posting in the student forum.

131. In contrast, in its observation of later AQSC and CAB meetings, the team found that the student representatives were in attendance and keen to contribute to discussions. The team further found that students' contributions were welcomed by the committee and board.

132. Outside formal committee meetings, a Student Experience team has been established. The team includes a dedicated Student Experience Manager and Student Experience Officer, with a remit involving oversight and monitoring of student engagement and initiatives, analysis of student feedback, and working closely with student representatives and other students to support effective engagement or respond to queries on all aspects of the student experience. The college reports that the Student Experience Officer undergoes initial training to enable effective and impartial communication, with further training opportunities to support development in active listening and communication across cultures and demographics. The team found evidence of the Student Experience team facilitating student engagement opportunities through its review of minutes of SEG, AQSC and CAB meetings. For example, it was reported at a CAB meeting that the team had surveyed students and graduates to gather suggestions for enhancing the student community.

133. The college also provides opportunities for students to engage through regular surveys, including new starter, end of module and end of programme surveys. The team reviewed examples of student feedback from surveys, which the college presented via infographics and 'You said, we did' posters and found evidence of how student feedback had been acted on to improve the college's provision. For example, a student had commented on the lack of support for moving into the honours project phase. The college response included introducing

an online webinar at the beginning of the module to answer questions and provide further information to those who are new to the honours project via the TLP platform.

134. The team found that the minutes of November 2023 AQSC meeting note that initial responses to the surveys under the new feedback survey process were higher than previous surveys, which the minutes suggest was potentially because survey completion incentives were offered. Although minutes of later AQSC and CAB meetings in July 2024 reported a decline in responses for the May 2024 term compared with previous periods, it was indicated that this was down to a distribution error. Nevertheless, the team found evidence of discussion of the decline and of suggestions to increase survey engagement, which incorporated input from the student representative. This included a suggestion to employ a more personalised approach to collecting survey data, such as trialling one-to-one feedback with a random sample of students.

135. The team also found that there was alignment between feedback from the student representative and initiatives the college had already been exploring, such as a student-led forum accessed via an app, to support student engagement and feedback. Though the Stack Team app had been introduced previously, and the student rep had accessed it to engage with other students around coursework queries, it was reported that the app was not compatible for students accessing from some countries. In response, the Student Experience team had further surveyed students and graduates and identified that ‘an intuitive social network’ was a common suggestion. The Student Experience team was therefore undertaking further investigations into another app, with a view to pilot in 2024-25. The assessment team viewed this initiative as a demonstration of the college’s commitment to enhancing student engagement in providing feedback.

136. The college also administers UoP’s Student perception questionnaire (SPQ), which mirrors the questions used in the National Student Survey (NSS). The college reports that this metric is used to provide student feedback data to support the annual programme review process, and that the college intends to continue to administer the SPQ survey questions for students studying on its own awards. Further information on the SPQ is provided in paragraph 475.

137. The team found that providing opportunities for students to give feedback, through which the college can measure and analyse their satisfaction, forms one of the five clear aims of the college’s ‘Student Experience Strategy’. The college has also very recently introduced a new student feedback strategy, with the goal of ‘addressing challenges such as survey fatigue, low engagement, and data quality’.

138. In summary, while the student representative system in its current format is relatively new, the team was able to see some evidence of how the process is supporting students to engage effectively. The team was also able to locate examples indicating that reporting pathways with regards to student engagement are working effectively, specifically for SEG, AQSC and CAB. Furthermore, the college has developed and implemented a number of informal and formal mechanisms to engage students individually and collectively in its governance and management, including student surveys and direct engagement with the Student Experience team. The assessment team felt assured that the new systems and posts will enable more structured and supportive student engagement across the student journey.

Conclusions

139. The assessment team considered that the college's student body and delivery model create specific challenges to involving students in all aspects of the control and oversight of the college's academic governance. However, the team also considered that, in its experience, these challenges are not unique to the college or distance learning students, with many campus-based providers also struggling to gain substantial student feedback and engagement.

140. Nevertheless, the team formed the view that the college has clearly identified this as an area of concern, to which it has taken a multi-strand approach to address, including a new Student feedback strategy and paid student representation. There is some early evidence of progress, including increased student representation at key forums such as CAB. The steps taken so far show, in the opinion of the team, a clear intent and commitment by the college to address this area of weakness, ensuring that student voice and collaboration are in place across its provision.

141. The team therefore concluded that, on balance, the college meets criterion A1.2 as overall the evidence demonstrates that student partnership is sought and acted on for the college's academic governance, including all aspects of the control and oversight of its higher education provision.

Subcriterion A1.3

A1.3: Where an organisation granted degree awarding powers works with other organisations to deliver learning opportunities, it ensures that its governance and management of such opportunities is robust and effective and that decisions to work with other organisations are the result of a strategic approach rather than opportunism.

Advice to the OfS

142. The assessment team's view, based on its review of evidence, is that the college meets criterion A1.3 because, where it works with other organisations to deliver learning opportunities, it ensures that its governance and management of such opportunities is robust and effective and that decisions to work with other organisations are the result of a strategic approach rather than opportunism.

Reasoning

143. The college's governance and management structure sets out that the CEG has oversight of any collaborative academic partnerships. The CEG is supported in its activities by the CAB, which oversees the implementation of any partnership agreement, including acting in accordance with academic regulations.

144. The assessment team understands that the college currently only works with UoP, as the college's validating partner, and not with any other UK or overseas organisations, to deliver learning opportunities. Nevertheless, in line with the terms of reference, the board meeting in January 2025 reports initial discussion around the possibility of establishing a joint programme with Plymouth Business School, under its existing partnership arrangements with UoP.

145. During the team's meetings with senior staff, the team was told that UoP had been supportive of the college's intention to gain Full DAPs, and that a mutually beneficial future relationship was intended. The college further confirmed this in a supporting narrative, which stated that it 'will continue [its] relationship with [UoP] in common areas of interest' where 'strategically relevant'.

146. UoP's periodic review of the college, undertaken in 2023-24, confirms this supportive partnership. The team found that the panel considered the college's plan to be 'clear and strong', that the college had a positive working relationship with UoP staff, and that no concerns had been identified at either stage one or stage two of the review.

147. The team was informed that any future relationship with UoP would broadly align with the college's current 'Academic Cooperation Agreement'. The college's strategic plan indicates that this may include new programmes, dual award degrees, or even services supplied from the college to UoP. The college also reported that discussions are under way with UoP for a service agreement that would allow future college registered students to access the same services as those registered on UoP degrees, including shared learning facilities such as the online library. Further evidence was provided in the form of a revised financial schedule, which is discussed further in paragraph 464.

148. The team considered that there appears to be a supportive and collaborative approach between UoP and the college. However, it also considered that the timely establishment of a service agreement with UoP will be paramount if the college is awarded DAPs.

149. The college made the team aware of two organisations through which the college has delivered or continues to deliver some of its higher education provision: one with an overseas naval force, which is currently on hold, and one with the Hong Kong Marine Department (HKMD) through IMarEST. For the latter, in the first instance, the college worked with IMarEST to ensure a suitable distance learning programme at Level 7 of the Framework for Higher Education Qualifications (FHEQ) could be integrated into a new professional training standard for the role of Assistant Surveyor of Ships (Nautical). The PGDip Sustainable Marine Operations was selected from the college's existing provision and is delivered as normal. The college has developed one new specific module to be more suited to the HKMD requirements, but otherwise the HKMD employees access the programme as any other student. The college report that the Rector and Vice-Rector (Academic) meet regularly with the HKMD senior management team to review progress and plan for student intake.

150. For the overseas naval force, the college led on the development of three specific bachelor's degree programmes validated by UoP. These were delivered face-to-face by college staff at the force's naval academy, and in line with UoP's regulations and policies. The programmes ran for one year but were then put on hold while the force moved its academy to a new facility and considered its future requirements.

151. The team understands that the college does not plan to enter subcontractual or validation agreements with other organisations to deliver learning opportunities, if awarded DAPs. In line with the college's intention to continue to deliver programmes validated by UoP alongside any new provision it delivers if its DAPs application is successful, the team expects that the delivery of the PGDip Sustainable Maritime Operations programme for the HKMD would continue to run under the validation agreement with the UoP.

152. Furthermore, during the online visit, senior staff referred to building strong links with employers and industry to ensure programme relevance, in addition to developing potential new pathways to meet industry needs. The team considered this a key component of industry-relevant education and understood that it would inform the college's curriculum development rather than the college becoming an awarding partner. The college's strategic plan builds on this approach, stating that it will seek opportunities, as it has done under UoP, to partner with industry and industry associations to deliver education and training programmes. The plan further identifies the college's intention to work collaboratively with the wider GEDU network to access and use resources to support its offer.

153. As identified in paragraph 21, the college is a strategic partner of UNITAR and an education partner of CIFAL. The college's intention is to continue these relationships should it gain Full DAPs, as it aligns with the college's strategic and higher education mission, aims and objectives.

154. The team found that learning opportunities with these organisations are not subcontractual. They are delivered by the college itself and tailored to the vision of the partner, so there is no change to the governance and management of these learning opportunities. Rather, they form part of the college's core higher education provision, such as the Global Sustainable Development suite of programmes

155. The college's ongoing relationship with IMarEST, its former owner, continues to connect it to a key body in the marine and maritime sectors. While the college now operates independently of IMarEST, the institute remains a strategic aspect of the college's plans based on its global standing in the marine and maritime sector.

156. While the college's relationship with these professional bodies in delivering learning opportunities is not contractual, the team was reassured of the college's level of industry connection to help inform its curriculum.

Conclusions

157. The team therefore concluded that the college meets criterion A1.3, as overall the evidence demonstrates that it ensures that its governance and management of learning opportunities delivered in partnership with other organisations is robust and effective, and that decisions to work with other organisations are the result of a strategic approach rather than opportunism.

158. The college plans to continue a relationship with UoP where there is mutual benefit and strategic relevance, with the intention and agreement from UoP that any new higher education provision the college develops under its own powers (if successful) would be able to access and use additional resources and services such as the library.

159. The college further plans to continue its strategic industry partnerships with UNITAR and CIFAL City of London, as it aligns with its strategic plan and higher education mission. This is associated with curriculum relevance and credibility, rather than learning opportunities delivered via subcontractual or validation agreements.

160. Finally, the college's established relationships with the HKMD and overseas naval force were mutually beneficial, rather than opportunistic. The college has not entered and does not intend to enter a subcontractual or partnership arrangement with either organisation.

Assessment of DAPs criterion B: Academic standards and quality assurance

Criterion B1: Regulatory frameworks

Advice to the OfS

161. The assessment team's view, based on specific consideration of the evidence requirements for this criterion, alongside other relevant information, is that the college meets criterion B1: Regulatory frameworks because it meets subcriteria B1.1 and B1.2.

162. The team's view is that the evidence shows, in summary, that the college has in place comprehensive published and draft academic frameworks and regulations to govern how it conducts and will conduct student assessments and awards qualifications. The college maintains a definitive record of all programmes and qualifications that it approves, which constitutes, and will constitute, the reference point for delivery and assessment of each programme, its monitoring and review, and for the provision of records of study to students and alumni.

Subcriterion B1.1

B1.1: An organisation granted degree awarding powers has in place transparent and comprehensive academic frameworks and regulations to govern how it awards academic credit and qualifications.

Advice to the OfS

163. The assessment team's view, based on its review of evidence, is that the college meets criterion B1.1 because there is evidence to show that it has comprehensive academic frameworks and regulations to govern how it awards academic credit and qualifications.

Reasoning

164. To assess how far the college's academic frameworks and regulations governing its higher education provision are appropriate to its current status and are implemented fully and consistently, the assessment team considered its current academic regulations.

165. The team also undertook observations of the Assessment Committee and IAAB, in addition to meetings of the AQSC and CAB.

166. The college currently operates under the academic regulations, policies and procedures of its validating partner for the delivery of its undergraduate and postgraduate programmes. These regulations cover, for example, student admissions, assessment (including extenuating circumstances, how credit is awarded across a programme, pass marks, compensation and reassessment), progression and award.

167. These regulations and frameworks are supplemented with additional documents such as the college's 'Admissions Statement'. The college is responsible for recruiting students, and therefore this statement confirms the college's commitment to following UoP's admissions regulations, in addition to specific requirements for entry onto any of its programmes. For

example, the statement sets out that the college will, in line with UoP's Accreditation of Prior Learning and Accreditation of Prior Experiential Learning policy, consider entry to its programmes based on previous experience.

168. The team found the college's commitment to UoP's admissions regulations is also reflected in its online learning platform and content, which the team considered to be accessible for students who might be recruited via the Accreditation of Prior Learning or Accreditation of Prior Experiential Learning procedures. The college's ability to deliver a high quality academic experience to students irrespective of previous educational background, and its approach to equity, are discussed further under criteria B3 and D1 respectively.

169. The college also has a number of its own or hybrid policies and procedures relating to student transfers, the Prevent duty, data protection, equality, diversity and inclusion, and marking and moderation.

170. In recognition of the nature of the college's delivery model and student body, a number of exceptions to the academic regulations the college adheres to have been agreed with the college's validating partner. These are considered and conferred at programme approval, and are referred to as 'non-standard regulations' (NSRs). These are specific to programmes delivered via distance learning (with the exception of the MBA by Research Project pathways, discussed further in paragraph 175) and cover:

    a. Approval of a 48-hour extension for the submission of an assessment by the student's personal tutor, as opposed to the requirement to submit a formal extenuating circumstances application.

    b. A deadline extension of up to 28 days for valid, self-certified and evidenced extenuating circumstances claims, in addition to considering 'poor internet connection' as a valid extenuating circumstance where the circumstance arises as an issue related to employment (such as work in an offshore environment).

    c. An instant referral in the event of failure or non-submission, with or without submission of a valid extenuating circumstance, to be approved through the college's IAAB and reported to the next subject assessment panel or award assessment board.

    d. A maximum period of study of 10 years for awards that equate to single level of study or more.

171. The team reviewed an example of a request made to and approved by the college's validating partner, to apply NSRs to the BSc (Hons) Global Sustainable Development (Top-up), MSc Global Sustainable Development and MSc Sustainability in Practice (Top-up), following programme approval. The document sets out the rationale behind the implementation of the NSRs, explaining that these are to accommodate and ease the process for what the college expects to be 'entirely an employed student market', studying via distance learning.

172. The team further reviewed the programme specifications for all three programmes, in addition to examples of minutes from IAABs in 2022-23 and 2024-25. The team found that the programme specifications detail the credit weightings of the individual modules that make up the programme, and confirm whether or not a module is compensatable.

173. The team also found evidence of the implementation of NSRs in conjunction with UoP's standard regulations across the college's higher education provision, for example where students have failed or not submitted an assessment and the IAAB has granted students an instant referral. The team observed that, in conjunction with UoP's standard academic regulations, the 'instant referral' has been granted as either a first or second attempt depending on whether the student has valid extenuating circumstances, or has submitted and failed.

174. Furthermore, the team observed the Assessment Committee and IAAB and determined that the board had robustly adhered to the 'Assessment, Marking and Moderation Policy' in considering the interim marks consistently for all candidates. Although the team noted that the IAAB considered marks for individual modules and not an individual student's grade profile when making decisions on referrals, the team could see from its review of the minutes of the subsequent award assessment board that students' full profiles of marks were reviewed at the award stage. The college's assessment practices are discussed further under criteria B2 and B3.

175. As mentioned in paragraph 170, the MBA by Research Project pathway does not include the NSRs. The MBA is a 12-month, 60-credit research module with very clearly defined deadlines set out in the programme quality handbook. The handbook specifically states that students must be available for the presentation schedule or must apply for an extension through the extenuating circumstances process. This is a change from the policy of using NSRs but, on balance, the team viewed it as appropriate given the overall duration and scheduling of the module.

176. The team considered that the academic regulations and NSRs (where applicable), are appropriate to the college's status as a provider of distance learning to predominantly mature professionals, many of whom are working offshore where internet connections may be unstable or unavailable for periods of time. It further considered that the operation of programme-specific regulations is usual practice across the sector, alongside some exceptions to a provider's academic regulations.

177. The team also saw evidence of the college's implementation of UoP's complaints procedure in response to a student complaint. The initial complaint was handled at the early resolution stage in accordance with the policy. This was elevated to the formal student complaint stage where it was investigated and responded to, and subsequently, as the student was dissatisfied with the outcome, the complaint was escalated to a request for review. According to the policy, this final review stage is to be conducted by an external independent reviewer, and in this instance it was conducted by UoP as the college's validating partner. Further discussion of the college's procedures for handling complaints is included under criterion B3.

178. In summary, the team's view is that the academic frameworks and regulations that the college has put in place governing its higher education provision are appropriate to its current status, and are implemented fully and consistently.

179. The team also sought to establish how far the college has created, in readiness, one or more academic frameworks and regulations that will be appropriate for the granting of its own higher education qualifications. To do this, the team considered the college's draft academic framework and academic regulations in addition to policies and procedures for:

- admissions and RPL
- extenuating circumstances
- external examiners
- fitness to study
- academic offences, complaints and appeals
- safeguarding
- programme validation, monitoring and review.

180. As set out in paragraph 108, the college reported that it will continue to work with UoP to validate its current programmes, which will remain under the academic regulations, policies and procedures of its validating partner.

181. The draft frameworks, regulations and policies that the college has developed will therefore be applied, in the event of a successful DAPs application, to any new provision that the college develops and validates under its own powers. Although senior staff reported in a meeting with the team that the regulations, policies and procedures of its validating body form the foundation for the college's own processes, the college intends to develop these further to meet the specific needs and context of its delivery model and student body. The college has further confirmed that this will include adopting the current NSRs as set out in paragraph 170 as standard academic regulations for its own awards.

182. The team saw evidence that the college's draft academic regulations clearly articulate how it will award academic credit and qualifications, including exit awards, up to and including Level 7. These regulations also set out the requirements for recognition of prior learning, enrolment and registration, interruption and withdrawal, programme structure, assessment, extenuating circumstances and academic offences, and are detailed further in underpinning policies such as the draft 'Recognition of Prior Learning Policy' and draft 'Academic Offences Policy'.

183. The college has further draft policies and procedures relating to fitness to study, student conduct and safeguarding, which are in line with the equivalent policies and procedures that it has been operating with under its validating partner.

184. As highlighted in paragraph 169, the college also has a number of its own policies and procedures in operation, relating to equality, diversity and inclusion and student transfer. These will continue to remain in their current form if DAPs are awarded. The only exception will be for the college's terms and conditions, of which there will be two separate versions – one for students studying on a UoP validated programme and a new version for students studying on an MLA College validated programme.

185. The team reviewed the college's draft academic framework which will be used for the development and delivery of programmes of study leading to an MLA College award. This includes details relating to the structure of programmes, programme validation, programme monitoring, student recruitment and external examiners. The framework is intended to work in conjunction with policies and procedures including the draft 'Admissions Policy', draft

'Assessment, Marking and Moderation Policy', draft 'Complaints and Appeals Policy' and draft 'External Examiners Policy', to define the requirements regarding student admissions, programme validation and monitoring, assessment, award and progression, external examiners, complaints and appeals.

186. The team found that, if awarded DAPs, the implementation of the college's draft academic framework and regulations will be monitored through a range of processes including annual reports to CAB on quality, assessment, awards and student experience, programme validation, monitoring and review, and internal programme audits at least once every five years. Furthermore, the team found that each document is assigned a 'document sponsor', who is responsible for undertaking annual review and maintenance of the framework, policy or procedure.

187. With this in mind, the team considered the college's draft policy for external examiners, which sets out the appointment criteria, roles and responsibilities, induction and contract. The team formed the view that the policy is appropriate for implementation, and compared it with the college's current practice in collecting, considering and reporting on external examiner feedback. It found evidence to demonstrate effective implementation in line with the draft policy, and established practice in managing external examiner feedback, with matters being reported to the AQSC. Additionally, there is reference to the planned implementation of new external examiner induction training from minutes of a CAB meeting in 2023-24.

188. The college's draft regulations, policies and procedures have been developed, to a large extent, to mirror those of its validating partner. The team considered that this provided assurance of the college being able to implement these effectively, as much of this is already operated in practice.

189. During the online visit, the team met with senior staff to discuss the college's draft academic framework and regulations in the context of its plans to expand its higher education provision into related fields, as set out in paragraph 22. The college reported that its academic model is designed to be scalable, so that it can integrate new subject areas without compromising the quality of its delivery.

190. The team formed the view that the college's draft academic framework and academic regulations, in addition to its governance structures and staffing model as set out under criteria A1 and C1 respectively, would provide appropriate frameworks and mechanisms to enable a proposed expansion into related fields.

191. The college reported that, since its current programmes will remain under UoP validation for current and future students, it has not yet developed a planning document or timeline to set out how and when its draft framework and regulations will be adopted, if awarded DAPs. While the team found some assurance from the college's plans to continue to deliver its UoP validated provision, the team considered that there is a need for detail around the college's arrangements for implementing its draft academic framework and regulations. It further considered a need for greater clarity regarding how the college plans to operate the draft academic framework and regulations for its own awards in parallel with the UoP framework, regulations and policies governing the existing provision. If awarded DAPs, the team considered that the college should prioritise establishing the timeline for publishing its draft

academic framework and regulations and establishing the structures for running the UoP validated programmes in parallel with programmes for its own higher education qualifications.

192. Based on the evidence reviewed, the team formed the view that the academic frameworks governing its higher education provision are appropriate to its current status and implemented fully and consistently. Furthermore, the college has created, in readiness, an academic framework, regulations, policies and procedures which will be appropriate for the granting of its own higher education qualifications.

193. It is noted that, as existing programmes would remain under UoP validation, the college has not yet defined clear timelines for the full implementation of its current draft academic framework, regulations, policies and procedures for new programmes from 2026-27 onwards in the event of a successful DAPs application.

Subcriterion B1.2

B1.2: A degree awarding organisation maintains a definitive record of each programme and qualification that it approves (and of subsequent changes to it) which constitutes the reference point for delivery and assessment of the programme, its monitoring and review, and for the provision of records of study to students and alumni.

Advice to the OfS

194. The assessment team's view, based on its review of evidence, is that the college meets criterion B1.2 because there is evidence to show that it maintains a definitive record of each programme and qualification that it approves.

Reasoning

195. To determine how far the college maintains definitive and up-to-date records of each qualification to be awarded and each programme being offered, and uses these as the basis for the delivery and assessment of each programme, the assessment team reviewed:

- programme specifications and programme quality handbooks
- module records
- the college's current data sharing agreement with its validating partner
- commentary on the college's plans for programme, module and student record-keeping in the event of a successful DAPs application.

196. The team also accessed and observed a demonstration of the college's TLP to demonstrate the consistency of the module delivery with the documentation.

197. The college reported that its validating partner currently holds the definitive record of each programme in its own curriculum management system. The college also holds programme records in its own student records database, in addition to identical copies of programme documentation in its own Sharepoint site. The team found that this programme documentation, specifically programme specifications (which are embedded in and form the

basis of programme quality handbooks) and the associated module records constitute the reference point for the delivery and assessment of each approved programme.

198. The team reviewed a sample of seven programme specifications including for BSc (Hons) Global Sustainable Development (Top-Up), MSc Sustainability in Practice (Top-Up) and the PGDip Engineering Management, and found that each document sets out the award title, aims, programme learning outcomes, structure, credit values and level of study. This is in line with practice across the sector and, in the team's view, the documents are used appropriately and consistently as the basis for other programme documentation including module information provided on the TLP and assignment briefs.

199. For example, the BSc Global Sustainable Development (Top-Up) programme specification forms the basis for the programme quality handbook. The TLP for each module provides a link to the respective programme quality handbook, to give the students the definitive set of programme level learning outcomes. The TLP also provides students with a link to the module record and the assignment brief, and the latter refers to the learning outcomes detailed in the module record.

200. The team saw evidence of the link between the module documentation and delivery through the TLP. The TLP includes a section for the module record to which students are referred, in the assignment briefs, for information on the learning outcomes. Students are also provided with the college's student handbook and the relevant programme quality handbook. The latter links the programme specifications and module records as well as providing students with details on the academic regulations, assessment and referral processes. The team observed that programme specifications are referred to consistently across academic policies, procedures and student-facing documentation.

201. Where there are changes to a programme, the college currently prepares modified programme documentation which it submits to its validating partner for review. Once approved, the college holds an identical copy of the final programme documentation. The team found that any changes to a programme are reported to the AQSC.

202. The college reported that its current system, introduced in 2023, will need to be upgraded to function fully as a curriculum management system for any programmes it develops and modifies under its own DAPs, if its application is successful. While the current system will enable the college to create and edit programmes, implement version control functions and generate course catalogues, developments are likely to focus on, for example, the inclusion and management of course prerequisites, credits and learning outcomes, in addition to the implementation of standardised programme document templates. The college plans to have the additional functionality in place for the start of the 2026-27 academic year, and ahead of launching any new programmes. The college's existing programmes, validated by UoP, would continue to run under its existing arrangements as set out in paragraph 197.

203. The team considered that the college understands the developments that are needed for its student record system, to maintain a definitive record of each programme and any changes to it. Though the team has not been able to see evidence of how the system will be used in this way, the team considered that the college's draft Programme validation, monitoring and review policy outlines a robust procedure to support maintaining and making changes to programme records, with clear lines of reporting through the AQSC and CAB.

204. Currently, student transcripts and certificates are produced by the college's validating partner, following ratification of results at the award assessment board. This is facilitated by a data sharing agreement with UoP, whereby student records are maintained and updated by the college via its student record system, and data is transferred to UoP for the purposes of calculating final awards, producing assessment board papers, transcripts and certificates. Transcripts are made available to students to view and download via UoP's Digital Learning Environment (DLE).

205. As discussed in paragraph 202, the college reported that, to enable it to manage its academic records and confer its own awards independently, its current student record system will be enhanced to implement standardised student e-transcript and certificate templates.

206. The college provided a sample of five e-transcripts produced by UoP, which will continue to be in place for current and future students enrolling on programmes delivered by the college but validated by UoP. The college did not provide further evidence to demonstrate how transcripts might look for its own awards, but the team understands that this is because the functionality of the student record system is not yet in place.

207. The college has not provided a detailed timeline for these developments, but the team's view is that, on balance, the college has the capacity to manage completion of the process to be ready for the new programmes developed in the event of a successful DAPs application. The plan to develop the student record system after the award of DAPs is, in the team's view, appropriate given that existing programmes will remain under UoP validation and UoP record systems.

208. In summary, the team's view is that the college meets criterion B1.2 because it maintains, and will maintain, a definitive record of each programme and qualification that it approves (and of subsequent changes to it), which constitutes the reference point for the delivery and assessment of the programme, its monitoring and review, and the provision of records of study to students and alumni.

Conclusions

209. The assessment team concluded that the college has in place transparent and comprehensive academic frameworks and regulations, and draft academic frameworks and regulations in readiness for DAPs, to govern how it awards academic credit and qualifications. These regulations cover the academic standards of qualifications, admissions, the engagement of students and appeals against academic decisions.

210. With regards to implementation, these draft academic frameworks and regulations will only be applied to any new programmes the college develops under its own DAPs, should its application be successful. The team noted that a timescale for this has not yet been established by the college. Given that the college intends for its current programmes to continue to be validated by UoP and therefore be subject to UoP's academic regulations and frameworks, the team concluded that it is important for the college to establish, before delivering its own awards, a clear timeline and robust approach to managing programmes running under two different sets of regulations.

211. Further, the team felt on balance that the college's plan to develop its student record systems ahead of establishing new programmes under its own DAPs was appropriate, but that in the

event of a successful DAPs application, the college will need to establish firm timelines for these upgrades to ensure that systems are in place in readiness for the development of new programmes. Therefore, the team concluded that the college meets criterion B1.

Assessment of DAPs criterion B: Academic standards and quality assurance

Criterion B2: Academic standards

Advice to the OfS

212. The assessment team's view, based on specific consideration of the evidence requirements for this criterion, alongside other relevant information, is that the college meets criterion B2: Academic standards, because it meets subcriteria B2.1 and B2.2.

213. The team's view is that the evidence shows, in summary, that the college has clear and consistently applied mechanisms for setting and maintaining the academic standards of its higher education qualifications. The college has demonstrated that it can design and deliver courses and qualifications that meet the threshold academic standards described in the FHEQ. The college has demonstrated that the standards that it sets for its qualifications are maintained above the threshold, are reliable over time and are comparable to those set and achieved by other UK degree awarding bodies.

Subcriteria B2.1 and B2.2

B2.1: An organisation granted degree awarding powers has clear and consistently applied mechanisms for setting and maintaining the academic standards of its higher education qualifications.

B2.2: Organisations with degree awarding powers are expected to demonstrate that they are able to design and deliver courses and qualifications that meet the threshold academic standards described in the Framework for Higher Education Qualifications (FHEQ). Organisations with degree awarding powers are expected to demonstrate that the standards that they set and maintain above the threshold are reliable over time and reasonably comparable to those set and achieved by other UK degree awarding bodies.

Advice to the OfS

214. The assessment team's view, based on its review of evidence, is that the college meets criterion B2.1 because it has clear and consistently applied mechanisms for setting and maintaining the academic standards of its higher education qualifications, and that it meets criterion B2.2 because the evidence provided demonstrates that it can design and deliver courses and qualifications that meet the threshold academic standards described in the FHEQ. The team further formed the view that the standards that the college sets and maintains above the threshold are reliable over time and reasonably comparable to those set and achieved by other UK degree awarding bodies.

Reasoning

215. To test how far the college's higher education qualifications are offered at levels that correspond to the relevant levels of the FHEQ, the assessment team reviewed programme specifications, programme handbooks, assessed student work, and external examiner

reports, in addition to minutes of the Subject Assessment Panel. To do this, the team reviewed evidence including:

- programme specifications for four undergraduate and three postgraduate programmes, including a three-year residential BSc (Hons) Maritime Operations programme developed for an overseas naval force
- programme quality handbooks for the BSc (Hons) Global Sustainable Development (Top-up), MSc Global Sustainable Development, MSc Sustainability in Practice
- a sample of Level 6 and 7 module records across two undergraduate and two postgraduate programmes
- a sample of Level 6 and 7 student assessed work across two undergraduate and one postgraduate programmes
- a sample of subject external examiner reports for Level 6 and 7 programmes covering marine, maritime, sustainability, hydrography and the MBA suite of programmes
- a sample of award external examiner reports
- minutes of a subject assessment panel.

216. The team also reviewed samples of Level 5, 6 and 7 module landing pages and associated resources across three undergraduate and six postgraduate programmes via the college's TLP.

217. The team considered, through a review of programme handbooks and specifications, whether programme intended learning outcomes correspond to the relevant FHEQ level descriptors and whether the programmes have been designed in line with sector-recognised standards for Level 6 and 7 qualification descriptors. For example, the sector-recognised standards have a requirement for students completing a master's degree to demonstrate:

> 'a systematic understanding of knowledge, and a critical awareness of current problems and/or new insights, much of which is at, or informed by, the forefront of their academic discipline, field of study or area of professional practice'.

218. The team considered this requirement against the programme intended learning outcomes for the MSc Global Sustainable Development programme, MSc Sustainability in Practice, MSc Engineering for Marine Professionals, and MBA by Research Project (Top-up). Each of the programmes includes programme level learning outcomes focused on current research in the specific field and, recognising the demographics of the college's students as generally being in employment, they also include employment-related learning outcomes such as graduates having developed the ability to 'Critically evaluate personal performance and the work of others' and 'specific skills, which may lead to transformative impact on organisations [in] specific industries'.

219. The team's view is that the programme intended learning outcomes are in line with sector-recognised standards for Level 7, which has been confirmed by the subject external examiners. The team also considered examples of the Level 6 programme intended learning outcomes for the BSc (Hons) Global Sustainable Development (Top-Up), BSc (Hons)

Maritime Operations, BSc (Hons) Maritime Technology (Engineering) and BSc (Hons) Maritime Technology (Electro Technical). The team's view is that these correspond with the FHEQ level descriptor, which has also been confirmed by the award and subject external examiners.

220. The team also found that mapping tables are included in each programme handbook and specification. These identify which modules contribute to the programme intended learning outcomes, and in turn the relevant levels of the FHEQ. Each module record also specifies which level of the FHEQ it corresponds to. For example, the qualification awarded for the college's BSc (Hons) Global Sustainable Development (Top-up) programme is located at the correct level of study. The final exit award is appropriately set at bachelor's degree and is at Level 6. The team notes that this appropriately reflects the level at which this qualification would be expected in line with the sector-recognised standards, and that awards are appropriately made.

221. The team also reviewed documentation for the recent validation of the PGDip Engineering Management programme. The team's view is that the programme is in line with the sector-recognised standards for Level 7, and it is also noted that the college has expressed an intention to apply for professional accreditation for the programme, which will give further assurances of the programme standard.

222. The team observed the learning materials at Levels 5, 6 and 7 that are made available to students through the TLP, including recorded lectures with transcripts and supporting materials, formative assessments, an online discussion forum and links for the online library, the module assessment, and news from the college and student support contacts. The team found that the materials provided for each module it sampled were of high quality and appropriate to the level of study. Modules reviewed included EHYD504A Earth Science and Positioning, MLA703B Maritime Industry Practice, MLA708 Maritime Strategy and Policy, MLA636 Space and Society, MLA640 BSc (Hons) Global Sustainable Development honours project, MLA723 Hungry for Change, and MLA729 Sustainable Production Systems.

223. The team further reviewed samples of assessed student work covering two modules at Level 6 and 7, for one bachelor's and one master's programme. The sample included at least two examples from each grade band. Having reviewed the samples, the team found that there was appropriate progression between FHEQ levels, and formed the view that the standards are in line with the FHEQ and equivalent to other providers across the sector.

224. The teaching materials and assessments have also been scrutinised by the subject external examiners, who have attested to the standards of the teaching and confirmed that the threshold standards are at the appropriate levels.

225. In summary, the team's view is that the college's higher education qualifications are offered at levels that correspond to the relevant levels of the FHEQ.

226. The team sought to test how far:

    a. The setting and maintaining of academic standards takes appropriate account of relevant external points of reference and external and independent points of expertise, including students.

b. The college makes use of appropriate external and independent expertise in establishing, and then maintaining, threshold academic standards and comparability of standards with other providers.

227. The team found that the college engages with external points of reference to set and maintain academic standards in the development of new programmes. The college currently follows the programme and module design guidance of its validator, which sets out which external points of reference must be complied with when designing a programme, such as the FHEQ, subject benchmark statements and professional accreditation requirements. The team's review of programme approval documentation, including the approval report for the Global Sustainable Development suite of programmes, confirmed that the college sets academic standards in line with the requirements of its validating body. The team further confirmed, through its review of programme quality handbooks and module records, that the college's modules are designed with appropriate and explicit reference to the relevant level of the FHEQ and subject benchmark statements.

228. The team further found that the college makes use of appropriate external and independent expertise in the development of new programmes, through engagement with its professional stakeholders (including professional bodies and membership organisations) and external examiners.

229. The college reports that external stakeholders are consulted and engaged in the both the development and validation of programmes. The team found that, in line with the requirements of its validator, two independent external advisers (one professional and one academic) are appointed to a panel to consider and recommend approval of a new programme proposal. The college currently sources and nominates external advisers, who it submits to its validator for consideration and approval. The team reviewed the CV of one industry expert, who was appointed as an external adviser for the suite of sustainability programmes, and found their credentials to be appropriate.

230. The team considered how external advisers are involved in programme approval in practice, through review of programme approval and validation reports for the suite of sustainability programmes and the PGDip Engineering Management. The reports confirmed that the college had developed assessments that were appropriate to the achievement of programme aims and learning outcomes, and in line with the validator's policies and regulations. The team also found evidence for the PGDip Engineering Management of alignment with professional standards where relevant, such as the Engineering Council's AHEP, fourth edition, and engagement with industry stakeholders such as the Institute of Engineering and Technology to support the development of the programme. Furthermore, there was evidence of academic and professional external advisers providing comment and sharing recommendations on both module aims and programme learning outcomes to ensure alignment with the FHEQ, and updates to learning material references and soft skill requirements to reflect changes in the engineering sector.

231. In addition to external industry involvement in programme approval processes, the team formed the view that the college is engaged in regular consultation with industry stakeholders through its close working relationships with professional bodies and membership organisations, including the Institute of Chartered Shipbrokers and IMarEST. The college also actively engages with industry in updating and modifying existing programmes. The team

reviewed the terms of reference for the college's IAP and also the initial list of membership. The panel is due to meet every six months, but no evidence was available at the time of writing.

232. The college has set out in its draft Programme validation, monitoring and review policy that it intends to continue to include independent and external academic and industry expertise in the membership of a validation panel, to ensure appropriate alignment with both academic and industry standards. In conjunction with the draft policy, the college ran an internal mock validation exercise for the PGDip in Engineering Management in parallel with its validating partner, to test its draft policy and processes. The exercise included one academic and one professional external adviser in line with the policy, who attended both the mock validation and approval event conducted by the validating partner. As set out in paragraph 230, the evidence from both events confirmed that the college had undertaken consultation with relevant professional, statutory and regulatory bodies in the development of the programme.

233. Although the college's draft policy includes student representation in the validation panel membership, the team noted that there were no students present at the internal mock validation event or validating partner event. As discussed under paragraph 127, the team understands that the college has faced challenges in securing student representatives, but that a student representative is now in post, with plans to appoint subject-specific student representatives going forward.

234. The team found that the PGDip Engineering Management was developed partly in response to prospective student feedback, and that of professionals in the engineering field who are looking to upskill, in addition to an observation that students on the college's existing MSc Engineering for Marine Professionals (Top-up) are choosing business management as a research topic. The team formed the view that the college is responsive to the needs of industry in developing its programmes. There is evidence in the programme intended learning outcomes of a strong focus on student employability and transferrable skills.

235. The team also observed how the college acts on both external and student feedback with regard to the currency of its programmes and to ensuring that its graduates have the skills required by industry. For example, revisions to the Sustainable Maritime Operations programme were discussed at a meeting of the AQSC, to respond to changing industrial regulations. The college then developed an action plan for the Sustainable Maritime Operations programme updates and this fed into the annual report. Progress on the actions was discussed at the March 2025 AQSC, with documentation of the changes submitted to UoP for approval.

236. External examiners are a further source of independent expertise, ensuring that academic standards are maintained through their involvement in academic quality processes. The college currently follows UoP's regulations for the recruitment and assignment of external examiners, but the college has established a policy for the appointment of external examiners, to be followed in the event of a successful DAPs application.

237. In line with UoP's regulations, external examiners attend subject assessment panels to confirm academic standards for a module or subject. The award external examiner also attends award assessment boards to ensure that academic standards are maintained at

award level, based on reports from the subject assessment panel, and comparable with similar awards in other UK higher education providers.

238. The team reviewed evidence of feedback from external examiners including interim and annual subject and award reports across core subject areas of sustainability, engineering, business, marine and maritime, at Levels 6 and 7, and subject assessment panel minutes. The team found that external examiners are asked to confirm whether 'the threshold standards set for the modules examined are appropriate for modules at this level, in this subject' and in line with the FHEQ and relevant subject benchmark statements.

239. The college's external examiners have included, for example, professors senior lecturers from universities across the sector, who have the experience to qualify them to make this judgement. The team found that the external examiners have confirmed, both in reports and in the minutes of the subject assessment panel meeting, that the modules that they have assessed are of appropriate standard and comparable with similar subjects at the equivalent level in other UK higher education providers. The team also found reference to these reports and comments in various committee meetings. For example, the team observed a meeting of AQSC in which the committee reported how feedback on 'blind second marking' had been suggested by an external examiner and then implemented by the college. There is further discussion of external examiner reports in criterion B3.

240. In summary, the team's view is that the college takes appropriate account of relevant external points of reference and external and independent points of expertise in the setting and maintaining of academic standards. It also uses appropriate external and independent expertise in establishing, and then maintaining, threshold academic standards and comparability of standards with other providers.

241. As noted previously, the college has had challenges with getting student representation in previous activities, such as the PGDip Engineering Management internal mock validation event, or the validating partner event. The team was encouraged, however, to see greater student involvement. For example, outputs from the March 2025 AQSC meeting suggests that strategies discussed around student engagement during the visit are starting to take effect.

242. The team considered evidence to test how far:

    a. The college's programme approval arrangements are robust, are applied consistently, and ensure that academic standards are set at a level which meets the UK threshold standard for the qualification and are in accordance with their own academic frameworks and regulations.

    b. The college's programme approval, monitoring and review arrangements are robust, are applied consistently and explicitly address whether the UK threshold academic standards are achieved and whether the academic standards required by the college are being maintained.

243. As set out in paragraphs 227 and 232, the college currently designs its programmes in accordance with the guidance of its validator and has developed its own draft academic framework and draft Programme validation, monitoring and review policy in readiness for DAPs. The team found that relevant subject benchmark statements and academic standards

set out in the FHEQ are considered at all stages of programme design, approval, monitoring and review, and external examiners are appointed to provide independent assessment of the academic standards.

244. The college's draft Programme validation, monitoring and review policy sets out the programme approval, monitoring and review arrangements which the college will implement in full, if awarded DAPs. The arrangements include a requirement for the CAB to confirm initial approval of a programme, processes for developing and monitoring programmes, roles and responsibilities of the relevant programme team and membership of each validation panel, including external and student representation. Furthermore, the policy clearly defines the processes for making changes to a programme or module, which can be requested twice per year and must be approved by the AQSC. The team also found that the policy sets out a requirement for revalidation if collective changes to a programme exceed a threshold level, such as a series of minor changes exceeding 25 per cent of the total programme credit.

245. The team reviewed evidence relating to the development and approval of the Global Sustainable Development suite of programmes, including the programme proposal and validation report. The validation report confirmed that:

> 'the requirements of the FHEQ had been appropriately considered. Programme learning outcomes were confirmed as being aligned with the relevant qualification descriptors; account had been taken of the QAA qualification characteristics and subject benchmarks; and that the programme proposal met the University's requirements in relation to academic frameworks and regulations for the award of credit.'

246. The team found evidence to demonstrate that the college has been operating robust programme approval processes, including engaging with external industry and academic experts, in line with the requirements of its validator. Furthermore, the team found that the college had been robust in ensuring that it sets appropriate academic standards.

247. The team's view is that the college has the experience to design and validate new programmes independently, as it has already been largely managing these processes as part of its partnership with UoP.

248. Furthermore, as set out in paragraph 232, the college undertook a mock validation event for its PGDip Engineering Management, shortly after the official validation event run by its validator. The mock event was used as an internal self-critical exercise to test its draft policy and process, without the presence of its validator, but including the external academic and industry advisers. The team reviewed the report of the validation event and found that it provides a definitive record of commendations, conditions, requirements and recommendations as determined by the panel, including the external advisers. As discussed in paragraph 233, there was no student representation at the event. However, the team noted that the Student Experience Officer was a formal member of the panel. The team formed the view that this was appropriate in light of the challenges of engaging students, as the Student Experience Officer is responsible for liaising with student representatives and attending committee meetings as a representative of the student body.

249. According to the college's draft Programme validation, monitoring and review policy, responses to validation reports (including action taken in response to conditions and recommendations) will be submitted to the CAB for final approval. The team's view is that this

is appropriate, since CAB is the senior academic authority in the college. The college reported that the mock validation was a successful exercise, which highlighted some process modifications that were required and were subsequently reported to the CAB.

250. To ensure the maintenance of academic standards, the college's programmes currently undergo both annual monitoring and periodic review with its validating partner. The team found that the programme review plan template for annual monitoring requires programme teams to consider information and data, including entry requirements, student feedback, module level results, attainment and continuation. The template also requires programme teams to comment on the information and data, and to complete an action plan to identify where enhancements can be made. Completed plans are reported internally to the AQSC and also to UoP via the annual Joint Board of Studies meeting as part of its ongoing quality assurance processes. Minutes reviewed by the assessment team confirm that annual programme reviews are discussed and actions are implemented as a result. An example of this is the adoption of a template for best practice going forward, to assist in completing programme plans, and to address discrepancies found in UoP's dashboard of monitoring data, which are subsequently reviewed with UoP by the Head of Student and Programme Services.

251. Feedback from external examiner reports is also considered through the annual monitoring process, and external examiners are asked to comment specifically on the maintenance of standards. The team reviewed a sample of reports for undergraduate and postgraduate programmes including for the:

- BSc and PGCert/PGDip/MSc Sustainable Maritime Operations
- MBA by Research Project
- MSc Advanced Hydrography for Professionals and MSc Advanced Oceanography for Professionals
- MSc Engineering for Marine Professionals
- BSc Global Sustainable Development.

252. As set out in paragraph 224, the team found that external examiners had responded positively. Further information on external examiner feedback is provided under criterion B3.

253. In addition to annual monitoring, the team found through its review of minutes of meetings that programme managers provide monitoring reports to the AQSC twice per year. These are reviewed and any actions are identified. For example, the team found there had been detailed discussion of a concern that some information provided at the recruitment stage, regarding the college's delivery model, expectations and programme structure, had not been well translated via the college's recruitment channels. In response to this, steps were taken to reinforce the recruitment process with clearer information and guidelines for communication with potential applicants. Subsequent discussions with recruitment and admissions staff were positive, and reported that the issues had been successfully addressed.

254. The team found that the college's draft Programme validation, monitoring and review policy clearly outlines the processes it will follow for programme monitoring, which includes twice-

yearly monitoring facilitated by programme managers and periodic review of programmes every five years, or sooner if required. The team considered these to demonstrate opportunities for the college to engage in reflection and evaluation of its learning, teaching and assessment practice, and to confirm that academic standards are being maintained. The draft policy states that programme monitoring will:

> 'reflect critically on, and evaluate, a range of data sources in order to prompt discussion on in-year and/or future developments and to identify actions which will address any matters arising, ultimately enhancing the provision and the student experience.'

255. The draft policy further identifies sources of evidence-based feedback using both qualitative and quantitative data, which the college will use to identify areas for enhancement as well as of good practice. These sources include feedback from students, external examiners and industry bodies, attainment data and programme change requests.

256. The team identified that annual monitoring report requirements will mirror the UoP template, with reports on feedback from students and external examiners, and data including for recruitment, retention and student success. This is in alignment with practice across the sector for programme monitoring, in the opinion of the team.

257. Periodic programme review, as set out in the college's draft Programme validation, monitoring and review policy, scrutinises existing programmes before a decision is made to revalidate a programme for continuing delivery. This has a wider remit than programme monitoring, as it takes a retrospective view of the programme, looking at previous trends, but also includes a forward-looking rationale for change and development. The team found that, in line with UoP policies, the normal period of validation for college programmes will be five years, but earlier review may be triggered by cumulative programme amendment, by feedback from external examiners and professional, statutory and regulatory bodies, by programme monitoring, or on the authority of the Rector. The team considered this to be appropriate.

258. The ultimate authority for revalidation of all programmes and modules resides with the CAB and again this is confirmed by consideration of the minutes of CAB meetings. Both the periodic review and revalidation of the programmes require consideration of internal and external factors affecting the programme, with input from students and external examiners as well as subject benchmark statements, qualification frameworks and current fit with industry and sector needs. The periodic review, as set out in the draft policy, aligns with the current practice under UoP validation of the college's programmes, and the team's view is that it defines appropriate external input, including from students. Although the college has not yet implemented it in full, it has tested the programme validation process defined in the draft Programme validation, monitoring and review policy. The team's view is that the policy that the college has put in place for programme validation, monitoring and review is robust and clearly defines the roles and responsibilities for the processes.

259. In summary, the team's view is that the college's programme approval arrangements are robust, applied consistently, and ensure that academic standards are set at a level that meets the UK threshold standard for the qualification and are in accordance with its own academic frameworks and regulations. The college has also put in place proposed programme approval, monitoring and review arrangements, which are robust, applied consistently and explicitly address whether the UK threshold academic standards are achieved. Additionally,

the monitoring processes and appropriate use of external expertise ensure that the academic standards required by the college are being maintained.

260. To establish how far credit and qualifications are awarded by the college only where the achievement of relevant learning outcomes has been demonstrated through assessment, and both the UK threshold standards and the academic standards of the relevant degree awarding body have been satisfied, the team reviewed evidence including:

- a sample of Level 6 and 7 module records across two undergraduate and two postgraduate programmes
- a sample of Level 6 and 7 assessment briefs across three undergraduate programmes and six postgraduate programmes
- a sample of Level 6 and 7 student assessed work across two undergraduate and one postgraduate programmes
- learning materials provided to students on the TLP for a sample of seven Level 6 and 7 modules across two undergraduate and five postgraduate programmes.

261. The team found that programme documentation, including module records, programme quality handbooks and programme specifications clearly define the learning outcomes for each programme and module. This information is also included in each module handbook, which is linked via the TLP landing page, and assessment briefs also direct students to this information as part of the explanation of the summative element of the module assessment.

262. In its sampling of assessed student work, the team considered two examples for each degree classification across one module at Level 6 for the BSc (Hons) Global Sustainable Development (Top-up) and one module at Level 7 for the MSc Sustainable Maritime Operations programme. The team formed the view that credit is awarded appropriately, in line with the relevant learning outcomes, and that the standard of the sample work is comparable with that of similar degree programmes in other higher education providers and appropriate to the level of assessment. Furthermore, it found that the examples demonstrated constructive feedback that clearly indicate to students where they could have improved to achieve the learning outcomes of the assessment.

263. The team further considered evidence from external examiner reports and academic quality assurance activities, such as the college's award assessment board. The evidence demonstrated that subject external examiners confirm that the module threshold standards are in line with the FHEQ and subject benchmark statements, and that the module assessments are sound and fairly conducted.

264. The college's subject assessment panels and award assessment boards are currently overseen and chaired by its validator. The team reviewed minutes of these meetings and observed the operation of a mid-year IAAB, and was satisfied that the panel and board followed robust procedures to confirm the award of credit and qualifications in line with the FHEQ.

265. The college has developed a draft Assessment and award board procedure in readiness for DAPs. This procedure sets out the intended purpose and membership of assessment boards

(in place of subject assessment panels under the college's validating partner) and award boards. An assessment board will continue to operate in the same way as a subject assessment panel; it will consider the standards of assessment, confirm module marks and make recommendations to the award board, and subject external examiners will continue to provide independent input. The award board will approve the award of qualifications on completion of a student's study with independent input from the award external examiner.

266. In summary, the team found that credit and qualifications are awarded by the college only where the achievement of relevant learning outcomes has been demonstrated through assessment, in line with the FHEQ and academic standards of its validating partner. The team's view is that the college has robust procedures in place to maintain these academic standards in the event of a successful DAPs application.

Conclusions

267. The assessment team concluded that the college meets criterion B2.1 as the evidence demonstrates that the college has clear mechanisms for setting and maintaining the academic standards of its higher education qualifications, and that these are consistently applied.

268. The team further concluded that the college meets criterion B2.2, as the evidence demonstrates that the college designs and deliver programmes and qualifications that meet the threshold academic standards described in the FHEQ, and that these reflect appropriate sector-recognised standards. The evidence demonstrates that the standards that it sets and maintains above the threshold are reliable over time, and reasonably comparable to those set and achieved by other UK degree awarding bodies.

269. Therefore, the team concluded that the college meets criterion B2.

Assessment of DAPs criterion B: Academic standards and quality assurance

Criterion B3: Quality of the academic experience

Advice to the OfS

270. The assessment team's view, based on specific consideration of the evidence requirements for this criterion, alongside any other relevant information, is that the college meets the requirements for criterion B3: Quality of the academic experience.

271. The assessment team's view is that the evidence shows the college can demonstrate that it can design and deliver courses and qualifications that provide a high quality academic experience to all students from all backgrounds, irrespective of their location, mode of study, academic subject, protected characteristics, previous educational background or nationality. Learning opportunities are consistently and rigorously quality assured.

Criterion B3.1

B3.1: Organisations with degree awarding powers are expected to demonstrate that they are able to design and deliver courses and qualifications that provide a high quality academic experience to all students from all backgrounds, irrespective of their location, mode of study, academic subject, protected characteristics, previous educational background or nationality. Learning opportunities are consistently and rigorously quality assured.

Reasoning

Design and approval of programmes

272. To establish whether the college operates effective processes for the design, development and approval of programmes, the assessment team reviewed evidence including the college's draft programme approval policy and the programme approval documentation for the Global Sustainable Development suite of programmes.

273. As discussed in detail under criterion B2, the team found that the college operates effectively in line with the programme approval policy and processes of its validating partner and has also developed its own draft Programme validation, monitoring and review policy for implementation in the event of a successful DAPs application.

274. The team reviewed evidence of programme design and development for the Level 6 and 7 Global Sustainable Development suite of programmes, which was highlighted in the QAA initial assessment summary report as an example of how the college will operate its own programme development processes. While the final approval for this suite of programmes was through UoP processes, the team considered that the evidence demonstrated that the college has experience of operating in line with effective processes for the design and development of programmes.

275. This was further demonstrated through the team's review of the initial proposal for the PGDip in Engineering Management, as reported to CAB. In line with practice across the sector, this

initial proposal included market and competitor analysis as well as mapping against the Engineering Council's AHEP4 learning outcomes.

276. To test how far relevant staff are informed of and provided with guidance and support on the procedures for the design, development and approval of programmes and their roles and responsibilities in relation to them, the team reviewed evidence with regard to the college's professional development of staff. The team also met with teaching staff to discuss their experiences with regards to programme development.

277. The college's Learning and teaching strategy sets out the college's aim for 'designing and delivering modules offering an interactive and responsive experience' and the professional development requirements for staff relating to the design and development of programmes. The strategy includes the aim of 'Ensuring that all tutors have [a higher education] teaching qualification with the goal of acquiring [Advance HE] Fellowship' and also states that staff who support student learning will be offered the opportunity to undertake continuing professional development (CPD) related to learning, teaching and assessment. The team's view that the college's Learning and teaching strategy defines a supportive environment for staff with regard to their roles and responsibilities in the design and development of programmes.

278. The college also uses UoP's guidance document on designing programmes and modules, which provides staff with a step-by-step guide through the process of programme development from initial design to final approval. The team discussed the teaching experience of newer members of staff as part of the virtual visit to the college, and staff confirmed that they had clear requirements on training and had both formal and informal mentoring from more senior colleagues.

279. The college's delivery model, whereby teaching content is delivered through the TLP, requires all modules to be produced through the Production team. The Head of Production is part of the COG, which has oversight of staffing matters and staff requirements.

280. The college's staff have gained experience of programme approval or validation through following the UoP procedures and they have also tested their own validation procedure through the mock validation exercise. The programme leads and senior academic staff have gained experience of programme approvals through the UoP panels for the college's existing programmes, and it will be important for them to mentor newer members of academic staff through approval processes as the college introduces new programmes. Given the relatively small number of permanent academic staff in the college, the team's view is that, on balance, this is likely to happen naturally as the number of programme leads increases.

281. The team found that, at present, the CAB oversees, and has responsibility for, approving the new undergraduate and postgraduate programme proposals, with approval and final validation undertaken through UoP. In the event of a successful DAPs application, the CAB will have ultimate responsibility for the full programme approval and validation process, as set out in the draft Programme validation, monitoring and review policy.

282. As discussed in paragraph 232, the team considered that both the current and the draft procedures for programme approval clearly outline the requirement for the inclusion of external expertise from both academia and industry. The team also found clear evidence of this in practice, through its review of programme approval documentation for the Global

Sustainable Development suite of programmes, and both the official and the mock validation events for the PGDip Engineering Management.

283. The team also reviewed evidence of actions being monitored: for example, minutes of a CAB meeting clearly record a new programme proposal ahead of the development and validation of the PGDip Engineering Management. Furthermore, the team saw evidence of how the mock validation panel's recommendations were reported to the CAB and subsequently actioned by the programme team. For example, the panel recommended updates to the programme specification regarding programme learning outcomes, which have been implemented. There were some modifications to the validation process following the mock exercise, which were reported to the CAB.

284. To test whether the coherence of programmes with multiple elements or alternative pathways is secured and maintained by the college, the team considered the MBA by Research Project (Top-up) programme, which includes five pathways: Maritime Operations, Entrepreneurship and Innovation, Marketing, Capital Markets and Finance and Financial Technology. These programmes are structured to allow multiple intakes per year (September, January and May). The top-up programme consists of a single 60-credit dissertation module in which students are 'actively encouraged to identify a suitable project that explores innovation and leadership in business, driven from their work experience while, at the same time, developing professional industry and academic research standards'. Coherence of the programme is maintained through the programme intended learning outcomes, which have been developed to be applicable in the student's chosen area of focus. The module handbook, which students can access through the TLP, gives students a detailed schedule for tasks on the module, which applies regardless of start date.

285. The college's modules each run three times per year, with start dates in January, May and September. This is set out for students in the student handbook, which is available through the TLP for all modules. The teaching materials are the same for each instance of the module in a given academic year, but there is a separate TLP module, so that the discussion forum is specific to a particular cohort on the module. Three separate assessments are set for each module in a given year. For example, the team reviewed three consecutive assignments for the module MLA603, and found these to demonstrate that the assessment of intended learning outcomes is consistently applied at the appropriate level for the module.

286. The team's view is that the specific example of the MBA by Research Project (Top-up), and the availability to students of modules at different times of the year, demonstrate that the college has experience of securing the coherence of programmes with multiple elements or alternative pathways.

287. The team observed that the professional services team, which includes the Head of Student and Programme Services, the Head of Recruitment and Admissions and the Student Experience Officer, are closely embedded in the college's programme planning and approval arrangements. For example, the team noted that the Head of Student and Programme Services is included in the membership of the CAB, AQSC and programme validation panels. Additionally, the Student Experience Officer was included as part of the validation panel for the mock validation exercise, giving student experience input in the absence of student representation. Given that the college's programmes are delivered via its TLP, close links to

the learning support services are essential, and the college has in place policies to ensure that these are maintained.

288. Overall, the team's view is that the design and approval processes at the college are effective in ensuring that new programmes provide students with a high quality academic experience, irrespective of their background or location. Opinions of external experts are sought and acted on, and internal stakeholders are fully engaged with the processes.

Learning and teaching

289. To evaluate whether the college implements a strategic approach to learning and teaching that is consistent with its stated academic objectives, the assessment team reviewed the college's Teaching and learning strategy. This sets out the college's aim to provide a high quality, personalised education to its diverse and international student community, and aligns with its overarching strategic plan and mission. The strategy outlines five priority areas for teaching and learning:

- a personalised student experience
- an interactive and inclusive learning environment
- assessment for learning with an emphasis on 'feedforward'[14] to enhance the benefits of student learning
- student skills and attributes
- professional development for staff.

290. The implementation of the strategy is stated as being through policies developed by the various committees reporting to the CAB. Programmes are reviewed annually with reports going to the Joint Board of Studies. The team reviewed evidence, including minutes of the AQSC, which showed alignment with the objectives of the Teaching and learning strategy and include, for example, discussion around the use of artificial intelligence (AI) and the college's response to this.

291. The college has also reported that it is working towards a strategy of blended learning. This would include online lectures delivered through the TLP, and face-to-face tutorials and seminars. The current model of digital delivery through the TLP with asynchronous tutor support would remain as an option for those who wish to access it. There is not yet a formal strategy document detailing this development of blended delivery, but the college has stated that it would be undertaken as a phased approach, retaining the use of the TLP. The team's view is that, on balance, this blended learning approach including face-to-face delivery in strategically important locations for the college's subject area (with Singapore and London initially proposed), would be a positive development particularly for the student experience.

292. The team reviewed the college's TLP to determine how far:

[14] Feedforward focuses on providing students with assessment feedback which will help them improve for one or more future assessments.

a. The college maintains physical, virtual and social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use.

b. Robust arrangements exist for ensuring that the learning opportunities provided to students studying at a distance from the organisation are effective.

293. The college delivers all its education in a distance learning format through its TLP, therefore there is no physical environment for either teaching or social learning.

294. The college has developed its own in-house virtual learning environment for delivery of its teaching materials, the TLP. The team considered seven modules across various programmes on the TLP and found there is a very consistent and intuitive delivery of information across the different modules. For each module, the TLP provides students with:

- a welcome pack and study guide
- a series of lectures as offline videos with transcripts
- supporting materials for the topics covered
- a link to the online library
- a student discussion forum
- optional lectures to support specific academic or career pathways
- links to welfare support and the Student Experience Officer
- assignments and coursework submission point.

295. The TLP has been specifically designed around accessibility, with consideration given to the possible range of abilities that students might have. The design of the TLP aligns with the college's 'Equality, Diversity and Inclusion Policy', which promotes a supportive and inclusive learning environment and the requirement for everyone to be treated with dignity and respect. The materials on the TLP have been designed to be accessible in different formats to give an inclusive environment that is suitable for students from different educational backgrounds.

296. The college's students are largely international and from a diverse range of backgrounds with, for example, cohorts on the Sustainable Maritime Operations programmes frequently working on board ships. The TLP has therefore been designed to allow it to be downloaded for use when an internet connection is not available.

297. The team met with a group of student representatives, which included one current student and one recent graduate from the BSc (Hons) in Sustainable Maritime Operations programme, four from the MSc Sustainable Maritime Operations programme, one from the MBA Maritime Operations (Top-up) and one from the MSc Sustainability in Practice (Top-up). The team heard that some of the student representatives felt that for some assessments the information provided on the TLP was insufficient and wider reading was required, therefore undertaking the modules without access to a stable internet connection was not possible. This was particularly an issue where students were working offshore for extended periods of

time. However, the team noted that the non-standard regulations (as discussed under paragraph 170) that are currently applied to all of the college's programmes state 'poor internet connection, where appropriately described as an employment driven issue causing the missing of an assessment deadline (e.g. whilst "at sea"), may be considered as a valid extenuating circumstance'. As a result, students can apply for submission extensions where required. The college intends to apply these regulations as standard for new programmes, if awarded DAPs.

298. The team observed a meeting of the SEG and found that feedback had been received that students were keen to have a discussion forum that could foster a greater degree of 'student community'. The team noted that an app had been trialled previously, but in discussion with a group of student representatives it was reported that this was not available in all countries. It was highlighted by the college at the meeting that providing a discussion forum was not straightforward with a globally distributed cohort of distance learning students, as many discussion forum platforms, including the app that was trialled, are banned or restricted in certain geographical locations.

299. The college has since been trialling two platforms, a student discussion forum intended for both social use and as an assessment tool, and Chatter, which is a social tool. The student discussion forum is monitored by academic and student experience teams, while Chatter is an open resource and accessible to both students and members of programme services. Students using either platform are required to adhere to the college's 'IT Acceptable Use Policy', 'Prevent Policy', 'Data Protection Policy' and 'Terms and Conditions'.

300. The team was encouraged by the college's continued intent to find the best solution (as reported in paragraph 135) to provide a degree of 'student community'.

301. In a meeting with student representatives, the team heard that students have identified some inconsistency in tutorial support, which is also reflected in student survey responses. The student representatives felt that there was relatively little tutorial time and, while module feedback has reported positive examples of tutor support, it has also identified issues with tutors not being available. The team found that the college has started to develop a tutoring handbook in response to this, to ensure consistency of student experience across programmes and modules. The team that this is a positive development towards enhancing the student experience of the modules, and also demonstrates the college's self-criticality with regard to reviewing the effectiveness of its provision.

302. In summary, the team found that the college provides a virtual learning environment that is safe, accessible and reliable for every student, with flexibility through the non-standard regulations where a student's working environment limits their connection to the TLP. The college promotes values of dignity, courtesy and respect, and has specifically designed its educational environment to be inclusive to students from a wide range of geographical and educational backgrounds.

303. The team considered that robust arrangements exist for ensuring that the learning opportunities provided to the college's students studying at a distance are effective, but that further work is required in ensuring that the level of tutoring support is consistent across modules. The team was encouraged by the college's reflection on its DAPs application

experience, and the steps it is taking in developing the tutor handbook to provide guidance for staff and ensure a consistent student experience.

304. The team considered whether the college has robust mechanisms to enable students to monitor their progress and further their academic development.

305. Students are currently able to view their grades via UoP's DLE and view their results and progression details when these are updated. The college has reported that its student record system is not accessible to students at present, but that it is developing the system to allow students to access, among other things, their grades and aggregate marks. The developments are planned to effectively provide a 'student portal', which will allow students to select optional modules and view progress and award board decisions. The college anticipates that this development will be completed during summer 2025. Until the student record system has been upgraded, the process is that the programme services staff contact students in the lead-up to each new term, to advise them of their progression status and encourage them to sign up for their next module.

306. Students are allocated a tutor for each module and can discuss their academic progress with them, either asynchronously via email or synchronously by video call. Each module includes formative assessments for the students to work through, and the college has a standard practice of offering feedback on one draft of any piece of summative assessment. Students have reported differing levels of interaction with their tutors but, as noted previously, the college is preparing a tutoring handbook to ensure a consistent student experience.

307. Overall, the team's view is that the college implements a strategic approach to teaching and learning, and provides a safe and reliable distance learning experience for all its students. Students have access to their grades and can to monitor their progress through the UoP DLE at present, and this will continue to be the case for students registered on UoP validated programmes. The team's view is that the developments that the college has reported for the student record system and tutoring handbook will provide students with robust tools for monitoring their progress and furthering their academic development.

Assessment

308. The assessment team tested whether the college operates valid and reliable processes of assessment, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought. The team therefore reviewed:

- the college's policy on assessment, marking and moderation
- the assessment regulations the college currently adheres to under its validating partner
- the college's draft RPL policy
- terms of reference and minutes of the Assessment Committee
- papers and minutes from a subject assessment panel and interim and annual award assessment boards
- a sample assessment brief for one Level 6 module

- a sample of Level 6 and 7 assessed work across two undergraduate and one postgraduate programmes

- programme quality handbooks for BSc (Hons) Global Sustainable Development (Top-up), MSc Global Sustainable Development and MSc Sustainability in Practice.

309. The team also undertook an observation of the Assessment Committee and IAAB.

310. The team saw evidence that the college's assessment processes are appropriate and fair. For example, the sample assignment briefs and those provided through the TLP align with the intended learning outcomes detailed for the respective module in the programme handbooks. Furthermore, through its review of feedback across the sample of Level 6 and 7 assessed work, the team formed the view that feedback on assessments is fair and constructive, with clear direction to how students can improve their work. There are also direct references to the published learning outcomes, which have been communicated to students both in the programme handbooks and via the TLP.

311. This is further supported by external examiners, who are asked to comment in interim and annual reports on whether the assessment processes for modules are 'sound and fairly conducted', reliable and inclusively designed. The team found that the 2021-22 reports confirm that this is the case.

312. The college currently adheres to the regulations and policy of its validating partner for recognising prior learning. In the event of a successful DAPs application, this policy would be replaced by the college's draft 'Recognition of Prior Learning Policy'. Both the existing UoP policy and the draft college policy cover the Credit Accumulation and Transfer Scheme and Accreditation of Prior Experiential Learning. Furthermore, they clearly differentiate between recognition of academic and experiential learning, and detail the process that the applicant must complete to apply for recognition of prior learning. It is also made clear that where RPL is not permitted because of professional, statutory or regulatory body requirements, this is stated in the programme documentation.

313. The UoP policy is implemented in conjunction with the college's 'Admissions Statement', and in the event of a successful DAPs application these would be replaced by the college's draft 'Admissions Policy'. The team's view is that the college's draft policies on recognising prior learning are robust and that the college has the experience to implement its own policy in the event of a successful DAPs application.

314. The college's current policy on assessment, marking and moderation aligns with the objectives of UoP's assessment policy and academic regulations[15]. The policy establishes the college's approach to the design, approval, marking and moderation of assessments, including guidance on designing referral assessments, external examiner scrutiny and sampling. The team saw evidence of the implementation of this procedure through reporting of internal moderation of assessments to the Assessment Committee, external examiner scrutiny of assessments and the operation of the subject assessment panels and award assessment boards, as discussed in the next paragraph. The team considered that the procedures appear robust and appropriate. The college has also developed a draft policy on

[15] Available at University of Plymouth, Student regulations, policies and procedures.

assessment, marking and moderation, which will be implemented if the college is awarded DAPs. The policy follows the same principles as the current policy, but with reference to the college's own draft academic regulations instead. The team's view is that the college has the structures in place to implement this policy independently in the event of a successful DAPs application.

315. The college operates assessment boards in line with the UoP procedures, which includes a subject assessment panel and an award assessment board. The subject assessment panel undertakes moderation of modules, confirming the standard of assessments, and receives feedback from dedicated subject external examiners. The panel then reports to the award assessment board, which also receives input from the award external examiner.

316. Under the current agreement with UoP, the college additionally runs interim assessment and award boards, which make decisions on student progression. This arrangement has been put in place because of the format of the programmes with predominantly part-time students; decisions can be made on referrals, for example, when provisional marks are released to the students rather than having to wait for the award assessment board at the end of the academic year. The team observed an Assessment Committee and IAAB, and considered the discussions and processes followed to be robust and well-considered. The IAAB decisions are reported to the subject assessment panel and award assessment board, which are chaired by UoP.

317. In the event of a successful DAPs application, the college has prepared a draft Assessment and award board procedure, which mirrors the current UoP processes. The assessment board will mirror the current subject assessment panels under UoP, with subject external examiner input and moderation of module marks. These moderated marks will be reported to the award board, which will confirm the final marks with input from the award external examiner. The team's view is that the college has appropriate draft procedures in place and the experience from its current practices to implement them appropriately.

318. In summary, the team found that the college currently operates valid and reliable processes of assessment, including for the recognition of prior learning, and that it has plans in place for robust assessment procedures in the event of a successful DAPs application. These processes enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought.

319. The team sought to test whether:

    a. Staff and students engage in dialogue to promote a shared understanding of the basis on which academic judgements are made.

    b. Students are provided with opportunities to develop an understanding of, and the necessary skills to demonstrate, good academic practice.

320. To this end, the team reviewed teaching and assessment materials, the student handbook, the college's 'Teaching and Learning Strategy 2021-2024' and minutes of meetings and an observation of the SEG.

321. The team found that the college's student welcome pack, provided at registration, introduces students to the TLP and key staff, including the Student Experience Manager. The student

handbook then provides students with guidance on their programme structure, assessment and submitting work, student voice and available support. The handbook also includes guidance on good academic practice, referencing and how to avoid issues such as plagiarism. There is information on academic offences with links for library guides and support with regard to regulations and appeals, and there is a detailed explanation of the different aspects of academic dishonesty.

322. The specific assessment briefs then encourage students to work through 'Study help' materials on the TLP and formative assessments, and to seek guidance and advice from the course tutor. For example, the assessment brief for MLA603 Maritime Regulation and Governance clearly advises students to work through the formative assessment questions on the TLP, to cement their understanding of the module material before undertaking the summative assessment outlined in the specific document. The assignment brief provides information to help students to better understand plagiarism, and also guidance with regard to word count and referencing requirements.

323. Students confirmed to the team that discussions with the course tutors take place but feedback surveys completed by students illustrate that the level of support is uneven. The tutoring handbook being developed should formalise the expectations for this activity, and would be reasonably expected to ensure the quality of the tutoring experience for all students. In discussion with the student representatives there was a comment that assignments could have been more clearly defined, but it was highlighted that there is an opportunity for a tutorial meeting to clarify any doubts. Students did comment that, although they can get feedback on a draft of their submissions, they would have liked the opportunity to have meetings to discuss the feedback on their summative work, to help them to understand how that feedback can be taken forward to the next module.

324. The assessments designed by the college adhere to the college's current Assessment, 'Marking and Moderation Policy', which ensures that assessments support student learning as well as measuring achievement. The samples of student work reviewed by the team for the MLA635 Sustainability on Your Doorstep module on the BSc (Hons) Global Sustainable Development programme, and the MLA703 Maritime Industry Practice module for the MSc Sustainable Maritime Operations programme, show that students have been provided with the opportunity to develop an understanding of, and the necessary skills to demonstrate, good academic practice. For example, they are provided with feedback through Turnitin with detailed comments on and at the end of their assignments.

325. The feedback provided supports with both the subject understanding and the academic skills that they require as they progress through the programme. For example, the assignment for MLA635 is an essay-based question around the United Nation's Sustainable Development Goals. The feedback provided to the students includes topic-specific feedback but also more transferrable feedback comments on referencing, writing styles, essay structure and presentation. The marker has provided detailed comments about what has been done well and where the student could improve. The latter comments in particular are relevant to other assessments, with feedback around issues with referencing, punctuation and academic writing style. This is targeted at helping students to develop good academic practice. In the assessment for MLA703, there is a set of four questions to be answered including one on a critique of an essay written by ChatGPT. The team considered that such methods of supporting students to understand the limitations as well as the benefits of AI tools in an

academic context are becoming more common across the sector, as a means of helping students to understand what constitutes good and poor academic practice.

326. To assess whether the college operates processes for preventing, identifying, investigating and responding to unacceptable academic practice, the team reviewed the assessment regulations the college currently adheres to under its validating partner, it draft 'Academic Offences Policy' and the student handbook.

327. As discussed previously, students are provided with information on good academic practice through mechanisms including the TLP, student handbook and assignment briefs. The college sets all assessments in the form of coursework submitted through Turnitin, which can detect plagiarism and, to some extent, the use of AI.

328. The college has a procedure in place for handling academic offences through the regulations and procedures of its validating partner. This sets out what is meant by an academic offence, and identifies the person responsible for chairing the committee appointed to investigate suspected academic offences. The procedure also establishes the penalties that could be applied and includes proforma correspondence for communication with a student. The procedure is accessible to students via a link in the student handbook, but also on the UoP website. The student handbook also provides guidance on good academic practice and avoidance of academic offences.

329. The team reviewed evidence of the procedures implemented in instances of plagiarism and inappropriate use of generative AI tools. The team's view is that the handling of these cases, based on the procedures outlined, is robust and appropriate. Data on academic offences is normally reported to the subject assessment panel and the award assessment board. The team found no cases reported in the evidence sampled from the 2022-23 academic year, but a number of potential and detected academic offences reported to the IAAB meetings in 2024.

330. The college has produced a draft 'Academic Offences Policy' for implementation in the event of a successful DAPs application. This mirrors the requirements and definitions of the current regulations under UoP, and provides detailed definitions of academic offences as well as procedures for investigating suspected cases. The policy appears robust and appropriate, and aligns with the existing UoP procedure, which the college has experience of implementing.

331. In summary, the team found that the college has processes in place for preventing, identifying, investigating and responding to unacceptable academic practice. It would be reasonable to expect that implementation of the college's draft 'Academic Offences Policy' would essentially replace the current UoP procedure, with no significant changes from the student perspective.

332. To test whether processes for marking assessments and for moderating marks are clearly articulated and consistently operated by those involved in the assessment process, the team considered the college's assessment, marking and moderation policy, the draft 'Assessment and Award Board Procedure', programme handbooks and marking criteria.

333. The form of assessment for each module is outlined in the module record. These are provided in programme quality handbooks and are the formal description of each module.

Individual assignments are subject to the approval process detailed in the college's 'Assessment, Marking and Moderation Policy', with approval authority resting with the Assessment Committee. The team reviewed evidence of this process and found that, following internal approval, assessments are sent to subject external examiners, and their comments on the assessments are reported to the Assessment Committee. The team's view was that the process was clear and well managed, and would not require any changes in the event of a successful DAPs application. Following approval of an assessment, the specific assessment task and marking criteria are detailed in the assignment brief for the given module.

334. The internal moderation policy is designed to ensure consistency in marking, both within a cohort and over time. This policy is based on the equivalent UoP policy and assessment regulations, and would continue to be used in the event of a successful DAPs application. The team found that the moderation policy is robust with regard to the sampling of student work for moderation and actions based on the outcome of the process. The second marking of student work (either dissertations or in the instance of transnational education provision), is also covered by the policy, with a clear process defined to resolve any discrepancies in marking.

335. The team reviewed samples of dissertation marking forms and module assessment moderation. The dissertation marking forms document feedback from both markers, as well as the agreed mark and the mechanism by which agreement was reached. The team determined this was evidence of good practice, with transparency in how the decision was reached. The module assessment moderation forms detail moderation of either all submissions where the cohort is small, or sampling where the cohort is larger, in accordance with the policy. There is evidence of module leaders responding to comments from the moderator, and forms to allow for external examiner feedback, although the team was not able to confirm external examiner feedback from the samples provided. The team considered that comments from the moderators justify the decisions made, and in one case confirm the evidence of a suspected academic offence in a submission. The team's view is that there is evidence that the processes for marking assessments and for moderating marks are clearly articulated and consistently operated by those involved in the assessment process.

336. Overall, the team considers that the college's approach to assessment is robust and fair and encourages students to develop good academic practice, and that the college has in place appropriate policies to deal with unacceptable academic practice.

External examining

337. To test whether the college makes scrupulous use of external examiners, the assessment team reviewed a range of evidence including:

- the college's current and draft policy on assessment, marking and moderation
- the college's draft external examiners policy
- minutes of subject and award assessment panels
- interim and annual external examiner reports.

338. The college currently appoints external examiners according to the external examiners policy of its validating partner.[16] The college has also prepared a draft external examiners policy, for use in the event of a successful DAPs application.

339. The UoP policy and procedure, along with the college's 'Assessment, Marking and Moderation Policy', establishes the duties of the external examiner and their role regarding moderation of assessments. The external examiners for the college complete two reports per year, with an interim report submitted mid-academic year and an annual report at the end of the year. This is in accordance with the external examiners policy under UoP, which requires more than one report per year where there is more than one subject assessment panel or award assessment board per year.

340. The team identified two different external examiner roles: the subject external examiner and the award external examiner. The college reports that:

    a. Subject external examiners are responsible for ensuring academic standards, including reviewing assessment processes, reviewing assessment processes, moderating grades, providing feedback and reporting on any findings and recommendations for improvement. Subject external examiners are also members of the subject assessment panel, at which their comments are considered.

    b. Award external examiners are responsible for ensuring the credibility and integrity of the award, overseeing student outcomes, monitoring award processes in accordance with academic regulations and providing independent judgement. Award external examiners are also members of the award assessment board.

341. The college's draft 'External Examiners Policy' also refers to a programme external examiner, to oversee academic standards across a whole programme where there are 'multiple external examiners who moderate different parts of the programme'. This person would 'assure the quality of the assessment and academic standards across the whole programme'. There is no further evidence regarding this role, as it is a new title in the college's draft policy.

342. Subject and award external examiners are currently appointed by UoP, in line with the UoP policy. However, should DAPs be awarded, the college will take over this process for its own awards, as set out in its draft policy. The team found that the criteria for appointment mirror those of the UoP policy.

343. As discussed in paragraph 339, external examiners complete interim reports during an academic year, as the college holds more than one subject assessment panel or award assessment board meeting per year. They then also complete an annual report, following the main subject assessment panel or award assessment board meeting in November. The team found that the interim reports ask the external examiner to agree or disagree with three statements regarding threshold standards and whether the assessments are sound and fairly conducted. Generally, the team found that comments are only required if the response is negative, though one subject external examiner did expand on their response with positive comments regarding second marking and mode of assessment for one of the modules. One of the interim reports from the award external examiner also commented positively regarding

[16] Available at University of Plymouth, Student regulations, policies and procedures.

the external examiner role in moderation of marks. The external examiner annual reports provide greater detail, and have regard to the external examiners' scrutiny of the assessment processes and their role in moderation of assessment.

344. Alongside the draft policy, the college has established draft report templates for both subject and award external examiners, with interim and annual reports to be completed, mirroring the UoP process.

345. In summary, the team found that the college makes appropriate use of external examiners, in accordance with UoP policies, in the moderation of assessment tasks and student assessed work. The college's draft policies also provide the team with confidence that the college will continue to do so. However, the team identified that further clarification is needed for the role of the programme external examiner in the college's draft external examiner policy.

346. The team found evidence that the college gives full and serious consideration to the comments and recommendations contained in external examiners' reports and provides external examiners with a considered and timely response to their comments and recommendations. For example, where the external examiner has provided detailed comments on the programmes and processes, the college has given a considered response. In particular, an external examiner commented on the potential issues with plagiarism in a distance learning programme. The college provided a well-reasoned response in terms of assessment design and the use of tools such as Turnitin but is also considering looking into data around this subject.

347. There was further evidence of an external examiner's comments being considered at the AQSC, where they had proposed changes to the assessed learning outcomes for MLA717 Engineering for Marine Professionals. The college had reflected on the external examiner's feedback and adjusted one of the learning outcomes to enable students to produce assessment work around engineering management.

348. Overall, the team considers that the college's approach to external examining contributes to ensuring that its assessment practices are rigorous, fair and in line with the sector. The college gives due consideration to feedback from the external examiners in the ongoing enhancement of its programmes and processes.

Academic appeals and student complaints

349. The assessment team examined whether:

    a. The college has effective procedures for handling academic appeals and student complaints about the quality of the academic experience.

    b. These procedures are fair, accessible and timely, and enable enhancement.

    c. Appropriate action is taken following an appeal or complaint.

350. The team therefore reviewed the college's current complaints procedure, its draft 'Complaints and Appeals Policy', and examples of complaints and one appeal submitted to the college.

351. The college reported that it has had few complaints or appeals to date, but those that have been submitted have been handled through the UoP processes. The college's current MLA-

branded complaints procedure sets out that it follows the UoP complaints procedure, and directs students to the college's 'early resolution complaint form' on the website in the first instance. The procedure has three levels: early resolution, formal complaint and review stage, with the steps and timings clearly set out in the appendix of the procedure.

352. The team reviewed evidence of the handling of two complaints. The first of these was handled by the college at the early resolution stage, and the evidence demonstrated a considered response to the student's complaint and why it was not being upheld. In the second case, the appeal went through each of the three stages of the complaints procedure. The evidence demonstrated a consistent approach, in accordance with the complaints procedure, also with reference to the Office of the Independent Adjudicator for Higher Education (OIAHE) process as the next stage of escalation if required. The team considered that the conclusions were explained clearly in writing to the student.

353. The team also reviewed an appeal that was handled in line with the UoP Complaints and appeals procedure. The response to the student clearly articulates the reasons why the appeal is not being upheld and, again, makes reference to the OIAHE in case the student wishes to take the appeal to a review. The team formed the view that the evidence demonstrates the college has taken appropriate action and robustly adhered to the process of its validator.

354. The college has developed its own draft 'Complaints and Appeals Policy' for implementation in the event of a successful DAPs application. The policy provides clear guidance on the grounds for making an appeal or submitting a complaint, in addition to signposting students to where they can access advice and guidance internally, such as via the Appeals Officer. The policy also outlines the various stages of a complaint or appeal, including what happens at the end of the internal procedures, with reference to the OIAHE indicated as the final step in the process in either case should further escalation be required. The team found that the policy broadly aligns with the procedure that the college adheres to under its validating partner. Together with the evidence of the college operating in line with these procedures effectively, the team was assured that the college will effectively follow its own policy.

355. Overall, the team found that the college has effective processes in place for handling academic appeals and student complaints, and that these processes are fair, accessible and timely and enable enhancement. The team also found that there is evidence that appropriate action is taken following an appeal or complaint.

Conclusions

356. The college has developed a unique virtual learning and teaching environment in the form of the TLP, which provides students with direct links to essential materials and documentation for their studies. Although discussion forums are provided through the TLP, students have expressed a desire to have more community and networking opportunities. This lack of social learning environment is something the college is seeking to address, but the assessment team recognises that this can be challenging in the context of a provider with geographically diverse student cohorts, who are predominantly professionals studying on a part-time basis.

357. Students have reported mixed experiences regarding interactions with and support provided by module tutors, and the college has since reported that a tutoring handbook is under

development to endeavour to bring consistency to the level of tutoring provided and enhance the student experience. The team considers that it will be important for the college to establish mechanisms to monitor the effectiveness of its approach once in place.

358. Overall, having reviewed the evidence, the team concluded that the college is able to design and deliver courses and qualifications that provide a high quality academic experience to all students from all backgrounds, irrespective of their location, mode of study, academic subject, protected characteristics, previous educational background or nationality, and that their learning opportunities are consistently and rigorously quality assured.

359. The team concluded that the assessment processes are robust and fair, that good use is made of external examiners, and that transparent and fair processes are in place to enable and resolve appeals and complaints.

360. Therefore, the team concluded that the college meets criterion B3.

Assessment of DAPs criterion C: Scholarship and the pedagogical effectiveness of staff

Criterion C1: The role of academic and professional staff

Advice to the OfS

361. The assessment team's view, based on specific consideration of the evidence requirements for this criterion, alongside other relevant information is that the college meets the requirements for criterion C1: The role of academic and professional staff.

362. The team's view is that the evidence shows, in summary, that the college has demonstrated that it has appropriate numbers of staff (either permanently employed by the college or as associate staff) to teach its students, and that all staff are appropriately qualified to teach and support students at the levels of the qualifications being awarded. The college ensures that staff maintain a professional understanding of current developments in research and scholarship in their subject, and keep in touch with their professional practice.

Criterion C1.1

C1.1: An organisation granted powers to award degrees assures itself that it has appropriate numbers of staff to teach its students. Everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately qualified, supported and developed to the level(s) and subject(s) of the qualifications being awarded.

Reasoning

363. To determine whether staff involved in teaching or supporting student learning, and in the assessment of student work, have relevant learning, teaching and assessment practices that are informed by reflection, evaluation of professional practice, and subject-specific and educational scholarship, the assessment team considered a range of documents including:

- the 'MLA College Staff Spreadsheet'
- a sample of five academic staff CVs in addition to staff online biographies[17]
- a sample of six anonymised staff performance reviews
- the college's 'Staff Development Policy' and 'Teaching and Learning Strategy'
- minutes of meetings of AQSC
- a supporting narrative document provided by the college in response to a request for further information.

364. As noted in paragraph 53, the college's strategic plan sets out, in summary, the college's mission to 'deliver outstanding flexible education and training' through providing distance and

[17] See MLA, Meet the team.

blended learning opportunities for the marine, maritime, sustainability and wider sectors. The focus on ‘flexible education’ and ‘distance and blended learning’ is fundamental to the college’s staffing model and associated staff development, which, as the strategy further sets out, will undergo continuous review for appropriateness.

365. The college’s ‘Teaching and Learning Strategy’ explains the college’s approach to the professional development of its staff, which includes a commitment to:

- ensure that all staff who teach or support learning are engaged in CPD
- ensure that all tutors have a higher education teaching qualification, with the goal of acquiring Advance HE Fellowship
- offer selected CPD in learning, teaching and assessment to staff who support student learning
- use its performance and development review scheme to set objectives relating to the student experience
- expand the range of tailored, responsive development activities offered to teaching and professional services staff, and ensuring staff have sufficient opportunity to share good practice
- ensure that teaching staff are meeting expectations around scholarship in their specialist areas (as set out in the Staff development policy).

366. To support these intentions, the college’s self-assessment states that annual face-to-face meetings are held, augmented by termly virtual meetings, comprising the whole student-facing team (associate and permanent members of staff, as well as key members of the professional services team), to communicate and share advances in pedagogy. The assessment team found that the effectiveness of these meetings is supported by comments from both academic and professional staff in their (redacted) performance reviews. For example, the team found evidence of specific comments relating to how useful these opportunities are for peer consultation, advice and collaborative support. This was also confirmed in discussions with teaching staff around staff development as part of the online visit.

367. Evidence of the evaluation of professional practices was also found in minutes of meetings of the AQSC. These demonstrated to the team that staff engage in discussion and development of curriculum and assessment, for example:

- development of a new marking rubric
- investigation of a virtual platform designed to enhance and strengthen the sense of community among staff and students (as a direct response to feedback received from students)
- application of academic best practice for referrals and repeating students.

368. Subject-specific scholarship is advantaged by the college’s policy of using associate teaching staff as a significant proportion (around 66 per cent) of staff. These staff are experts in their

field, who are employed by other higher education providers or in industry, or undertaking consultancy work. For example, an associate member of staff on the MSc in Engineering for Marine Professionals has 28 years of global experience in ship surveying and operations management. Another associate staff member is an expert in the field of fluid dynamics. They are also a Research Inspired Teaching Excellence mentor, an invited contributor to the Erasmus+ Key Action 2: Cooperation for Innovation and Exchange of Good Practices programme, and currently the deputy editor-in-chief of the world's leading peer-reviewed journal for sailing research. Many of these staff have notable involvement in professional engineering institutions (PEIs) such as IMarEST or the Royal Institution of Naval Architects, or other regulatory bodies such as the Engineering Council.[18]

369. The team found that the staff development policy sets out that permanent staff are encouraged and supported to pursue educational scholarship, recognising that a strategic, professional approach to staff development helps the college to attract and retain high calibre staff with the skills and competencies to deliver its objectives. The general principles of the policy include:

    - a commitment to the development of staff through the encouragement of an environment conducive to development
    - ensuring equitable access to opportunities appropriate to job roles and aligned to staff objectives
    - staff development processes closely aligned to other planning and review cycles, including staff induction at individual, departmental and college level.

370. The college also recognises that, for its staff development policy to be effective, staff must take responsibility for their own development. Staff are expected to avail themselves of the development opportunities provided to enable them to keep their skills updated and respond flexibly to change. The college reports that these opportunities take the form of development in the subject field and development related to the pedagogic, leadership and management aspects of senior tutorship. As examples of recent subject development, staff have contributed to or attended events hosted by Southwest Marine, World Maritime University, Maritime UK, Maritime and Port Authority of Singapore, and The Source UK.

371. The team's review of anonymised performance reviews provided evidence that reflection on and evaluation of professional practices and issues of CPD are both actively encouraged and exercised. For example, they feature as components of the templated review forms, which include an employee self-assessment and feedback provided by the line manager conducting the review. The sample performance reviews include comments from the staff member under review, confirming that they have been encouraged to reflect on these issues and are supported in the actions decided on in this regard.

372. There is further evidence that reflection on learning, teaching and assessment practices is encouraged and active, provided by the responses to student feedback, including infographic summaries and especially the 'You said, we did' infographic. From these, it is clearly evidenced both that programme managers (and via them, individual lecturers) are provided

[18] See MLA, Meet the team.

with the information to make informed decisions on any necessary adaptations or adjustments in teaching style, content or assessments that might be required, and that staff are actively engaged in making changes as required. An example of this is the provision of the option to speed up or slow down lecture videos to suit learners' preferences (bearing in mind that many of the student cohort do not have English as a first language). This was introduced in direct response to student feedback and was quickly enabled across all lectures to all students using Chrome as a browser. This behaviour of reflective practice was further demonstrated in programme review documentation.

373. Consequently, the team concluded that the college has in place relevant learning, teaching and assessment practices that are informed by reflection, evaluation of professional practice, and subject-specific and educational scholarship, and that furthermore, it is keeping these practices under review on an ongoing basis.

374. To evaluate whether staff involved in teaching, supporting student learning, and in the assessment of students' work have academic and (where applicable) professional expertise, the team considered evidence including:

- the 'MLA College Staff Spreadsheet'
- staff online biographies[19]
- a sample of 13 staff CVs
- a sample of six anonymised performance reviews
- the college's 'Staff Recruitment Policy' and Teaching and Learning Strategy'.

375. The college staff spreadsheet provides evidence that all staff involved in teaching and assessment are qualified to Level 7 (44 per cent) or Level 8 (56 per cent), which is equal to or higher than the highest level they teach. It also confirms that approximately half of all staff hold professional qualifications, which is further supported by the biographies of both full-time and associate academic staff.[20] The biographies evidence Chartered Engineers, Chartered Marine Engineers, Chartered Surveyors, Chartered Chemists and Chartered Scientists, involvement in PEIs such as IMarEST, the Nautical Institute, the Royal Institution of Naval Architects and the Chartered Management Institute, or other regulatory bodies such as the Engineering Council. The sample of teaching staff journal publications provided evidence that the staff are actively engaged in research and scholarly activity relating to both academic and professional expertise.

376. A similar proportion of staff involved in teaching and assessment (48 per cent) hold a teaching qualification specific to higher education. This includes eight members of staff who have gained professional recognition under the Advance HE[21] Fellowship scheme, six as Fellows, one as a Senior Fellow and one as a Principal Fellow, which the team considered to be appropriate and reflective of sector standards. A further 11 per cent have a teaching

[19] See MLA, Meet the team.

[20] See MLA, Meet the team.

[21] Formerly known as the Higher Education Academy.

qualification not specific to higher education. Among the 14 full-time learning support staff, nine members of staff (64 per cent) report holding academic qualifications at Levels 5 to 8 (seven at Level 6, two at Level 7) and one holds a professional qualification.

377. There is also evidence from the anonymised performance reviews that additional qualifications, particularly teaching-specific qualifications such as PGCert or the various grades of Advance HE Fellowship, are actively encouraged and supported by the college in its staff development activities.

378. The college delivery model uses an approximately 1:2 ratio between academic staff with permanent contracts and associate staff, who the college refers to as 'associate tutors' and 'associate lecturers'). The team's view is that this ratio is appropriate, as the delivery model allows the college to use subject matter experts as associate tutors who themselves are supported by permanent academic staff. The associate tutors are drawn from both academia and industry, the latter proving beneficial in supporting a demographic of part-time students who are also full-time working professionals, operating in sectors relevant to their programme of study.

379. The college's 'Teaching and Learning Strategy' states that a key goal is to ensure that all permanent tutors have a higher education teaching qualification, with the aim of acquiring Advance HE Fellowship status. Furthermore the college intends, where possible, to recruit new members to the team (as it has the potential to expand its operations) who already possess such a qualification. In the case of associate teaching staff, some are from other higher education providers, but others come from backgrounds of significant industry experience and specific subject expertise. In such cases, their appointment is based on a judgement of equivalency of qualification against experience and expertise. The team found that this was reflected in the college's 'Staff Recruitment Policy' and Academician Job Description respectively.

380. The team concluded that the evidence provided showed that staff have both academic and professional expertise, and the means are in place to ensure that these are maintained or improved on as future staff are recruited.

381. To establish how far staff exhibit active engagement with the pedagogic development of their discipline knowledge, the team reviewed:

- staff online biographies[22]
- a selection of staff CVs
- anonymised performance reviews
- example agendas for the college's annual staff away day
- the college's 'Staff Recruitment Policy'
- a sample of teaching staff journal publications.

[22] See MLA, Meet the team.

382. The team considered that the college's practice of using a significant proportion of associate academic staff is advantageous in this regard, as they can demonstrate familiarity with the practical, working environment and bring current and relevant expertise of discipline knowledge to the teaching.

383. In terms of pedagogical development, members of the full-time permanent teaching staff have also undertaken or are about to undertake training and attended events run by other higher education providers, Advance HE, and CIFAL. The college reported that research work that is currently ongoing (but is yet to be published or presented) focuses on areas as diverse as social sustainability in the maritime sector (as ongoing PhD work), surfing geographies (recognising an important local tourism issue), rewilding (an ongoing debate in local National Parks), and protected landscapes, as well as pedagogic work on the use of AI in assessment.

384. The college is a member of Advance HE, providing opportunities for permanent academic staff to attend events and conferences relating to pedagogic development. The team reviewed evidence of recent examples of events and conferences attended by permanent members of staff, which included the Advance HE Teaching and Learning Conference 2024 and networking events. In its self-assessment, the college states that permanent members of staff are encouraged to attend these where possible. Termly online meetings with the wider associate team are held, through which advances in pedagogy are communicated and shared. Alongside this, the entire student-facing team of the college (i.e. associate and permanent members of academic staff, along with key members of the professional services team) are brought together annually for an in-person meeting and conference. Agendas of the annual staff away days show that issues such as research ethics and the rise of AI are included as staff briefings for wider dissemination, including for associate teaching staff.

385. The team formed the view that the fact that a significant proportion of the teaching staff are 'visitors' is a strength for the college. This is because it allows it to draw readily on good practice based on the experience of staff from other higher education providers and from industry. For example, the meeting with academic staff as part of the visit highlighted discussions in response to a suggestion from an associate tutor for the college to develop examples of feedback comments aligned to the various grade boundaries (as used at their own provider) to enable better consistency of feedback from different markers. The advantages of this approach were readily acknowledged, and the decision made to adopt the suggestion.

386. As discussed in paragraph 379, the college intends all permanent members of academic staff to hold a suitable teaching qualification, specific to higher education. It is also the college's intention, where possible, to recruit new members to the team who already possess such a qualification. If new recruits do not possess this, the intention is that within their first year of employment staff are registered on a relevant programme, ideally one accredited or linked to successful graduates gaining Advance HE Fellowship status.

387. More senior members of staff are encouraged to continue their development by applying for recognition at higher levels as appropriate (e.g. Senior or Principal Fellowship).

388. However, the team found that the evidence provided to support this statement was not extensive, and consequently requested further information and evidence from the college. The college submitted anonymised performance reviews, the 'Staff Development Policy' and

a supporting narrative which identified, for example, that the college sets out a fundamental commitment to the ensure staff have the relevant skills, knowledge and competencies. Formal endorsement for staff seeking to undertake further study is given by the line manager or head of department.

389. The team reviewed examples of both academic and professional services (redacted) performance reviews and found that not only did the review form template encourage suitable self-assessment and reflection on the part of the reviewee, but specific attention is paid to objectives such as Senior Fellowship and attainment of a PGCert qualification. Furthermore, both the academic and professional examples of the performance reviews reference attendance at seminars, events and workshops as examples of staff expanding their higher education networks.

390. The team concluded that the evidence showed that staff are supported, encouraged and able to demonstrate active engagement with pedagogic development of their discipline knowledge.

391. To establish how far staff understand current research and advanced scholarship in their discipline, and that such knowledge and understanding directly inform and enhance their teaching, the team considered:

- the 'MLA College Staff Spreadsheet'
- staff online biographies[23]
- a selection of staff CVs
- a sample of teaching staff research output publications.

392. The team found that associate staff comprise roughly two-thirds of the academic teaching resource, which provides access to research and advanced scholarship in the form of subject-specific expertise to enhance teaching at the college. Examples of this are widespread through staff online biographies. For instance, one associate tutor is a highly experienced maritime researcher of 23 years with a focus on the social sciences, and an extensive list of published and referenced works. Their international research expertise focuses on the human side of shipping, including seafarers' wellbeing and mental health, sustainable management and leadership, onboard safety culture, gender diversity, equality and inclusion. Other staff online biographies and staff CVs evidence the industry experience, professional credentials and research specialisations of all full-time and associate academic staff, and confirm that considerable subject-related expertise is accessed via the college's associate teaching staff.

393. The college's staff spreadsheet and selection of staff CVs provide evidence of outputs from staff research and advanced scholarship activities, including published research output such as journal articles and presentations. The examples are written by full-time members of the academic team, who have also been involved in the development of the college's taught programmes. Furthermore, they demonstrate how staff scholarly research feeds into

[23] See MLA, Meet the team.

teaching, as they have direct relevance to aspects of the taught programmes on offer, such as the Global Sustainable Development suite of programmes.

394. One example is written by an associate tutor and again evidences a very clear relevance to the college's taught provision. The college reported that current research work (yet to be published or presented) focuses on areas such as social sustainability in the maritime sector (as ongoing PhD work), surfing geographies (recognising an important local tourism issue), rewilding (an ongoing debate in local National Parks), and protected landscapes, as well as pedagogic work in the use of AI in assessment.

395. The team concluded that there is clear evidence that staff involved in teaching and supporting student learning have an understanding of current research and advanced scholarship in their discipline and that such knowledge and understanding directly inform and enhance their teaching. Also, staff have active engagement with research or advanced scholarship to a level commensurate with the level and subject of the qualifications being offered.

396. To assess whether staff have opportunities to engage in reflection and evaluation of their learning, teaching and assessment practice, the team reviewed:

- the college's staff spreadsheet
- anonymised performance reviews
- agendas of the annual staff away days
- policies including for staff recruitment, external examiners, assessment, marking and moderation and programme validation, monitoring and review
- a sample of infographics capturing new starter, start and end of module student feedback
- terms of reference for the CAB, Assessment Committee and AQSC
- minutes of meetings of the CAB and AQSC.

397. The team also met with teaching staff and learning support staff during its online visit.

398. In discussions with the college staff during the visit, the team was informed that staff engage in both formal and informal opportunities for reflection on their learning, teaching and assessment practice. An example of this is the analysis of student survey data, with a formal opportunity to respond in the programme review documentation. The end of programme survey includes questions to provide quantitative data to establish overall satisfaction levels regarding all elements of a student's learning and teaching experience. Quantitative survey data is reviewed at three levels:

- the SEG reviews individual survey data on a termly basis
- the AQSC reviews data at a cohort level
- the CAB compares data year on year to establish longer term trends.

399. All academic committees are attended by the Student Experience team and include membership of the student representatives to ensure issues raised are appropriately considered and addressed. Qualitative data is also collected as part of these surveys. The college reports that the Student Experience team is currently investigating processes to collate common themes and trends, which will be presented at the appropriate academic committee. A new data dashboard (to present data in an easier-to-interpret format) has also been developed, to enhance the provision of raw survey data to all programme managers for review. The team noted that this proactive and responsive attitude was itself a good indicator of the college's reflective and evaluative practices.

400. The team found further evidence of staff engaging in reflection on their learning, teaching and assessment practices through the responses to student feedback, including infographic summaries and especially the 'You said, we did' infographic. These summaries make clear both that all members of the student-facing team are provided with the information to make informed decisions as to any necessary adaptations or adjustments in teaching style, content or assessments that might be required, and that also there are regular meetings that review this information to ensure that suitable action is taken wherever necessary. Examples of this, evidenced by the 'You said, we did' infographic include the development and delivery of an online webinar, to address a specific request for further detailed information to answer questions from new students at the beginning of the honours programme project module.

401. There is also evidence of the opportunities to engage in reflection on, and evaluation of practices provided by annual staff performance reviews, as well as the agendas for annual staff away days. For example, these discussions have led to staff briefings on research ethics (as many associate staff are project supervisors but may not have encountered this), and, more recently, the rise of AI, with one member of staff being particularly recognised for their contribution to this issue in their annual performance review.

402. Consequently, the team concluded that the evidence presented showed that the college provides opportunities for staff to engage in reflection on and evaluation of their learning, teaching and assessment practices and that furthermore, the college is monitoring the effectiveness of its activities and actively seeking further improvements.

403. To review whether staff have development opportunities aimed at enabling them to enhance their practice and scholarship, the team considered the following documents:

- the 'MLA College Staff Spreadsheet'
- staff online biographies[24]
- a selection of staff CVs
- examples of staff research output and publications
- anonymised performance reviews
- agendas of the annual staff away days

[24] See MLA, Meet the team.

- the college's 'Staff Development Policy'.

404. In addition, the team met with teaching staff as part of its online visit.

405. As discussed in paragraph 378, the delivery and staffing model of the college relies on extensive use of associate lecturers and tutors from industry, other higher education providers and professional bodies such as PEIs. Therefore, the team considered there to be evidence of regular cross-fertilisation of ideas and practices from associates' 'home' providers, actively supported and encouraged by the termly (virtual) and annual (in-person) meetings and conferences, which comprise the whole student-facing team (associate and permanent staff, as well as key members of the professional services team). The team found that these events enable all staff to communicate and share advances in pedagogy, as well as developments in respective subject fields. As set out in paragraph 366, the effectiveness of these meetings is supported by comments in performance reviews, where specific comments are made relating to how useful these opportunities are for peer discussion. Furthermore, there is evidence from the agendas of the annual staff away days that issues such as research ethics and the development of AI in assessment are discussed and disseminated more widely among both permanent and associate teaching staff.

406. The degree to which all staff, and notably associate staff, are engaged with advanced scholarship and research is particularly evidenced in the college's staff spreadsheet, in which a large proportion of the teaching staff (63 per cent) are active in consultancy or professional practice. This was confirmed through discussions with senior and academic staff as part of the online visit. Further evidence was provided by comments in both the (redacted) performance reviews, where specific comments relate to engagement with Advance HE events and development pathways (e.g. the attainment of various grades of Fellowship), in addition to examples of peer-reviewed journal articles and publications that have been submitted. There is also evidence provided by the 'Staff Development Policy', which sets out mandatory staff development activities in addition to provision of funding and study leave to support staff in the development of their practice and scholarship.

407. The college also provided examples of events and conferences attended by permanent members of staff, including the Advance HE Teaching and Learning Conference 2024, and Deputy Vice-Chancellor and Pro Vice-Chancellor network events.

408. The team concluded that the evidence is sufficient to confirm that there are development opportunities aimed at enabling staff to enhance their practice and scholarship, and that these opportunities are acted on.

409. The team evaluated whether staff have opportunities to gain experience in curriculum development and assessment design, and to engage with the activities of other higher education providers. This included reviewing the level of engagement staff have through, for example, involvement as external examiners, and the team therefore considered evidence including:

- the 'MLA College Staff Spreadsheet'

- staff online biographies and CVs[25]
- anonymised performance reviews.

410. The team found that the college's staff spreadsheet confirms that 75 per cent of permanent teaching staff, including those with key programme management responsibilities, have experience of curriculum development and assessment design for taught programmes. A further quarter of these have experience as external examiners, external reviewers and as validation panel members for taught programmes. This data was further supported by the team's review of staff CVs. For example, the team found that one member of staff has extensive experience as an external examiner for a number of other higher education providers, in addition to acting as an educational consultant nationally and internationally.

411. The team recognises that the majority of total teaching staff (70 per cent) are associate staff and bring with them experience from other higher education providers. The team was also able to examine staff online biographies for associate staff, which demonstrated a range of experience.

412. The team found that the annual staff performance reviews provide evidence that staff are encouraged and supported in programme development, assessment design and validation activities. These aspects feature prominently as key objectives and goals in the review form and the reviewee is asked to assign timescales for the focus of such activities over the next quarter, six months and year. For example, one member of staff's performance review reflects on their development of a new PGDip, the fact that it has been well received by the validating partner and the intention to have it accredited by the Institution of Engineering and Technology.

413. Furthermore, as discussed in paragraph 375, and evidenced through staff biographies, some of the associate teaching staff also have assessor roles with PEIs, in which they undertake accreditations of taught programmes globally.

414. The team concluded that the evidence demonstrated that the college provides opportunities for staff to gain experience in curriculum development and assessment design and to engage with the activities of other higher education providers, for example through becoming external examiners, validation panel members or external reviewers. There is also evidence of engagement with the activities of providers of higher education in other organisations.

415. To consider whether staff involved in the assessment of student work have expertise in providing feedback on assessment that is timely, constructive and developmental, the team reviewed documents including:

- the 'MLA College Staff Spreadsheet'
- the college's 'Assessment, Marking and Moderation Policy' and draft policy in readiness for DAPs
- terms of reference for the college's Assessment Committee

[25] See MLA, Meet the team.

- a sample of academic feedback for students' assessed work
- eight external examiner reports.

416. The college reported in its self-assessment submission that a significant emphasis is placed on 'feedforward' for assessments. This approach is well explained in the sample of assessment briefs. The team found that the assessment briefs provide a clear explanation of the requirements of the assessment, including deadlines, the formative and summative nature of the specific assessment component, the support available, advice on referencing, technical matters and formatting, word count expectations, and submission procedures. They provide clear explanation of the opportunities for formative feedback (or feedforward) from their tutor, available for a single draft version of the intended assignment submission, before the formal submission deadline. The briefs also set out that detailed feedback is expected on the marked coursework around four weeks after the submission date. This is in line with the college's 'Assessment, Marking and Moderation Policy', which requires that all marking and moderation should be completed within 28 days.

417. Comments provided by students, for example via end of module feedback forms, refer to both feedback and feedforward provision and are generally very positive:

> 'I was unable to submit a draft this semester, however in the past I have received very valuable feedback in a reasonable timeline which has immensely helped my understanding and final grade.'
>
> 'Feedback was very helpful. I totally understand which parts that I need to improve – pointed out my mistakes – what I could improve on, the critical points that were missing.'
>
> 'A Zoom meeting was initiated by my tutor before feedback in writing was provided. This Zoom meeting offers better understanding as it allows two-way communication. It was helpful in completing assessment.'
>
> 'Helped I'm better structuring of my report format and referencing outline.'

418. Furthermore, end of module feedback from the 2020-21 and 2021-22 academic years indicates high levels of agreement (89 per cent and 86 per cent respectively) with the statement' I have received detailed feedback on my assessment(s) in a reasonable time frame'.

419. The team found that this was further evidenced through external examiner reports, which provided comments supportive of the quality of feedback and support, including:

> 'Detailed written feedback provided on thesis'
>
> 'tutor feedback was comprehensive and useful'
>
> '...the feedback provided on modules appears extremely constructive...'
>
> 'Feedback generally very constructive and good to see the feedback provided for the higher performing students as well as lower performers.'

420. The team reviewed examples of feedback provided on assessed work, and formed the view that these were clear and provided good evidence of feedback for specific cases. The team requested and received further examples of feedback on assessed work at undergraduate

and postgraduate level, across the full range of grade bandings, including of typical feedforward practices.

421. The additional examples of assessed work across programmes and grade bandings provided further evidence that assessment feedback was timely, constructive and developmental. The team found that assessment feedback provided clear guidance on how students could have improved for this and subsequent submissions, specifically regarding (for instance) sourcing and referencing supporting information. The college reported that students are encouraged to speak with their tutor at the beginning of the following module, to discuss the advice given. Tutors then address any concerns or queries about that advice in the one-to-one tutorials. Furthermore, the team viewed a recording of a reflective session hosted by a member of teaching staff, reviewing student performance and experience on a specific module. Feedforward and feedback are incorporated in the discussion, along with opportunities for workplace mentors to contribute (the module in question is a work-based learning module delivered to students employed by the HKMD).

422. The team concluded that the college can evidence expertise in providing feedback on assessment that is timely, constructive and developmental.

423. To establish whether staff have experience of curriculum development and assessment design, the team considered evidence including:

- the 'MLA College Staff Spreadsheet'
- staff online biographies[26]
- a selection of staff CVs
- a sample of programme specifications for bachelor's and master's degrees
- the college's draft academic framework
- the 'MLA College Programme Validation, Monitoring and Review Policy'
- a sample of assessment briefs
- terms of reference for the college's Assessment Committee
- terms of reference and minutes of meetings of the AQSC.

424. In addition, the team observed meetings of the CAB and AQSC.

425. As outlined in paragraph 410, the team found evidence in the college's staff spreadsheet, and more specifically the examples provided of staff CVs, that all staff with key programme management responsibilities and assessment coordinators have experience of curriculum development and assessment design for taught programmes.

426. Initial proposals for new programmes are presented to the CAB for approval to proceed to full programme design and validation. Once this has been granted, the relevant programme team

[26] See MLA, Meet the team.

is expected to engage in detailed programme design and development work in preparation for review by the AQSC. The draft 'Programme Validation, Monitoring and Review Policy' provides a detailed explanation of the various stages of design and approval of the taught programmes, including the timescales and resources allocated to ensure that a robust process is followed. The validation process involves a review by the AQSC, which includes input from the programme team, in addition to external experts and students. Minutes from meetings of the AQSC, for example, demonstrate that staff engage in discussion and development of curriculum and assessment. They included, for instance:

- ensuring that content is up to date and optimises student engagement
- mapping of programme and module learning outcomes for each award presented for validation (including exit awards)
- feedback from external academics and other external stakeholders consulted on curriculum development.

427. Through its observation of the AQSC meeting, the team found that discussions were grounded in evidence, informed by relevant expertise and had clearly defined objectives leading to actionable outcomes. As a consequence, they provided an opportunity for staff to develop their experience of curriculum design and assessment. An example was the discussion arising from the advice of an external examiner regarding the consistency of grades awarded (across various academic markers) against typical feedback comments provided. The merits were considered of providing a guideline document giving examples of the sort of comments that would be expected to apply to exceptional, excellent, good, average and poor submissions, compared with current practices. A decision was made that staff, particularly less experienced academic staff, would benefit from the guidance and furthermore that it would assist students' perception of grading consistency across different markers and modules. The college reported that this would be included in the newly commissioned staff tutor handbook.

428. The team was able to conclude that the evidence supported the college staff's experience in curriculum development and assessment design.

429. To establish that the college has made a rigorous assessment of the skills and expertise required to teach all students and the appropriate staff-student ratios, the team examined documents including:

- the 'MLA College Staff Spreadsheet'
- staff online biographies[27]
- a selection of staff CVs
- terms of reference for the CAB and minutes of the meetings
- the college's 'Staff Recruitment Policy'

[27] See MLA, Meet the team.

- the ‘MLA College Academician Job Specification’.

430. The team also observed a meeting of the CAB.

431. The CAB assesses the skills and expertise required to teach all students and the appropriate staff-student ratios using information gathered, for example from the college’s strategic plan, programme specifications and programme review meetings. The college reported a detailed approach to staff-student ratios, which is guided by its staffing model of permanent and associate staff. Typically, associate staff would have no more than six students to support in one term, and permanent staff between 20 and 25 or between 40 and 45 students, depending on wider responsibilities such as management or content development. The team considered this to be appropriate to the college’s context and delivery model.

432. The team examined agendas and meeting minutes of the CAB and found that the college regularly reviews and monitors areas such as the annual programme review action plans. The CAB meeting observed by the team confirmed that these activities are considered and undertaken in a rigorous manner regarding resourcing the necessary number of staff, including their skills and expertise.

433. The ongoing monitoring of the college’s staff resourcing and skills is supported by a clear academician job specification, which identifies the requirements of scholarship and specialist knowledge, alongside the college’s ‘Staff Recruitment Policy’, which stipulates that candidates must meet these essential criteria to be interviewed.

434. The ‘Staff Development Policy’ clearly defines the focus on ensuring that existing staff are given full opportunity to further develop the required expertise and skills for their role. During the team’s online visit, senior staff presented plans for continued investment in both academic and professional services staff in the future. Of particular note was the IT and media staff provision to support the bespoke TLP.

435. Regarding appropriate staff-student ratios, the team also carefully considered the college’s stated strategy for growth. The team requested further information on the governance structure, and specifically how a high number of associate lecturers will be managed in line with the intended growth. The college reported that it is confident that the present governance and management structure is scalable to facilitate the expected and intended growth. It also emphasises that the CEG, COG and CAB constantly monitor staffing requirements across the college. The college further reported that this had resulted in recruitment, including for two new academics, a digital production assistant and a business intelligence officer. The associate lecturer or tutor model is also scalable, and ensures that not only the correct and relevant expertise, but also staff-student ratios, are maintained – more so than relying on a small permanent staff base. As this model grows, the team learned, management will be overseen by the Vice-Rector (Academic) through the subject and programme leads. The number of permanent academic staff will continue to increase alongside the number of associate staff. The team agreed that these explanations of structures and strategies to address the situation were appropriate and well justified.

436. The team considered that the online staff biographies, staff CVs and the ‘MLA College Staff Spreadsheet’ demonstrate that the college has made a rigorous assessment of the skills and expertise required to teach all students and of the appropriate staff-student ratios.

437. To confirm whether the college has appropriate staff recruitment practices, the team reviewed the ‘MLA College Staff Recruitment Policy’ and ‘Academician Job Specification’.

438. The team’s view is that the ‘Staff Recruitment Policy’ demonstrates that the college has appropriate staff recruitment practices. For example, it emphasises a clear commitment to meeting the requirements of all relevant employment legislation, and recognises the importance of a strategic, professional approach to recruitment as essential to attract and retain staff of the highest calibre. Core principles include encouraging the recruitment of staff with disabilities, making reasonable adjustments during the recruitment process, and providing support as required for a successful candidate with a disability to undertake the post. The policy also states a commitment to treating all candidates fairly, equitably and efficiently, with respect and courtesy, and to recruiting the best candidate for the job based on merit. The college’s appropriate staff recruitment practices are further evidenced by the online staff biographies and evidence of existing staff.

439. The team reviewed this policy with the provided example of a job description for an academician. It found that clear job person specifications are prepared, detailing duties, responsibilities and accountabilities as well as required experience, skills, qualifications and training. Clear explanations of how the various aspects of the candidates’ application will be measured against each of the criteria are also given. This was also found in a review of the job descriptions for non-academic staff, such as the student experience officer and student experience manager, which demonstrated a consistent and transparent approach.

440. This gave the team confidence that the college has appropriate staff recruitment practices.

Conclusions

441. The assessment team’s view, based on its review of evidence, is that the college meets criterion C1.1 because it has appropriate numbers of staff to teach its students, and that all staff involved in teaching or supporting learning are appropriately qualified, supported and developed.

Assessment of DAPs criterion D: Environment for supporting students

Criterion D1: Enabling student development and achievement

Advice to the OfS

442. The assessment team's view, based on specific consideration of the evidence requirements for this criterion alongside other relevant information, is that the college meets the requirements for criterion D1: Enabling student development and achievement, because it meets this criterion.

443. The team's view is that the evidence shows, in summary, that the college has in place, monitors and evaluates arrangements and resources that enable its students to develop their academic, personal and professional potential.

Criterion D1.1

D1.1: Higher education providers have in place, monitor and evaluate arrangements and resources which enable students to develop their academic, personal and professional potential.

Reasoning

444. To consider whether the college takes a comprehensive strategic and operational approach to determine and evaluate how it enables student development and achievement for its diverse body of students, the assessment team reviewed evidence including:

- the college's strategic plan and 'Access and Participation Statement 2022-23'
- the college's 'Student Experience Strategy' and new student feedback strategy
- terms of reference and minutes of the CAB and AQSC
- draft policies including for admissions, RPL, extenuating circumstances, fitness to study and safeguarding
- published policies for bursary and equality, diversity and inclusion
- the student handbook.

445. The college's approach to student development and achievement is articulated in its strategic plan and 'Student Experience Strategy', which set out a clear vision for the student experience and the means to achieve it. For example, the strategic plan states the college's mission 'to deliver outstanding flexible education and training to promote the conservation and sustainable use of the environment for the advancement of the global community'. The plan also states that the college is 'committed to a clearly defined set of core values where the learner is placed at the centre of everything we do'. The college seeks to achieve this by, for instance, providing personalised and engaging experiences as well as ensuring

accessibility, inclusivity, and comprehensive support services that meet the specific needs of the students via the TLP and student experience support staff.

446. The CAB is responsible for providing overarching academic governance in relation to academic standards, quality and the student experience. The team reviewed the CAB's terms of reference and minutes of meetings, and undertook an observation of a board meeting. Through this evidence, the team was able to confirm that the board determines and evaluates how it enables student development and achievement for its diverse body of students by regularly reviewing a wide range of relevant information, including:

- student retention and achievement results
- the results of student feedback from induction processes and at the end of module and end of programme
- development in learning resources.

447. Under the current process there is a stated commitment to making studies accessible and inclusive, recognising that external factors can affect student engagement and progression. Support for students through these challenges is implemented by:

a. Communication channels via academic staff and the Student Experience team, to support open communication and enable staff to raise concerns about non-engagement, academic performance, or pastoral needs. The bespoke 'JotForms' (a proprietary custom online form provision) is used to log and manage these concerns, with access limited to relevant support teams.

b. Periodic contact with students via email, phone and online meetings to check on wellbeing (for example, during Week 6 of the honours project).

c. Interruption for students facing academic or engagement issues, allowing them to pause studies without penalty. Students retain access to resources and receive support during the break. Return is flexible within registration limits, and the process is documented through JotForms.

d. 'Return to study' meetings to support a smooth return after interruption, addressing previous challenges and assessing readiness. Attendees include the student, programme manager, and Student Experience team. Discussions focus on timing and support needs, and meeting minutes are available for relevant staff to access.

e. Return to study without compulsory interruption for students who voluntarily interrupt or have approved extenuating circumstances. These students may also have return to study meetings. The admin team checks readiness and, if needed, arranges a meeting with the Student Experience team and programme manager.

448. The college also reported that, if its application for DAPs is successful, it plans to enhance student support through a more structured review process and alignment with the implementation of its draft fitness to study and safeguarding policies. For example, return to study meetings will expand to include wellbeing reviews for students still studying but identified as at risk.

449. The college's AQSC also considers issues that impact on teaching, learning and assessment across the college. The team reviewed minutes from previous meetings and observed a meeting of this committee. It found that the committee considers the full range of issues in its remit, and oversees the college's initiatives for continuous improvement in these matters. For instance, this committee discussed annual programme reviews, in particular small differences in approval outcomes between the college and the validating partner that had arisen from minor disparities in judgement criteria. The team found that actions were put in place to address modifications to paperwork to ensure full alignment.

450. The operational specifications for undergraduate and postgraduate programmes provide clear outlines of the various taught programmes. These are suitably detailed as to the programme structure, allocation of resources, consideration of risk factors and a robust analysis of quantitative and qualitative performance data to monitor and evaluate the effectiveness of the college's strategies. Discussions with staff during the team's visit included consideration of how this data is used by the college. The college also shared information on its recent initiative to create a 'dashboard' to present both quantitative and qualitative information in a clearer manner for consideration by the appropriate decision-making bodies such as CAB and AQSC.

451. In addition, the team reviewed the college's academic policies associated with student support and was satisfied that the college has appropriate policies in place to support student development and achievement. It further considered that these policies reflect best practice adopted across the sector, based on the team's experience. For example, the draft 'Extenuating Circumstances Policy' clearly explains the circumstances that might enable an application for extenuating circumstances to be submitted, how to make an application and the process that is followed. This is aligned with current practice via the UoP regulations and current practice for the college.

452. The team found that the student handbook contains a section on student support and guides students to the use of 'Self Help Inspiring E-Resources (SHINE)', a self-help website developed through the validating partner's Student Counselling and Personal Development Service. Students can watch, read, listen and find apps and useful links to the best online resources and information about mental health and wellbeing. Similarly, online support is available, providing access to 24-7 online community and professional support from trained counsellors for all matters of mental health and wellbeing. The college intends to maintain access for its students to these UoP services, should it be awarded DAPs.

453. The college gathers student feedback through a series of scheduled surveys distributed at key stages throughout the student journey. Following a recent review of this process, a new 'Student Feedback Strategy' has been developed, which introduces a more progressive and responsive approach to gathering feedback, with a core focus on addressing issues such as survey fatigue, low response rates, and inconsistent data quality. Key improvements include updated terminology, revised survey questions, refined demographic data collection, and a streamlined survey schedule. These changes aim to enhance transparency, strengthen feedback loops, and support the timely implementation of student insights. The team had these intentions explained during its visit and agreed that these represented useful developments in the process of gathering useful feedback. The team found that the revised feedback framework was approved by the AQSC in March 2025 and is now in active implementation.

454. The team concluded that the college takes a comprehensive strategic and operational approach to determining and evaluating how it enables student development and achievement for its diverse body of students.

455. To determine whether students are advised about, and inducted into, their study programmes in an effective way and account is taken of different students' choices and needs, the team reviewed documents including:

- the college's admissions policy
- the student handbook
- the college's student welcome pack and student induction email template
- the 'MLA Terms and Conditions 2022-23'
- a copy of the survey questions for new students and results of the SPQ
- examples of student feedback
- minutes of meetings of the SEG
- the college's academic cooperation agreement with its current validator.

456. The team also met with senior staff and students and was given a guided tour of the TLP during its online visit.

457. The team reviewed the college's induction materials, including the welcome pack and induction email and found them to be comprehensive, covering a range of relevant and appropriate topics for new starters. Students are guided to where they can find information on their chosen programme and the support services available to them throughout their studies, initially through a student induction email, which notifies them of their allocated personal tutor and directs them to view the welcome pack online via the TLP.

458. The TLP operates, behaves and is navigated in precisely the same way as a standard internet browser, albeit one that behaves the same whether on or offline. While the college anticipates that students will be familiar with using an internet browser at, and as a result of, the online application and enrolment processes, each TLP includes comprehensive video instructions on how to use it and where certain key resources might be found. These instructions are found in the 'Welcome' section of each TLP module, and serve as a functional induction into its use. The assessment team also found that the college technical team is available throughout each term to assist any students who might be experiencing difficulties in accessing any component of their study.

459. The information contained in the college's student welcome pack includes an introduction to key staff and information regarding the support and resources to assist students in their studies, should they encounter a study or personal problem. A key link from the welcome pack is the student handbook, and students are encouraged to view this for important information relating to their studies. The TLP for each element of the taught programmes provides specific advice on each module, including guidance on the aspects such as assessment and its submission as well as more common advice, such as guidance on

accessing library resources. This process takes place during the first week of term for new students. The evidence demonstrated that students were presented with a range of induction materials, including relevant academic support information such as academic integrity and misconduct.

460. The team noted that these sources of information are accessible, detailed, accurate and current. The team also noted that the individual needs of students, for instance in relation to additional learning support, are prominently advised on, with guidance regarding wellbeing and disability services.

461. Personal advice is delivered in the first week by the allocated personal tutor and also at regular intervals throughout a student's programme, via touch points with support staff that coincide with formative or summative deadlines. The team felt that this represented an appropriate system for providing personal support for students during their studies, given the distance learning provision and workplace-based student cohort. It was found that, in practice, there are inevitably some inconsistencies in the provision across the range of tutoring staff, but the team was reassured to find that the college is aware of this issue and is actively engaged in finding ways to reduce these inconsistencies.

462. Students are then introduced to the academic staff involved in their teaching and learning and are briefed on assessment requirements and deadlines. The personal tutor's role is to provide both academic and pastoral support, ensuring that any student queries or requests for support specific to the programme or module are dealt with swiftly and providing a 'friendly face' during their studies. All tutoring staff, including associate staff, are responsible for producing constructive feedback with an emphasis on feeding forward, an aspect that, for students on taught modules, is reviewed by student and tutor at the beginning of each module.

463. During the online visit, senior staff explained to the team that the college has recently launched a new customer relationship management system to capture admissions data from the point of enquiry, enabling a fast response to enquiries and facilitating the evaluation of subsequent applications. Students are asked to complete a new student survey after they have registered on their programme. The team found that the college uses this feedback to ensure that admissions processes are continually improved and respond to the needs of prospective students. Feedback from new students confirms that they are very satisfied with the induction process, with over 90 per cent responding positively (except against 'clarity of payment plan options', which received 84 per cent).

464. In addition to the college's TLP provision, all programmes currently validated by UoP also allow students to access resources offered via the virtual library, or on campus should students be in a position to make use of these locally. If the college's DAPs application is successful, the college plans to continue to offer its own students the same access through the updated academic cooperation agreement with UoP regarding access for students on programmes validated by the college.

465. The team was able to conclude that students are advised about, and inducted into, their study programmes in an effective way, and that account is taken of different students' choices and needs.

466. To evaluate whether the effectiveness of student and staff advisory, support and counselling services is monitored, and any resource needs arising are considered, the team reviewed evidence including:

- examples of student feedback
- SPQ survey results
- minutes of meetings of the AQSC and SEG
- examples of student support provided with extenuating circumstances and technical issues.

467. The team also observed a meeting of the SEG.

468. The SEG is responsible for the strategic enhancement of the student experience. It is also responsible for the implementation of policy and procedures that ensure and enhance relevant aspects of the student experience, in support of the Student experience strategy. Minutes from the meetings of the SEG and the team's observation of one of the meetings confirm that the group has detailed discussions relating to issues such as student representation, student surveys, and actions to facilitate communication among the student body to improve the sense of community for distance learners. These discussions are not limited to academic provision or the more general student experience, but also consider such aspects as the effectiveness of support, advisory and disability services in the context of a student body that is distance learning and workplace-based.

469. The effectiveness of the group and the wider student support team is evidenced by the results from the SPQ. This specifically enquires about such issues as learning opportunities, academic support, organisation and management and learning resources, and results are highly positive in all categories.

470. In cases where extenuating circumstances are significantly affecting a student's ability to complete all or part of their programme, the Student Experience Officer and tutor may intervene and bring the topic to a CAB meeting for discussion, and examples of such cases and the staff responses are provided. The team noted that these are appropriate in the urgency of response, empathy for the issue raised, advice as to the necessary evidence required and, ultimately, the action decided on by the college in its policies and procedures.

471. Programme services staff closely monitor any issues with accessing learning materials at the beginning of term. This is a crucial part of the induction period, where the Programme Services team supports the academic team in quickly identifying students who may need to defer, so that they will not be disadvantaged by losing study time. Again, an example of a response to a request for technical help was provided and demonstrates the team's willingness to resolve issues raised.

472. The team found that there is clear evidence of monitoring in the examples of the minutes of the AQSC. For example, 'Summary of student feedback' is presented as a regular agenda item, alongside 'Student voice', and encouragingly this is discussed in the presence of the student representative members of the committee, with encouragement for them to contribute to the discussions, leading to appropriate actions. Summary infographics are produced of the

results of student surveys, to clarify and assist discussion and decision-making arising from such monitoring and feedback activity.

473. Summaries of the student feedback are considered on a quarterly basis by the CAB, and provide significant input to the review of all programmes and associated academic and professional support. The minutes of the CAB meetings confirm that these summaries are considered as a regular agenda item, and that any issues raised are acted on accordingly. The team observed a meeting of the CAB and was able to witness the close attention that was given to gathering the voice of the students on the college programmes. An example of issues raised (again, in the presence of student representative members of CAB) is a discussion from feedback that there were cases of staff taking leave around submission deadlines without having arranged for a colleague to handle any questions arising from the students. This directly influenced the decision to compile an academic tutor handbook, with the aim of setting out clearly the expectations of both permanent and associate staff, to arrive at a more consistent student experience. The summary of these results are later compiled into a 'You said, we did' infographic.

474. The college also administers UoP's SPQ and provides an annual report of its findings via the UoP annual programme review cycle. The college has achieved an increased return from around 7 per cent in 2019 to 53 per cent in 2022. The satisfaction rates for both internal feedback surveys and the SPQ are high (typically 85 to 95 per cent), and the team discussed this with the senior team during the visit. The assessment team found that the college attributes these high satisfaction rates to various factors. In particular, the distance learning delivery model makes the provision of online advice and feedback essential, and it is very well provisioned in the college's model, in terms of the diligence of academic tutors but also the (increasing) resources of the Student Experience team. This is generally highly appreciated as a facility that enables the students to continue with full-time employment yet still feel supported in their studies. The college also accepts that the maturity and experience of most of its students may be a helpful factor. For example, this might contribute to their being more organised, proactive and engaged than some students, and therefore more appreciative of the flexibility of the college's mode of delivery and academic support.

475. As identified in paragraph 136, the SPQ closely mirrors the questions used in the NSS. It is therefore a required metric used by UoP to assess student feedback as part of the annual review process. This process currently culminates in the Joint Board of Studies meeting each January, preceded by the submission of a report to UoP that includes an update on the previous year's SPQ results. The SPQ serves as a key benchmark for student satisfaction, and provides a comprehensive overview of the overall student experience. Any issues identified through it are addressed during this review process, with corresponding actions documented in the annual review report. Since the college's students are not eligible to participate in the NSS, the SPQ offers a valuable alternative, enabling UoP to evaluate satisfaction using comparable metrics and standardise its review of the college's provision in line with other academic partners.

476. The college intends to continue to administrate the SPQ to the same schedule as the NSS for students graduating from UoP validated programmes, as it is a vital tool for assessing the quality of higher education in the UK. If successful in achieving DAPs, the college intends to maintain a strong focus on reviewing and refining its internal feedback mechanisms. Its stated goal is to ensure these tools remain effective in enhancing transparency, reinforcing feedback

loops, and supporting the timely and meaningful implementation of student insights. The college remains open to using the SPQ where necessary, with a preference for integrating relevant and meaningful questions into internal surveys such as ‘The final chapter’ (formerly known as the ‘End of programme survey’), to ensure alignment with the specific context and needs of the college’s provision.

477. The team was able to conclude that the college monitors the effectiveness of student and staff advisory, support and counselling services and that any resource needs arising are considered.

478. To establish whether the college’s administrative support systems enable it to monitor student progression and performance accurately and provide timely, secure and accurate information to satisfy academic and non-academic management information needs, the team analysed:

- the college’s draft ‘Assessment and Award Board Procedure’
- minutes of a subject assessment panel and award assessment board
- the college’s draft ‘Programme Validation Monitoring and Review Policy’
- minutes of AQSC meetings
- SPQ survey results
- the college’s new ‘Student Feedback Strategy’.

479. The current process for monitoring student progression, engagement and performance for students is necessarily based around online communication and record-keeping, as implemented by the Student Experience team. This team maintains open communication to raise any concerns regarding non-engagement, academic performance, or pastoral needs. As set out under paragraph 447, use is made of ‘JotForms’ to log and manage these concerns, with access limited to relevant support teams. It is appropriate to note, as mentioned previously, that there has recently been significant growth in the Student Experience team, both in numbers of staff involved and its management structure. Students are regularly contacted by tutors via email, phone and online meetings to check on their progress and wellbeing.

480. The team found that, in line with the college’s programme monitoring and review arrangements, programme managers collate student feedback, which is reviewed by the AQSC twice a year in the spring and autumn. This forms a major part of the college’s own draft programme monitoring process, as discussed in detail under criterion B2.

481. As discussed in detail under criterion A1, the college acknowledges in its self-assessment that a consequence of delivering distance learning to students mainly engaged in full-time employment is the challenge of engaging student representatives in its academic committees. Student attendance at the AQSC therefore includes a Student Experience Manager, to represent the student voice and inform decision-making based on student feedback across the organisation. The college intends to continue to closely monitor and improve the feedback process, for example through the recently implemented ‘Student Feedback Strategy 2024-25’.

482. Students are monitored in terms of progression through student support activities, subject assessment panels and award assessment boards, and academic interventions via the tutoring model. The team found that the college 'Assessment, Marking and Moderation Policy' applies to summative assessment, and the Programme Services and Student Experience teams are jointly responsible for maintaining and updating the college's marks and moderation database so that data regarding extenuating circumstances is captured in the same place as assessment data. This ensures that student support activity directly translates to an award board and that students are not disadvantaged. This is found to operate well in practice, particularly as a result of the reorganisation and expansion of the Student Experience team providing adequate resource.

483. The college's intended student wellbeing reviews as part of the draft 'Fitness to Study Policy' will also provide a mechanism to inform the discussion and decision-making process. This is highlighted in the draft 'Assessment and Award Board Procedure', where information from a student wellbeing review may be considered when ratifying marks or making awards at an award board. In response to the team's request for further information on progress with the proposed student wellbeing reviews, the college reported that these are still under development and will be introduced if it is successful in its application for DAPs.

484. A rigorous process of checking UoP's panel and board papers is currently in place, supported by the college's marks and moderation database in tandem with UoP enrolment data. By ensuring that both sets of data are reviewed together and are confirmed to be accurate, the college can ensure that subject assessment panels and award assessment boards run smoothly; this is endorsed by the award external examiners, who comment on the efficiency of these administrative processes. The college expects the same approaches to be applied to its own assessment and award board procedures, and these will be monitored through the Assessment Committee to ensure the accuracy of student progression data. The AQSC will ensure that academic regulations are applied across all operations.

485. The college currently uses UoP's records database (Unit-e) for enrolment data, with all enrolment, interruptions, withdrawals, and assessment and award board data passed to the university to process and update. The college maintains a corresponding database, which is regularly updated and checked for accuracy against the UoP records. This ensures that no errors have occurred, and produces a marks report, which is updated by the college's Programme Services team with marks and extenuating circumstances data for review at subject assessment panels and award assessment boards.

486. The team formed the view that the college has in place administrative support systems that enable it to monitor student progression and performance accurately, and provide timely, secure and accurate information to satisfy academic and non-academic management information needs.

487. The team considered how the college evidences that it provides opportunities for all students to develop skills that enable their academic, personal and professional progression, for example academic, employment and future career management skills, as well as skills to make effective use of the learning resources provided, including the safe and effective use of specialist facilities, and the use of digital and virtual environments. To do so, the team considered evidence including:

- the college's academic cooperation agreement with its validating partner
- draft policies including for extenuating circumstances and fitness to study
- the college's 2023-24 student handbook
- the student welcome pack
- examples of student feedback
- SPQ results from 2021 to 2024
- job descriptions for the student experience manager and student experience officer.

488. The team also reviewed modules on the TLP.

489. In considering the evidence for students developing skills that enable their academic, personal and professional progression, it is noted that most students are in sector-related employment. This allows enhanced opportunities for professional development in their existing career. The team found that assessments and research dissertations are generally undertaken in a way that allows students to consider their own development requirements alongside the needs of their employer.

490. Students are directed to all relevant policies and governance documents before registering to start a programme, as well as at regular intervals throughout their study via email communication and the information provided in the TLP for each module. Appropriately for distance learning students, the provision is entirely online, but is administered on a personal basis. During the online visit to the college, the team was informed of how initially, the student's personal tutor (who has regular meetings with their students either by phone, email or Microsoft Teams) will encourage students to feed back any issues they are having with their course. In the discussions, staff pointed out that most issues raised by students to tutoring staff are of an individual nature and usually resolved at a local level either via the personal tutor or, if necessary (or more appropriate), the Student Experience Officer.

491. The team recognised that an important feature for such distance learning provision is the available technical support. The Technical team provides a helpdesk service for students who may experience technical difficulties or broadband connectivity issues. This was a specific issue that was discussed with the team during the visit, as the Technical team had received requests from students experiencing difficulties accessing their course materials online. Given that the problems were arising from attempts to access the TLP from some quite remote locations (often at sea, given the nature of their employment), the team was impressed by the proactive nature and assiduity of the team's response. It was apparent that under such circumstances, a robust solution might be difficult to find, but the team was keen to offer advice to students to alleviate the issues as much as possible.

492. In discussions with senior staff during the team's visit, it was emphasised that the college is further developing the resources in the Student Experience team to provide dedicated frontline staff members who are independent of the teaching team. The student experience manager and student experience officer job descriptions provide clear requirements of the roles and, in the opinion of the team, confirm that the responsibilities and cross-college

services that they interact with are appropriate for these roles to be effective. Students seeking advice and support for queries not covered by the individual tutoring system are signposted to the Student Experience Officer, who can resolve queries related to personal circumstances and provide advice on additional learning requirements and guidance on additional learning resources. The officer also acts as an intermediary between the student and programme managers, to resolve matters such as referrals and interruption to study. The initial training of the student experience officer involves establishing the correct style of communication to maintain an objective stance in interactions with students, with ongoing training and development opportunities available for developing expertise in conflict resolution, active listening, and ability to communicate effectively with students from different cultures and demographics. There are plans for the Student Experience team to grow further as the college and student body mature, acknowledging the importance that the senior staff place in this activity for the online teaching provision.

493. In addition to having full access to UoP's Careers Service, current students can also access a careers guidance and advice service provided by IMarEST as a result of its longstanding relationship with the college. All students can get free membership of the IMarEST. This is beneficial, as they can access the institute's online library resources as well as newsletters, journals and bulletins, providing current information related to the professional maritime sector.

494. As stated in paragraph 464, an agreement has recently been signed with UoP to renew a service agreement that would allow students on the college validated programmes to access the same services (such as the Careers Service) as those registered on UoP validated programmes, if awarded DAPs. It is the intention that this service and cooperation agreement will continue even if the college is successful in its application for DAPs.

495. Academic staff, particularly associate staff (many of whom have had careers in the marine and maritime sectors), have strong professional ties to industry that bring currency to their teaching, with backgrounds in both professional practice and scholarship, giving students the opportunity to access this expertise, as evidenced more fully under criterion C. The college also has a close association with PEIs such as IMarEST. These affiliations with the maritime sector also drive the college's approach to ensuring that the suite of education programmes are industry aware and responsive to sector requirements.

496. The distance learning model of delivery means that all teaching and learning is conducted online and, as a consequence, the college places great importance on providing support to develop skills for making effective use of the learning resources provided, particularly digital and virtual environments. As an example, on induction, the students receive a welcome pack which introduces the DLE and Primo (UoP's online library) and importantly highlights the student handbook. This provides further, detailed information and advice on student support, including careers education, and guidance including academic study skills. Perhaps most importantly, the handbook also includes contact information for staff dedicated to assisting with more specific study queries, such as making the best use of the features in the TLP. The team found that advice is not limited to the induction process; for example, the 'You said, we did' infographic provides further evidence of support for the development of academic skills. In response to requests for additional information from students new to dissertation writing, an online webinar was created for the beginning of the project module, to answer questions and provide further information.

497. Each module on the TLP provides advice on study skills specific to the learning on that topic and, notably, guidance on the digital resources associated with the assessment. During the online visit, the team was able to discuss the college's bespoke TLP with the Production team that designed and supports it. The team was also granted access to a representative sample of module pages. The team found the TLP to be a clear and useful resource and was provided with examples of recent developments that evidence the Production team's responsiveness to student feedback and intention to continuously improve the resource. An example is the recent facility to adjust the playback speed of the teaching videos, which it was noted was important for international students. The team observed that common features such as AI guidance and access to library facilities are available in each TLP module.

498. The TLP Production team provides guidance to academic teams, with content driven by academics but layout and template by the Production team. Each programme area on the TLP is typically updated three times per year (for each cohort) and in advance of each module running, which includes new assignments and minor updates. Initial modules contain more in the way of guidance, such as a welcome introduction video and renewed access to the welcome pack. The Production team currently comprises six members of staff, who also offer support to academic staff for issues such as content copyright, which the team considered to be appropriate and effective provision.

499. The effectiveness of the college's provision in this area is further evidenced by the 'New Starter Survey' and the 'End of Module Student Feedback Survey'. There is evidence that the comments gathered are acted on in a timely manner, for instance in response to student feedback regarding initial difficulties understanding how to use the online library resources. The team found that, as part of the welcome pack, students can now view a video user guide for accessing and using the online library. SPQ results confirm that students' responses to these actions are very positive.

500. Overall, the team's view is that the college provides opportunities for all students to develop skills that enable their academic, personal and professional progression – for example academic, employment and future career management skills – as well as skills to make effective use of the learning resources provided, including the safe and effective use of specialist facilities and the use of digital and virtual environments.

501. To determine whether the college's approach is guided by a commitment to equity, the team analysed:

- the college's strategic plan 2023-2027
- the college's 'Access and Participation Statement 2022-23'
- the college's admissions statement
- draft policies including for admissions, RPL, extenuating circumstances and fitness to study
- current policies including for student bursary, equality, diversity and inclusion
- the college's academic cooperation agreement with its validating partner.

502. The team also met with students during its online visit.

503. The college's strategic plan explicitly references equality, diversity and inclusion as one of its clearly defined set of core values, intended to ensure that 'the learner is placed at the centre of everything we do'. The college's approach to equity is outlined in, and supported by, a range of draft and published policies, statements and plans. The team found these documents to be detailed, comprehensive in their coverage and designed to ensure fair treatment and opportunities for all students, staff and external partners at the college, irrespective of any of their protected characteristics. The 'Access and Participation Statement 2022-23', for example, describes a range of activities and support designed to broaden participation in higher education, including Women in Maritime Scholarships as well as scholarships provided by a partner company in support of sustainability.

504. The team noted that the draft 'Admissions Policy' states that one of its core purposes is to provide accessible education, particularly focused on widening participation, equality and diversity and disability and specific learning needs:

> 'No potential student will be excluded entry to any MLA College programme as a result of discrimination on the grounds of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage or civil partnership, pregnancy, and maternity.'

505. The team heard that the majority of the college's students are mid-career professionals in full-time employment. The intake is also made up of home and international students, reflecting the extensive diversity of the sectors that are supported. The team further found that the location of employment ranges from local to national and international, so the ability to impact at a regional level is limited, but nevertheless the college is mindful of ensuring that it collaborates with support mechanisms for the local economy. The college's Access and participation statement reports that its mature entrant figures are above the sector average in the areas of access, success, non-continuation and attainment.

506. The team learned that access to all programmes is based on qualifications and recognition of prior learning alongside work experience. This approach aims to support career progression opportunities for individuals and provides access for the sectors that the college works with to training and development for their workforce.

507. To widen accessibility to higher education, the college has an established Scholarship and Bursary Scheme, which was introduced in recognition of the financial barriers to higher education often faced by individuals from both the UK and overseas, and includes a 'Women in Maritime' bursary in recognition of the underrepresentation of mature female students in the maritime sector. The college also offers payment plans to support students in budgeting for their chosen programme of study. Scholarships and bursaries are promoted through marketing activities, in line with the 'Equality, Diversity and Inclusion Policy'.

508. In addition, the college is part of the GEDU global network, which has six universities, five language schools and five liaison offices worldwide. It aspires to achieve global education for a sustainable future, and the 'Access and Participation Statement 2022-23' sets out its aspirations for an accessible, inclusive and quality experience for students from across the world.

509. The evidence reviewed therefore led the team to conclude that the college's approach is guided by a commitment to equity.

Conclusions

510. The assessment team found that the college has in place arrangements and resources that enable students to develop their academic, personal and professional potential. While some important services are currently provided by the college's validating partner, the team was satisfied that, should the college be successful in its application for DAPs, it will be able to continue these arrangements with UoP or to establish and draw on other existing facilities and resources (such as from the GEDU network).

511. The college sets out a comprehensive strategic and operational approach to determine and evaluate how it enables student development and achievement, while its administrative support systems support students in monitoring their progression and performance.

512. The college has invested significant resources to provide online provision to support its distance learning model intended for a cohort of students who are mid-career and workplace-based professionals. Specialist support services for personal support are also in place. This ensures that it meets the individual academic, personal and professional progression needs of all its students. It also means it has developed effective approaches to delivering, monitoring and evaluating these services, both at programme level and in its committee structures, supported by suitable administrative support systems.

513. The advice students receive about their study programmes, including through the academic induction process, is clear and transparent. All students are given opportunities to develop skills to make effective use of the specialist facilities and learning resources provided.

514. Therefore, the team concluded that the college meets criterion D1.

Assessment of DAPs criterion E: Evaluation of performance

Criterion E1: Evaluation of performance

Advice to the OfS

515. The assessment team's view, based on specific consideration of the evidence for this criterion alongside other relevant information gathered throughout the assessment process, is that the college meets the requirements for criterion E1: Evaluation of performance because it meets this criterion.

516. The team's view is that the evidence shows in summary that the college takes effective action to assess its own performance through internal and external monitoring and review, respond to identified weaknesses and further develop its strengths.

Criterion E1

E1: An organisation granted degree awarding powers takes effective action to assess its own performance, respond to identified weaknesses and develop further its strengths.

Reasoning

517. To evaluate whether critical self-assessment is integral to the operation of the college's higher education provision, and that action is taken in response to matters raised through internal or external monitoring and review, the assessment team considered evidence including:

- annual review data and analysis at programme and provider level
- student feedback surveys
- minutes of meetings of the AQSC
- the college's draft academic framework
- documents relating to a mock internal programme validation.

518. The team also met with internal stakeholders, including academic and professional services staff and students.

519. As discussed under criteria A1 and B2, the team found that the college has a clear quality framework, which it implements consistently, a committee and governance structure that is consistently implemented according to existing regulations, and a strong intention to engage with student feedback and input.

520. The college's policies and procedures include review panels such as the AQSC, external stakeholders, external examiners and industry reflective strategies, such as that of IMarEST.

521. The college's draft academic framework signposts review points it will continue to implement throughout the programme lifecycle, if awarded DAPs, including:

- assessment boards
- external examiner reports
- feedback from the SEG
- feedback from programme managers.

522. The draft framework also identifies the planned introduction of 'individual programme committees' to the college's existing committee structure, to support internal monitoring and review at programme level. Where currently the small permanent academic team, including programme managers, can engage in more in-depth monitoring and review of programmes via the AQSC, the college anticipates that individual programme committees will be more appropriate as its provision and staff base evolve. This will be supported by the annual programme review process, which will include external input such as that of external examiners.

523. As discussed under criterion A1, the college has been transparent about its difficulties in engaging students in academic governance, and the team identified that the lack of an overarching student engagement strategy or policy was noted in the QAA's initial assessment. However, as set out in paragraph 121, the college has refreshed and developed its approach to student engagement over the last couple of years. This has included, for example, introducing a dedicated 'Student Experience Strategy', rebranding its student committee as the SEG and introducing incentives to encourage student representations and survey feedback. The team found examples of discussion as part of the SEG, AQSC and CAB meetings, which provide evidence that the college is engaging in ongoing reflection of what further developments could be implemented to promote student engagement, and what has worked well.

524. The team was assured that the college acts in response to matters raised by students, through internal monitoring and review processes. For example, student feedback captured via the SPQ for the BSc Sustainable Maritime Operations programme reported difficulties with search requirements on UoP's online library. This issue was identified and discussed as part of the programme review and at an AQSC meeting, where it was reported that further information and support had been shared via the student forum and included in induction emails, and would now also feature in future welcome packs. The team was able to confirm that students are now signposted to self-help and PDF guides, in addition to the internal college technical team and UoP IT Services in the welcome packs.

525. As another example, one of the college's 'You said, we did' infographics highlighted that the college was taking action to review and refresh module content on the TLP. The team found that the college was undertaking a review of lecture content, and in discussion with its Production team about re-recording several lectures as part of an ongoing project.

526. While the college reports that improving student engagement in academic governance remains a priority, the team considered that it was positive to see the progress that has been made, as a result of the college's ongoing assessment of its own performance in this area. For example, student representatives have now been recruited and provide regular feedback through committee meetings or via the Student Experience team, and minutes demonstrate accountable action points.

527. The college should remain focused on improving and embedding its initiatives to increase student engagement, but in the team's view the college has adequately demonstrated strategy implementation, progress and a committed intent to improve this situation.

528. The team identified that the QAA's initial assessment noted limited evidence to demonstrate the college's own internal monitoring and review processes, independent of UoP. As discussed under criterion B2, the team found evidence to demonstrate that the college has engaged in further development of its monitoring and review processes, including testing how these may work in practice. For example, the college used the internal mock validation exercise as an opportunity to trial its draft programme approval, monitoring and review policy and identify any changes needed to the policy or future validation events. The team heard from quality and senior staff at the online visit that the college felt that the process had been demonstrated successfully, with minor lessons learned for future validation events.

529. Furthermore, as discussed in paragraph 235, the team saw evidence of how the college is engaged in regular review of the currency of its programmes, in line with changes in industry. The team was assured that the college responds to matters raised and acts where appropriate, which involves the creation of an action plan, inclusion as part of the annual programme review process and discussion at the relevant committees.

530. This point was also evidenced in the team's review of programme review documentation, such as the programme review plan for the Hydrography suite of programmes. The plan makes note of the falling recruitment numbers and sets out a recommendation to discontinue the programme, in line with the suggestion for a more interdisciplinary approach to the subject. While the team considered that the documentation for the MSc for Marine Professionals (Top-up) suite of programmes demonstrated a more descriptive than analytical approach to the commentary considered at the programme review, it does identify a need to improve satisfaction around 'student community' in the group's survey results. As discussed in paragraph 132, the Student Experience team has since undertaken further research to understand what students are looking for from their student community. The more recent action plan for the Sustainable Maritime Operations suite of programmes contains actions for the programme manager (rather than 'from' as evidenced in the programme review), including a review of the Sustainable Maritime Operations programmes and minor changes, which has recently taken place.

531. The introduction of the IAP was further noted by the team as a positive addition to the college's ability to scrutinise its performance, as well as maintaining the currency of its provision. Although the panel had not yet met at the time of writing the report, the team noted that its terms of reference include a key objective to 'strengthen the accountability and performance of MLA College's Board of Directors and Academic Board through independent advice and challenge' and ensure the college's provision is subject to continuous development and remains relevant to sector-specific developments.

532. The team also examined minutes and undertook observations of committee meetings such as the AQSC, to consider how far the college embeds critical self-assessment in the operation of its committees. In keeping with paragraph67, the team found there was limited evidence of challenge in meeting minutes for the board, in addition to examples of internal 'challenge' in other committees and the CAB. However, the team observed challenge and self-criticality in its observations of the Assessment Committee, SEG, AQSC and CAB. For example, in the

Assessment Committee and IAAB the team found an appropriate level of questioning and diligence given to student outcomes. The team also felt there was an open environment where members could challenge each other (or the decisions being made). Furthermore, in the SEG meeting, a programme manager requested more careful consideration of an issue that had been raised. The team observed how external experience from other higher education providers fed into a response, and there was a request for more clarity on survey release dates to improve engagement.

533. During the AQSC meeting, the team also observed how the committee was reflecting on the DAPs assessment process so far, and considering potential adjustments to support quality assurance. One proposed initiative was the introduction of a tutor handbook, which would be a live document, to include updates on the use of AI. This aligned with other discussion witnessed in the team's observation of the Assessment Committee and IAAB, which referenced an AI sub-group, development of a new policy and consideration of the impacts of AI on both student experience and student support staff. The team considered this pertinent in the current education landscape.

534. The team therefore formed the view that, rather than lacking self-criticality, the college perhaps needs to detail its discussions more fully in meeting minutes, to better represent the challenge and critique that the team witnessed in the observed meetings. This would, in the team's view, represent a more robust account of the discussions and self-criticality taking place through these mechanisms.

535. The team considered that the college demonstrates that it takes action in response to matters raised through monitoring and review undertaken via external examiners. The college's implementation of external examiner processes and examples of changes implemented in response to feedback are detailed in paragraph 346. The team was reassured by the draft academic framework and draft external examiner report templates, that the college will continue to consider and take action in response to matters raised by external examiners, if the college is awarded DAPs.

536. Therefore, on balance, the team found that the college was able to take effective action to assess its own performance, respond to identified weaknesses and develop further its strengths.

537. To investigate whether clear mechanisms exist for assigning and discharging action in relation to the scrutiny and monitoring of the college's academic provision, the team scrutinised the CAB, as its senior academic authority. The team found that minutes of all meetings, including actions, responsible persons and follow up, were well kept and readily available. The team observed a CAB meeting, which it found to be well chaired and attended, with an appropriate level of engagement from the membership, including open discussion on key points of note. Most notably, the student representatives present were specifically engaged by the chair on suggestions to improve general student engagement. Discussion was minuted and actions were noted for follow up where relevant.

538. The team examined other mechanisms for assigning and discharging action in relation to the scrutiny and monitoring of the college's academic provision. This included programme review documentation, external examiner reports, an observation of the Assessment Committee and associated minutes and actions plans found in minutes of meetings of CAB, SEG and the

board. Paragraphs 334 and 335 give further examples including scrutiny of assignment briefs, external examiner agreement and assessment feedback, in addition to evidence from programme handbooks and the TLP.

539. As set out in paragraph 129, the college has developed a draft academic framework and regulations in readiness for Full DAPs, which do not show significant changes to the monitoring processes it is currently adhering to under UoP. The similarity between current and proposed processes gives the team confidence in the ability of the college to implement, monitor and review its own academic provision. For example, the current contractual programme review cycle of five years is set to continue under the college's draft academic framework and 'Programme Validation, Monitoring and Review Policy'. The same documents include reference to the college's annual programme monitoring cycle, which the college is currently operating in practice under UoP and is set to continue under the draft policy should the DAPs application be successful.

540. Based on the team's scrutiny against criteria E1 and B1, it formed the view that the college can conduct its quality monitoring cycle within existing structures. The team found reassurance in the similarity between the current and draft cycles, which strengthened its confidence in the college's mechanisms for assigning and discharging actions related to the scrutiny and monitoring of its academic provision.

541. To determine how far ideas and expertise from within and outside the college are drawn into its programme design, approval, delivery and review arrangements, the team reviewed evidence including:

- the college's governance and management structures
- approval documentation for programmes including the Global Sustainable Development suite of programmes and PGDip Engineering Management
- a sample of programme review plans from Levels 6 and 7 covering each suite of programmes for Hydrography, Sustainable Maritime Operations and MSc for Marine Professionals
- subject and award external examiner reports
- the college's draft academic framework.

542. The team also observed a meeting of the Assessment Committee and IAAB.

543. As discussed in paragraph 67, the team found that the college's governance and committee structure includes appropriate staff and student membership, in addition to external representation where appropriate. For example, the recently established IAP aims to 'serve as a bridge between the college and wider professional, industry and academic communities'. The team recognises the IAP as a positive enhancement of the college's ability to draw external ideas and expertise into its programme design, approval, delivery and review arrangements.

544. Furthermore, the college has demonstrated that it considers and maintains alignment with the strategy of its former owner IMarEST, a key professional body for marine professionals. For

example, the college's aim to provide flexible education and training, particularly for working professionals, aligns with IMarEST's strategic goals to 'promote professionalism and technical leadership' and 'to support the development and sustainability of the marine sector'. Both goals include mention of education, CPD and qualifications. The college's endeavour to provide flexible education and training, often to working professionals, demonstrates a commitment to supporting these goals.

545. Additionally, several of the college staff and senior leadership have been involved with IMarEST and continue to hold professional membership, including the Rector and other members of the senior leadership and teaching team.[28]

546. The assessment team was able to establish evidence of internal expertise being drawn into arrangements for programme design and approval through the validation of the PGDip Engineering Management. For example, the programme manager who led its development has a master's degree in engineering science and a PhD in manufacturing, in addition to previous programme leadership and module development experience, both with the college and with other higher education providers. Furthermore, the programme lead for the Global Sustainable Development suite of programmes has previously won a research grant for, and published, work related to sustainability, in addition to holding a PhD in marine chemistry. The respective validation documentation for these programmes also references input from, and questioning of, programme leads. For example, the panel for the PGDip Engineering Management programme commended the inclusion of mapping against the Engineering Council's higher education programme requirements. This was conducted by the programme team, demonstrating a clear level of internal ideas and expertise in use for programme development.

547. Finally, the college's draft documentation in readiness for DAPs gave the team an understanding of how the college would approach the integration of external and internal ideas and expertise. As set out in paragraph 539, the college will continue with a very similar approach to the one it currently operates under UoP. For example, the policy on programme validation, monitoring and review notes the requirements of an external panel member (including appropriate competence, experience and continuing active involvement in the relevant subject discipline and relevant qualifications). This was demonstrated in practice at the official validation event and subsequent internal mock validation exercise of the PGDip Engineering Management programme. In demonstration of the college's proposed process, the minutes from the mock validation exercise record two external advisers: an academic expert from a university and an industry expert who also had a professorial title.

548. The team therefore concluded that the college draws ideas and expertise from within and outside the organisation into its arrangements for programme design, approval, delivery and review.

Conclusions

549. The assessment team concluded that the college takes effective action to assess its own performance, respond to identified weaknesses and develop further its strengths, because of its well-embedded quality framework. This framework includes cyclical monitoring and review

[28] See MLA, Meet the team.

processes that report to the CAB, as the most senior academic authority. These processes were found to engage external and internal ideas and expertise as well as student input.

550. The team concluded that clear mechanisms exist for assigning and discharging actions related to the scrutiny and monitoring of its academic provision, such as through programme validation and monitoring.

551. The team concluded that the college draws on internal and external ideas and expertise. This includes academic staff representation on appropriate boards and committees, an academic team with a wide range of specialisms and qualifications, external academic representation on programme validation committees, and the use of external examiner scrutiny and feedback, in addition to the board and work in support of IMarEST and other professional bodies.

552. Overall, the team concluded that the college demonstrates its ability to take effective action to assess its own performance, respond to identified weaknesses and further develop its strengths. This conclusion includes the key recommendations, in this respect, from the initial assessment stage of QAA.

553. Therefore, the team concluded that the college meets criterion E1.

Assessment of overarching criterion for the authorisation for DAPs

Full DAPs: A self-critical, cohesive academic community with a proven commitment to the assurance of standards supported by effective quality systems.

Advice to the OfS

554. The assessment team's view, based on consideration of the evidence requirements for the DAPs criteria, the team's visit and observations of boards and committees, alongside other relevant information, is that the college meets the overarching criterion for Full DAPs because it meets all the underpinning criteria.

555. The team's view is that the evidence shows in summary that the college develops and encourages a self-critical and cohesive academic community. It has a clear commitment to the assurance of standards, supported by effective and robust quality systems. The college has developed draft documentation in readiness for DAPs and has demonstrated effective processes for its enactment, based on current regulations and practice.

Reasoning

556. The assessment team found that **self-criticality** is demonstrated through the college's ongoing monitoring and review, as evidenced through the committee structure and processes such as annual programme reviews. The college regularly seeks feedback from students, staff and industry, which it takes action in response to, and it demonstrates a clear commitment and intent to fully embed quality systems to address issues, for example in relation to student engagement.

557. The team found the college to constitute a **cohesive academic community**. During meetings with senior and teaching staff, and observations of committees and boards, the team found consistent messaging and alignment of approach. In its observations the team also witnessed open discussion and debate, such as on AI and student feedback, which were supported by the committee chair. Staff also spoke of the coaching support that new staff receive from more experienced colleagues.

558. The team found a similar approach in meetings with professional and support staff, with a collaborative approach, in particular for student engagement, demonstrated across services. Most notably these separate discussions with academic and professional services staff aligned with their intent and direction, demonstrating a cohesive approach across staff teams, but also corresponded with meetings with senior staff.

559. The college has a **proven commitment to the assurance of standards**, as demonstrated through its transparent and comprehensive academic framework and regulations, in terms of both current practice and those drafted in readiness for DAPs. As these do not vary significantly from each other, and the college has identified minor amendments to better accommodate its context, which it plans to implement gradually, the team has confidence in the college's ability to effectively implement, review and monitor these policies and

processes. However, the team identified that the college should prioritise establishing clear and detailed arrangements for the implementation of its draft regulations, academic frameworks and service agreement with UoP, if awarded DAPs.

560. The team considered that the college is supported by **effective quality systems**, as demonstrated through the team's review of annual programme review processes, the mock programme validation event and the capture and implementation of external examiner feedback.

Conclusions

561. While the assessment team formed the view that some aspects of the college's efforts to enhance student engagement and foster self-criticality are still in the process of being fully embedded, the team considered that, on balance, the college had demonstrated a clear commitment to these goals. The team therefore concluded that, on balance, the college meets the overarching criterion, as the evidence demonstrates that it has a self-critical, cohesive academic community, with a proven commitment to the assurance of standards, as supported by effective quality systems.

Annex A: Abbreviations

Abbreviation	Meaning
AHEP	Accreditation of Higher Education Programmes
AI	artificial intelligence
AQSC	Academic Quality and Standards Committee
CAB	College Academic Board
CEG	College Executive Group
CEO	chief executive officer
CIFAL	International Training Centres for Local Authorities and Local Leaders
COG	College Operational Group
CPD	continuing professional development
DAPs	degree awarding powers
DLE	Digital Learning Environment
DQB	designated quality body
FHEQ	Framework for Higher Education Qualifications
GEDU	Global Education Holdings Limited
HERA	Higher Education and Research Act 2017
HKMD	Hong Kong Marine Department
IAAB	Interim Award Assessment Board
IAP	Independent Advisory Panel
IMarEST	Institute of Marine Engineering, Science and Technology
NSRs	non-standard regulations
NSS	National Student Survey
OfS	Office for Students
OIAHE	Office of the Independent Adjudicator for Higher Education
PEI	professional engineering institution
QAA	Quality Assurance Agency
QAC	(the OfS's) Quality Assessment Committee
RPL	recognition of prior learning
SEG	Student Experience Group
SPQ	student perception questionnaire
TLP	Total Learning Package
UNITAR	United Nations Institute for Training and Research
UoP	University of Plymouth

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