

Institutional audit

University College Birmingham

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Preface

The Quality Assurance Agency for Higher Education's (QAA's) mission is to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education. To this end, QAA carries out Institutional audits of higher education institutions.

In England and Northern Ireland QAA conducts Institutional audits on behalf of the higher education sector, to provide public information about the maintenance of academic standards and the assurance of the quality of learning opportunities provided for students. It also operates under contract to the Higher Education Funding Council for England and the Department for Employment and Learning in Northern Ireland to provide evidence to meet their statutory obligations to assure the quality and standards of academic programmes for which they disburse public funding. The audit method was developed in partnership with the funding councils and the higher education representative bodies, and agreed following consultation with higher education institutions and other interested organisations. The method was endorsed by the then Department for Education and Skills. It was revised in 2006 following recommendations from the Quality Assurance Framework Review Group, a representative group established to review the structures and processes of quality assurance in England and Northern Ireland, and to evaluate the work of QAA.

Institutional audit is an evidence-based process carried out through peer review. It forms part of the Quality Assurance Framework established in 2002 following revisions to the United Kingdom's (UK's) approach to external quality assurance. At the centre of the process is an emphasis on students and their learning.

The aim of the Institutional audit process is to meet the public interest in knowing that universities and colleges of higher education in England and Northern Ireland have effective means of:

- ensuring that the awards and qualifications in higher education are of an academic standard at least consistent with those referred to in *The framework for higher* education qualifications in England, Wales and Northern Ireland and are, where relevant, exercising their powers as degree awarding bodies in a proper manner
- providing learning opportunities of a quality that enables students, whether on taught or research programmes, to achieve those higher education awards and qualifications
- enhancing the quality of their educational provision, particularly by building on information gained through monitoring, internal and external reviews and on feedback from stakeholders.

Institutional audit results in judgements about the institutions being reviewed. Judgements are made about:

- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the academic standards of awards
- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

Audit teams also comment specifically on:

 the institution's arrangements for maintaining appropriate academic standards and the quality of provision of postgraduate research programmes Institutional audit: report

- the institution's approach to developing and implementing institutional strategies for enhancing the quality of its educational provision, both taught and by research
- the reliance that can reasonably be placed on the accuracy and completeness of the information that the institution publishes about the quality of its educational provision and the standards of its awards.

If the audit includes the institution's collaborative provision, the judgements and comments also apply unless the audit team considers that any of its judgements or comments in respect of the collaborative provision differ from those in respect of the institution's 'home' provision. Any such differences will be reflected in the form of words used to express a judgement or comment on the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that the institution publishes, and about the quality of its programmes and the standards of its awards.

Explanatory note on the format for the report and the annex

The reports of quality audits have to be useful to several audiences. The revised Institutional audit process makes a clear distinction between that part of the reporting process aimed at an external audience and that aimed at the institution. There are three elements to the reporting:

- the summary of the findings of the report, including the judgements, is intended for the wider public, especially potential students
- the **report** is an overview of the findings of the audit for both lay and external professional audiences
- a separate **annex** provides the detail and explanations behind the findings of the audit and is intended to be of practical use to the institution.

The report is as concise as is consistent with providing enough detail for it to make sense to an external audience as a stand-alone document. The summary, the report and the annex are published on QAA's website.

Summary

Introduction

A team of auditors from the Quality Assurance Agency for Higher Education (QAA) visited University College Birmingham (the University College) from 24 to 28 January 2011 to carry out an Institutional audit. The purpose of the audit was to provide public information on the quality of the learning opportunities available to students and on the academic standards of the institution's awards.

To arrive at its conclusions the audit team spoke to members of staff throughout the University College and to current students, and read a wide range of documents about the ways in which the University College manages the academic aspects of its provision.

In Institutional audit, the institution's management of both academic standards and the quality of learning opportunities are audited. The term 'academic standards' is used to describe the level of achievement that a student has to reach to gain an award (for example, a degree). It should be at a similar level across the UK. The term 'quality of learning opportunities' is used to describe the support provided by an institution to enable students to achieve the awards. It is about the provision of appropriate teaching, support and assessment for the students.

Outcomes of the Institutional audit

As a result of its investigations, the audit team's view of University College Birmingham is that:

- confidence can reasonably be placed in the soundness of the institution's present and likely future management of the academic standards of its own awards and those it delivers on behalf of the University of Birmingham
- confidence can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

As the University College will be subject to a separate audit of its collaborative provision these judgements do not apply to that provision.

Institutional approach to quality enhancement

The University College is committed to enhancing the learning opportunities of its students. However, in that its approach to quality enhancement is currently somewhat reactive, it has a little way to go before it can be said to have a strategic approach designed to ensure the enhancement of the quality of its provision.

Published information

Reliance can reasonably be placed on the accuracy and completeness of the information that the University College publishes about its educational provision and the standards of its own awards and those it delivers on behalf of the University of Birmingham.

Features of good practice

The audit team identified the following areas as being good practice:

• the opportunities, support and information provided for students to make the transition to higher education successfully and to progress to a range of awards.

Recommendations for action

The audit team recommends that the University College consider further action in some areas.

The team advises the University College to:

 ensure that its quality and standards procedures as a whole, with particular but not exclusive reference to the monitoring of collaborative provision and the role of the core external examiner, are consistently and fully documented in a readily accessible form.

It would be desirable for the University College to:

- extend the opportunities that currently exist for student access to external examiners' reports
- strengthen the external academic and professional contribution to periodic review throughout the procedure
- review the efficiency and effectiveness of the relationship between programme evaluation, internal audit, periodic review and revalidation.

Reference points

To provide further evidence to support its findings, the audit team investigated the use made by the University College of the Academic Infrastructure, which provides a means of describing academic standards in UK higher education. It allows for diversity and innovation within academic programmes offered by higher education. QAA worked with the higher education sector to establish the various parts of the Academic Infrastructure, which are:

- the Code of practice for the assurance of academic quality and standards in higher education
- the frameworks for higher education qualifications in England, Wales and Northern Ireland, and in Scotland
- subject benchmark statements
- programme specifications.

The audit found that the University College engages actively with the Academic Infrastructure.

Report

- An institutional audit of University College Birmingham (the University College) was undertaken in the week commencing 24 January 2011. The purpose of the audit was to provide public information on the University College's management of the academic standards of its own awards and those it delivers on behalf of the University of Birmingham, and of the quality of the learning opportunities available to students.
- The audit team comprised Dr Keith Elliott, Mr Kevin Mattinson, the Reverend Professor Kenneth Newport and Professor Paul Periton, auditors, and Miss Gillian Hooper, audit secretary. The audit was coordinated for QAA by Professor Robert Harris, Assistant Director, Reviews Group.

Section 1: Introduction and background

- University College Birmingham (the University College) is a teaching and learning-led institution with a strong commitment to vocational skills teaching and widening participation. Its 4,000 full-time higher education students constitute over 60 per cent of its population; its pedagogy emphasises the hospitality, tourism and service sectors; its strong links with industry are reflected in the extensive use of placements. An accredited college of the University of Birmingham (the University), the University College has, since its previous Institutional audit, been granted taught degree awarding powers (which it exercises only selectively) and permission to take its current title; it has also invested heavily in estate and facilities expansion and development. The present audit found that the five features of good practice previously identified have been sustained and the four recommendations conscientiously addressed, albeit that one reappears in modified form in this report (see paragraphs 7 and 34).
- The Principal is supported strategically by a small Executive Management Team and a broader-based Senior Management Team, and operationally by an Academic Management Team. Academic Board, the senior decision-making body, discharges its responsibilities mainly through subordinate bodies. Of particular relevance to this audit are the Curriculum and Quality Committee, which oversees the development and implementation of institutional quality systems, and the Validation and Approvals Committee, which approves new and revised programmes and modules. The responsibilities of both committees are clear and well established; both have student representation.
- The main vehicles for assuring and maintaining academic quality and standards are: programme and module approval; annual monitoring (comprising module review, programme evaluation, school review and institutional review); internal audit (currently triennial); periodic review; and revalidation. The framework for managing academic standards and the quality of learning opportunities is centrally directed but augmented by significant programme-level activity; though operationally significant, not all such activity is articulated in the institutional framework.

Section 2: Institutional management of academic standards

External examiners are appointed to programmes or groups of programmes: they are seen as critical friends as well as central to maintaining academic standards. Key aspects of appointment, induction, training, attendance and reporting are harmonised with those of the University, though the University College also encourages external examiners to participate in an annual February meeting with programme teams, students and fellow examiners. These meetings are widely appreciated. Detailed and elaborate

procedures exist for reading and responding to external examiners' reports; while effective, scope may exist for these procedures to be streamlined.

- Following a previous audit recommendation (see paragraph 3), the University College has designated one external examiner 'core external examiner' to verify standards and resolve differences which might arise when a module is overseen by different external examiners. It proved impossible to find detailed documentary reference to the important role played by this examiner. It is advisable that the University College ensure that its quality and standards procedures as a whole, with particular but not exclusive reference to the monitoring of collaborative provision and the role of the core external examiner, are consistently and fully documented in a readily accessible form.
- In a move with the potential to enhance learning opportunities, the University College has stated its intention to post external examiners' reports in full, alongside the institutional responses, on the staff (but not student) intranet area. Current arrangements for making full reports available to students, while they exist, do not ensure the ready availability of such reports. It is desirable that the University College extend the opportunities that currently exist for student access to external examiners' reports.
- 9 The external examiner system meets the expectations of the *Code of practice*, *Section 4: External examining* and current procedures contribute effectively to the institutional oversight of the standards of awards and the quality of learning opportunities.
- Responsibility for approving new or amended modules and programmes lies with the Validation and Approvals Committee. Industrial input at preparation stage is mandatory and is properly provided; external academic input, though optional at this stage, is provided by an external academic member at the programme approval event. The audit found that approval procedures are appropriately designed and properly followed.
- Annual monitoring takes place at module, programme, school and institutional levels. At module level, in a process which may lead to minor revisions or significant changes, a detailed module review form is submitted to the Validation and Approvals Committee. Annual programme evaluation, coordinated by assistant deans, results in an enhancement plan: this rather new process has been well received by members of the academic staff, who consider it an advance on its predecessor. The audit found, however, that the associated documentation is not easy to find electronically (see also paragraph 17). Programme evaluations feed into annual school reviews; these involve an overview report, submitted to senior management and culminating in an enhancement plan. Finally institutional review involves a self-evaluation report, compiled by the Executive Management Team; based on school reviews and other evidence, it is submitted to the Corporation following internal debate, relevant data being incorporated into an evaluative and reflective performance measures and targets document.
- Periodic review, which takes place quinquennially, is developmental in nature and involves the programme team producing an evaluation of the relevance, currency and quality of learning opportunities. While it is confirmed that the process meets the expectations of the *Code of practice* in respect of external involvement, this involvement is restricted to commenting on final-stage documentation; in particular, the external expert neither sees original documentation, such as external examiners' reports, nor meets students. The audit found that a system based on supplementing a well-established senior internal committee with an external expert cannot be relied upon to provide in-depth discipline-level debate. It is desirable that the University College strengthen the external academic and professional contribution to periodic review throughout the procedure.

- Periodic reviews may lead to revalidation, an event for which the procedures mirror those for programme approval. While revalidation can occur at the periodic review meeting, there is normally a delay, sometimes of several months, while the programme team responds to the outcomes of review.
- In addition to monitoring and review, a procedure of triennial internal audits continues to exist, based on the QAA's former subject review methodology. While no such audits in respect of higher education provision have taken place since 2007, when they were officially suspended, at the time of the audit consideration was being given to the introduction of a modified annual scheme.
- Overall the audit found the institutional culture driven predominantly by a concern to deliver an at times elaborate system of quality assurance. While confidence in the working of the processes and in the University College's ability to meet all necessary requirements is justified, the audit found that institutional systems could with benefit be streamlined to make strategic development and the implementation of practice more responsive and proactive. Accordingly, while programme approval, monitoring and review are thorough and generally effective, the process as a whole is not optimally efficient. It is desirable that the University College review the efficiency and effectiveness of the relationship between programme evaluation, internal audit, periodic review and revalidation.
- The Academic Infrastructure is fully embedded within institutional processes and procedures. A number of programmes are subject to formal accreditation or recognition by professional bodies, and the University College engages actively and on a continuing basis with employers and sector skills bodies through school-level industrial liaison committees and employer reference groups. It is confirmed that the University College engages actively with the Academic Infrastructure and other appropriate external reference points.
- Academic Regulations were revised in 2009. They are clearly communicated and operationalised in two documents: Assessment Procedures and Assessment Protocols. The former aims mainly to advise programme teams on the setting and marking of assessment; the latter, as operational expressions and amplifications of the Regulations, aims to ensure the consistent treatment of students across the institution. Since the Protocols in particular appear on the institutional website, both as a free-standing document and as part of the Academic Regulations, Part 3, problems of version control inevitably arise. The wisdom of having both two overlapping documents and two versions of the Protocols themselves is therefore questionable. In addition, while the Regulations, Assessment Procedures and Assessment Protocols are all available electronically, the search facilities on the institutional website and the staff documents intranet page make it very hard to find them (see also paragraph 11). The University College may find it helpful to review its electronic indexing and search procedures to achieve greater accessibility.
- Both staff and students were enthusiastic about an online assessment tracking system, which, among other benefits, permits turnaround time to be monitored. This system shows that timely returns have been made in 82 per cent of cases, a figure which understates the true position, as the remaining 18 per cent predominantly constitutes marks which have been directly communicated. The University College will doubtless wish to ensure that future returns avoid this ambiguity. Overall, the audit found students aware of all main aspects of assessment policies and procedures and satisfied with the means by which information about them is communicated.
- The University College uses a commercial database for all management information: it believes this system, developed since the previous audit, has extended the range and improved the quality of the data captured. The audit confirms that this is so, but

found that not all the analysis to which data are subject was of the quality of the best. This variability inevitably impacts on utility (see also paragraphs 28 and 30).

Overall, confidence can reasonably be placed in the soundness of the University College's current and likely future management of the academic standards of its own awards and those it delivers on behalf of the University.

Section 3: Institutional management of learning opportunities

- The University College's commitment to ensuring that the student voice is heard is effectively communicated to staff and students. For students the process begins with a 'first impressions' survey and continues with module and programme questionnaires, the results of which feature centrally in all aspects of the monitoring and review processes (see paragraphs 11-14) and contribute to a global meta-report on questionnaire responses generally. Students, including placement students, are encouraged to participate in the National Student Survey, the results of which are carefully analysed and evaluated. The University College makes constructive use of national surveys and is effective in informing itself of, and responding to, students' views.
- Students are represented on all appropriate institutional-level committees; course representatives on subject boards and other relevant bodies are trained and supported by the Guild of Students. 'Student perceptions' is a standing item on the agenda of the Higher Education Board of Studies, where it is debated and addressed appropriately; student attendance is, however, frequently poor. Overall, the University College takes seriously its commitment to involving students in quality management.
- The University College promotes curriculum-relevant interdisciplinary research and scholarship. It sees staff research and scholarly activity as important contributors to staff effectiveness, student learning and programme development and has recently established a Research Development Group to oversee them. The audit found the responsibilities of the group to be clear and appropriate.
- The University College delivers no programmes entirely online, but makes increasing use of e-learning technologies. These include the virtual learning environment, on which modules are required to have a basic presence; to this end training and guidance are provided and satisfactory management arrangements are in place. The University College anticipates extending its future use of flexible and distributed learning, to which it is taking a planned and targeted approach. The audit found current arrangements satisfactory.
- The University College takes a strategic and centralised approach to information technology and learning resources; a dedicated department is responsible for the former and decisions about the latter are taken at senior level. Considerable investment has been made since the last audit in increasing and upgrading learning resources, and the post of Director of Learning Services has been created to inform strategic decision-making. Students, though critical of the quality of some resources in sport (an issue of which the institution is aware), expressed particular satisfaction with the increased availability and off-campus accessibility of electronic resources. The University College has enhanced its learning resources and has mechanisms which enable it to identify critical difficulties and apply remedial action.
- It is a priority of the institutional Admissions Policy, which permits entry at levels beginning at craft level and gives parity of treatment to vocational and academic qualifications, to ensure that all those with the ability to succeed have the opportunity to enter higher education. This priority is consonant with institutional culture and effectively supported by staff development; the skill and professionalism with which the University

College supports further education students' transition to higher education were particularly noted. The opportunities, support and information provided for students to make the transition to higher education successfully and to progress to a range of awards are a feature of good practice.

- It follows that student support is central to the institutional mission, and survey evidence confirms that students perceive the University College as a wholly supportive institution. Central academic support, particularly for those with specific learning needs, is provided through the Learning and Skills Development Centre, and the student written submission's statement that the Centre is well resourced and valued was confirmed in the course of the audit. Support and assistance for those whose first language is not English are well regarded and fit for purpose; in particular, changes to the tutorial system have recently been made with the aim of improving retention rates. Overall, institutional arrangements for student admission and support effectively assure and maintain the quality of learning opportunities.
- The Professional Development Committee's responsibilities for staff development involve overseeing developmental activities to ensure the effective implementation of relevant institutional priorities and policies. Documentary sources scrutinised in the course of the audit indicated that the information available to this Committee focuses more on the collation of data on matters such as staff development participation rates than on impact evaluation (see also paragraphs 19 and 30); it would be beneficial were this imbalance to be corrected. The appraisal scheme emphasises staff development, including research and scholarly activity and enhancing staff members' current and likely future responsibilities. Arrangements for new staff include a compulsory induction programme, an effective mentoring scheme and a requirement (with specified exceptions) to take an accredited teaching programme; this requirement is well understood and factored into workloads. These arrangements are fit for purpose and serve the needs of both staff and students.
- The audit found that confidence can reasonably be placed in the soundness of the University College's current and likely future management of students' learning opportunities.

Section 4: Institutional approach to quality enhancement

- The University College regards enhancing the quality of student learning opportunities as underpinning the institutional mission, and cites numerous examples of enhancement-relevant activities. These are discussed and encouraged at all institutional levels (albeit that programme-level meetings are not minuted), including the developmental February meetings with external examiners (see paragraph 6), which are also not minuted. The audit found that institutional management systems facilitate rapid responses to opportunities as they arise, and that taking a team-based approach to teaching facilitates the sharing of good practice. This is done both through mutually beneficial interactions between experienced and newer staff and through an in-house publication which encourages staff to evaluate and share the impact of their work. Enhancement also features strongly in all levels of review activity. Data gathering is a well-developed part of this process, though the subsequent processes of data analysis and translation into policy enhancement were found to be rather less consistent across the institution (see also paragraphs 19 and 28).
- On the one hand, therefore, the University College has a collegial ethos, an environment highly responsive to ideas and innovation, and systems which facilitate timely enhancement and have the confidence of staff members. On the other hand, while not wishing to overstate this point or to deny the existence of institutional-level initiatives, the audit found that the approach taken is not only supportive of good ideas but sometimes a

little dependent on them. Accordingly, it would not be inaccurate to describe the University College as having a quality assurance orientation augmented by strong support for staff members' developmental initiatives rather than a fully developed institutional-level strategic approach to enhancing learning opportunities. Alongside this description, however, the University College's approach to facilitating such initiatives, which reflects its collegial and supportive culture, has proved beneficial to student learning.

The University College is committed to enhancing the learning opportunities of its students; however, in that its approach to quality enhancement is currently somewhat reactive, it has a little way to go before it can be said to have a strategic approach designed to ensure the enhancement of the quality of its provision.

Section 5: Collaborative arrangements

- The University College defines collaborative provision as any educational activity of which part or all is the responsibility of another party acting under contract or agreement. It offers three modes of partnership falling within this definition. Firstly, progression agreements: these are comprehensive in scope, pave the way for students to progress appropriately, and are diligently approved and reviewed at institutional level. Secondly, programmes block-taught overseas by University College staff: here student surveys and monitoring reports submitted after teaching blocks indicate high levels of student satisfaction, and external examiners confirm the satisfactory nature of both student performance and institutional actions to secure standards. Students lack representation rights on programme committees, but programme coordinators are responsible for drawing students' views to the attention of appropriate individuals and deliberative bodies. This arrangement appears to operate satisfactorily.
- Thirdly, a Foundation Degree is offered under licence at a local further education college. This is monitored by means of a quality assessment report deriving from a biannual quality visit to the partner institution. While successive quality assessment reports were found to be thorough and informative and to receive proper consideration, it was not clear that this monitoring approach follows published procedures, since it appears only in a specific Guidelines document and not in the Collaborative Handbook. Given both the higher level of risk involved with collaborative provision and the fact that a similar omission was found to exist in a different context (see paragraph 7), it is advisable that the University College ensure that its quality and standards procedures as a whole, with particular but not exclusive reference to the monitoring of collaborative provision and the role of the core external examiner, are consistently and fully documented in a readily accessible form.
- All management arrangements for collaborative provision are specified in a Collaborative Handbook; in essence they are those applicable to on-campus provision, with scope for modest variations (for example in respect of capturing student feedback) and supplemented as appropriate in areas such as due diligence, collaborative contracts and certificates and transcripts. The audit found all these arrangements to be appropriate and generally carefully followed.
- Assessment and external examining also follow standard procedures, with the external examiner for the franchised Foundation Degree examining the parallel on-campus programme in an approach which ensures consistency across the piece. The audit found that the levels of student achievement in collaborative provision are comparable to those attained on the parallel on-campus programme, and that the University College takes proper steps to assure itself of the appropriateness of the academic standard of the franchised programme.

37 The University College has devised and implemented sound procedures for the management of its limited collaborative arrangements; it should, however, incorporate all these procedures into its documentation.

Section 6: Institutional arrangements for postgraduate research students

The University College has no postgraduate research students.

Section 7: Published information

- The University College provides a wide range of information for prospective and current students in printed form, on its website and on memory sticks. It produces separate prospectuses for undergraduate, postgraduate and part-time programmes; its student charter provides useful information for prospective and current students, and the student handbook provides more detailed information on academic and non-academic matters.
- All published information is overseen and coordinated by the Marketing Department. Information concerning programmes, learning resources and services is produced by the relevant school or department, with copy carefully checked for accuracy: here the implementation of a new student record system has ensured a secure academic database for student and programme records. In respect of partner institutions the University College retains full rights over all relevant publications, which are checked and require formal authorisation. The audit found that the University College's confidence in the robustness of this process is justified.
- The student written submission described prospectus information as well presented, clear and current; this view was reinforced orally in the course of the audit. The audit found all such information, whether presented in printed or electronic form, to be accurate, relevant and current.
- It is confirmed that the externally available information required by the Higher Education Funding Council for England guidelines is published on the University College's website, and that the teaching quality information on the Unistats website appears accurate and complete. The audit team is aware that, through no fault of the University College, certain inaccuracies exist in matters which include the allocation of student numbers to subject categories and student:staff ratios.
- Reliance can reasonably be placed on the accuracy and completeness of the information that the University College publishes about its educational provision and the standards of its own awards and those it delivers on behalf of the University of Birmingham.

Section 8: Features of good practice and recommendations

Features of good practice

- The audit team identified the following areas as being good practice:
- the opportunities, support and information provided for students to make the transition to higher education successfully and to progress to a range of awards (paragraph 26).

Recommendations for action

- 45 Recommendations for action that is advisable:
- ensure that its quality and standards procedures as a whole, with particular but not exclusive reference to the monitoring of collaborative provision and the role of the core external examiner, are consistently and fully documented in a readily accessible form (paragraphs 7, 34).
- 46 Recommendations for action that is desirable:
- extend the opportunities that currently exist for student access to external examiners' reports (paragraph 8)
- strengthen the external academic and professional contribution to periodic review throughout the procedure (paragraph 12)
- review the efficiency and effectiveness of the relationship between programme evaluation, internal audit, periodic review and revalidation (paragraph 15).

Appendix

University College Birmingham's response to the Institutional audit report

University College Birmingham (UCB) welcomes the judgements of confidence in the soundness of our management of academic standards and the quality of learning opportunities. We note that the audit team recognised how effectively UCB supports the transition into higher education of students and their consequent success in gaining awards and employment. This reflects a significant investment in both staff skills and the physical resources available to students, together with a deep institutional understanding of craft qualifications and the way that these prepare students for undergraduate study. The audit team also recognised how this has led to a very satisfied student body and excellent links with industry and employers. As a smaller institution with a mission of vocational education and a commitment to placing the student at the centre of all that we do, UCB is quite different to the large institutions from which the auditors were drawn and sections of this report clearly reflect that fact. We will address those observations in the report that have a capacity to further add to the student experience.

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The Quality Assurance Agency for Higher Education Southgate House Southgate Street Gloucester GL1 1UB

Tel 01452 557000 Fax 01452 557070 Email comms@qaa.ac.uk Web www.qaa.ac.uk