Degree awarding powers (DAPs) assessment report for College of Legal Practice Limited

New degree awarding powers end assessment

Contents

Executive summary

Type of assessment	Quality and standards assessment for new degree awarding powers end assessment
For	College of Legal Practice Limited

1. This report represents the conclusions of an assessment for degree awarding powers (DAPs) at College of Legal Practice Limited ('the college').

2. The college currently holds new degree awarding powers (New DAPs) and is seeking authorisation for time-limited Full DAPs for all taught awards for specific subject of Law, following the end of its New DAPs probationary period. This assessment is referred to as the 'New DAPs end assessment'.

3. 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.

4. The team concluded that the college has not 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 advice against the DAPs criteria

Underpinning DAPs criteria	Summary
Criterion A1: Academic governance	Met
Criterion B1: Regulatory frameworks	Met
Criterion B2: Academic standards	Met
Criterion B3: Quality of the academic experience	Not met
Criterion C1: Scholarship and the pedagogical effectiveness of staff	Not met
Criterion D1: Environment for supporting students	Met
Criterion E1: Evaluation of performance	Met
Overarching Full DAPs criterion	
The provider is a self-critical, cohesive academic community with a proven commitment to the assurance of standards supported by effective quality systems	Not met

New degree awarding powers end assessment

The Office for Students (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 has been delivering higher education for less than three years does not have a sufficient track record to apply for a full degree awarding powers (Full DAPs) authorisation. It can instead apply for a new degree awarding powers (New DAPs) authorisation.[1]

A provider that has been authorised with New DAPs will enter a probationary period from the date on which the New DAPs order takes effect and will normally be eligible to seek time-limited Full DAPs at the end of the probationary period.

Providers may seek time-limited full DAPs authorisation on a subject-specific basis or covering all subjects. A provider that has held Full DAPs for three years or more is normally eligible to apply to seek 'indefinite' DAPs, with no time limit.

Assessment and decision making process

Before deciding whether to authorise a provider that holds New DAPs with time-limited Full DAPs, the OfS will undertake a New DAPs end assessment. The purpose of a New DAPs end assessment is to gather evidence to inform a judgement about whether a provider meets the DAPs criteria and has the ability to:

- 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.[2]

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.[3]

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

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

[2] See OfS, Regulatory framework: Annex C: Guidance on the criteria for the authorisation for DAPs.

[3] See Higher Education and Research Act 2017, section 46.

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.[4]

Further information

We have published further information about providers seeking New DAPs and Full DAPs in Regulatory advice 12.[5]

5. College of Legal Practice Limited is an accredited postgraduate law school that has been in operation since 2018. The college is a wholly owned subsidiary of the College of Law Ltd (COL), a not-for-profit provider of higher education in Australia, and delivers online legal training and postgraduate programmes.

6. The college was awarded taught New DAPs by the OfS on 14 December 2021, for a period of three years and three months. The New DAPs order authorised the college to grant specified taught awards, for a probationary period beginning on 1 February 2022 and expiring on 30 April 2025.

7. Prior to being awarded New DAPs, the college delivered a Developing Legal Professionals postgraduate programme for pre-qualification trainee solicitors or paralegals.

8. In accordance with the OfS's regulatory framework and operational guidance on the assessment of DAPs,[6] the college is eligible to be considered for Full DAPs for all taught awards (up to and including Level 7), because it has reached the end of its New DAPs probationary period and meets the eligibility criteria for Full DAPs set out in paragraph 249 of the OfS's regulatory framework.

9. The OfS appointed an assessment team on 5 June 2024 which consisted of three academic expert assessors and a member of OfS staff. The team was asked to give its advice about the quality of, and standards applied to, higher education courses at the college and whether the college has met the DAPs criteria through the implementation of its New DAPs plan during the probationary period.

10. The assessment team considered a range of information submitted by the college in support of its request for time-limited Full DAPs, alongside evidence collected during monitoring activities throughout the college's probationary period. 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.

11. This report will be considered by the OfS's Quality Assessment Committee at its meeting of 22 January 2025. QAC will formulate its advice to the OfS regarding quality and standards at the college, having considered this report.

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[4] See Higher Education and Research Act 2017, section 2.

[5] See OfS, Regulatory advice 12: How to apply for degree awarding powers.

[6] See OfS, Operational guidance for providers on DAPs assessment.

12. The OfS will consider this assessment report, and QAC's advice in deciding whether to grant the college's Full DAPs authorisation 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

13. This report represents the conclusions of DAPs assessment for the College of Legal Practice Limited. The college currently holds New DAPs and is seeking authorisation for time-limited Full DAPs for all taught awards for specific subject of law, following the end of its New DAPs probationary period. This assessment is referred to as the 'New DAPs end assessment'.

14. The OfS's Quality Assessment Committee will consider the report and formulate its advice to the OfS regarding the quality and standards at the college.

15. The OfS will have regard to the assessment report, and QAC's advice when deciding whether to grant the college's Full DAPs authorisation on the basis requested. The OfS will also consider its own risk assessment for the college and will have regard to advice received from others where this has been sought, as well as other relevant considerations such as the OfS's general duties under section 2 of HERA.

Context

16. The college is an accredited postgraduate law school based in the UK that has been in operation since 2018. The college is a wholly owned subsidiary of the College of Law Ltd, a not-for-profit provider of higher education in Australia. The college delivers online legal training and postgraduate programmes. Its entry into the higher education sector in the UK was partly in response to changes introduced by the Solicitors Regulation Authority to the qualification routes for solicitors in England and Wales that require a common examination that all prospective solicitors must take before qualifying.

17. The college was awarded taught New DAPs (up to and including Level 7) by the OfS on 14 December 2021, for a period of three years and three months. The New DAPs order authorised the college to grant the following specified taught awards, and associated intermediate exit awards, for a probationary period beginning on 1 February 2022 and expiring on 30 April 2025:

    • Master of Law (MA) in Legal Practice (LLM Legal Practice)

    • Master of Science (MSc) in Legal Practice

    • Master of Business Administration (MBA) in Legal Practice

    • Postgraduate Certificate in Legal Practice

    • Postgraduate Diploma in Legal Practice.

18. Prior to being awarded New DAPs, the college delivered standalone modules, as part of its Developing Legal Professionals postgraduate programme for pre-qualification trainee solicitors or paralegals. Delivery of the first module of this programme, Solicitors Legal Knowledge, commenced in August 2021.

19. The college's first cohort of students under its New DAPs authorisation commenced the Master of Law in Legal Practice programme in February 2022.

20. In the first year of its probationary period, the college took the decision not to continue with the development of its Master of Science (MSc) in Legal Practice and Master of Business Administration (MBA) in Legal Practice programmes, as it considered there to be little demand in the current market for these qualifications. In the second year of its probationary period, the college developed and approved a credit-bearing only programme, the Graduate Foundation in Law (GFL). The college modified this programme further into a Graduate Diploma in Law (GDL) that commenced in 2024.

21. The college operates fully online, without a physical campus. The nature of the college's model of higher education means that it does not follow a traditional academic calendar. The college has several cohort intakes each year and offers different full-time and part-time modes of delivery.

22. Based on the latest available OfS 'Size and shape of provision data dashboard',[7] the college had a total student population in 2022-23 of 470, which comprised 30 full-time students, 370 part-time students, and 70 students studying wholly outside the UK. During the online visit to the college in September 2024, the college reported that its current enrolment figures were 516, including 71 students studying outside the UK.

23. The college employs five academic staff members, based on the latest available Higher Education Statistics Agency (HESA) staff data for 2022-23.[8] The college's academic staffing profile is compiled of employed members of academic staff and contracted adjunct staff. The college's adjunct staff are normally legal professionals who are contracted on a temporary and fractional basis by the college to form the role of 'supervisors' to students during their studies. All students are assigned a supervisor for each module they undertake. The college uses this model to allow itself to 'scale teaching resources based on fluctuating module enrolments'. In August 2024 the college reported that it currently employs six academic staff members and engages 40 adjunct supervisors.

24. The college noted that internally it does not define its adjunct 'supervisors' as staff. However, for the purposes of this report and assessing against the DAPs criteria, adjunct staff are included in the assessment. For example, the wording of criterion C1 sets out: 'everyone involved in teaching or supporting student learning [...] is appropriately qualified, supported and developed.'

25. The OfS's operational guidance on the assessment of DAPs sets out information regarding the monitoring of providers with New DAPs and the assessment process at the end of the probationary period. This guidance sets out that a typical monitoring schedule period would see a provider undergo monitoring throughout its probationary period, with a view to commencing assessment for Full DAPs towards the end of the period. To supplement this, the timelines and process of the New DAPs end assessment follow the timescales and processes detailed in the OfS's regulatory framework and operational guidance on the variation of DAPs.[9]

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

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

[8] Available at HESA, HE staff data.

[9] See OfS, Variation and revocation of DAPs: Operational guidance on assessment by the OfS.

decided that a New DAPs end assessment, including a provider visit, should be undertaken. The purpose of the New DAPs assessment is to gather evidence to inform a judgement about whether a provider meets the DAPs criteria and has the ability to:

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

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

27. The OfS appointed an assessment team on 5 June 2024, which consisted of three academic expert assessors and a member of OfS staff in the following roles:

- Dr Ben Warwick – committee chair and lead assessor

- Professor Susan Prince – deputy committee chair and assessor

- Mr John Koo – deputy committee chair and assessor

- Mrs Izzy Navarrete – committee member and assessment coordinator.

28. The OfS asked the team to give its advice about the quality of, and standards applied to, higher education courses at the college and whether the college has met the DAPs criteria through the implementation of its New DAPs plan during the probationary period.

29. The assessment team considered a range of information submitted by the college in support of its request for time-limited Full DAPs, alongside evidence collected during monitoring activities throughout the college's probationary period.

Assessment process

Information gathering

30. In accordance with the operational guidance on assessment for degree awarding powers outlined in Annex D of the OfS's guidance on how to apply for DAPs, the college submitted a self-assessment document on 15 July 2024, setting out how it considered it met the DAPs criteria through the implementation of its New DAPs plan during the probationary period.

31. To support the statements made in the self-assessment document, on 15 July 2024 the college submitted a range of documentary evidence. This included programme and assessment documentation, as well as information relating to academic policies, processes and governance structures. The team was also granted access to the college's virtual learning environment (VLE), 'Canvas'.

32. Following the team's assessment of the college's evidence submission and evidence submitted during the probationary period, the team requested further information and evidence from the college. The college submitted a response to this request with further evidence provided on 30 August 2024.

33. The team undertook a two-day online visit to the college on 26 and 27 September 2024. During the visit the team met with a range of the college's staff and students, observed a teaching session and received a demonstration of the college's online systems and VLE.

34. Following the visit the team requested additional information and evidence from the college. The college submitted a response to this request, with further evidence provided on 4 October 2024.

New DAPs probationary period monitoring activities

35. In accordance with the operational guidance on assessment for degree awarding powers outlined in Annex D of the OfS's guidance on how to apply for DAPs, the team's assessment included a review of previous monitoring activities undertaken, throughout the college's New DAPs probationary period.

36. The monitoring activities and associated evidence that the assessment team considered during the probationary period included:

    - the college's New DAPs plan, and changes to it during the probationary period

    - seven self-assessment reports and associated documentary evidence submitted by the college

    - five monitoring reports completed by the Quality Assurance Agency for Higher Education (QAA) in its former role as designated quality body in England

    - one monitoring report completed by an OfS appointed assessment team.

37. From 1 February 2022 to 31 March 2023, the college underwent probationary monitoring activities by the QAA. The QAA undertook 11 observations, which included observations of the Board of Directors meeting, the Quality Standards Working Group and a Progression Awards

Panel. The QAA also undertook two online visits to the college, on 4 to 5 May 2022 and 13 to 14 December 2022.

38. Since 1 April 2023 the college's probationary period monitoring has been undertaken by the OfS. During this period the college submitted three self-assessment reports to the OfS and underwent one monitoring assessment by an OfS-appointed assessment team between January and June 2024.

39. The assessment team used evidence collected during the probationary period, as well as evidence submitted by the college to support the New DAPs end assessment.

Assessment of DAPs criterion A: Academic governance

Criterion A1: Academic governance

Advice to the OfS

40. The assessment team's view is that the college meets criterion A1: Academic governance because it meets the subcriteria A1.1, A1.2 and A1.3, although the team has identified concerns relating to A1.2 (academic governance in partnership with students).

41. The assessment team's view is based on its review of evidence which shows in summary that the college has sound academic governance and management structures. The evidence demonstrated that the college has clear and appropriate lines of accountability for its academic responsibilities, despite some weaknesses in the depth of its academic leadership. The evidence also shows that the college has robust and effective governance of partnership arrangements.

42. On balance, the evidence shows that academic governance is conducted in partnership with its students. However, the team considered there to be weaknesses in the effectiveness of student engagement in academic governance, and noted that this has been an ongoing deficiency of the college that impacts on its ability to demonstrate its effective academic governance.

43. This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

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 is that the college meets subcriterion A1.1 because overall it has effective academic governance with clear and appropriate lines of accountability for its academic responsibilities.

45. The assessments team's view is based on its review of evidence which shows that the college has met the evidence requirements for A1.1, although the team identified some weakness in the depth and strength of the college's academic leadership.

Reasoning

46. To assess the college's academic governance arrangements, the team reviewed the current governance structures in place and how the college has evolved its approach during the probationary period. The team reviewed a range of the college's academic governance documentation, including the terms of reference and minutes for the following committees:

- the Audit Risk and Compliance Committee

- the Board

- the Programme Committee

- the Partnership and External Stakeholders Group

- the Staff-Student Liaison Committee

- the Curriculum Development and Delivery Group.

47. The team also discussed issues relating to academic governance during the online visit to the college.

48. In summary, the team found that this evidence shows that the college's governance structure consisted of a Board, which is the senior authority and top level of the college's academic and corporate governance, with Audit, Risk and Compliance, Programme, and Nominations Committees sitting beneath that Board. The Programme Committee, which acts as the senior academic authority, is supported by a range of committees and advisory groups including those relating to partnerships, curriculum development, and staff-student liaison.

49. The college itself is a wholly owned subsidiary of the College of Law Limited, an established Australian company providing legal education.

50. The college's higher education purpose, mission and vision are published on its website and express an intention to 'develop excellent legal professionals through personalised, flexible learning'.[10] The college's strategy is set by its Board and communicates the strategic direction through the college's Strategic Plan. The team found that the college's current strategic plan reflects its higher education purpose, mission and vision. For example, the college's Strategic Objectives for 2024 to 2027 specify that the aim of the college is to 'develop an inclusive, supportive and evolving student experience, that enhances pass rates for professional exams and increases opportunities to access the profession.'

51. The assessment team found that throughout its governance arrangements, the college understood its higher education mission and strategic direction and that associated policies are coherent, published, understood and applied consistently. For example, the team found that there is a clear and coherent strategic alignment of policy and action throughout the organisation, as demonstrated by the Board's planning conference papers, which set out the college's view of future developments in the legal education market and how the college can respond to them. The team also observed how the college's strategy was discussed among its staff coherently and consistently during the online visit to the college.

52. The team found that these strategic insights are applied coherently throughout the college and are particularly evident through its associated strategic documents and policies. For example, the college's approach to teaching and learning is set out in the Teaching and Learning Strategy and Learning and Teaching Principles and these reflect the college's commitment to developing legal professionals. For example, it sets out the principles that the college's

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[10] See College of Legal Practice, About us.

programmes will: 'reflect current law and legal practice', 'promote best legal practice' and 'integrate work-based and academic learning'. Furthermore, the team considered that the college's mission and strategic direction are also evident through how it enters partnerships, as discussed below under subcriterion A1.3, and through how it continues to adapt its educational provision and develops and publishes policies on its website.[11]

53. The assessment team found that, at the overarching governance level, the college's academic policies support its higher education mission, aims and objectives. This was demonstrated by a review of the college's suite of academic regulation and policy documentation that set out the expectations for students, staff and stakeholders. These include the following policies:

- Academic Appeals Policy and Procedure
- Equality and Inclusion Policy for Students
- Exceptional Circumstances Policy
- Leave of Absence Policy
- Quality Assurance and Assessment Regulations
- Selection and Admission of Students Policy
- Student Contract
- Teaching and Learning Strategy.

54. The team found that these policies support its mission, aims and objectives by reflecting the college's commitment to a flexible delivery of provision and taking account of students' circumstances. For example, the Leave of Absence Policy reflects that the college's higher education delivery is to postgraduate students who are engaged in professionally focused study and therefore potentially in employment. As discussed in paragraph 52, the team found that the college's Teaching and Learning Strategy and subsequent principles and policies support the college's mission to 'develop excellent legal professionals'. In addition, the team considered that the college's Selection and Admission of Students Policy supports its mission, aims and objectives as it sets out the college's commitments to support applications from 'all prospective students whatever their background, with the potential to do well on their masters' programmes'.

55. The college has processes in place for the annual review of its academic policies to ensure that they remain relevant and applicable to its status, mission and objectives. The team found this review process be effective in practice, as discussed further under criterion B2. Overall, the team was assured that the college's academic policies support its higher education mission, aims and objectives and are sufficient to meet subcriterion A1.1. However, the assessment team identified some concerns about the detail and operation of some academic policies in practice. For example, the team identified concerns regarding the college's implementation of its academic misconduct policy, which are discussed further under criterion B2 and in depth under criterion B3.

56. The assessment team found good clarity and differentiation regarding the functions of, and responsibilities for, the college's academic governance structures and arrangements for

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[11] Available at College of Legal Practice, Policies and procedures.

managing its higher education provision. This included evidence demonstrating that the function and responsibility of the senior academic authority are clearly articulated and consistently applied. The team found evidence of an appropriate level of independence and expertise among the members of the key governance committees, including the senior academic authorities of the Board and Programme Committee. For example, the team reviewed the Board's governance code, which sets out in detail the expectations of the Board collectively, and of its individual members.

57. The code sets out that the Board has ultimate responsibility and oversight for the governance and management of the college, but that it is supported by three primary committees, the Programme Committee, the Audit, Risk and Compliance Committee and the Nominations Committee. The team found that the Programme Committee conforms to the principles set out in the governance documents of the Board, for example, through having two directors on its membership, and that the Programme Committee's responsibilities are clearly differentiated from the Board's. One example of this is that the Programme Committee is specifically concerned with matters from an academic perspective, considering topics such as student outcomes, staffing, and student numbers from an academic quality and standards perspective.

58. According to the college's self-assessment, the college states that it has its own 'independent governance structure' from COL, its parent company. The relationship between the college and COL is described in the college's Board Code as the college being a 'wholly owned subsidiary of COL Hold Co Pty Limited (which is a member of the College of Law Australia group of companies ("the College of Law Group")'. During the online visit to the college, COL's role in the management and governance of the college was described by senior staff as minimal, with the college being 'wholly independent'. Notable roles of COL listed by senior staff included the provision of funds, two shared Board members, and shared services such as the IT and virtual learning platforms. The college also clarified that its academic governance and all teaching is UK-based and carried out by the college itself. The assessment team examined in detail the governance and functional relationship between the college and COL, through discussions during the online visit, reviews of governance documentation together with self-assessment reports and previous reports produced by assessment teams during the college's probationary period.

59. While a previous New DAPs monitoring assessment team reported some potential concerns regarding the influence of COL on the college's academic governance and decision making, as set out in the June 2024 OfS New DAPs monitoring assessment report, a further analysis by the team presented no issue in this respect. The team found that COL has some involvement in the college through the provision of Board members, expertise in other committees, and infrastructure and services. However, in the team's view this involvement did not appear to be inappropriate. Therefore, the team was satisfied that COL, as the parent company, provides resources, support and relevant expertise where required, but that the college enjoys appropriate independence in respect of its academic governance and management of its higher education provision. Therefore, the team was satisfied that this evidence demonstrated one way in which the function and responsibility of the college's senior academic authority is clearly articulated and consistently applied.

60. The Programme Committee is the college's senior academic authority, and the team found that its functions and responsibility are clearly articulated in its terms of reference. The team reviewed how the Programme Committee reported to the Board and reviewed the function of

its own subcommittees and groups. The team found that the Programme Committee delegates appropriate functions to various panels, groups and subcommittees such as Periodic Review Panels, Assessment Panels, Programme Approval Panels and the Staff-Student Liaison Committee. The team noted that such panels and committees hold specific responsibilities and report to the Programme Committee to effectively inform decision making. The team found evidence to demonstrate that the Programme Committee appropriately considers the outputs and information reported to it by its subcommittees and groups. For example, the team evaluated evidence of the Programme Committee reviewing Programme Evaluation Reports, which are initially considered by the Staff-Student Liaison Committee, and found that appropriate analysis and discussion took place, including the identification of actions to address issues or concerns raised in the Programme Evaluation Reports. Therefore, the team was assured that the evidence demonstrated that the function and responsibility of the senior academic authority is clearly articulated and consistently applied.

61. The team reviewed a sample of minutes from meetings of the Board, Programme Committee, Audit, Risk and Compliance Committee and Staff-Student Liaison Committee. The team found that the minutes further evidenced how the college's academic governance structures operate with clarity and differentiation of functions. For example, the team reviewed evidence of the approval for the periodic review of the LLM Legal Practice, which took place in April 2024. This showed that a periodic review approval event took place, led by a Periodic Review Panel, and that the outcomes of this were reported to the Programme Committee for final approval. However, the review of minutes also raised concerns regarding the effectiveness of the role of students in the Staff-Student Liaison Committee and Programme Committee. The engagement of students in the college's academic governance and management is discussed fully under subcriterion A1.2. The team noted that the college also operates a Curriculum Development and Delivery Group, which supports the college's programme and development processes, and the team identified some ambiguities regarding its role and responsibility, which are set out further below in paragraphs 63 to 67. This evidence demonstrated that 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.

62. In addition, the team found that clarity and differentiation of function and responsibility at all levels in the college are also demonstrated by the approach it takes to its staff meetings. For example, these are held at a module level and through quarterly supervisor meetings, which the team noted enables academic governance and higher education management issues to be discussed at all levels. During the online visit to the college, the assessment team heard that teaching staff at this level of the college understood their responsibilities for module delivery and were regularly informed of key developments to the college's higher education provision through senior members of staff.

63. As noted in paragraph 61, the team identified some academic governance concerns relating to the college's Curriculum Development and Delivery Group ('the Group'). These included a lack of clarity regarding the Group's role, its composition, and changes to its terms of reference. The college's Governance Organogram shows that the Group reports to the Programme Committee. According to its terms of reference, the Group's responsibility is to advise the Programme Committee regarding the development and delivery of the college's curricula and programmes and its membership includes representatives from COL, the college's parent company. The assessment team considered the role, composition and terms of reference of the Group, which were revised in 2023, prior to the 2024 periodic review of the LLM Legal Practice.

The new terms of reference altered the membership of the Group to remove the membership of the college's chief operations officer (as previous chair) and the membership of COL's chief operations officer. The college's head of curriculum design was assigned as the new chair of the Group and most of the group's membership otherwise remained the same, though the specific mention of 'programme leaders as required' on the membership was removed. Four members of the Group are representatives from COL, including its chief academic officer, director of academic policy and quality management, and director of teaching learning and design.

64. While the team considered that this membership reflected a large proportion of external members from COL, on balance the team did not find evidence to show that this had, in practice, led to undue influence. As set out in paragraphs 58 and 59, the college's wider academic governance structure demonstrated that the college maintains sufficient independence from COL, and therefore this was not of concern to the team. However, the team noted concern that the terms of reference of the Group were changed autonomously by the Group itself, without relying on the authority of the Programme Committee. While the changes to the Group were put to the committee, the team did not see evidence of comment or approval by the Programme Committee of these changes, which it would have expected given the roles and responsibilities of the Group as set out in its terms of reference.

65. Furthermore, the team identified ambiguity and inconsistency in the role of the Group in practice. As noted, the terms of reference of the Group set out that it has 'responsibility for the development and delivery of the College's curricula and programmes'. Alongside this, the college's Programme Development and Approval Process sets out that the Group has specific approval responsibilities in the development of a new programme or to commence the process for a periodic review of an existing programme. However, in its self-assessment the college set out that the Group 'augments' the Programme Committee in the review and approval of changes to programmes, and that the Group is not a formal part of the college's academic governance structure. The college reported that it 'operates outside the academic governance structure, advising the Programme Committee on curriculum development, design, and delivery. It connects the college's Academic Team with the Teaching, Learning, and Development team' at COL.

66. The team considered that the role of the Group has changed during the probationary period. The team found evidence of an approval role of the Group during the development and approval of the LLM Legal Practice and GFL programmes in 2021, reflecting the requirements set out in the Programme Development and Approval Process; whereas it did not find evidence of an approval role of the Group during the periodic review of the LLM Legal Practice in 2024.

67. This evidence, together with the college's own expressed understanding of the advisory role of the Group, demonstrated to the team that there is ambiguity and inconsistency in the role and function of the Group. The college did not appear to have identified this inconsistency through its annual policy review processes, and therefore the team determined that this should be reviewed to ensure there is clarity and consistency in the assigned roles and responsibilities for college's programme development and approval procedures. This is further discussed under criterion B2. However, overall, the team did not consider that the concerns regarding the Group impacted on the college's academic governance and overall function of its management responsibilities of its higher education delivery. In particular, the team found no evidence that the ambiguity of the role of the Group had impacted on the function and responsibility of the

Programme Committee as the senior academic authority. Therefore, the team concluded that the evidence reviewed showed that 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.

68. The team reviewed evidence to assess the depth and strength of the college's academic leadership, including the college's organisation chart and the CVs of academic staff and senior staff. The team also met with a range of staff from across the college during the online visit. The assessment team found that the Board and Executive Team has appropriate experience and qualifications; for example, members of the Executive Team have experience of different higher education contexts, of the provision of training and education to law students and of managing and leading in complex organisations.

69. However, the team identified some concerns regarding the depth of academic leadership across the college. While there was evidence of leadership strength in the upper layers of the college, for example in the Board and Executive Team, the team found that this strength was not evident throughout the college. The team reviewed adjunct staff CVs and the CVs of junior permanent academic staff, and had discussions with staff during the online visit. From this evidence the team found that staff at those levels did not appear to have leadership roles in the college or demonstrate an understanding of their function in leading the college academically, even commensurate with their contract type and level of seniority. For example, there was no evidence of the involvement of programme and module leaders taking an active role in decision making around policies, contributing to ideas for staff development processes and opportunities or deputising for others in more senior leadership.

70. The team considered that this lack of academic leadership depth appeared to be caused by two features of the college. Firstly, that the college is a small and newer higher education provider and therefore opportunities for leadership will necessarily be more limited. Secondly and more critically, in the view of the team the college's approach to staff development has been piecemeal and limited, which may have restricted the opportunities for more junior staff to engage in management and leadership opportunities, training or mentoring. This latter concern is addressed more fully under criterion C1. Therefore, the team's view is that there is evidence of appropriate strength of academic leadership in the college, but there are deficiencies in the depth of academic leadership across the college. These identified deficiencies do not prevent the team from concluding that the college meets subcriterion A1.1, given the strengths in the Executive Team.

71. The team reviewed a range of governance documentation to assess how the college develops, implements and communicates its policies and procedures in collaboration with its staff and external stakeholders, including employers and its partners. The team also met with a range of the college's staff during the online visit to the college. The team found that there is external representation through the Programme Committee, as its terms of reference require a minimum of two external representatives on its membership. The team also found evidence of effective contributions from external individuals when discussing programme development and reviewing, including through the 2024 periodic review of the Master of Law in Legal Practice (which is discussed further under criterion B2. However, the June 2024 OfS New DAPs monitoring assessment report identified the role of external stakeholders in the college's development of policies and procedures as an area to monitor further.

72. To assess the college's response to the concerns raised in the previous monitoring assessment report, the team reviewed the college's self-assessment, which set out that the college proposed to establish a new Partnership and External Stakeholders Group to function as an advisory group to the Programme Committee. The team reviewed the newly developed terms of reference for the Partnership and External Stakeholders Group, which the college reported would meet for the first time in October 2024. The team found that terms of reference set out an appropriate approach and would provide an effective mechanism for the college to seek regular engagement with its external stakeholders. For example, the remit of the group includes: 'to provide feedback and analysis on current college programmes, bearing in mind the needs and requirements of partner stakeholders' and 'to evaluate and reflect on student feedback (where available) from partner stakeholder organisations to feed into discussions.' The team considered that the development of the Partnership and External Stakeholders Group showed one way in which the college places importance on the input of external stakeholders in its governance. The team's view is that, should the Partnership and External Stakeholders Group function as per its terms of reference, it would be an effective mechanism for the college to develop, collaborate and communicate its policies and procedures with its external stakeholders.

73. The evidence reviewed by the team also shows that the college appears to have mechanisms for implementing and communicating its policies and procedures to staff. These include a staff newsletter, supervisor quarterly meetings, and module-level meetings and training. However, the team noted that the evidence also shows that staff, particularly adjunct staff who form the majority of the college's staffing base, are not adequately collaboratively involved in the development of policies and procedures. For example, the team noted limited representation of academic and adjunct staff on the Programme Committee, where the college's policies are discussed, reviewed and approved. Furthermore, during the online visit to the college, the team met with a range of adjunct staff who, when asked, did not appear to have strong involvement in shaping policies such as the college's developing reasonable adjustment policy. In addition, the team found that minutes of supervisor quarterly meetings show a pattern of adjunct staff being recipients of information, rather than active co-creators of or collaborators in policies. The lack of input and active engagement of adjunct staff in the college's policies and procedures is discussed further under criterion C1.

74. Overall, the team found that the college has demonstrated that it effectively implements and communicates its policies and procedures with its staff, though it noted that the college should review its staff engagement mechanisms to ensure effective collaboration in the development of its policies and procedures. Furthermore, the team found that the college demonstrated that it engages with external stakeholders through its governance structures and is improving its formal mechanisms to demonstrate how it routinely develops, implements and communicates its policies and procedures in collaboration with external stakeholders. The team's assessment of how the college develops and implements its policies and procedures in collaboration with its students is discussed under subcriterion A1.2.

75. The assessment team concluded that the evidence reviewed, in relation to the college's academic governance and management of its higher education provision, demonstrated that it would successfully manage the responsibilities that would be vested in it were it to be granted full degree awarding powers. This is because the evidence reviewed and discussed regarding subcriterion A1.1 demonstrates to the team that the college's governance, strategic direction, mission and associated policies are clear and appropriate to its status. The college has also

demonstrated an adequate ability to respond to change and adopt new policies and procedures when a need is identified. However, this conclusion is separate from the assessment team's concerns regarding the college's ability to critically self-assess.

76. The team's concerns regarding self-critically are discussed in detail under criterion E, but in summary, the team found that while the college has an ability to respond when policy or governance needs are identified, there are gaps in its ability to critically self-assess in other areas. The team considered that weak self-assessment as a feature of the college's governance culture has contributed to weaknesses in identifying and responding to issues that need addressing. For example, as discussed fully under criterion B3, the team identified concerns relating to the college's social learning environment and its approach to preventing and identifying academic misconduct. The team found that these concerns had been raised previously during the college's probationary period by external New DAPs monitoring assessment teams, and determined that the college had not internally adequately identified or appropriately considered these issues when identified externally. However, overall, the team concluded that the college has demonstrated that it would successfully manage the responsibilities that would be vested in it were it to be granted full degree awarding powers.

Conclusions

77. In summary, the team considered that the college's development of its academic governance arrangements during its probationary period demonstrated that, in relation to subcriterion A1.1, the college has successfully implemented its New DAPs plan as intended.

78. The team therefore concluded that the college meets subcriterion A1.1 as overall the evidence demonstrates that the college has sound academic governance and management structures. The evidence also demonstrates that the college has clear and appropriate lines of accountability for its academic responsibilities, despite some weaknesses identified regarding the depth of its academic leadership.

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

79. The assessment team's view is that the college meets subcriterion A1.2 because its academic governance is conducted in partnership with its students, although the team considered that the college meets only the baseline requirement for this criterion.

80. The assessment team's view is based on its review of evidence which shows that the college has, on balance, demonstrated sufficient evidence to meet the evidence requirements for A1.2.

81. However, the team found that the college's approach to engaging students in its academic governance mechanisms has been piecemeal. The evidence shows that the involvement of students on academic governance committees is deficient and does not represent an effective partnership regarding all aspects of the control and oversight of the college's higher education

provision. The team considered this has been an ongoing weakness of the college identified during its probationary period.

Reasoning

82. In order to assess the extent to which students, individually and collectively, are engaged in the college's academic governance and management arrangements, the team reviewed a range of evidence including minutes from a range of committees and groups including:

    - the Board

    - the Periodic Review Panel

    - the Programme Committee

    - the Staff-Student Liaison Committee.

83. The team also discussed issues relating to student engagement in academic governance during the online visit to the college.

84. In summary, the team considered that evidence showed that the college has an appropriate policy setting out the role of student involvement in the college's governance, through the Student Partnership Framework Policy. The team also found evidence of some student engagement in the college's academic governance and management of the college's higher education provisions, such as through the Programme Committee, Disciplinary Panel and Programme Approval Panels. The college also operates a Staff-Student Liaison Committee, which acts as the primary vehicle for student engagement in the college's governance and operations of its higher education delivery. However, as discussed further throughout this section, the evidence also shows a lack of depth and breadth in effective student engagement throughout all the college's governance and management mechanisms.

85. In reviewing the evidence and forming its views, the team carefully considered how the involvement of students as partners might appropriately look, in the organisational context of the college. That context is, in summary, that of a small, new, specialist, online-only provider with mature, postgraduate students who are typically in some form of employment. Based on the extensive evidence reviewed, the assessment team found that, while some of the college's policies and procedures are developed in response to student feedback, there is no consistent practice or evidence of collaboration throughout the college's decision making mechanisms. Furthermore, the team's view is that the college provides appropriate measures to ensure that students are supported to be able to engage in governance, but in practice, students are not effectively engaged in the governance and management of the organisation and its higher education provision.

86. The college sets out its approach to student engagement in its Student Partnership Framework Policy. This policy details what students can expect of the college and the mechanisms through which students can provide feedback. The formal mechanism through which students can engage with college's governance and management arrangements is student representation on the Programme Committee and the Staff-Student Liaison Committee. The college also sets out that students are invited to be members of Periodic Review Panels and College Disciplinary Panels.

87. Through its review of the Staff-Student Liaison Committee terms of reference and minutes, and in discussion with students during the online visit, the team found that students are enabled to input into a wide range of operational aspects relating to their learning including careers provision, the virtual and social learning environment, learning materials and programme evaluation. Students reported that student representatives on the Staff-Student Liaison Committee seek feedback from peers via WhatsApp, to allow representatives to take issues to the Staff-Student Liaison Committee. The Staff-Student Liaison Committee records and tracks action points, and these are then reported to the Programme Committee and to the Board. The team determined that this evidence demonstrated some good practice in engaging students in the governance arrangements. However, the team identified a concern regarding the small number of students engaged with the Staff-Student Liaison Committee and determined that, in practice, this small number of students inhibited student representation and effective engagement with the committee. The team's view is that, as a consequence of this weak representation, the Staff-Student Liaison Committee is not effective at ensuring that the college's academic governance, including all aspects of the control and oversight of its higher education provision, is conducted in partnership with its students.

88. Table 2 summarises the attendance figures of staff and students at Staff-Student Liaison Committee meetings from October 2021 to April 2024.

Table 2: Summary of attendance at Staff-Student Liaison Committee meetings

Staff-Student Liaison Committee meeting date	Number of staff in attendance	Number of students in attendance
October 2021	5	1
March 2022	3	1
June 2022	6	3
September 2022	7	1
December 2022	7	2
March 2023	6	2
June 2023	6	1
September 2023	7	2
December 2023	5	4
January 2024	7	2
April 2024	6	3

89. Proportionately, these attendance figures represent between 0.2 per cent and 0.8 per cent of the college's student body, based on its current enrolment figures. Based on its experience, the team acknowledges that, while percentages of students engaged as student representatives varies across the sector, these very small numbers make it difficult to ensure the breadth of the student body is represented (in terms of programmes, fee status, diversity and background). The team also acknowledged that student enrolments at the college fluctuate across the year, due its delivery model. However, given the emphasis on the Staff-Student Liaison Committee,

and the centrality attached to it by both staff and students as a mechanism for ensuring students' concerns are represented in the college, the assessment team considered the continued low attendance of students at this committee to be a concern.

90. Furthermore, the team determined that the minutes of the Staff-Student Liaison Committee show that, because of the small numbers of students who are actively engaged with the function of the Staff-Student Liaison Committee, the feedback sometimes lacks disaggregation by programme or module, and is sometimes addressed as if it were equally relevant to all modules and programmes. In addition, the team found that some feedback shared at the Staff-Student Liaison Committee is somewhat speculative, rather than representative. For example, feedback around in-person graduations and the delivery patterns of modules appears to be an estimation of what students 'may' prefer, rather than based on actual feedback given by students. The college noted that, occasionally, low attendance at Staff-Student Liaison Committee meetings is supplemented by email input from students to staff, but this mechanism does not appear to ensure effective engagement in the development of policy in partnership with students. For example, at the June 2023 Staff-Student Liaison Committee meeting, feedback was requested via email because of low student attendance. The team reviewed the feedback provided via email and noted that it was high-level feedback and did not reflect discussion or detail of particular policy proposals such as the Prevent policy.

91. The terms of reference for the Programme Committee set out a requirement for one student representative, and during the online visit the team heard from the college that it had recently recruited one additional student as a member of the Programme Committee so that there are now two student representatives on the committee. The minutes of the Programme Committee, however, indicate that the attendance of the student representative at the committee has been inconsistent, particularly since early 2023. For example, the Programme Committee meetings on 14 February 2023, 16 May 2023, and 6 November 2023, do not appear to have had any student representative present.

92. Furthermore, the team found that there is little evidence from the minutes of the Programme Committee to demonstrate active involvement or effective input of the student representative. For example, the minutes from the July 2023 Programme Committee show there was very little input from the student representative present when important matters such as student terms and conditions, religious observance policy, and academic appeals policy were discussed and approved. In addition, the team noted that the June 2024 OfS New DAPs monitoring assessment report identified a risk that the Programme Committee is making assumptions about students' needs.

93. Overall, the team determined that the evidence shows that both the Staff-Student Liaison Committee and the Programme Committee have continued to struggle to engage students effectively as partners and in policy development throughout the college's probationary period. The team considers this a particular weakness, as the Programme Committee is the college's senior academic authority, where many important decisions relevant to students, their learning and the future of the college, are made, and the Staff-Student Liaison Committee is the key mechanism and forum for regular student feedback.

94. In summary, the team found that evidence shows that, while there is engagement with students through its academic governance mechanisms, the college does not effectively develop and implement its policies and procedures in collaboration with its students. Furthermore, the team

determined that this evidence demonstrates that students individually and collectively are engaged in the governance and management of the college and its higher education provision, though the low attendance and lack of effective contribution in the Staff-Student Liaison Committee and the Programme Committee committees is a weakness.

95. The team reviewed the college's Student Representative Handbook and other mechanisms in place to ensure that students are supported to engage effectively in practice. For example, during the online visit the team heard how a senior staff member meets with student representatives prior to engaging with the Programme Committee, to brief them on their role and expectations. The college has in place training for newly appointed student representatives, supplemented by a student representative handbook, which the team found to be appropriate and informative. The team determined these to be effective mechanisms in practice to support student representatives to engage effectively in the governance and management of the college's higher education provision. However, the low numbers of student representatives that the college has appointed during the probationary period mean that in practice the effectiveness of these support mechanisms have not been fully tested or demonstrated.

96. During the online visit to the college, the team met with two groups of students, including part-time and full-time students from a range of backgrounds and on different programmes. When asked about their engagement with the college's academic governance and management, students expressed a lack of awareness of college governance mechanisms besides the Staff-Student Liaison Committee. Students reported that they were sometimes unaware of what use was made of their feedback and how it might shape the policies of the college, for example not knowing what was done with the results of module feedback surveys. However, students stated that they were satisfied overall with changes made in response to some of their feedback.

97. The team also reviewed evidence of how students are engaged to some extent in the design of programmes, in module reviews and in monitoring academic standards through programme reviews. For example, the team noted that the programme evaluation for the Graduate Foundation in Law was discussed with students, and one student reported that they had been involved in the periodic review of the LLM Legal Practice. Student involvement in the development and design of programmes is discussed in further detail under criteria B2 and B3, but in summary, the team considered that the evidence shows that there is adequate evidence to demonstrate that the college meets the requirement that students individually and collectively are engaged in the governance and management of the organisation and its higher education provision, with students supported to be able to engage effectively. However, the team noted that, because of its concerns regarding the effectiveness of student engagement and lack of evidence regarding the depth and breadth of student engagement, the college meets the baseline of this requirement.

98. The team identified its concerns regarding the deficiencies of student engagement across the college's academic governance during its desk-based assessment, and noted that similar issues had been raised as a potential area of concern throughout the college's probationary period. Previous self-assessment reports submitted by the college, and reports produced by New DAPs monitoring assessment teams during the college's probationary period, show that the college has found it challenging to engage its desired proportion of student representation in its governance arrangements. For example, concern about the recruitment of student representatives was set out in a report by the QAA in year one of the college's probationary

period and in the June 2024 OfS New DAPs monitoring assessment report, an assessment team identified a corrective action for the college to consider the development of additional mechanisms to increase student engagement in academic governance. While these reports also reflect positively on the college's adoption of additional measures to support student engagement that were not foreseen in its New DAPs plan, the reports highlighted that there have been multiple opportunities for the college to reflect and evaluate its need for additional measures to ensure student engagement is effective.

99. The team considered that the areas of concern raised by previous assessment teams during the probationary period have not yet been adequately addressed. For example, the corrective action set out in the June 2024 OfS New DAPs monitoring assessment report was that the college required 'further development of mechanisms in place to ensure that students are engaged in the academic governance and management of the provider's higher education provision'. The college's response set out that it would add a second student to the membership of its Programme Committee, but the team noted that no further mechanisms or approaches were being considered.

100.   Therefore, during the online visit to the college, the team met with senior members of staff and raised queries around this corrective action and the measures taken by the college. The team determined that this discussion demonstrated that the college considers its current engagement with students to be sufficient and adequate and that it was not exploring any further mechanisms or approaches to improve the engagement of students in the college's academic governance and management of its higher education provision. The team found that the college's response to this concern demonstrates a lack of self-criticality and a deficiency in its response to identified weakness, which is discussed further under criterion E1.

101.   The assessment team acknowledges the challenges faced by the college in securing student engagement and effective involvement as partners across all aspects of the control and oversight of its higher education provision. During the online visit to the college, the team heard, from both staff and students, about how students are busy and often working. For example, one student expressed how they might have liked to be more involved in other parts of the college's life but did not have time alongside their work, study and caring commitments. The team also observed, however, that the student body is highly motivated, driven and professional. The assessment team weighed the difficulties faced by the college in securing student involvement against the possible range of further mechanisms it could employ to develop its approach to student engagement so that its academic governance, including all aspects of the control and oversight of its higher education provision, is conducted in partnership with its students. For example, further student engagement could be encouraged through ensuring there is an active, cohesive student academic community and a social learning environment. Based on its experience across the sector, the assessment team is of the view that an active student community, encouraged through social learning environments, can often act as a precursor to student 'buy in' to the functions and workings of higher education providers and assist in securing student involvement as partners in governance. The team's findings and views on the college's social learning environment are discussed in full under criterion B3.

102.   Overall, the team determined that throughout its probationary period, the college could have explored a wider range of mechanisms to enable greater and wider engagement of students in its academic governance and management arrangements. In addition, as

discussed further under criterion B3, the team determined that the college does not appear to have identified a lack of a cohesive student academic community, or its weakness in how it maintains its social learning environment, as a continuing concern or priority. The team considered that this may be a contributing factor that has hindered the college's understanding or consideration of alternative mechanisms.

103.   Furthermore, the team noted that there has been a deficiency in the college's considerations of and response to this issue throughout its probationary period. The team considered that it is a notable weakness that the college has not taken more significant action to ensure students are fully engaged as partners in its governance. On balance, the team's view is that the measures introduced by the college mean it meets the baseline requirements to demonstrate that students individually and collectively are engaged in the governance and management of the college and its higher education provision. Furthermore, the evidence demonstrates that students are supported, to be able to engage effectively. However, this area requires further development and attention for the college to demonstrate that students are effectively engaged as partners.

Conclusions

104.   In summary, the assessment team determined that, while students are present in the college's academic governance mechanisms and in the management of its higher education provision, they are not currently effectively engaged as partners in the development of its policy and procedures nor effectively engaged as partners in all aspects of the governance and management of the organisation.

105.   This is because, while a small number of student representatives are involved in the Staff-Student Liaison Committee and Programme Committee, that engagement is not effective in terms of either the numbers of students involved or the scope of the matters in which they are invited to input into. The assessment team does however find that the college provides appropriate measures to ensure that students are supported to be able to engage effectively in governance.

106.   The team took into consideration the context and nature of the college and how this may contribute to a lack of depth and breadth in student engagement in academic governance. For example, the majority of the college's cohort are in employment or study part-time, which the team considers to be a factor preventing students from choosing to engage in the college's academic governance or student representation mechanisms.

107.   Therefore, the team concluded that, on balance, the evidence shows that there are mechanisms of student engagement to demonstrate that academic governance, including all aspects of the control and oversight of its higher education provision, is conducted in partnership with its students, albeit with weaknesses. The team therefore concluded that the college meets subcriterion A1.2.

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

108.   The assessment team's view is that the college meets subcriterion A1.3 because its governance and management of partnership opportunities is robust and effective and that decisions to work with other organisations are the result of a strategic approach rather than opportunism.

109.   The assessments team's view is based on its review of evidence which shows that the college has met the evidence requirements for A1.3.

Reasoning

110.   To assess the college's governance structures and management of partnerships, the team reviewed a range of documentation including:

- Middlesex University and Winchester University validation outcome documentation

- student feedback from employer partnerships

- the terms of reference for the Partnership and External Stakeholders Group

- the college's Partnerships Framework Handbook

- minutes of meetings of the Board, the Audit Risk and Compliance Committee and the Programme Committee.

111.   The team also discussed issues relating to academic governance and partnerships during the online visit and considered previous reports from assessment teams during the college's probationary period.

112.   In summary the team found that the evidence reviewed shows that the college takes a strategic approach to partnerships. For example, the team considered that evidence of the college's academic partnerships reflects its Strategic Plan, which sets out a focus on developing partnerships with universities and employers, and places priority on improving access to the legal professions. The team found that the college has partnerships in place with other higher education providers, for example Middlesex University and Winchester University, to deliver its 'stand-alone' Solicitors Legal Knowledge and Solicitors Legal Skills modules as part of other providers' degree provision. The team noted that this also reflects the college's mission to support students in qualifying as solicitors.

113.   The college's Partnerships Framework Handbook sets out the procedures and requirements for the approval of academic partnerships, programme collaborations and other arrangements. It also sets out how partnerships are governed and managed through a strategic lead. The team determined that the college undertakes effective assessments of risk and due diligence before entering into partnerships, for example assessing whether there are reputational or operational risks from entering into partnerships. The team also found evidence that the terms of partnerships are defined in written legal contractual agreements, for example in the relationship with Manchester Metropolitan University, which demonstrated that the

college entered into that partnership having considered the legal terms, boundaries and responsibilities of each partner.

114.   The delivery of the college's provision through its partnerships is subject to the same oversight as the rest of the college's higher education provision, including mechanisms for student feedback. The team reviewed evidence of this in practice through examining student feedback on the Solicitors Legal Knowledge module, which is delivered at both Middlesex University and at the college. This showed that students studying the module at the partner provider and the college were asked the same range of questions. Furthermore, the college reported that modules delivered through its partnerships are also subject to the college's assessment procedures and quality assurance mechanisms, including moderation and external examining.

115.   The assessment team therefore concluded that the college meets subcriterion A1.3, as the evidence demonstrates that the college is successfully managing the responsibilities expected of a higher education provider that works with other organisations to deliver learning opportunities. The team was satisfied that the college's 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.

Conclusions

116.   In forming its conclusions, the team carefully considered the nature and context of the college.

117.   The team concluded that the college has effective academic governance and management structures that demonstrate clear and appropriate lines of accountability, despite some weaknesses identified regarding the depth of its academic leadership.

118.   Furthermore, the team determined that the college has robust and effective governance and management of its partnership opportunities, which are determined by a strategic approach.

119.   The team also concluded that, while students are present in the college's academic governance mechanisms and in the management of its higher education provision, they are not currently effectively engaged as partners in the development of its policy and procedures. However, on balance, the team determined that that the college meets the baseline requirements of the criterion, which require the college to demonstrate that academic governance, including all aspects of the control and oversight of its higher education provision, is conducted in partnership with its students.

120.   The team considered that, despite meeting subcriterion A1.2, student engagement in academic governance remains a weakness for the college and warrants review and further consideration by the college.

121.   Overall, the team concluded that the college meets criterion A1.

Assessment of DAPs criterion B: Academic standards and quality assurance

Criterion B1: Regulatory frameworks

Advice to the OfS

122.   The assessment team's view is that the college meets criterion B1: Regulatory frameworks because it meets sub-criteria B1.1 and B1.2.

123.   The assessment team's view is based on its review of evidence which shows in summary that the college has in place transparent and comprehensive academic frameworks and regulations to govern how it awards its qualifications. The college maintains a definitive record of each programme and qualification that it approves; these records constitute the reference points for delivery and assessment of its programmes, its monitoring and review, and for the provision of records to students and alumni.

124.   This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside other relevant information.

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

125.   The assessment team's view is that the college meets subcriterion B1.1 because it has in place transparent and comprehensive academic frameworks and regulations to govern how it awards academic credit and qualifications.

126.   The assessment team's view is based on its review of evidence which shows that the college has met the evidence requirements for B1.1.

Reasoning

127.   To assess the college's academic frameworks and regulations, the assessment team reviewed its academic regulations and current policies including the process and rationale for any changes made to policies during the New DAPs probationary period. The team also considered proposed changes to the college's current policies.

128.   The team also discussed issues relating to regulatory frameworks and specific policies during the online visit to the college. During the visit, the team met with senior staff and raised questions about aspects of the academic framework and specific policies. The team also met with a representation of students to assess the implementation of policies in practice.

129. The college's Quality Assurance and Assessment Regulations set out the foundation for the college's academic framework and regulations governing its higher education provision. The Quality Assurance and Assessment Regulations are supplemented by a suite of policies relating to wider aspects of its academic provision, which include:

- Selection and Admission of Students Policy

- Academic Appeals Policy and Procedure

- Student Charter and Code of Conduct

- Student Complaints Policy and Procedure

- Student contract

- Student Disciplinary Process Policy

- Exceptional Circumstances Policy

- Equality and Inclusion Policy for Students

- Fitness to Study Policy

- Leave of Absence Policy

- Programme and Module Modification Policy

- Policy Approval and Communication Policy

- the college's outline of approaches to reasonable adjustments

- Student Terms and Conditions

- Welfare Policy.

130. In addition, the college's approach to teaching and learning is set out in the Teaching and Learning Strategy and Learning and Teaching Principles.

131. At the time of the New DAPs end assessment, the college was also developing the following:

- Academic Engagement and Attendance Policy

- a code of practice relating to freedom of expression

- Reasonable Adjustments Policy.

132. To assess whether the college's academic frameworks are implemented fully and transparent, the assessment team considered where responsibilities lie for the development and approval of policies and how its policies are communicated to staff and students. The team also reviewed examples of how and where its regulatory framework is implemented.

133.   The college has in place a Policy Approval and Communication Policy which states that the Executive Team is responsible for ensuring that all staff are aware of its academic policies, which are published internally on the college's SharePoint site. The team heard from adjunct staff during the online visit that they were aware of how to access policies through this site. The team found that students can access the college's policies in various ways: for example, its student-facing policies are available publicly on the college's website, such as the Exceptional Circumstances Policy, Equality and Inclusion Policy for Students, Fitness to Study Policy and Leave of Absence Policy. Some policies are incorporated into, or linked to from, the Student Handbook,[12] and others are available via links on the college's VLE and its other platforms. The team noted that the college's academic regulations and policies are reviewed regularly and republished annually to reflect changes made by the Programme Committee, as set out in its Quality Assurance and Assessment Regulations. Overall, the team was assured that the evidence shows that the college has transparent and comprehensive academic frameworks and regulations in place, which are sufficiently accessible to students and staff.

134.   As discussed under criterion A1, the Programme Committee is the college's senior academic authority and as such has primary responsibility for the academic framework and any changes made to it. In accordance with its role, the Quality Assurance and Assessment Regulations set out how the Programme Committee is 'responsible for all matters concerning curriculum development and delivery, including policymaking on eligibility, enrolment, progress, assessment and completion of award courses'. It has in all cases authority for academic decisions including credit and awards and is in turn accountable to the Board. The team reviewed minutes of the Programme Committee, which it found to demonstrate that reviews of the college's policies took place during the New DAPs probationary period. A number of policies have been formally reviewed and the team was assured that changes to policy have been secured in line with the college's principles of policy review. For example, the Programme Committee minutes for the 2023 annual policy review demonstrated that there was consideration of nine policies including the Quality Assurance and Assessment Regulations, as well as discussion and approval of amendments to the Exceptional Circumstances Policy and to the student terms and conditions.

135.   Alongside the Programme Committee, the college has subgroups that feed into the Programme Committee in an advisory capacity regarding policy development: a newly formed Partnership and External Stakeholders Group and a Curriculum Development and Delivery Group. The Partnership and External Stakeholders Group intends to provide a forum with external stakeholders to discuss, among other matters, the design and delivery of programmes, and to provide feedback on proposals of new policies. The Curriculum Development and Delivery Group has responsibility for the design and delivery of the college's curriculum. The team identified some contradictory evidence regarding the role and function of the Curriculum Development and Delivery Group, which is discussed further under criteria A1, B2 and B3. Consideration of the role of the Partnership and External Stakeholders Group is discussed further in paragraphs 136 and 137.

136.   The team considered the June 2024 OfS New DAPs monitoring assessment report, which set out a potential concern regarding the robustness of the college's procedures when making changes to its academic regulations and policies. The report set out findings that demonstrated

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[12] Available at College of Legal Practice, Policies and Procedures.

how the college had made 'reactive' changes to its regulations and policies, for example when the application of a regulation in an individual case caused difficulties or raised doubts. Furthermore, the report advised that the college would benefit from further 'involvement of wider stakeholders' in this matter, and identified this as an area that should be reassessed during this New DAPs end assessment. The team considered the college's response to the report, through its self-assessment, and found that the college had proposed to develop a new Partnership and External Stakeholders Group, to provide wider external involvement in changes to its academic regulations and policies, as discussed under criterion A1. The terms of reference for the Partnership and External Stakeholders Group set out that members will include representatives from partner institutions and legal services providers, with the remit of the group as 'a forum for discussion and analysis of the College's programme design and delivery and the developing needs and requirements of partner universities and legal service providers'.

137.   The team noted that the creation of this group, and its capacity to provide external advice from experienced experts from other higher education providers and the legal sector, could help to minimise the risk of reactive decisions and allay the concern raised in the previous New DAPs monitoring assessment report. However, the remit of the group, based on its terms of reference, does not specifically identify consideration of the academic regulations or their application. The team is of the view that the effectiveness of the Partnership and External Stakeholders Group will depend on it being constituted and functional as required, as well as the group confirming that its remit includes consideration of the college's academic regulations and policies, something which the assessment team cannot currently assess because of the recent inception of the group.

138.   However, the assessment team noted that alongside this new group, the college has access to external views on policy development through the external members of the Programme Committee. Therefore, the team was assured that the college has sufficient external input in the development and review of its academic frameworks and policies, and that the Programme Committee is effective in its role regarding oversight of the college's academic regulations, policy development and review. The team also considered more broadly that the college has matured its academic frameworks during the probationary period, through implementation of its New DAPs plan and quality assurance mechanisms, which includes external input. This supports the team's overall view that the academic frameworks and regulations governing its higher education provision are appropriate and that there are adequate mechanisms for ensuring good governance.

139.   To further assess the appropriateness of the college's academic frameworks and regulations, and whether these are implemented fully and consistently, the team triangulated findings from previous monitoring assessment reports with its own review of policies and how they had been applied in practice. One policy the team reviewed was the college's admissions procedures: The principles for admission are set out in the college's Selection and Admission of Students Policy, which sits alongside the specific admission criteria for the college's programmes as set out in the programme specifications. The Selection and Admission of Students Policy sets out the college's commitments to support applications from 'all prospective students whatever their background, with the potential to do well on their Masters Programmes'. The team found that this policy covers, among other areas, the selection process, consideration of mitigation circumstances and contextual data, and rules for transfer of credit, as well as a statement in support of admission of 'Disabled applications and

applicants with addition support needs.' The team considered this policy to be appropriate to the college's status and mission, as well as an effective part of its governance of its programmes.

140. To assess how the college applies and reviews this policy in practice, the team considered how admissions data is included in the annual Programme Evaluation Reports which are presented to the Programme Committee for approval. Three Programme Evaluation Reports have been submitted by the college during the probationary period – two for the Master of Law in Legal Practice programme and one for the Graduate Foundation in Law (since revised as the Graduate Diploma in Law. The assessment team found that admissions data in each report is provided according to a number of protected characteristics: sex, gender, ethnicity, sexuality, disability and religion. This demonstrated to the team that there is evidence of annual monitoring of the application of this policy and in the team's view this demonstrated evidence of effective governance of its policies and programmes.

141. Furthermore, the team reviewed minutes of the Programme Committee that demonstrated that the college is committed to regularly reviewing its admission policy. For example, the November 2023 Programme Committee discussed the admissions policy and communications to prospective students in the light of emerging performance data on the external Solicitors Qualifying Examination (SQE), as well as performance data by protected characteristics on its programmes. The team found that the evidence showed that the college has a working process that ensures that it can and does review and assess the implementation of its admissions criteria as it continues to grow. This evidence further assured the team that the college's frameworks and regulations governing its higher education provision are appropriate to its current status and are implemented fully and consistently.

142. The college's Quality Assurance and Assessment Regulations set out the framework for assessment and the conditions under which credit is attained and qualifications awarded. These set out that credit is awarded in recognition of 'verified achievement of learning outcomes' within modules at the determined level. The team determined that the regulations are appropriate to the college's status and are implemented fully. For example, the regulations appropriately define a module as 'a self-contained area of study with defined intended learning outcomes, syllabus, and assessment(s), which measure knowledge and skill'. The regulations identify a programme of study with a group of modules taken together in an approved curriculum. Learning outcomes are situated and mapped against Level 7 in the framework for higher education qualifications (FHEQ)[13] for the LLM Legal Practice programme and against Level 6 for the GDL programme. The college's mechanisms for setting and maintaining academic standards and its assessment procedures are discussed further under criterion B2. The assessment team determined that the regulations governing assessment, progression and award are appropriate to the college's current status. Taking account of the college's assessment procedures discussed under criteria B2 and B3, the team also noted that overall, the regulations are implemented consistently.

143. The team reviewed the college's Academic Appeals Policy and Procedure and the Student Complaints Policy and Procedure. Together, the policies set out the grounds for appeals and complaints, and the subsequent procedures for students. The team considered the policies and

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[13] Available at QAA, Qualifications Frameworks (qaa.ac.uk).

procedures to be clearly set out and explained. Both policies link to the Office of the Independent Adjudicator (OIA) and set out the process for an independent review, should a student be dissatisfied with the college's process. Based on the team's experience across the sector, it found that the grounds for review and the processes for both policies are appropriate and comparable to equivalent policies in the sector. The Programme Committee is required to receive an annual report on the implementation of the policies for appeals and complaints. The team considered that one such review has taken place during the probationary period for the 2022-23 academic year and found that in this review, there was one formal complaint reported from a total cohort of 516 students.

144.   The team reviewed the context of the complaint and how it was considered and addressed by the college. Part of the complaint identified an issue with where responsibility sits for making final decisions on complaints and appeals, as the complainant had also submitted an appeal that was considered by the same member of staff. The complaint was upheld and resulted in a change to the Student Complaints Policy and Procedures to ensure there are different staff responsible for decisions on complaints and appeals. This changed policy and procedure was approved by the Programme Committee. In the view of the assessment team, the evidence showed that both the college's complaints and appeals policies are implemented effectively and that the policy review process has enabled them to be adjusted appropriately. The team was reassured that these policies are appropriate to the college's current status and that they are implemented fully and consistently.

145.   The college currently operates an 'approach' to reasonable adjustments that is not yet formalised within an operational policy, which the team noted was identified as an area that required further monitoring in the college's previous New DAPs monitoring assessment report dated June 2024. In response to this previous report, and as set out in its New DAPs end assessment self-assessment and further evidence submitted, the college reported that it has taken an incremental approach to improving and formalising its approach to reasonable adjustments, and has drafted a reasonable adjustments policy for consideration by the Programme Committee in November 2024. The college commissioned training in 2023 from AdvanceHE, which was followed by discussions and the sharing of information within the college. The team considered this to be effective practice and demonstrated an appropriate understanding of reasonable adjustments, based on its experience across the sector. While the college's new Reasonable Adjustments Policy is yet to be implemented, the team was assured, taking account of the college's approach to this area, that its approach to reasonable adjustments is appropriate and effective. The assessment team found that the college has created in readiness a reasonable adjustment policy that will be appropriate given its current status. Analysis of the college's approach to reasonable adjustments and its draft policy is further discussed under criterion D1.

146.   The team noted that the June 2024 OfS New DAPs monitoring assessment report also considered that the effectiveness of the college's finalised student engagement policy required further assessment, as it was being drafted at the time. The team found that, in lieu of the finalised policy, engagement with the requirements of the programme has been covered in the following ways: the terms of obligations under the contract with students; the college's Student Terms and Conditions; and the Student Charter and Code of Conduct. The contract includes an obligation to submit work and attend scheduled teaching, and provides grounds for termination, which, as specified in the Student Terms and Conditions, include for 'poor attendance, as defined in the Programme Handbook, at lessons and engagement with assessment'. The 2024

Programme Handbook does not elaborate on attendance requirements or engagement, but refers to the Code of Conduct and to the risk of withdrawal for non-engagement.

147. During the online visit to the college in September 2024, the team was made aware of the recently finalised Academic Engagement and Attendance Policy, which was subsequently submitted to the team. According to the college, the purpose of this policy is 'to outline [the college's] expectations of student engagement with [its] programmes, for example through attendance at sessions, submission of formative assessments'. The team reviewed the policy which applies to all students and found that it sets out a range of expectations relating to engagement and attendance. For example, it establishes a mid-point review of engagement against expectations and establishes processes for informal support and formal steps to address engagement concerns. A formal negative decision around engagement will lead to the following outcomes:

- referral to another policy (as appropriate)

- withdrawal

- notifying a university or employer partner.

148. The team found that the policy appears to take the college's approach to engagement forward and is the basis, subject to its implementation and effective policy review, to support and enhance student engagement. This is because the policy provides for the first time a single framework that formally introduces and links engagement expectations and a monitoring and intervention process to address concerns, as well as alternative outcomes that are flexible and proportionate to individual situations. On this basis, the team concluded that the college has created, in readiness, an engagement policy that should, subject to effective implementation and monitoring, be appropriate for the granting of its own higher education qualifications.

Conclusions

149. Overall, the team considered that the evidence shows that the college has sufficiently implemented its New DAPs Plan during its probationary period and created a comprehensive academic framework that is appropriate for the granting of its own higher education qualifications. Therefore, the team concluded that the college meets subcriterion B1.1, because the evidence demonstrates that the college has transparent and comprehensive academic frameworks and regulations which govern how it awards academic credit and qualifications, and that they are appropriate, accessible and applied in practice.

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

150.   The assessment team's view is that the college meets subcriterion B1.2 because it maintains a definitive record of each programme and qualification that it approves (and of subsequent changes to it) and that these constitute the reference point for delivery, and assessment, monitoring and review of each programme. These are the reference point for the provision of records of study for students and alumni.

151.   The assessments team's view is based on its review of evidence which shows that the college has met the evidence requirements for B1.2.

Reasoning

152.   To inform its view of how the college maintains records of its qualifications, the team reviewed the following evidence:

- examples of a transcript and a qualification certificate

- information on the college's webpages

- programme and module specifications for the LLM Legal Practice and GDL programmes

- periodic review documentation for LLM Legal Practice

- the college's Programme and Module Modification Policy

- reports of previous New DAPs monitoring assessments

- records of changes made to programmes

- demonstrations of the functioning of the college's IT and data systems.

153.   As discussed under subcriterion B1.1, the team noted how the college's Quality Assurance and Assessment Regulations list the programmes of study and awards with learning outcomes mapped against the relevant FHEQ levels. The programmes of study are recorded in each programme specifications and these are supplemented with module specifications. The specifications are the definitive record of the content and assessment for the programmes. The team considered that these records are clear and are used as the basis for the delivery and assessment of each programme, which informed the team's view that the college maintains definitive records of each programme.

154.   The college has in place two procedures for the review and proposal of changes to its programmes: the Programme and Module Modification Policy and the Programme

Development and Approval Process for a periodic review. The Programme and Module Modification Policy sets out the way proposed changes to curriculum can be made, through either minor or major modifications processes. The policy includes a responsibility assigned to staff to update programme content in programme specifications and on the website. The team considered previous modifications to programmes and the effectiveness of ensuring accurate records of changes were maintained. For example, the modifications policy was used to make a major modification to the Graduate Foundation in Law programme, which was retitled to the Graduate Diploma in Law, and as a major change, it was approved by the Programme Committee. Comparison of the changes to the programme specifications demonstrate that an accurate record of the change was made as does the exemplar of a template that states correctly the name of the programme.

155.   The periodic review process takes place every five years and requires consideration of all matters relating to a programme's curriculum, delivery and assessment, as set out in its programme specification. The team considered the college's first periodic review, which was of the LLM Legal Practice in 2024. The paperwork shows that the college decided to bring the review forward, which is permitted under the policy, to enable changes principally to the transactional (elective) modules. The assessment team found that the evidence demonstrated that proposed changes related to the then existing validated programme and that the rationales for change were referenced against it. The Periodic Review Panel approved a revised programme specification, including revisions to module specifications.

156.   The evidence included in the periodic review documentation also demonstrated that the college communicated changes internally, as well as externally. For example, though the assessment team was unable to see the full programme specification per se on the college's webpages, the information about the programme is available, which includes detail from the amended programme specification and reflects the amendments to module content.[14] Furthermore, the periodic review approval event and the approval of changes by the Programme Committee are minuted, and provide further evidence to the team that the college ensures it maintains definitive and up-to-date records of changes made to its programmes.

157.   During the college's probationary period, previous assessment teams have reported confidence in its systems to ensure there are definitive records of all students and each qualification to be awarded. For example, the June 2024 OfS New DAPs monitoring assessment report set out that a previous assessment team was assured of the effectiveness of the college's student information system (Salesforce) by the records and outcomes of assessment reports, and views of external examiners. In addition, the March 2023 New DAPs monitoring assessment report detailed the views of a previous assessment team that witnessed a demonstration of the college's student information system and reported that it is comprehensive in tracking individual students and automatically drawing on data from the college's VLE, to inform the production of final transcripts and certificates.

158.   The June 2024 New DAPs monitoring assessment report sets out that evidence of records of study had not yet been assessed, as the college had not had its first cohort of students complete and graduate. Since this report, the college's first cohort of students have completed and graduated. In its New DAPs end assessment submission, the college provided evidence to demonstrate that it issues academic transcripts to students following confirmation of module or

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[14] Available at College of Legal Practice, Explore Our Legal Programmes | Flexible Online SQE Courses.

programme outcomes at an Assessment Panel. For example, the team reviewed exemplars of an anonymised transcript detailing grades on modules and overall award and an anonymised certificate conferring the award. The team triangulated this evidence with the findings of previous assessment teams and is therefore satisfied that the college has a secure system in place to keep records of student achievement and can provide accurate copies of transcripts and certificates including to college alumni.

159. The team concluded that the college meets subcriterion B1.2, as the evidence demonstrates that it maintains a definitive record of each programme and qualification that it approves. These records constitute the reference point for delivery and assessment of the programme, for its monitoring and review, and for the provision of records of study to students and alumni.

Conclusions

160. The assessment team concluded that the college has in place transparent and comprehensive academic frameworks and regulations 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.

161. Furthermore, the team concluded that the college maintains a definitive record of each programme 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. In forming its conclusions, the team carefully considered the nature and context of the college.

162. Therefore, the team concluded that the college meets criterion B1.

Criterion B2: Academic standards

Advice to the OfS

163.   The assessment team's view is that the college meets criterion B2: Academic Standards because it meets sub-criteria B2.1 and B2.2.

164.   The assessment team's view is based on its review of the evidence which shows in summary that the college has clear and consistently applied mechanisms for setting and maintaining the academic standards of its qualifications. It has demonstrated that it can design and deliver courses and qualifications that meet sector-recognised standards and the FHEQ, and has demonstrated that it sets and maintains standards above the threshold, comparable to those set and achieved by other UK degree awarding bodies.[15]

165.   However, the team identified ambiguity and inconsistency in the role of the Curriculum Development and Delivery Group in the development, approval and review of the college's programmes. The team also considered that the college's current approach to identifying academic misconduct could pose a risk to the maintenance of academic standards.

166.   This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

Subcriterion 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. 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.

Reasoning

167.   To determine whether the college's higher education qualifications reflect the appropriate levels of the sector-recognised standards and correspond to the relevant levels of the FHEQs, and whether it demonstrates that the standards that it sets and maintains are reliable over time, the team reviewed a range of evidence including:

- the college's Annual Report on Quality and Standards

- external examiner reports

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[15] See OfS, Sector-recognised standards.

- external references points

- minutes of the Programme Committee

- meetings of Module Assessment Panels and the Progression and Awards Panels

- programme and module specifications for the LLM Legal Practice and GDL

- the Programme and Module Modification Policy

- the Programme Development and Approval Process

- the Quality Assurance and Assessment Regulations

- samples of summative assessments and feedback for the LLM Legal Practice.

168.	The team also discussed issues relating to regulatory frameworks and specific policies during the online visit to the college, and considered evidence from previous New DAPs monitoring assessments during the college's probationary period.

169.	The team found that the Quality Assurance and Assessment Regulations form the foundation for the regulatory framework for the college's academic provision and specify the college's programmes of study. Currently, the college delivers two higher education qualification programmes: these are the Level 7 LLM Legal Practice and the Level 6 GDL, which was originally developed as the GFL.

170.	Admission on to the college's programmes are for postgraduate entrants only. The LLM Legal Practice programme is situated at Level 7, based on attainment of 180 credits, of which 150 must be at Level 7 and 30 at Level 6. Alternative exit awards are available at Level 7 for a Postgraduate Diploma and Postgraduate Certificate, which are awarded for achievement of 120 credits and 60 credits respectively. The GDL award is situated at Level 6, based on attainment of 90 credits, all at Level 6. The team found that the levels set for both programmes appropriately reflect the levels at which these qualifications would be expected to be awarded, based on the team's experience in the sector and in line with the OfS's sector-recognised standards and the FHEQs.

171.	In addition, the team reviewed the programme specifications for the LLM Legal Practice and GDL. These further supported the team's view that the college's programmes and awards appropriately reflect the relevant levels in line with FHEQ and sector-recognised standards and reflect the college's academic regulation framework. The programme specifications each describe in broad and appropriate terms the programme learning outcomes. For example, the learning outcomes for the LLM Legal Practice programme are explicitly situated in the context of professional legal practice and the learning outcomes require learners to devise practical and innovative solutions, to critically evaluate established techniques and to demonstrate autonomy. The learning outcomes are designed to enable successful students to qualify for professional practice. The team considered that the learning outcomes are appropriately situated at Level 7 of the FHEQ and reflect the college's academic regulations. Based on the evidence reviewed, the assessment team is assured that the college's assessment processes enable it to determine the appropriate achievement of learning outcomes in line with the programme specifications and the regulations.

172.	The assessment team also reviewed a sample of module specifications statements and considered that these appropriately map on to the programme outcomes. For example, the team has examined the learning outcomes for the compulsory 60-credit Capstone module and reviewed them against those for the programme. This module requires the learner to independently devise a topic of their choosing in the context of professional legal practice and, with limited supervision, to achieve outcomes which require the student to 'critically evaluate an issue/s in an area of law or legal practice,' to 'critique practical problems and issues that present themselves,' to 'evaluate the extent to which any existing, new or emerging approaches may address the practical problems and issue/s' and to 'draw sound conclusions based on your analysis and evaluation'. In the team's view, these outcomes appropriately align with and map onto the programme outcomes. Based on the evidence, the team concluded that the LLM Legal Practice programme appropriately reflects the applicable sector-recognised standards and the FHEQ.

173.	The learning outcomes for the GDL programme are explicitly designed for a 'graduate entry foundation programme' to legal studies. The outcomes cover knowledge of the foundations of the legal system and skills relating to selecting appropriate legal principles to analyse problems and the ability to acknowledge uncertainty and to critically evaluate legal matters. The assessment team reviewed a sample of module specifications statements and considered that these appropriately map on to the programme outcomes. The team considered that the learning outcomes appropriately reflect the applicable sector-recognised standards and the FHEQ levels. Overall, the team concluded that the college's programmes and qualifications appropriately reflect the applicable sector-recognised standards and the FHEQ.

174.	Alongside the OfS's sector-recognised standards and QAA's FHEQ, the team reviewed evidence that demonstrated how the college takes account of other relevant points of reference in the setting and maintaining of its academic standards. For example, learning outcomes for both the GDL programme and the LLM Legal Practice programme are mapped against the Solicitor Regulation Authority's examination, the SQE. This is appropriate given that elements of the programme are designed to enable students to prepare students for the SQE. In the assessment team's experience across the sector and the subject of law, it is common to situate learning outcomes for courses preparing for the SQE at and above Level 6. In addition, the team found that the GDL programme is appropriately benchmarked against the QAA Law subject benchmark statement.[16] The team also determined that the LLM Legal Practice is benchmarked against the QAA Law subject benchmark statement. While the benchmark statement is devised for undergraduate programmes (Level 6), in the assessment team's view this benchmarking helps to characterise and frame the LLM Legal Practice as an appropriate Level 7 law programme. This further demonstrated to the team how the college sets its academic standards taking appropriate account of relevant external points of reference.

175.	Furthermore, the team triangulated its findings with evidence of a previous OfS New DAPs monitoring assessment report, dated June 2024, which set out that the Programme Approval Event for the LLM Legal Practice included appropriate internal and external academic expertise and input, and demonstrated that the development of the programme took account of external reference points including the FHEQ and professional standards set out by the Solicitors Regulation Authority. The team considered that this evidence further demonstrated that, in the

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[16] Available at QAA, Subject benchmark statements.

setting and maintaining of academic standards, the college takes appropriate account of relevant external points of reference and external and independent points of expertise.

176.   The team reviewed evidence to assess whether the college's programme approval, monitoring and review arrangements are robust, are applied consistently and explicitly address UK threshold academic standards. The evidence considered included the college's Programme Development and Approval Process, which defines how the college develops programmes in line with its strategic plan and sets out the processes for initial approval. Programmes are thereafter subject to a periodic review process every five years, though this can be earlier, or exceptionally, with reasons, extended by one year. The assessment team also considered the Programme and Module Modification Policy, which provides the authorisation process for minor changes to modules and programmes and major ones which arise before a periodic review. The team found that these procedures are in line with sector approaches to programme modification and reflect a clear policy approach.

177.   The team reviewed evidence of the Programme Development and Approval Process being applied effectively and consistently during the development and approval of the LLM Legal Practice and the GFL, which has since been modified to become the GDL. For example, the LLM Legal Practice Programme Approval Event demonstrated appropriate compliance with the college's procedures by engaging with external advisers and a student representative, as well as mapping against external benchmarks including the FHEQ, the Solicitor Regulation Authority's statement of Solicitor Competence and Assessment, and the QAA Masters' Degree Characteristic Statement.[17] In addition, the evidence showed how these references and benchmarks were applied in the development of the programme specification. This demonstrated to the team that the development and setting of standards in the programme took account of external reference points. The Programme Approval Event report also demonstrated that the programme approval arrangements appeared robust and ensured that the levels set were in accordance with the college's own academic frameworks and regulations, as well as UK threshold academic standards as described in the FHEQ. The team also saw evidence that the approval panel included appropriate internal and external academic expertise, as discussed previously.

178.   To assess how the college monitors, reviews and maintains its academic standards, the team considered its periodic review procedures. The Programme Development and Approval Policy sets out the requirements for a periodic review, which must be assessed in the light of a range of specified internal and external factors. Periodic reviews are intended to ensure that the process of the review is in line with the college mission and sector practices and standards. The procedure requires a periodic review of an existing programme every five years, though this can be undertaken sooner at the request of the programme leader. The team reviewed the documentation for the 2024 periodic review of the LLM Legal Practice, which was undertaken earlier in the five-year cycle to make changes to the transactional modules and to review the programme prior to the end of its probationary period. Through its review of the periodic review documentation, the team found evidence of appropriate consideration of external points of reference in the same way the original Programme Approval Event did, specifically including references to the FHEQ, QAA subject benchmarks and the Solicitor Regulation Authority. The periodic review documentation also reflected engagement with internal and external expertise:

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[17] See QAA, Characteristics statement: Master's degree.

there was one student representative and two external members on the panel, which the team considered to be appropriate to the level and subject of the programme.

179. However, as discussed previously under criterion A1, the team did not find evidence of involvement of the Curriculum Development and Delivery Group during the periodic review of the LLM Legal Practice, in the way that the Programme Development and Approval Process sets out that it should. Rather, the necessary approval stages were made by the Programme Committee, as the ultimate decision maker. While the team considered that this did not impact on the efficacy of the process, it noted that this raised concerns around the ambiguity of the role of the Group and inconsistent function in practice. As discussed further under criterion A1, the team considered that the role of the Group, and how its responsibilities are set out in the Programme Development and Approval Process, warrant further review by the college. The team's view is that, despite this anomaly, the periodic review Process for LLM Legal Practice resulted in changes to an approved programme that are in line with the college's academic regulations for a Level 7 masters' course, and reflect the appropriate FHEQ levels and sector-recognised standards. Furthermore, while the team found evidence of the college's programme development and review mechanisms not always consistently applied, it concluded that this has had no apparent substantive impact on the academic standards at the college.

180. In summary, the team found that the periodic review of the LLM Legal Practice programme demonstrated how the college ensures the maintenance and reliability of standards over time, with the programme continuing to align with the college's academic regulations, together with the appropriate FHEQ and sector-recognised standards. The team was assured that the college's programme review arrangements are robust, in that they explicitly address whether the UK threshold academic standards are achieved and whether the academic standards required by the individual degree awarding body are being maintained. Furthermore, the team is satisfied that the evidence demonstrated that the college makes use of appropriate external and independent expertise, including students, in maintaining UK threshold academic standards.

181. In setting and maintaining academic standards, the team found that external examiners have been appropriately and regularly engaged in the college's assessment process. The reports submitted by external examiners confirm that the college's programmes and qualifications appropriately reflect the applicable sector-recognised standards and the FHEQ. The team also considered that the college's engagement with external examiners, and external examiners' assurances of the college's standards, demonstrated that the college makes use of, and takes appropriate account of, relevant expertise in maintaining comparability of standards with other providers of equivalent level qualifications. For example, the team reviewed the most recent evidence of assessment panel minutes, which confirm that the assessment panels took place with the participation of external examiners and that external examiner reporting continued to confirm that assessments had been set and marked in line with relevant FHEQ levels. The team noted that one of the external examiners reports included implied criticism about the quality of the college's moderation process, given a number of mistakes that could have been rectified by proofreading. This assured the team that external examiners were sufficiently scrutinising the assessment and awards of the college and therefore were being effective in their roles as appropriate external expertise.

182. In assessing how the college takes appropriate account of students in the setting and maintaining of academic standards, the team noted that the June 2024 monitoring assessment

report of the college identified this area as requiring corrective action. The report identified that there were no student representatives in attendance at the Programme Committee, which approved modifications to modules in the changes to the LLM Legal Practice programme. The report set out concerns that there was no evidence of consultation with students and that modifications may have been made based on assumptions about student need, rather than evidence from student feedback or consultation. The reports' authors considered this a gap in the process, and that the college should further develop its programme approval and monitoring procedures to ensure students are fully embedded as a point of expertise throughout the process by which academic standards are set and maintained. Therefore, the report identified this as an area that required corrective action to be assessed in full during the New DAPs end assessment process.

183.   In its response to the June 2024 monitoring assessment report, the college reported that there are other mechanisms in place which enable student voice to be heard, so that it may be considered sufficiently embedded as a point of expertise throughout the process by which academic standards are set and maintained. The team considered this response during its review of evidence.

184.   The team reviewed evidence, from the college's other committees and other student feedback mechanisms, of how students' views and feedback are accounted for by the college. For example, the Staff-Student Liaison Committee, according to its terms of reference, 'provides a formal link between students and the governance committees'. This is the formal committee whereby students provide feedback on their experiences and an action log is maintained to demonstrate where student feedback has been acted on. Minutes of these meetings, the action log and a report from the chair of the committee are presented the Programme Committee. The college reported that this ensures that the Programme Committee has direct access to student feedback as part of its governance work.

185.   Another mechanism that the college has in place to seek the views of students is Module Reviews. Students complete module surveys at the end of each module, which feed into the Module Reviews completed by the Programme Team. The Module Reviews feed into the annual Programme Evaluation reporting, which includes an opportunity for staff to comment directly on academic standards through interrogation of student achievement statistics and the narrative prepared by the Programme Team.

186.   During the online visit to the college, the team heard positively from a student who had been a representative on the Staff-Student Liaison Committee, as well as from one who had participated in the LLM Legal Practice periodic review. The team considered that the engagement of the student during the periodic review process was an appropriate way of taking account of the student voice. For example, the college noted that the changes proposed in the periodic review were 'in response to feedback from students on the intensity of study on the modules, demonstrating our approach to using student feedback'. The team also noted that the programme team that led the periodic review was commended by the Periodic Review Panel on 'the commitment to engaging with and responding to student voice, reflected in the revised programme structure, with the effect of continuous improvement of the student experience'. While the participation of a student representative in the original approval event for the LLM Legal Practice and in the later periodic review demonstrated that, in some instances, the setting and maintaining of academic standards has taken account of students' views, the team concluded that the concern identified in the previous monitoring report remains, in that

the setting and maintaining of academic standards does not take appropriate account of students as points of expertise.

187. The team considered that students are too often absent in decision making relating to the setting and maintaining of academic standards, notably in the Programme Committee. The evidence reviewed by the team of minutes of the Programme Committee demonstrates that there has in practice been little student representation there. Given this, and that there was no formal student input into the last round of Programme Evaluation reporting, the concern remains that decisions are made about students and standards without representation at the point of decision making. The role of students' engagement with the college's academic governance and management of higher education delivery is discussed in full under criterion A1. However, the evidence reviewed does not assure the team that students are fully embedded as a point of expertise throughout the processes by which academic standards are set and maintained. The assessment team acknowledges that the college is working to secure further student representation in the Programme Committee, but that it continues to be a weakness.

188. Overall, the assessment team found that, despite difficulties with student representation, through its formal committees, in the maintaining of academic standards, the college takes appropriate account of relevant external points of reference and external and independent points of expertise, including students.

189. To assess whether achievement of relevant learning outcomes is demonstrated through assessment, and that both the UK threshold standards and the academic standards of the relevant degree awarding body have been satisfied, the team reviewed the college's assessment and awarding procedures, as set out in its academic regulations, together with evidence including:

- external examiner reports

- evidence of assessment procedures and moderation of assessments

- evidence considered from previous New DAPs monitoring assessment reports, including observations of progression and awards panels

- meetings of module assessment panels and the Progression and Awards Panel

- the college's Quality Assurance and Assessment Regulations

- samples of summative assessments and feedback for the LLM Legal Practice.

190. As discussed under paragraph 171, the team found that the college's programme specifications set out how programme learning outcomes are appropriately mapped against relevant FHEQ levels and sector-recognised standards. This evidence helps to demonstrate that the college's modules and programmes are designed so that delivery and assessment are coherent and consistent, to ensure that recognition of attainment of learning outcomes is appropriate to the standards stipulated in the programme specifications and regulations. Therefore, the programme specifications set the reference point for the college's awarding of credit and qualifications.

191. In reviewing the college's assessment and awarding procedures, the team noted that the June 2024 OfS New DAPs monitoring assessment report sets out a previous assessment team's review of a sample of students' summative assessed work from the LLM Legal Practice programme. The report sets out that the evidence demonstrated that appropriate academic standards are being maintained and the college is offering its qualifications at levels that reflect the relevant levels of the FHEQ, and reflect the standards set by the college. However, the report also set out that assessment rubrics and feedback to students had not been reviewed, and therefore identified that this required further assessment during the New DAPs end assessment. To do this, the current assessment team reviewed the following evidence:

- A sample of marking rubrics and feedback on the two core modules of the LLM Legal Practice programme via the college's VLE:

  - solicitors legal knowledge

  - solicitors legal skills.

- A sample of marking rubrics and feedback on two transactional (elective) modules of the LLM Legal Practice programme via the college's VLE:

  - acquisitions and finance

  - corporate finance.

- Screenshots of the assessment work across a number of different modules for five students on the LLM Legal Practice programme:

  - solicitors legal knowledge

  - solicitors legal skills

  - family law

  - acquisitions and finance

  - corporate finance.

- Assessment scrutiny forms, assessment rubrics and evidence of moderation for the following modules:

  - solicitors legal knowledge

  - solicitors legal skills.

192. During this review, the team also observed one case in which changes to marking were made through the assessment scrutiny and moderation process.

193. The team triangulated its review of evidence with that of previous assessment teams, which reviewed the college's processes for the internal moderation and recording of marks on the 'Marking and moderation form'. This includes input and comment from external examiners. The report from the previous New DAPs monitoring assessment of June 2024 concluded that

moderation decisions were made fairly and that the college was applying its regulations. Based on the evidence reviewed, the assessment team concluded that the college's assessment processes enable it to determine the appropriate achievement of learning outcomes through assessment as well as to give feedback to inform students of the reasoning for grading decisions. The evidence also shows that there is appropriate marking and moderation to demonstrate that the credit is being awarded fairly, in line with relevant learning outcomes. Furthermore, the samples demonstrated that appropriate academic standards are being maintained and the standards of assessment were in line with the sector-recognised standards regarding 'outcomes a graduate would be expected to demonstrate for each classification'.

194.   The team also reviewed evidence of the function of the college's Module Assessment Panel and Progression and Awards Panel to assess the remit and operation of the panels. The Module Assessment Panel determines the award of credit at module level and the Progression and Awards Panel applies credit to determine the conferral of awards in line with the programme specifications. A review of a sample of the minutes of both assessment panels assured the team that credit and qualifications are awarded only where the achievement of relevant learning outcomes has been demonstrated through assessment and that academic standards are satisfied. For example, the team determined that the panels consistently applied the college's academic regulations; the quality assurance processes were monitored and reviewed; application of prior credit was considered; the assessment outcomes were endorsed; and there was oversight by external examiners. A review of the assessment panels further demonstrated that over the course of the college's probationary period the panels have been appropriately constituted and duly minuted.

195.   In summary, the evidence reviewed demonstrated to the team that the college's academic regulations governing assessment, progression and award are implemented fully and consistently, and that credit and qualifications are awarded only where the achievement of relevant learning outcomes has been demonstrated through assessment. The team is satisfied that the college is offering its qualifications at levels that correspond to the relevant levels of the FHEQ, and reflect the standards set by the college as well as of the FHEQ and sector-recognised standards.

196.   In reviewing the college's assessment and award procedures, the team considered the college's approach to identifying, investigating and responding to unacceptable academic practice (academic misconduct). The assessment team noted that the college sets out rules on academic misconduct as part of its academic regulations and academic misconduct is a standard item on the agenda of the assessment panels. The team determined that although there are regulations in place, it has concerns relating to the college's practices in detecting academic integrity issues. Full discussion regarding the college's approach to academic misconduct is discussed under criterion B3.

197.   The assessment team assessed how the college reviews and considers maintenance of standards against completions rates. The college's 2023 Outcome of Examinations Report stated, 'we can infer that completion rates are broadly consistent across the protected characteristics, however there are some differences around ethnic origin and religion which will be monitored in the 2023-24 reporting year'. The college data shows there is a notable non-completion rate on the Solicitors Legal Knowledge and the Solicitors Legal Skills modules of the LLM Legal Practice. This had a consequential negative impact on the programme's completion rate, reducing the overall completion rate from 68 per cent to 52 per cent for 2022-

23. The team considered this low, based on its experience across the sector and the OfS's thresholds for student completion rates for postgraduate programmes.[18]

198.　The team considered the context of these core modules to review the potential causes of the low completion rates, and how the college has responded to these. These two modules are also referred to as SQE preparation modules, and a primary purpose of them is to prepare students to take SQE1 and SQE2, which are a prerequisite to becoming a solicitor. The team noted that these external SQE exams are therefore the major area of focus for students on these modules, and the attainment of academic credit may be a secondary concern. The team also noted that the college reported in the 2022-23 Outcome of Examinations report, which was received by the Programme Committee, that 'Anecdotally, non-submissions are less likely to occur on the LLM programme as students are invested in achieving the LLM award'.

199.　In summary, the assessment team's findings aligned with the college's own considerations regarding concern at the low completion rates. One cause is related to the pressure of the external SQE examination. The team acknowledged that the market across the sector for courses preparing for the SQE is still becoming established, and that the SQE is the subject of analysis and critique across the subject field, which was referred to by the college during the online visit. However, for the purposes of maintaining and demonstrating appropriate academic standards the assessment team was assured by the college's commitment to ongoing monitoring of completion rates on its programmes and its assessment of them against comparable performances for equivalent Level 7 law programmes elsewhere focused on preparation for the SQE, as well as Level 7 law programmes more widely. The team was further reassured by the college's quality assurance processes, which require external examiners to review and comment against academic standards.

200.　Overall, the college's processes demonstrated to the team that in continuing to maintain threshold academic standards and comparability of standards with other providers of equivalent level qualifications, the college makes use of appropriate external and independent expertise over time.

Conclusions

201.　The team concluded that the college meets subcriterion 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.

202.　The team further concluded that the college meets subcriterion 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 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 with those set and achieved by other UK degree awarding bodies.

203.　However, the team identified ambiguity and inconsistency in the role of the Curriculum Development and Delivery Group in the development, approval and review of the college's

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[18] See OfS, Numerical thresholds for condition B3.

programmes. The team also considered that the college's current approach to identifying academic misconduct could risk the maintenance of academic standards.

204.   However, overall, the team concluded that the college meets criterion B2.

Criterion B3: Quality of the academic experience

Advice to the OfS

205.   The assessment team's view is that the college does not meet the requirements of criterion B3: Quality of the Academic Experience.

206.   The assessment team's view is based on its review of evidence which shows in summary that the college has demonstrated that it meets a number of elements of the criterion regarding how it designs and delivers courses and qualifications that provide a high quality academic experience. However, the team found that there were two key areas where the college has not demonstrated that it provides 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: First, the college's approach to how it maintains social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use. Secondly, the college's processes for preventing and identifying unacceptable academic practice.

207.   The team considered these two areas warrant particular significance in the context of the college, as a wholly online provider of legal higher education. Therefore, the team determined that these concerns critically impact on the college's ability to demonstrate that it delivers a high quality academic experience to all students.

208.   This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

Subcriterion 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

209.   To assess the college's procedures for how it designs and delivers courses and qualifications that provide a high quality academic experience, the team reviewed evidence of the college's programme development and approval process and considered the governance procedures that underpin them. This included a review of:

- the college's periodic review documentation

- the college's Programme Evaluation Reports

- the college's Programme Development and Approval Process

- minutes of the Programme Committee and Staff-Student Liaison Committee.

210. The team also discussed issues relating to the design and approval of programmes during the online visit to the college.

211. Consideration and discussion of the college's design, development and approval of programmes procedures is given under criterion B2, and the team concluded that there are clear and coherent structures for programme approval in the college. The Programme Committee has final approval for all new programmes and receives documentation from Programme Approval Panels as the senior academic authority in the college. The college also operates a Curriculum Development and Delivery Group ('the Group'), which reports into the Programme Committee and has responsibility for the development, monitoring and review of the curriculum on an operational level. The role and function of the Group is considered and discussed under criteria A1 and B2, and the team found the function of the Group in the college's programme development and approval procedures to be ambiguous. As set out in criteria A1 and B2, the team found evidence of inconsistent function of the Group's responsibilities as described in the Programme Development and Approval Process. However, the team was satisfied that despite ambiguity regarding the function of the Curriculum Development and Delivery Group, ultimate responsibility for approving new programme proposals is clearly assigned through the college's Programme Committee, and that the Programme Committee appropriately discharges this responsibility.

212. The team evaluated the Programme Development and Programme Approval process, which sets out the purpose, scope and procedures for the college's programme approval and review processes. The college's Quality Assurance and Assessment Regulations provide the framework of regulations for new programmes, which must follow the Programme Development and Approval Process to be considered by a Programme Approval Panel. Through its review of the college's Programme Development and Programme Approval process, the team found evidence of effective practice. For example, the Programme Development and Programme Approval process document is drafted in accordance with the QAA Quality Code by ensuring that the quality of provision is a focus of the development and approval documentation.[19] The team saw evidence of the processes in practice through its review of the report of the Programme Approval Event for the LLM Legal Practice.

213. As discussed fully under criterion B2, the team considered that this evidence demonstrated effective programme development practices, such as the inclusion of external expertise on the Programme Approval Panels, and appropriate external reference points, such as the FHEQ and the standards and regulations set by the Solicitors Regulation Authority. This demonstrated to the team that the college operates effective processes for the design, development and approval of programmes, and responsibility for approving new programme proposals is clearly assigned, including the involvement of external expertise where appropriate.

214. The team also considered the college's approach to the review of, and changes to, approved programmes. As set out and discussed fully under criterion B2, the college has two mechanisms for the review and proposal of changes to its programmes: the Programme and Module Modification Policy and the Programme Development and Approval Process for a periodic review. The Programme and Module Modification Policy provides the process for

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[19] Available at QAA, UK Quality Code.

making minor and major changes to programmes. The team reviewed evidence of the college's modification procedures being applied effectively when the GFL programme was modified to become the GDL programme. In line with the college's modification policy, this change was considered 'major' and went through appropriate approval via the Programme Committee.

215.   The team evaluated the college's Programme Development and Approval Process to assess how staff are informed of, and guided through, its procedures. The team found that the Programme Development and Approval Process states explicitly that it is a collaborative, collegiate exercise and not intended to be confrontational or adversarial. The team evaluated evidence of this principle in practice through its review of:

- documentation for the Programme Approval Event for the LLM Legal Practice programme

- documentation for the Programme Evaluation Reports

- minutes of supervisor quarterly meetings

- terms of reference and minutes of the Programme Committee.

216.   In summary, the team found that the evidence demonstrated that relevant staff are informed of, and provided with guidance and support on, programme approval procedures and their roles and responsibilities in relation to them. The evidence further demonstrated to the team that responsibility for approving new programme proposals is clearly assigned. For example, the Programme Development and Approval process sets out the responsibility for approving programmes, via Programme Approval Events, and the requirement for externality on Programme Approval Panels. The team evaluated evidence of this process being applied in practice through the review of documentation from the Programme Approval Event for the LLM Legal Practice and GFL programmes.

217.   The team found that this evidence demonstrated appropriate membership on the Programme Approval Panels, including one student representative, and showed effective engagement with external panel members. The documentation also showed that the college's programme approval processes were duly followed, as the Programme Approval Panels approved the programmes and submitted their reports to the Programme Committee for further scrutiny and subsequent approval. The team also noted that the programme approval sign-off forms for the LLM Legal Practice programme showed that any action following programme approval is monitored where necessary, as required by the college's Programme Development and Approval process.

218.   While the team was satisfied that responsibility for approving new programme proposals is clearly assigned and relevant staff are informed of the appropriate processes, the engagement of students in the programme approval processes was not as effective in practice. Although there are mechanisms in place for student engagement within these processes, low attendance and minimal engagement of students through the Staff-Student Liaison Committee and Programme Committee diminish the effectiveness of this engagement. The college's Staff-Student Liaison Committee is described as a forum for the formal discussion of all matters relating to the delivery of the college's programmes and modules with students and, according to its terms of reference, there is a clear role for the committee in relation to the design, development and approval of the college's programmes. Furthermore, there is a student

representative on the Programme Committee, which has ultimate responsibility for the approval of new programmes. However, as discussed previously under criteria A1 and B2, the team found that in practice, student attendance and engagement with both the Staff-Student Liaison Committee and the Programme Committee was lacking.

219.   The team found evidence which showed that, when student representatives did attend the Programme Committee, they had little input. The team considered that the college sets out a commitment to including students in programme development and approval processes and decisions, but in practice, because of lack of effective participation and engagement, it does not meet the broader ambitions of partnership working as expressed in the Student Partnership Framework Policy. The team acknowledged that the college is aware of this weakness in fully embedding students in its academic governance structures, and this is discussed fully under criterion A1.

220.   In summary, the team was satisfied that the evidence reviewed demonstrated that the college operates effective processes for the design, development and approval of programmes and that relevant staff are informed of, and provided with guidance and support on, these procedures and their roles and responsibilities in relation to them. Furthermore, responsibility for approving new programme proposals is clearly assigned, including the involvement of external expertise where appropriate, and subsequent action is carefully monitored. However, the team considered that the processes for the design, development and approval of programmes could be improved with more prominent and effective engagement with students.

221.   The team considered how the college's support services are engaged with the development and approval processes of programmes. The team found that, in the delivery of programmes, the evidence showed that there are close links between academic teams and student support teams, and that this is embedded throughout the learning and teaching of the college's programmes. For example, there is regular monitoring of student engagement and progression, and one-to-one sessions between students and supervisors take place regularly. However, the team did not find evidence of direct participation from the Student Services team in Programme Approval Events, for example through its review of the Programme Approval Event documentation for the LLM Legal Practice and GFL. The team considered that on balance, this did not appear to impact on how learning support services engage with and inform programme planning and approval arrangements. For example, the team found that programme approval documents include a specific section on programme management and student support, which sets out how students on the programmes will be supported by staff. Furthermore, as discussed fully under criterion D1, the team's review of evidence of learning support services engagement with students and academic teams in practice provided further assurance that close links are maintained across the college. The team therefore concluded that the evidence reviewed demonstrated that, although support services are not directly involved in Programme Approval Events, the college has demonstrated other ways in which it ensures there are appropriate close links between learning support services and the programme planning and approval arrangements.

222.   To assess whether the college secures and maintains coherence of programmes with multiple elements or alternative pathways, the team reviewed the programme specifications of the LLM Legal Practice and GDL. The team determined that both are single-route programmes made up of core modules and electives, with no alternative pathways available. The team reviewed the content across the elective modules and found them to be coherent and

appropriate and in line with other providers offering similar programmes. However, the team noted that the college has multiple entry points and cohorts studying in parallel, and also works in partnership with law firms and other higher education providers. There is also a large proportion of students studying part-time and internationally in other time zones. The team therefore considered that there is a risk this model could contribute to a lack of cohesiveness across the student cohort that requires further monitoring as the college grows, though the team did not find evidence of this in practice. Overall, the team concluded that the coherence of programmes with multiple elements is secured and maintained.

223.   Overall, the team's view was that the college's approach to the design and approval of courses contributes to a high quality experience for all students.

Learning and teaching

224.   The team reviewed the college's Teaching and Learning Strategy and the Learning and Teaching Principles which, together, set out the objectives, strategic implementation and key policies governing the teaching and learning in the college. These are particularly focused around the practice-based content of the college's programmes and its engagement with the profession and the legal sector and community. The team also noted that the college has opted to use the QAA UK Quality Code as a reference point, and that it follows the expectations and core provisions for colleges of higher education in the UK set out in the Quality Code. For example, the college's strategic approach is published, communicated clearly and accessible to staff, students and external stakeholders, and is supported by a comprehensive and transparent governance framework. The team noted that this aligns with Principle 1 of the QAA UK Quality Code and therefore reflects practice across the sector.

225.   The college demonstrated application of its commitment to professional legal education through its three high-level objectives of Legal Professional Practice, Legal Education Best Practice and Legal Professional Ethics. For example, the college prioritises 'preparing new entrants to the legal profession, by equipping them with sound legal knowledge, the conceptual ability to solve legal problems, practical legal skills and ethical awareness'. The team found that these principles and objectives are in line with the college's strategic aims and higher education, as discussed further under criterion A1. During the online visit to the college, the team met with members of the college's senior team, who provided an overview of the college, its strategy, mission and ethos, and heard that the college prioritises a commitment to virtual learning and flexible delivery around students' lives to support its postgraduate practice-based provision. The team considered that this further demonstrated the clear strategic direction of the college and how this is reflected in its Teaching and Learning Strategy and Principles.

226.   Furthermore, the team met with a representation of students during the online visit to the college and heard that many felt the college's focus toward flexibility and support around student attendance enabled them to succeed in balancing their studies with their professional legal work. Therefore, the team was satisfied that the evidence reviewed showed that the college's approach to learning and teaching reflects and is consistent with its stated academic objectives.

227.   The college's provision is wholly delivered online. Therefore, all of its students study at a distance. To determine whether the college maintains virtual and social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use, the team assessed the college's virtual learning and social environments, systems

and resources. The team also assessed the college's virtual environments to determine whether they provide robust arrangements to ensure effective learning opportunities.

228. The team found that the college operates three virtual learning resources for students. These are:

- Canvas – the college's VLE, which operates as the basis for student learning with access to learning resources, teaching calendars and assessment submissions

- Student Hub – a platform that provides information and access to a variety of resources and tools, including the publication of results and the signposting and promotion of opportunities such as careers events

- ServiceNow – the college's student facing enquiry portal, which provides a case management system.

229. In addition, the college delivers its teaching sessions, both group and individual, online via Zoom.

230. To assess these resources the team was provided with access to multiple courses and modules in Canvas during its assessment. It reviewed screenshots of the Student Hub and observed a demonstration of the college's ServiceNow system during the online visit. The team also observed a live 'surgery' teaching session via Zoom for the Solicitors Legal Skills module during the online visit.

231. The team found that Canvas has been designed to provide students with a comprehensive, accessible and reliable virtual learning environment. This demonstrated evidence of the college's Teaching and Learning Strategy and expressed commitment to improvements and innovation in its online learning approach. The team considered that the Student Hub is a key resource of non-programme specific information to students. It is structured into four key areas which link to further resources, including Help and Support, the Programme Handbook, Canvas and Student News. The Student News section, for example, contains information such as student newsletters and networking event and opportunities.

232. The team triangulated its review of this evidence alongside consideration of previous New DAPs monitoring assessments undertaken during the college's probationary period. These assessments reported that the college's systems were accessible and that robust arrangements existed for ensuring that the learning opportunities provided to all its students were effective. For example, two previous monitoring assessment reports set out that asynchronous online learning is supported by a pre-course study packs and skills guides, which provide synchronous comprehensive learning materials. The team's observation of the college's VLE confirmed that teaching and learning materials are comprehensive and that the environment for learning is accessible and reliable. For example, students can choose to attend live teaching sessions (synchronous) or to watch recordings of teaching sessions (asynchronous), which are posted on relevant Canvas pages.

233. The team found that students are guided through their studies via an individual structured calendar, which is integrated into Canvas and shows what they should be studying and when. The team's view of the college's virtual learning environment was further informed by feedback provided by students during the online visit to the college. Students expressed satisfaction with

the college's VLE and its systems, in particular the fact that the learning environment is easy to navigate, and that synchronous learning is available through recordings. Furthermore, students stated that all staff, including IT Support staff, are readily available to offer help when it is needed.

234.   The team noted that the college has made recent improvements to its virtual learning resources and arrangements, to enhance the support mechanisms in place for its students, all of whom are studying at a distance from the college. For example, ServiceNow was implemented in January 2024 to improve how the college receives, manages and responds to student queries. Students can use ServiceNow to request support, advice and help from Student Services, Academic Administration and the IT Support Team on a wide range of issues. During the transition to implement the ServiceNow system, the college developed an implementation plan to ensure that no student queries were overlooked. The team considered that this demonstrated the college's commitment to maintaining an accessible and reliable virtual learning environment. Furthermore, during the online visit to the college, the team heard from students that they are happy with ServiceNow and found it to be effective and easy to use. This demonstrated to the team that the college's virtual learning environment is safe, accessible and reliable for every student.

235.   The team considered that students are enabled to monitor their progress and further their academic development in various ways. The college's integrated online systems monitor student data to track student learning and the team considered that this data is used effectively, by both staff and students. For example, supervisors have access to engagement data to inform discussions with students in one-to-one meetings, or, if needed, to raise concerns with programme leads and the Student Support Team. During its meeting with adjunct staff, the team heard how access to this data informs staff's ability to quickly intervene and support students where necessary. The team's observation of the college's VLE showed how students are enabled to monitor their progress and their own academic development and how the platform supports feedback sessions with supervisors. For example, students can access assessment grades and feedback immediately through each module's Canvas site, which is also used to generate reports for Assessment Panels. Furthermore, the team noted that all modules of the LLM Legal Practice programme include both group and individual support for students, and that students have regular meetings with their supervisors to review performance, progress and academic development. In summary, the team was satisfied that every student is enabled to monitor their progress and further their academic development.

236.   To assess whether the college promotes dignity, courtesy and respect in the use of its virtual learning environment, the team reviewed the virtual learning resources set out in paragraph 228, together with the college's Student Charter and Code of Conduct. The team found that the Student Charter and Code of Conduct sets out the expectations of the behaviour of all students enrolled at the college, for example that students should be respectful and polite to fellow students, staff and others working for the college. The team considered this policy was likely to promote dignity, courtesy and respect.

237.   Furthermore, the team determined that the virtual learning environment provides robust arrangements to ensure effective learning opportunities for its students, all of whom study at a distance from the college. However, as discussed in paragraphs 238 to 262 the team is not satisfied that the evidence demonstrated that the college maintains a social learning environment that is safe, accessible and reliable for every student. The team's view is that

these concerns regarding a social learning environment warrant particular significance, in the context of the college as a wholly online provider of higher education.

238.   To evaluate whether the college maintains social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use, the team assessed resources and tools that the college provides to students as a form of social learning environment. The team found that three resources operate at the college to form the social learning environment to students. These are:

- Student Hub – a platform that provides information and resources to students, including newsletters and promotion of opportunities such as networking and careers events

- small group sessions and feedback sessions for the Solicitors Legal Knowledge and Solicitors Legal Skills modules

- social media-based networks such as LinkedIn and WhatsApp groups.

239.   As discussed in paragraphs 228 to 232, the team found that the college's Student Hub provides students with a range of non-programme-specific information such as Staff-Student Liaison Committee updates and college policy updates. The Student Hub also promotes relevant events to students, such as CV workshops and career opportunities through LinkedIn and networking groups such as the Birmingham Law Society. During the online visit, staff explained that the Student Hub is one way in which the college maintains a social learning environment for students. The college reported that 'due to technical specifications', it was not possible for the assessment team to be granted access to the Student Hub, but screenshots of the main pages of the Student Hub were provided and a demonstration was arranged for during the online visit. During the visit the planned demonstration of the Student Hub did not take place, as the demonstration of ServiceNow and the college's student records system overran. Therefore, following the visit, the college provided further information to the team, including additional screenshots of the Student Hub as evidence to demonstrate the different ways in which students can engage with it as a social learning environment.

240.   The team considered that, while the Student Hub provides relevant and helpful information to students, the team did not see evidence to demonstrate that the college maintains the Student Hub as a social learning environment. For example, the platform appears to be an information dissemination mechanism and does not allow for interaction or two-way communication between students. Furthermore, while the team saw examples of multiple networking opportunities shared via the Student Hub, these appeared to be externally organised events focused on career development and opportunities, such as the Birmingham Solicitors Group Network Breakfast, rather than teaching and learning events organised by the college itself.

241.   These findings were triangulated with evidence of student feedback that the team received during the online visit. For example, when the team asked students to discuss their experiences of the college's virtual and social learning environments, no students raised or identified the Student Hub as a resource, tool or environment. When the team asked students about ways in which they could socially interact with peers, the team asked specifically about their use of the Student Hub. In response, one student stated that they did not consider the Student Hub as a source of social learning or community, but rather a noticeboard for

information. The same student reported that they understood it as a source of links for support, such as mental health, but that they had not been aware of anything 'social or community related' being shared through the Student Hub. Another student stated that they were not aware of the Student Hub but admitted that they may not have been necessarily seeking this out.

242.   The team noted that previous lack of engagement and understanding of the Student Hub had been raised in Staff-Student Liaison Committees in 2023, as the ongoing action plan from the committee included a previous action that identified how 'students are not often engaging with the Student Hub'. Based on this evidence, the team concluded that the Student Hub does not sufficiently demonstrate how the college maintains a social learning environment that is accessible for every student.

243.   Another way in which the college sets out that it maintains a social learning environment is through the mechanism of small group sessions, which the college recently introduced in August 2024, for the Solicitors Legal Knowledge and Solicitors Legal Skills modules. The college introduced these sessions following recurrent student feedback of a lack of sense of a social learning environment, which had been previously identified as a concern in a previous New DAPs monitoring assessment report. The college reported that these group sessions are included in students timetables and calendars, though the team did not observe any of these or establish whether they are mandatory. Further, due to the recent introduction of the small group sessions the team was not able to gather evidence from students of their experiences of these sessions.

244.   However, the team heard from students regarding 'feedback sessions' that the college also offers to students once they have completed the SQE assessments (following the Solicitors Legal Knowledge and Solicitors Legal Skills modules). During the visit, one student reported that they had attended a SQE feedback session which was attended by approximately five others and found it to be a helpful tool to discuss assessment feedback and share tips with peers. Another student stated that they were unable to attend any group sessions because of their work schedule, but noted that they were able to benefit from the content as the session was recorded. Throughout the online visit to the college the team heard, from students and staff, how many of the college's students work alongside their studies, and how this is indeed the driver behind the college's flexible teaching model of synchronous and asynchronous delivery. However, the team considered that, in the context of synchronous group sessions as a form of social learning environment, this could prevent students from being able to attend group sessions 'live' and so miss out on accessing them as a form of social learning environment.

245.   Furthermore, the college reported that the new group sessions have only been introduced on the Solicitors Legal Knowledge and Solicitors Legal Skills modules. While these are mandatory modules for all students on the LLM Legal Practice programme, the team noted that this approach could limit the opportunities for students to access group sessions as a form of social learning environment. Based on this evidence the team determined that, while the college is developing small group teaching sessions to provide a form of social learning environment, the team concluded that they do not provide an adequate social learning environment that is accessible and reliable for every student because of their limited offering.

246.   The third way in which the college sets out that it provides a social aspect to its learning environment is through social-media-based networks such as LinkedIn and WhatsApp groups. The team noted that, in its self-assessment, the college cited the use of WhatsApp groups as a way of encouraging a social aspect to the virtual learning environment. The college reported that these are student-led groups, encouraged by the college: 'Students also typically set up WhatsApp group chats, which we encourage, to connect further with each other outside of timetabled module sessions'. In response to an additional evidence request from the team, the college also reported that it has developed a student and alumni LinkedIn group as an opportunity for students to connect and engage with each other. The team was concerned to understand the ways in which the college maintains a social learning environment that is safe, accessible and reliable for every student via these social-media-based mechanisms and explored this area further during the online visit.

247.   During the visit, the team heard from students that WhatsApp groups are publicised by the college at learning sessions and Town Hall Meetings but are managed exclusively and voluntarily by students. The team also heard how students put great reliance on the WhatsApp groups to create a social learning environment. For example, when asked about sources of academic and pastoral support, students identified 'support from peers through WhatsApp' as one way alongside their supervisors in which they had received support, such as through 'weekend study groups' arranged via WhatsApp. Furthermore, when asked about sources of social learning and student community, no students identified or discussed LinkedIn groups or group sessions, but rather expressed the view that WhatsApp groups were the main way in which peers among cohorts could connect with each other. In addition, one student said that there was a reliance on individual students from different cohorts to set up the WhatsApp groups, but some had sought support from the Student Services team to publicise and share the groups across the cohort.

248.   In its meeting with permanent teaching and administrative staff, the team heard that WhatsApp groups are seen as online 'buddy groups' to build a sense of community. Staff also said that, although the groups are not a formal mechanism for social learning environment, they are recommended by staff to students if they 'wanted to use them as a way of information communication with peers'. The team found that the evidence from the visit demonstrated a reliance on the part of students on WhatsApp groups as a social learning environment, over and above other mechanisms that the college identifies as social learning environments. This raised concerns as the assessment team, based on its experience, considers that such WhatsApp groups can entail risks to the provision of a safe, accessible and reliable social learning environment for students. In particular, the encouragement of the use of WhatsApp by the college raises concerns regarding the risks around dignity, courtesy and respect in their use.

249.   The team was concerned that there was little guidance for students in managing inputs into the self-organised WhatsApp groups, in terms of ensuring that they are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use. For example, one student expressed unease around sharing their personal phone number with their cohort but said that they did so to gain access to the groups, which they found 'useful' as a social learning tool, and therefore did not wish to miss out on. Furthermore, the team noted that the lack of management or oversight of these groups by the college led to strong concerns about fair and equal access to a social learning environment. For example, the team heard from some students that they had not been made aware of the existence of such WhatsApp groups,

and that they felt that had missed out on a 'learning community entirely and had to search for that externally' through non-college study groups online. Another student reported that they found the WhatsApp groups a useful resource, but noted 'had it come from [the college] it would have helped for full cohort community in one place'.

250.   The team noted that issues around dignity, courtesy and respect in the operation of these groups had not been seriously considered by the college. During the visit the team queried the regulation and oversight of these groups with the college's staff, including members of the senior management team. The team heard that staff considered the WhatsApp groups to be informal and 'not regulated per se', but that considered it was 'clear that staff would want to know if there were issues'. It was robustly noted by the senior management team that the college had no plans to become involved in regulating the WhatsApp groups, now or in the future, and would not develop a policy surrounding their use. Although the team did not find evidence through its meetings with students to suggest that there was misuse of these groups, or of poor or unacceptable behaviour, it could not be assured that the groups promoted dignity, courtesy and respect in their use. As the groups are not maintained by the college, the team noted that it would be difficult to assess the extent of this.

251.   The team considered that the initiation and creation of the student-led WhatsApp groups was seen as students' response to feedback raised at the Staff-Student Liaison Committees, and a lack of progress from the college in responding to this feedback. For example, in the September 2023 Staff-Student Liaison Committee, students complained of a lack of a student community and ability to engage with each other through a social learning environment. In response to this, the college had reported that there were plans in place for a 'virtual campus (likely to be on Canvas)', with a proposed implementation at the end of 2023 or early 2024. However, the team did not hear of these plans directly from the college, either through its self-assessment or in discussions with staff during the online visit. In its meeting with senior staff during the online visit, the team heard that, in response to this feedback via the Staff-Student Liaison Committee and through 'informal feedback', staff had encouraged students to form WhatsApp groups. Staff reported that these had been 'successful' in addressing the feedback. However, as discussed in paragraphs 244 to 247, during the visit the team heard that students felt that, while the WhatsApp groups are useful, there continued to be 'an isolated feeling' and that they 'would appreciate something coordinated' by the college, as well as the student-led WhatsApp groups. This was echoed by an international student expressing that they had particularly struggled with accessing a sense of student learning community.

252.   Furthermore, one student described falling behind with their studies as 'overwhelming', which the team found reflected a sense of isolation in their studies. The team found that this sense of isolation was also evident in the April 2024 periodic review process for the LLM Legal Practice, where students had commented that they 'would like a stronger sense of community while learning'. Students believed that it was 'implied' that the college had plans to address the ongoing sense of isolation and lack of social learning environment, but did not specify what these were. This evidence further demonstrated to the team that the college considers that the student-led WhatsApp groups are an adequate form of social learning environment. Furthermore, the evidence demonstrated that the college has not sufficiently addressed the expressed lack of a social learning environment from students, which in turn led to the student initiation of WhatsApp groups.

253.   The team noted that the college's deficiencies in maintaining a social learning environment have been identified in previous monitoring assessment reports. The June 2024 OfS New DAPs monitoring assessment report identified that the development of a social dimension to the college's virtual learning environment warranted a review, as the evidence reviewed showed that students reported a lack of sense of a social learning community, due to lack of opportunities to engage through a social learning environment. The team triangulated this finding with its review of evidence, which demonstrated that students have previously reported a lack of such a social learning environment and complained of a lack of a 'sense of place' in Staff-Student Liaison Committee meetings during 2023.

254.   The team noted that the college responded to the concerns raised in the previous OfS New DAPs monitoring assessment report by setting out that it continues to make improvements to the social community and social learning environment aspects of its delivery, such as through small group sessions and the college's first in-person graduation ceremony. The team noted that the college has made some developments in response to the concerns identified in the previous monitoring assessment and to feedback from students, through the development of group sessions and student-led WhatsApp groups. However, as discussed throughout in this section, in paragraphs 237 to 253, the team found that the developments did not demonstrate evidence of an adequate social learning environment that is accessible and reliable for every student promoting dignity, courtesy and respect in its use. Furthermore, the team is of the view that an in-person graduation, held following the completion of studies, could not be considered a social learning environment.

255.   In summary, the team considered that the evidence demonstrated that the college states that it maintains a social learning environment through various mechanisms such as the Student Hub and small group sessions. However, the team found that students and staff report that in practice, the extent of a social learning environment appears to consist principally of the student-led WhatsApp groups, which are not maintained by the college. This raised concerns with the team in two ways. First, the team was not satisfied that such social media-based mechanisms could be considered a way in which the college maintains a social learning environment. Secondly, the team has concerns regarding the safe, accessible and reliable use of these groups. The team noted that the college holds a contradictory view of its approach to these groups. For example, while the college actively promotes and encourages the use of these groups as a form of social learning environment, it is firmly opposed to engaging with the oversight, regulation or maintenance of them. This demonstrated to the team that the college does not have a coherent approach to maintaining a social learning environment that is safe, accessible and reliable for every student, promoting dignity, courtesy and respect in its use. It also reflects a lack of awareness from the college regarding the risks to students and their use of such social media mechanisms.

256.   The assessment team would not necessarily expect all higher education providers to maintain oversight over external student-led forms of communication and social media, such as WhatsApp groups. However, as previously discussed, the team identified that the use of WhatsApp groups by students appears to be the main way in which students at the college engage in social learning with their peers. These groups are also actively promoted and encouraged by the college through Town Hall Meetings and teaching sessions. While the team found the use of these groups to be of concern, the evident reliance on them led the team to expect the college to maintain some oversight to ensure the safe use of them. The team reviewed the college's Student Charter and Code of Conduct and noted that it sets out that the

consequences of breaching the charter may include the college taking action 'on misconduct offences wherever committed, including online and in social media'. However, the team found that the charter does not specifically identify the WhatsApp groups, or similar online and social media mechanisms, under the 'Charter expectations'. Given the online nature of the college, the team would expect to see a more explicit approach to its expectations of students and the use of safe and accessible social learning environments, to minimise the potential for misuse or exclusion, because all students are studying at a distance and have few 'organic' opportunities to form social connections with peers.

257.   The assessment team noted that its concern over the misuse of social media tools such as WhatsApp is not a theoretical one, and that the sector has seen prominent examples at other providers of racism, homophobia, sexually violent content, and antisemitism in student WhatsApp groups, which have usually led to expulsions, withdrawal of offers to study and other forms of disciplinary action. Therefore, while the college could do more to maintain oversight of these groups, the team considered that WhatsApp groups on their own do not demonstrate an adequate or appropriate social learning environment.

258.   Based on its experience, the team's view is that a social learning environment would include platforms or tools to support and encourage continuous two-way communication among students and possibly also staff, and that these would be adequately maintained by the higher education provider. The team would expect a social learning environment to provide a mechanism for students to collaborate and continue learning beyond timetabled sessions, while also facilitating social relationships among peers. Furthermore, the team is of the view that a social learning environment should provide students with opportunities to receive and provide feedback and support with peers, interact and share ideas and build a sense of belonging among cohorts.

259.   In its review of this evidence the team took into consideration the context of the college's online provision and the challenges faced in encouraging an online student academic community and maintaining a social learning environment. The team acknowledged that this is a multifaceted area where freedom of speech, privacy, data protection and student conduct come together, and that the majority of the college's students work full-time or part-time in the legal sector. However, based on the team's experience, it considered that there are mechanisms, platforms and methods that the college could explore and implement to adequately maintain a social learning environment: for example, through developing college-maintained study groups or collaborative sessions through its VLE, or through writing groups, student societies and other extracurricular groups. The team considered that these are common features of higher education providers, including those of a non-traditional nature or smaller size.

260.   Furthermore, the team considered a report produced by the OfS following a review of blended learning in 2022. This report includes examples and case studies of students' experiences as 'part of a blended community'.[20] The team noted that the report concluded that, where online delivery forms part of a provider's model, 'peer learning supports individual learning, and being part of an academic community was connected to students' wider academic experience and could also affect the support required to ensure a high quality academic experience.' The report also concluded that 'a course delivered using blended

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[20] Available at OfS, Blended learning and OfS regulation.

approaches that does not foster collaborative learning among students would be likely to raise compliance concerns in relation to whether it is effectively delivered'. In addition, the team noted that this report recommends that 'providers should work with students to develop community building opportunities within all aspects of courses'. This reinforced the team's view that the college does not adequately maintain a safe, accessible and reliable online social learning environment, and reaffirmed its view that, because of the context and nature of its online provision, the college should be placing a particular focus on prioritising a range of mechanisms and platforms to maintain social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use.

261.   In summary, the team found evidence that demonstrated how the college maintains an accessible and reliable virtual learning environment for students, and these provide robust arrangements that enable learning opportunities for students studying at a distance. However, the team is not assured that the college's current mechanisms sufficiently demonstrate that it maintains a social learning environment that is safe, accessible and reliable for every student, promoting dignity, courtesy and respect in its use. On the contrary, the team determined that the student-led WhatsApp groups are the main mechanism in which students engage with a social learning environment, and that these are not safe, accessible and reliable for every student and do not promote dignity, courtesy and respect in their use. The team was also of the view that the WhatsApp groups were developed in response to a lack of a college-maintained social learning environment, which also demonstrated the deficiencies in the college's response to student feedback regarding this issue.

262.   The team considered that a continued lack of a social learning environment could, over time, hinder the effectiveness of the college's arrangements for students studying at a distance. The team noted that this has been an ongoing weakness of the college, as identified in previous New DAPs monitoring assessments throughout its probationary period. Furthermore, the team considered that this warrants particular significance, in the context of the college as a wholly online provider of higher education. Therefore, the team determined that this critically impacts on the college's ability to demonstrate that it delivers a high quality academic experience to all students from all backgrounds

Assessment

263.   To assess the college's assessment structures and procedures, the team reviewed the following evidence:

- evidence of assessment procedures and moderation of assessments

- meetings of Module Assessment Panels and the Progression and Awards Panels

- samples of summative assessments and feedback for the LLM Legal Practice

- the college's Quality Assurance and Assessment Regulations and Learning and Teaching Strategy

- the college's Outcome of Examinations Report

- the college's Student Disciplinary Process and Student Handbook.

264.   The college's Quality Assurance and Assessment Regulations set out the framework that underpins the policies and procedures for setting assessments, marking and moderation and external examining. This is complimented by the Learning and Teaching Strategy, which informs the college's approach to assessment types and methods. For example, it sets out the college's overarching intention to develop client-focused tasks and practice-focused activities and produce practice-led advice, solutions, strategies, plans and documentary outputs. The team found that there is a distinction of two forms of assessment adopted by the college in approaching its Learning and Teaching Strategy: modules are assessed by multiple choice question style assessments, as set in the Solicitors Legal Knowledge and Solicitors Legal Skills modules, or by academic research-focused assessments, for example, in the Capstone module.

265.   To evaluate the college's assessment procedures in practice, the team reviewed the following evidence:

- A sample of marking rubrics and feedback on the two core modules of the LLM Legal Practice programme via the college's VLE:

    - solicitors legal knowledge

    - solicitors legal skills.

- A sample of marking rubrics and feedback on two transactional (elective) modules of the LLM Legal Practice programme via the college's VLE:

    - acquisitions and finance

    - corporate finance.

- Screenshots of the assessment work across a number of different modules for five students on the LLM Legal Practice programme:

    - solicitors legal knowledge

    - solicitors legal skills

    - family law

    - acquisitions and finance

    - corporate finance.

- Assessment scrutiny forms, assessment rubrics and evidence of moderation for the following modules:

    - solicitors legal knowledge

    - solicitors legal skills.

266.   In summary, the team found that marking was fair and consistent and reflected the processes of assessment and moderation as robust, as discussed under criterion B2. The team

also considered that the assessments reviewed followed the college's Quality Assurance and Assessment Regulations, which set out the processes for the setting assessments, marking and moderation and external examining. The evidence also demonstrated to the team that processes for marking assessments and for moderating marks are clearly articulated and consistently operated by those involved in the assessment process. For example, the evidence showed that staff appropriately follow the college's marking guidance for individual modules.

267.   In addition, the college has clear and effective processes for the internal moderation of marks through the use of assessment scrutiny forms, which include input and comment from external examiners. The team noted that the assessment scrutiny forms provide useful data as well as evidence in the case of academic appeals. Based on its experience across the sector, the team considered that the college's moderation processes reflect excellent practice. Overall, the evidence demonstrated to the team that the college operates valid and reliable processes of assessment, and the processes for marking assessments and moderating marks are clearly articulated and consistently operated by those involved in the assessment process.

268.   As discussed under criterion B2, the college's programme specifications set out the programme learning outcomes, and module specifications supplement the programme specifications to set out the assessment requirements. In its review of assessed work and feedback, the team considered that the evidence further demonstrated the college's valid and reliable assessment practices that enable students to demonstrate the extent to which they have achieved the intended learning outcomes.

269.   The college's Module Assessment Panel determines the award of credit at module level, and the Progression and Awards Panel applies this credit to determine the conferral of awards in line with the programme specifications. The terms of reference for both panels set out the clear principles and guidance on functions, time limits and membership, and confirm that ultimate responsibility and authority for decisions lie with the Programme Committee. The team found this to be in line with best practice, based on its experience across the sector.

270.   The team noted that, during its probationary period, the college has amended its approach to Assessment Panels to ensure that their processes are effective to support the increase in student numbers and to allow for more flexibility in the function of 'rolling' panels. The team considered that this reflected an effective and flexible approach that allowed the college to adapt its approach to best suit its students' needs and its multiple-cohort entry structure.

271.   The team reviewed minutes of Module Assessment Panels and the Progression and Awards Panel, and found that they demonstrated evidence of valid and reliable processes of assessment. The Quality Assurance and Assessment Regulations also contain the principles for the accreditation of prior learning, which must be considered by the Progression and Awards Panel. The team found evidence of individual student cases following the recognition of prior learning policy in the minutes of the February 2023 Module Assessment Panel, and based on its experience considered that the policy was appropriate and reliable. The team therefore found that the assessment panels, and their inclusion of external examiners, reflected the college's academic regulations and appropriately considered the application of prior credit.

272.   The assessment team considered the processes for students to understand assessments and academic judgments made by staff. Students are given an induction to their programme through Town Hall Meetings, which set out the assessment structure of the programme and

detail what is required for each module. Students are also provided with an induction at the start of each module, which highlights the expectations of students. All students receive a Programme Handbook, which also sets out the assessment requirements and the college's assessment regulations. The team found that this demonstrated evidence of how the college informs and guides students to understand how assessments and academic judgements are made.

273.   For example, the Solicitors Legal Knowledge Town Hall Meeting contains slides and information about the detail of the multiple-choice question exams and papers, with detail of the subject matter, the timing of the assessment and what it looks like in detail, and the links and alignment to the SQE assessment. During their studies, students can regularly discuss and reflect on their assessment and individual progress in personal supervisor meetings. Discussion at these meetings focuses on progression and academic development and is supported by the analytics created by the college's system around engagement and assessment in Canvas, which provide data to staff and students regarding their progress. During the online visit, the team heard from students that they were happy with the level of feedback and discussion with supervisors when discussing assessment and academic judgement.

274.   In its review of sampled assessment and feedback for modules across the LLM Legal Practice programme, the team found evidence of constructive and development feedback given to students to enable their understanding of academic judgement. For example, the team viewed screenshots of assessment and found comments and corresponding grades on content, breadth, analysis and presentation, plus comments which were brief but clear. In addition, the team noted that the June 2024 OfS New DAPs monitoring assessment report found evidence that assessment and the exercise of academic judgment are a regular subject discussed at the Staff-Student Liaison Committee meetings.

275.   The team triangulated this with a review of more recent committee minutes from April 2024 and found that in the meetings students can raise assessment issues directly with programme leaders and student services officers. The wider student body can access the actions and discussions via minutes that are published on the Student Hub. The team noted that student module surveys also provide a route for students to comment on assessments and skills development, and the feedback from these surveys inform Programme Evaluation Reports. In conclusion, the team considered that staff and students engage in dialogue to promote a shared understanding of the basis on which academic judgements are made.

276.   The team determined that the same induction and guidance provided to students to inform their understanding of assessment and academic judgements demonstrated one way in which students are provided with an opportunity to develop an understanding of, and the necessary skills to demonstrate, good academic practice. Through the Town Hall Meeting induction sessions and module inductions, students are initially informed of the academic expectations of students through their studies. For example, in the Town Hall Meeting for the Solicitors Legal Knowledge module, the team noted a focus on orientation around content for the module; a detailed breakdown of assessment methods; the learning methodology for the practice areas covered in the module; online activities and study practices; and how feedback will be used to reinforce and consolidate learning. Town Hall meetings are held throughout the module to guide students and offer advice on assessment techniques, for example on multiple-choice questions for the Solicitors Legal Knowledge module. Students also receive formative feedback

and have one-to-one supervisor meetings as well as group assessment feedback sessions to further develop their understanding of the necessary skills to demonstrate good academic practice.

277. The team was therefore satisfied that this evidence demonstrated that students are provided with opportunities to develop an understanding of, and the necessary skills to demonstrate, good academic practice. However, the team did not find that this evidence sufficiently demonstrated how students are provided with opportunities to develop an understanding of avoiding and preventing unacceptable academic practice (academic misconduct), which is discussed below in paragraphs 278 to 290.

278. As discussed under criterion B2, the academic misconduct process is set out in the Quality Assurance and Assessment Regulations and details the definition of academic misconduct and the various ways that an offence can be carried out, such as plagiarism, collusion and contract cheating. The regulations distinguish academic misconduct from poor academic practice, which is described as 'the result of inexperience or a lack of knowledge', and set out the process that staff will follow if academic misconduct is identified. The Student Charter and Code of Conduct reproduces this section of the regulations, and this is underpinned by the Student Disciplinary Process. Furthermore, the team noted that discussion of academic misconduct cases is a standard item on the agenda of the college's assessment panels.

279. The team considered these regulations and processes in investigating academic misconduct to reflect practice across the sector. Therefore, this evidence demonstrated that the college has in place policies and procedures that inform students and staff of what is considered unacceptable academic practice, and the processes to be followed should such practice be identified. However, as discussed further below in paragraph 280, there have been no reported cases of academic misconduct during the college's probationary period. This has prevented the team from being assured that the college operates adequate process for preventing and identifying unacceptable academic practice. Furthermore, it has prevented the team from assessing whether the college implements the processes it has in place for investigating and responding to unacceptable academic practice.

280. In its self-assessment, the college reported that, according to the definitions set out in its regulations, it has not identified or investigated any cases of 'formal' academic misconduct to date, though it has identified 'poor academic practice'. During its review of samples of assessed work, the assessment team found one instance where the marker's feedback concluded there was poor academic practice, as defined in the college's assessment regulations. The team found it unusual that the college had not identified any cases of academic misconduct, based on the team's experience across the discipline and sector and in the context of the college and its student numbers. For example, the team noted that one meta-study reported that the smallest estimate of the proportion of students engaging in misconduct was 2 per cent.[21] To date the college has assessed approximately 1,000 module assessments, and no cases of academic misconduct would represent a 0 per cent rate of academic misconduct. The team determined that this evidence is highly likely to indicate that instances of academic misconduct are going undetected. Therefore, the team identified concerns regarding the college's approach to identifying academic misconduct. Furthermore, the team was

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[21] See Adam L, 2016, 'Student perspectives on plagiarism', in Bretag T (ed), Handbook of academic integrity, Springer, pages 519-535.

therefore unable to assess the college's processes for investigating and responding to unacceptable academic practice.

281. The team noted that the June 2024 OfS New DAPs monitoring assessment of the college considered that the effectiveness of its approach to academic misconduct required further monitoring and assessment. The report set out that the college does not use plagiarism detection software and suggested this as an appropriate development for the college to consider. In its response to this report, through its self-assessment, the college defended its approach and stated that its assessment tasks and activities, which include timed, randomised multiple-choice questions and oral assessments, reduces the likelihood of academic misconduct, therefore protecting standards. However, the college did state that it was still considering the use of plagiarism detection software and explained that in the meantime it has adopted a three-pronged strategy to prevent and identify academic misconduct. This is first a policy of deterrence, at induction and through student disclaimers on Canvas via a certification box that students must tick when they upload a submission assessment; secondly, detection by supervisors, who will have informal conversations with students; and thirdly, through policy, such as the academic misconduct and Student Disciplinary Process. While being mindful of the college's response to these issues, the assessment team was not assured that this response and evidence demonstrated adequate processes for preventing and identifying unacceptable academic practice (academic misconduct) and concluded that it warranted further exploration by the team.

282. The team noted the college's claim its assessments are not suitable for anti-plagiarism software, as it reported that the assessment design of the Solicitors Legal Knowledge module (its module with the largest cohort) is through multiple-choice questions with randomised orders. The college consider that this therefore provides for 'a very low risk of academic malpractice'. However, the team is of the view that even multiple-choice assessments can be subject to contract cheating, impersonation, collusion, and generative AI misconduct, and therefore do require an anti-misconduct strategy. Furthermore, on examination of types of assessment set for other modules across the LLM Legal Practice programme, the team found that there were many examples of assessments that could benefit from anti-plagiarism software, such as reflections and reports. For example, the Capstone module, which is the largest Level 7 module of the LLM Legal Practice programme at 60 credits, includes an assessment that is a 'project paper' with a wordcount guideline of 8,000 to 10,000 words. Furthermore, the Employment Law module for the same programme includes an assessment that is a 'reflective analysis'. The team considered that these types of assessment could also benefit from anti-plagiarism software to help more easily detect collusion, plagiarism and contract cheating given the nature and size of the assessments.

283. In setting out how it assures itself that its current practices allow for the identification of academic practice in lieu of anti-plagiarism software, the college stated that because of its size and staffing base, 'most' written assessments for a module have been assessed by one member of staff. The college considered that this means 'markers are more likely to detect academic misconduct including the use of AI'. The team considered that such a reliance on individual staff members to identify academic misconduct is not a robust and reliable method, because of the nature and size of the assessments. The assessment team noted that an individual assessor cannot be expected to adequately identify all text that is taken from another source, for example. In the cases of the internet, legal case law, and academic sources, the volume of material would be too expansive for any single marker to retain. Equally, the team

noted that as the student numbers continue to grow per the college's plan, this approach to avoiding collusion (in which a single member of staff can mark and compare the work of all students) will be difficult to maintain. For example, the assessment team noted that the Capstone module is planned to run in four iterations between May 2024 and February 2025, with around 40 students enrolled on each.

284.   The team considered it highly unlikely that a single member of staff would be able to retain and identify areas of collusion across hundreds of thousands of words, up to nine months apart. Therefore, the team determined that the college's current approach to identifying unacceptable academic practice is not adequate, and the college should expedite its consideration of adopting and implementing anti-plagiarism software, as well as introducing other mechanisms for identifying potential academic misconduct for all types of assessment. Furthermore, the team considered that the college should take additional steps to consider how online assessments may be at higher risk of plagiarism, collusion and impersonation.

285.   A further concern regards a lack of support and training for staff and students relating to academic misconduct. The team noted that neither in its self-assessment, nor in a previous response provided during its year two New DAPs monitoring assessment, the college did not specify how it trains or supports its students and staff in preventing, identifying or investigating unacceptable academic practice, other than referring to its academic misconduct procedure. During the online visit, staff highlighted that integrity is key to any student seeking solicitor's qualifications and that the threat of loss external validation for a professional course is a further means of deterrence [Solicitors Regulation Authority Assessment of Character and Suitability Rules, Rule 4.1].[22] However, the team did not consider that this could be relied on as a way in which the college prevents unacceptable academic practice, and in the team's view it did not reflect a sufficient understanding of the challenges higher education providers face regarding unacceptable academic practice across the sector.

286.   Regarding training for staff, the team asked the college to submit evidence of 'any guidance or training for staff on identifying and processing academic misconduct', through an additional evidence request sent to the college in August 2024. In its response, the college did not submit any evidence but provided a narrative response that stated that its Academic Team has previously 'discussed and shared examples of poor academic practice', and that it has plans to deliver a 'more in-depth session on identifying academic misconduct' for the next supervisors' quarterly meeting (date unspecified). During the online visit, the team asked six adjunct staff members whether they had received, or were aware of, any training or specific guidance relating to academic misconduct. No staff members said that they had, or were aware of any; in fact, one staff member reported that they had no experience to date with academic integrity. The team identified this as a particular concern because the college, as noted earlier in paragraph 283, currently relies on its staff being 'likely to detect academic misconduct' through its model of 'most assessments for [each] module' being marked by one member of staff, in lieu of anti-plagiarism software.

287.   Furthermore, through its review of staff CVs and during the online visit to the college, the team found that supervisors (adjunct staff), who form most of the college's teaching staff base, are more qualified in legal practice than pedagogy. As discussed in depth under criterion C1, because of their primary work in legal practice, adjunct staff do not appear as integrated into

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[22] Available at Solicitors Regulation Authority, Assessment of character and suitability rules.

the higher education sector, where they might be more exposed to common and best practice around academic misconduct. Therefore, the team considered that adjunct staff are more likely to require specific training on the diverse and sophisticated modes of academic misconduct, for example guidance on collusion between students, plagiarism and essay mills. Therefore, the team considered that this evidence demonstrated concerning gaps and weaknesses in the college's mechanisms for identifying unacceptable academic practice.

288.   Regarding support for students in preventing unacceptable academic practice, the team noted that, while the Quality Assessment Regulations and Quality Assurance and Assessment Regulations and Student Disciplinary Process set out information on poor academic practice for students, these are not supplemented with additional guidance or training. For example, there is no mention of academic misconduct or poor academic practice in the Programme Handbook, which is a key source of support information to the college's students. Furthermore, the team did not find evidence of any specific training offered to students on this topic. During the online visit the team asked students whether they had received any training regarding academic misconduct or academic integrity, and heard that students were unaware of any. The team noted that some students referred to the college's Student Code of Conduct and Solicitors Regulation Authority requirements as sources of guidance regarding integrity more widely but said that they had not received any specific guidance on this topic from the college. One student expressed the view that some of the college's modules are 'difficult to plagiarise' but also identified some of the LLM Legal Practice modules, including the 60-credit Capstone module, as a potential risk in terms of how students could use generative AI in producing the assessments.

289.   Following this, the team asked students if they had received any guidance on training regarding generative AI, which they said they had not. In the team's experience, students need clear guidance and support in how to avoid and prevent academic misconduct, particularly international students whose cultural academic differences in practice or approach might expose them to vulnerability. This gap in students' understanding is notwithstanding the introductory advice given to them regarding understanding good academic practice, which the assessment team identified above in its review of the evidence set out in paragraph 277. The team found that this evidence shows a gap between the guidance provided to students regarding good academic practice and the lack of support or training provided to students regarding preventing unacceptable academic practice. The team considered this provided further evidence of how the college reflects a lack of sufficient understanding of the challenges higher education providers face regarding unacceptable academic practice across the sector.

290.   In conclusion, the assessment team cannot be assured that the college operates adequate processes for preventing, identifying, investigating and responding to unacceptable academic practice. The team considered that the college's current approach to how it identifies unacceptable academic practice does not reflect practices across the sector or concerns expressed widely in legal education, for example through recently published research in the Law Teacher.[23] This view is also informed by the college's lack of identification of academic misconduct cases to date, which prevented the team from assessing whether the college

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[23] See Ajevski M (and others), 2023, 'ChatGPT and the future of legal education and practice', Law Teacher, 57, pages 353-364.

implements the processes it has in place for investigating and responding to unacceptable academic practice.

291.   The team found that the college's weakness in identifying academic misconduct was a gap in its approach to assessment and could impact on its ability to demonstrate that all learning opportunities are consistently and rigorously quality assured. Furthermore, as discussed under criterion B2, this could bring into question the assurance of the college's standards. Considering the context of the college, as a wholly online provider of legal higher education, the team considered that the support for preventing, and processes for identifying, unacceptable academic practice should warrant particular significance and focus in its higher education delivery. This is because of the multitude of ways online assessments could be at risk of increased unacceptable academic practice, as discussed throughout this section. The team considered this a deficiency of the college that critically impacts its ability to demonstrate that it ensures that learning opportunities are consistently and rigorously quality assured, and therefore hinders it from meeting subcriterion B3.1.

292.   Overall, the team found that the college operates some robust and effective assessment practices. However, the team considered that these are at risk of being undermined by a weakness in the college's approach and processes for preventing and identifying unacceptable academic practice.

External examining

293.   The college's Quality Assurance and Assessment Regulations set out the framework and requirements for the role of the external examiner. The team found that the policies and procedures guiding the appointment and function of external examiners at the college are appropriate to its context and in line with practice across the sector. For example, the regulations require that external examiners have sight of and approve all assessments and relevant marking schemes before these are shared with students. In practice, this takes place through assessment scrutiny forms, of which the team reviewed a sample from the Solicitors Legal Knowledge module. The team found that the forms give clear guidance for internal moderators when setting assessments and demonstrated evidence of approval from external examiners. The team considers this to reflect good assessment and quality assurance practice, based on its experience across the sector. The Quality Assurance and Assessment Regulations also set out the procedures for the appointment and induction of external examiners. The team found that this is supported by appropriate external examiner induction materials. The team evaluated the induction materials and found that they set out appropriate and relevant programme documentation together with information on the college's academic and assessment procedures. Furthermore, the team reviewed the nomination forms and CVs of the college's three external examiners and found that found that they have the appropriate knowledge and experience to fulfil their responsibilities, based on the team's experience across the sector.

294.   The team found evidence that the college makes scrupulous use of external examiners, including in the moderation of assessment tasks and student assessed work. For example, minutes of the Assessment Panels and external examiner reports demonstrated the effective use of external examiners in ratifying assessments and providing assurances on the college's assessment processes. The team also noted that the external examiners' reports reflected a

feeling that they had been appropriately inducted into the roles and had access to all relevant programme and assessment materials.

295.   The college reviews and considers external examiner reports at the Staff-Student Liaison Committee and Programme Committee, through its Programme Evaluation Reports. Its Quality Assurance and Assessment Regulations set out that external examiners will receive a written response to their report 'from a senior member of College staff'. The team reviewed the 2022-23 Programme Evaluation Report for the LLM Legal Practice, which provided evidence of this in practice, as recommendations from external examiners were noted as an action in the college's Annual Report on Quality and Standards action plan. All external examiner reports, and the college's responses to them, are considered and approved by the Programme Committee before being shared with external examiners, which demonstrated further evidence of the college giving full and serious consideration to the comments and recommendations contained in external examiners' reports. Through its review of external examiner reports, the team noted that there is a 'tickbox' for examiners to confirm that they received a response to the previous year's report. The team found that in one external examiner report, the examiner noted that they did not recall receiving a response to the previous year's report. While this could have been an anomaly, the team considers that this warrants review by the college to ensure there is a consistent approach for all its external examiners.

296.   Overall, the team considered that the evidence reviewed demonstrated that the college makes scrupulous use of external examiners including in the moderation of assessment tasks and student assessed work. The college also gives full and serious consideration to the comments and recommendations contained in external examiners' reports and provides them with a considered and timely response to their comments and recommendations.

Academic appeals and student complaints

297.   The team reviewed the college's Academic Appeals Policy and Procedure, together with the Student Complaints Policy and Procedure. As discussed under criterion B1, the respective policies set out the grounds for appeals and complaints, and the subsequent procedures for students. The team found that the policy and procedures are clearly set out in a way that is accessible for students. Both policies signpost to the OIA and set out the process for an independent review, should a student be dissatisfied with the college's process. The team found that the grounds for review and the processes for both policies are appropriate to the context of the college and its higher education provision, and that both policies are comparable with equivalent policies in the sector.

298.   The team also found that both policies are reviewed and kept up to date as part of the routine annual policy review process. As discussed further under criterion B1, the 2023 Annual Policy Review Report reported that there had been one student complaint and 14 academic appeals for the period 2022-23. The team found that the complaint was dealt with appropriately, in line with the college's policies and in line with best practice across the sector. The team noted that no complaints have been submitted to the Office of the Independent Adjudicator. In addition, the team considered that the evidence showed that the 14 academic appeals were considered appropriately, noting that nine were upheld. The team reviewed the breakdown of the 'grounds for appeal' for the 14 appeals and a summary of the judgements behind the outcomes, and considered that this appeared appropriate and in line with the college's policy and procedures. Furthermore, the team noted that the college follows the OIA Good Practice

Framework by ensuring it issues a 'completion of procedures' letter to students who have exhausted the college's appeals process.[24] This evidence demonstrated that the college is taking appropriate action following an appeal.

299.   The team found that the college has a clear process for the reporting and analysis of the details of appeals and complaints through an annual report on academic appeals and student complaints. This process includes anonymised case studies for information and precedent-setting, which are considered by the Programme Committee. The team considered this to reflect practice in the sector, and it supported the team's view that the college has a series of robust approaches in how it manages appeals and complaints. Furthermore, the team considered that the evidence of the reporting and analysis of the college's appeals and complaints processes can lead to enhancement of the academic experience for other students. In conclusion, the team found the college has effective procedures for handling academic appeals and student complaints about the quality of the academic experience. The team determined that the procedures are fair, accessible and timely, and enable enhancement. The team also concluded that appropriate action is taken following an appeal or complaint.

Conclusions

300.   In forming its conclusions, the assessment team carefully considered the nature and context of the college.

301.   The assessment team concluded that the college has demonstrated that it meets a number of elements of the criterion regarding how it designs and delivers courses and qualifications that provide a high quality academic experience. However, the team identified the following two key areas where the college has not demonstrated that it provides a high quality academic experience, regarding its approach to learning and teaching and assessment:

- the college's approach to how it maintains social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use

- the college's processes for preventing and identifying unacceptable academic practice.

302.   More specifically, the college has not demonstrated that it provides 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. This is because of deficiencies in how the college maintains its social learning environments, which the team considered are not a safe, accessible and reliable environment for every student, promoting dignity, courtesy and respect in their use.

303.   The team considered that the college has not made sufficient progress in its probationary period to ensure it maintains a social learning environment or addressed the sense of a lack of social learning community expressed by students. The team identified this deficiency as having led to the creation of, and a heavy reliance on, student-led WhatsApp groups as the main mechanism of a social learning environment, which raises concerns about dignity, courtesy and respect in their use.

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[24] See OIA, Good practice framework.

304.   The team noted that this has been an ongoing and significant weakness of the college, as identified in previous New DAPs monitoring assessments, and that this weakness warrants particular significance in the context of the college, as a wholly online provider of higher education.

305.   Furthermore, the team found that the college has not demonstrated that all assessments and learning opportunities are consistently and rigorously quality assured. This is because of significant weaknesses in the college's processes for preventing and identifying unacceptable academic practice. The team considered that the fact that no potential academic misconduct has been detected during the college's probationary period is unusual and particularly concerning. The team noted that this has also been an ongoing weakness of the college, as identified in previous New DAPs monitoring assessments, and the team considered this deficiency warrants particular significance in the context of the college, as a wholly online provider.

306.   The team determined that these deficiencies critically impact on the college's ability to demonstrate how it meets all elements of the criterion to ensure it delivers a high quality academic experience to all students, irrespective of background and location

307.   Therefore, the team concluded that the college does not meet 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

308.	The assessment team's view is that the college does not meet the requirements of criterion C1: The role of academic and professional staff.

309.	The assessment team's view is a balanced one, based on its review of evidence which shows in summary that the college has demonstrated that it meets a number of elements of the criterion regarding how it assures itself that it has appropriate numbers of staff to teach its students and that all involved in teaching, or supporting student learning, and in the assessment of student work, are appropriately qualified.

310.	However, the team found that the evidence has not demonstrated that everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately or adequately supported and developed to the level of the qualifications being awarded. This is because the team determined that the college is not providing adequate development opportunities to enable staff to enhance their practice, scholarship and pedagogic development of their discipline (outside their engagement with legal practice). Furthermore, the college is not providing adequate opportunities for staff to engage in reflection and evaluation of their learning, teaching and assessment practice.

311.	The team found that these deficiencies contributed to inadequate evidence of staff's active engagement with the pedagogic development of their disciplinary knowledge and inadequate evidence to demonstrate that relevant learning, teaching and assessment practices are informed by reflection, evaluation of professional practice, and educational scholarship.

312.	In addition, the team's view is that there was insufficient evidence to demonstrate that the college's staff are actively engaged with research and/or advanced scholarship to a level commensurate with the Level 7 qualifications being offered.

313.	The team considered this has been an area of weakness within the college that required development during its probationary period. The team therefore determined that these weaknesses critically impact on the college's ability to demonstrate that everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately qualified, supported and developed to the level of the qualifications being awarded.

314.	Furthermore, the team determined that these weaknesses prevent the college from being able to demonstrate that it has a cohesive academic community.

315.	This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

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

316.   To assess the scholarship and the pedagogical effectiveness of the college's staff, the team reviewed a range of documentation including:

- a sample of staff CVs

- evidence of annual performance review

- a sample of staff induction plans

- a sample of staff training records

- a sample of peer observation records

- a sample of supervisor quarterly meeting records

- module training records

- the college's Scholarship Framework

- scholarly activity records

- the Recruitment and Selection Policy

- staff resourcing maps and calendars.

317.   The team also discussed issues relating to staffing and pedagogy during the online visit to the college.

318.   In summary, the assessment team identified strengths in staff recruitment, staff qualifications, staff engagement with subject-specific scholarship, and staff expertise in providing quality feedback on assessment. There was additionally some evidence that demonstrated how the college provides opportunities for staff to gain experience in curriculum development, and to engage with other higher education providers. However, the team identified concerns regarding staff reflection, a lack of engagement with educational scholarship, the evaluation of all aspects of staff professional practice, and a lack of active engagement with the pedagogic development of their discipline knowledge. In practice this means, in the team's view, that the college is appropriately recruiting adequately qualified staff but is not developing those staff adequately or encouraging active engagement with the pedagogic development or practice of their discipline (outside their engagement with legal practitioners).

319. The college's staffing structure relies on a smaller number of permanent academic staff (5.6 FTE) and a much larger pool of adjunct staff (40 FTE), called supervisors. This staff base has grown over the probationary period. The college's adjunct staff are mostly legal professionals who are contracted on a temporary and fractional basis by the college to perform the role of supervisors to students during their studies. While the college has a large adjunct staffing body, the team noted that subcriterion C1.1 requires that 'everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately qualified, supported and developed'. Therefore, the team considered that all aspects of its assessment of this subcriterion apply to the college's adjunct staff.

320. The assessment team noted the closely connected nature of the evidence requirements relevant to subcriterion C1.1. In particular, the evidence requirements C1a, C1c and C1d have particularly similar themes:

- C1a: Relevant learning, teaching and assessment practices that are informed by reflection, evaluation of professional practice, and subject-specific and educational scholarship

- C1c: Active engagement with the pedagogic development of their discipline knowledge

- C1d: Understanding of current research and advanced scholarship in their discipline and that such knowledge and understanding directly inform and enhance their teaching. Also, active engagement with research and/or advanced scholarship to a level commensurate with the level and subject of the qualifications being offered.

321. The assessment team carefully considered the meaning of each of these evidence requirements in the context of subcriterion C1.1. The team approached these evidence requirements as being closely interlinked, but with each having its own meaning. Examples of how each evidence requirement differs, in the view of the assessment team, are provided below in paragraphs 322 to 325.

322. Evidence requirement C1a emphasises reflective and evaluative professional practice, seeking evidence that the professionals in a provider are reflecting on, and evaluating, their practice in order to inform relevant learning, teaching and assessment practices. Separately, C1a requires that subject-specific and educational scholarship informs relevant learning, teaching and assessment practices. In the view of the assessment team, this evidence requirement does not require that staff contribute to subject-specific and educational scholarship, merely that they engage with it sufficiently to inform their educational practice. Furthermore, the assessment team approached the term 'subject-specific scholarship' as including scholarship on law and legal practice, and the term 'educational scholarship' as including scholarship across disciplines on approaches to education, learning, students, and assessment.

323. Evidence requirement C1c emphasises 'active' engagement with, and the development of, discipline knowledge. This, in the view of the assessment team, differs from C1a, as C1c emphasises a requirement of some level of contribution to the pedagogic development of staff's disciplinary knowledge.

324. Evidence requirement C1d emphasises understanding of 'current research and advanced scholarship' and 'active engagement with research and/or advanced scholarship'

commensurate to the level and subject of the qualifications being offered. In the case of the college's degree offering, this means postgraduate qualifications (Level 7) in the subject of law. The assessment team approached this evidence requirement as requiring 'understanding' in a passive sense and also requiring 'active engagement' in the sense of making some level of contribution to research and/or advanced scholarship at that level.

325.   The assessment team also considered the differences between the C1a requirement of 'subject-specific scholarship', and the C1d requirement of 'research and/or advanced scholarship'. It put these differences firmly in the context of the college and the evidence requirements. The college is a small, specialist provider, delivering only postgraduate qualifications in law with a particular professional emphasis. In that context, engagement with practitioner texts and legal practice was treated as adequate to meet 'subject-specific' requirements. By contrast, the requirement to engage with 'research and/or advanced scholarship' was treated as indicating an engagement going beyond current practice and into 'advanced' approaches to the discipline that understand its context, theory, methodologies, impact, history and linkages. Such active engagement with research and/or advanced scholarship should be commensurate with masters' degree teaching, as defined by Level 7 of the FHEQ.[25]

326.   The team considered that the college has assured itself it has appropriate numbers of staff and has appropriate staff recruitment practices. For example, the college actively monitors and rigorously plans for the staff numbers and expertise required to teach its students through its calendars of required teaching hours, and workload planning documents. The team is satisfied that this evidence demonstrated that the college maintains an appropriate staff-student ratio for the types of pedagogy, students, and levels of study in which it is engaged.

327.   The college also demonstrated appropriate staff recruitment practices, with appropriate policies, job descriptions and selection criteria. For example, the team reviewed the college's Staff Recruitment Policy, which showed that there was adequate consideration of the breadth of tasks and expertise included in academic roles. Furthermore, the team reviewed all staff CVs provided and found that these reflected an appropriate implementation of the college's Staff Recruitment Policy and that staff were appropriately qualified. The team considered that this evidence also demonstrated that the college has made a rigorous assessment of the skills and expertise required to teach all students.

328.   The team noted that the previous OfS New DAPs monitoring assessment report dated June 2024 expressed concerns surrounding the college's plans to increase its student numbers and the impact on resourcing needs. However, the assessment team did not identify similar concerns, as the evidence reviewed shows how the college monitors and rigorously plans appropriately for its forecast student numbers. The team considered that, because of the college's large base of adjunct staff, it can adjust its resourcing effectively and in a timely manner. The assessment team was therefore assured by the evidence reviewed 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. The team was also assured that the college has appropriate staff recruitment practices.

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[25] See QAA, Qualifications Frameworks, page 27.

329.   Through its review of staff CVs, the team also found evidence that there is appropriate academic and professional expertise of staff. For example, the team reviewed all staff CVs provided and found that these demonstrated qualifications at an adequate level (Level 7) and relevant experience in the subject area of law. This was further evidenced during the online visit to the college. For example, the team met with a representation of the college's permanent and adjunct staff and heard details of their experiences at higher education providers and in legal practice. The team found that this further demonstrated the academic and professional credentials of staff. The team was also granted access to college's VLE, and reviewed samples of teaching materials, assessment and feedback, and communications from staff to students. The team noted that this evidence showed that staff have sufficient understanding of the material to effectively deliver courses and therefore further demonstrated appropriate academic expertise.

330.   As discussed previously under criterion B3, expertise in providing quality feedback on assessment was evidenced by the team's review of samples of assessment feedback. To evaluate evidence of expertise in providing assessment feedback, the team reviewed the following evidence:

- A sample of marking rubrics and feedback on the two core modules of the LLM Legal Practice programme via the college's VLE:

    - solicitors legal knowledge

    - solicitors legal skills.

- A sample of marking rubrics and feedback on two transactional (elective) modules of the LLM Legal Practice programme via the college's VLE:

    - acquisitions and finance

    - corporate finance.

- Screenshots of the assessment work across a number of different modules for five students on the LLM Legal Practice programme:

    - solicitors legal knowledge

    - solicitors legal skills

    - family law

    - acquisitions and finance

    - corporate finance.

331.   Through its review of assessment feedback, the team found evidence of constructive and developmental feedback given to students to enable their understanding of academic judgement. For example, staff comments helpfully differentiate between students' substantive errors and explain where students could go further in their analysis. Staff also provided feedback that identified areas where students' knowledge and understanding were good, but where a student's communication was a limiting factor. Through its review of feedback via the

college's VLE, the team found evidence that feedback provided to students was also timely. The team considered that staff qualifications and experience, demonstrated through its review of staff CVs together with its meetings with staff during the online visit to the college, provided further evidence of the staff's expertise in providing quality feedback on assessment. Overall, the team was satisfied that the college's staffing base demonstrated expertise in providing feedback on assessment that is timely, constructive and developmental.

332.   The team found evidence that demonstrated how the college provides some opportunities for its permanent academic members of staff with key programme management responsibilities, to gain experience in curriculum development and assessment design. This was demonstrated by some staff being involved in updating programme handbooks, being engaged in programme and module development, and sitting on the Programme Committee. In particular, the team noted that the approval event for the LLM Legal Practice programme demonstrated effective input of its permanent academic members of staff.

333.   The assessment team also found some evidence of staff engagement with the activities of other providers of higher education, through its review of the Staff Scholarly Record and staff CVs. The team found that across all the evidence reviewed of staff's activities, there were up to 10 instances of such engagement. For example, attendance at workshops and seminars convened by others, and instances of staff acting as external reviewers at other higher education providers. The assessment team found evidence to demonstrate that the college provides some opportunities for its permanent academic members of 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. The team also found evidence to demonstrate that there is adequate engagement, from staff with key programme management responsibilities, with the activities of other providers of higher education. However, the team's view is that the extent of this activity is below the norm for a provider that holds DAPs, even when taking into consideration the college's size and nature. Furthermore, the team noted that the extent of this activity is largely confined to the college's permanent academic members of staff, rather than across its adjunct staff. The team concluded, however, that, on balance, the team considered that the college had met the baseline evidence requirements.

334.   The assessment team considered how the college's staff use reflection on and evaluation of professional practice and subject-specific and educational scholarship to inform learning, teaching and assessment practices, and found inconsistent evidence to demonstrate this. The team found that there was some evidence of learning, teaching and assessment practices being informed by subject-specific scholarship (particularly relating to engagement with the legal professions). For example, at the approval event for the LLM Legal Practice, the team saw evidence of how scholarship relating to the changing nature of the legal services market has been used to inform programme design. However, the team determined that there were substantial gaps in relation to other aspects of these evidence requirements. These gaps, addressed further below in paragraphs 332 to 338, are, in the view of the assessment team, highly relevant to the college's ability to meet subcriterion C1.1 and to ensure that its staff are developed to the appropriate level of the qualifications being awarded by the college.

335.   The team found evidence that demonstrated that learning, teaching and assessment practices are informed by subject-specific scholarship. For example, the record of staff scholarship maintained by the college indicated staff attendance at a wide range of events for

legal professionals. The team's review of CVs also demonstrated a breadth of staff engagement with subject-specific scholarship, with many staff members having substantial legal practitioner experience. The Staff Scholarly Record shows that such engagement with subject-specific scholarship includes subject-specific scholarship events by solicitors' practices, barristers' chambers, law societies, legal regulators, and (albeit less frequently) other higher education providers. Based on the team's experience, it considered that, in line with the norms of the discipline of law and the college's higher education mission and delivery, such engagement with legal practice can properly be understood as engagement with subject-specific scholarship. The team found evidence that this subject-specific scholarship informs the learning, teaching and assessment practices of the college through the close alignment of its work with the needs of legal professions. For example, there is evidence of how this subject-specific scholarship feeds into the curriculum of the college's modules and its assessment practices as demonstrated through the module specifications and content on the college's module VLE sites for the LLM Legal Practice programme, such as the Solicitors Legal Knowledge module, which is aimed at preparing students to undertake the external SQE.

336.   However, the team determined that the college's learning, teaching and assessment practices do not appear to be adequately informed by reflection, which is an additional and important element of the subcriterion evidence requirement. For example, the team noted that the college identifies its supervisor quarterly meetings as an important mechanism for staff reflection and development, but the evidence reviewed showed that these meetings are often more for dissemination of information, than for collective staff reflection. For instance, minutes show that only 15 minutes of the hour-long June 2023 supervisor quarterly meeting were spent on a training 'bite' on the topic of managing students with attention deficit hyperactivity disorder (ADHD), with the rest of the meeting being centred on updates to staff. The team also found that the meetings provided little space for professional reflection among colleagues. Adequate evidence of reflection, in the view of the assessment team, would include a range of fora where all staff could openly share educational challenges they have faced in their professional practice, and discuss and learn from their peers' approaches to these challenges. Therefore, the team determined that the college does not adequately provide development opportunities for staff to engage in reflection on their learning, teaching and assessment practice.

337.   The team found that the most notable elements of staff reflection occurred in respect of the efficacy of administrative processes and, separately, the student experience. For example, the October 2022 supervisor quarterly meeting focused on topics such as the best use of PowerPoint slides and discussion boards, and how best to re-engage students. While these elements are important, the team's view was that these instances of staff reflection did not adequately cover the range of issues or topics that the team would expect to see within an academic community at a higher education provider. By way of further example, during the online visit, the team met with a representative group of teaching and professional services staff who were asked to reflect on the central question for the college of how they considered virtual learning might differ from traditional campus learning. The team evaluated the reflections as being generally limited, predominantly focusing on the staff's experiences of moving online during Covid-19 or the challenges that IT poses, rather than distinct pedagogy or learning and teaching techniques that the team considered might be required and relevant for maintaining virtual and social learning environments that are safe, accessible and reliable for every student. The team noted that, while the discussion with staff during the visit reflected one example, it contributed to the evidence demonstrating that there are deficiencies in how the college's

academic staff engage in reflection of their learning, teaching and assessment practice. In summary, the team did not find adequate evidence to demonstrate that relevant learning, teaching and assessment practices at the college are informed by reflection.

338.   In forming its views, the team considered the context and nature of the college. The team considered that adequate mechanisms for reflection on learning, teaching and assessment practices among staff are highly important, particularly for the college as it offers wholly online provision, relies heavily on a large proportion of contracted adjunct staff and has staff at different career stages with varied experience in the higher education sector. The team noted that the college's adjunct staffing base mostly consists of staff with a great deal of legal professional experience but who are, on occasion, relatively new to higher education. However, the assessment team found that the college is not making adequate use of the existing legal professional experience among staff to share reflections on learning, teaching and assessment practices to the benefit of all staff, and as a result its students. This contributed to the assessment team's view that there was not adequate evidence to demonstrate that learning, teaching and assessment practices are informed by reflection. Furthermore, the team determined that the college does not provide adequate opportunities for staff to engage in reflection and evaluation of their learning, teaching and assessment practice.

339.   The team was also of the view that learning, teaching and assessment practices did not appear to be adequately informed by reflection and evaluation of all aspects of staff's professional practice. In particular, there did not appear to be evidence of active evaluation in respect of staff's role and experience as professional educators involved in learning, teaching and assessment. The team found some evidence that demonstrated how evaluation of professional practice led to the identification and evaluation of issues in the college. For example, relating to the identification of the issue of awarding gaps in some modules, the college made use of its institutional membership of the Association of Law Teachers and staff peer observations to scope and understand the detail of the issues. However, the assessment team did not see sufficient evidence that the outcomes of these evaluations and engagements then informed and enhanced learning and teaching practices in the college. For example, the team would have expected to see evidence of discussion and training sessions for staff relating to the issues identified through evaluation, and a clear plan of action to re-shape learning, teaching and assessment practices that drew on reflective and evaluative practice.

340.   The team noted that, in its self-assessment, the college identified that its programme evaluation and periodic review processes provide evidence of reflection and evaluation of professional practice to inform learning, teaching and assessment practice. The team reviewed Programme Evaluation Reports and documentation of the recent periodic review of the LLM Legal Practice and found evidence that showed how such evaluations can lead the college to adapt its mechanisms or processes. For example, the college made changes to the pace of delivery and modes of assessment for its LLM in Legal Practice. However, the team noted that there is inadequate reflection on the educational roles of more junior staff in delivering such changes. The assessment team would expect that such reflection, if adequately informing learning and teaching practice, would extend across the whole staff base and would involve collective consideration of how members of teaching staff might adapt their practice based on reflections that have taken place. However, the evidence showed that programme or administrative modifications were adopted with little involvement of, or reflection from, the broader academic staff base. The assessment team is of the view that a lack of consideration of the role of staff in delivering such changes is a significant weakness in the college's ability to

demonstrate that relevant learning, teaching and assessment practices are informed by reflection and evaluation of professional practice.

341.   The team noted that the June 2024 OfS New DAPs monitoring assessment report identified this evidence requirement as an area that required further monitoring. This report noted a corrective action that was required in respect of C1: 'Further development opportunities for staff to ensure consistency in learning and teaching practices that are informed by reflection and evaluation of professional practice'. This was raised as a concern following identification of inconsistent learning and teaching practices. In its response to the report, the college set out how it was providing development opportunities for staff to ensure consistency in learning and teaching practices. For example, it invited an external speaker, a scholar of legal skills, to deliver training to staff on the topic of delivering and assessing 'reflection as a tool for practice', which is an assessment method for some of the college's modules. However, the team noted that this was not evidence of staff reflection or evaluation of their professional practice. The college also reported that the head of curriculum 'plans to engage with staff regarding sharing knowledge and experience regarding teaching and learning'. The team considered that these do not reflect adequate mechanisms to address the concerns raised in the monitoring report. This is because the college's response appeared to reflect a one-off example of a staff development opportunity, rather than a programme of learning and refection. Furthermore, the team did not find evidence from this response of how staff reflect, evaluate and share their experiences and learning to inform and enhance their practice.

342.   The team considered the college's Scholarship Framework, which sets out its expectations of its teaching staff, including adjunct supervisors. This framework sets out that 'supervisors will undertake scholarship to maintain, develop and advance their own academic discipline, field of study or area of professional practice, and teaching skills' and lists the types of scholarship activities it expects its staff to undertake, both internally and externally. For example, internal scholarship activities it identifies include:

- critically evaluating the quality of the learning opportunities provided for students

- dissemination to the profession through engagement with learning and development professionals in curriculum development

- preparing for and delivering webinars to the legal profession and student

- membership of the Association of Law Teachers or equivalent.

343.   External scholarship activities the framework identifies include:

- digesting reports and journals about developments in a particular area of professional practice, field of study and legal education, such as Law Teacher

- contributing to practice-related or trade journals

- speaking at or attending conferences and exhibitions

- writing practice notes or opinions on contemporary legal challenges

- attendance at workshops and lectures delivered by the Solicitors Regulatory Authority

- maintaining continuing competence as provided for by the Solicitors Regulatory Authority.

344. While the team considered this framework to be a useful statement of appropriate types of educational scholarship activity, it found that there was not sufficient evidence to demonstrate that the college's staffing base currently participates in the range of such activity. Through the team's review of the record of staff scholarship maintained by the college, which staff are required to complete, and a review of staff CVs, the team found that, over the approximately two-year period for which records were provided, staff have engaged in only a small number of activities that reflect the types of educational scholarship that the college sets out in its framework. For example, the majority of recorded educational scholarship consisted of attendance at three events on the Prevent duty, inclusive learning, and reflection in student assessments. Based on the college's own understanding of scholarship as set out in its Scholarship Framework, together with the team's experience across the sector, the team considered that such activities do not reflect adequate educational scholarship. In the view of the assessment team, if there was evidence of the college's staff fulfilling its Scholarship Framework expectations, this would likely demonstrate that it engages adequately with educational scholarship.

345. Furthermore, the team found no evidence to demonstrate how the engagement in the activities listed in the staff scholarly record informed learning, teaching and assessment practices at the college. The assessment team would expect that such evidence would include the identification of mechanisms for sharing learning among staff and full discussion in relevant committees and approval panels. Further examples that the team considers would show how such activities could inform learning, teaching and assessment practices include staff development sessions or reviews, at a module or programme level, that include discussion on the ways that learning, teaching and assessment practices can be enhanced by learnings from scholarship. Furthermore, the team would expect to see evidence of mechanisms in place for ensuring that personal and professional development is informed (particularly) by practice-orientated scholarship.

346. In the team's view, whatever form educational scholarship takes, such engagement with it would need to be sufficiently substantial, frequent and embedded throughout the college's academic community to ensure that it can impact the day-to-day teaching and learning practices of the college. It did not find evidence of this. For example, through its review of minutes of the supervisor quarterly meetings and its discussion with staff groups during the online visit, the team did not find evidence of educational scholarship having an adequate impact on the learning and teaching activities of the college. The assessment team therefore concluded that the evidence reviewed did not demonstrate that learning, teaching and assessment practices are adequately informed by educational scholarship. The team also noted that this lack of evidence regarding educational scholarship is linked to deficiencies in the college's approach to providing development opportunities for staff aimed at enabling them to enhance their practice and scholarship, which is discussed below in paragraphs 351 to 358.

347. The assessment team found inadequate evidence to demonstrate that the college's staff have active engagement with the pedagogic development of their discipline. The team considered the college's Scholarship Framework, which sets out that 'supervisors will undertake scholarship to maintain, develop and advance their own academic discipline, field of

study or area of professional practice, and teaching skills'. Examples of activities that are included in this framework that could be considered as pedagogical activities include:

- speaking at and/or attending conferences and exhibitions

- attendance at workshops and lectures delivered by the Solicitors Regulatory Authority

- engagement with external stakeholders and communities, including other academics who form part of a wider subject community

- authorship or co-authorship of texts, articles or externally published teaching materials

- involvement with employers, policy-makers, special interest groups and so on, which contribute to the further development, academic health and currency of a practice area.

348. In its self-assessment, the college addresses this evidence requirement by setting out that 'all members of the permanent academic staff and adjunct supervisors record scholarly activity to the college, and the college's engagement with the Association of Law Teachers provides an example of such activity'. Through its review of the college's record of scholarly activity and a review of staff CVs, the team identified evidence of some engagement in pedagogical development. This includes, for example, membership of the Association of Law Teachers and attending training aimed at making educational practice more inclusive. The team also noted that staff reported mandatory training required upon induction on topics such as the General Data Protection Regulation (GDPR), the Prevent duty and training on the college's approach to assessment marking. However, the evidence reviewed demonstrated that staff at the college are not routinely or actively engaged in developing the pedagogy of their discipline. For example, the team noted that the limited engagement that staff have with pedagogic development and enhancing their educational scholarship (as discussed above in paragraphs 342 to 350) is largely as attendees at events or training, and that the evidence reviewed does not adequately reflect the college's own understanding of pedagogical development as set out in the Scholarship Framework.

349. Furthermore, based on the team's experience, active engagement with pedagogic development might include leading discussion in the discipline relating to the college's discipline of law, and collective and frequent discussions and training on key educational developments and emerging issues, such as changing student demographics and academic misconduct, through relevant sector networks. The team found evidence during the online visit of just one staff member actively engaging in developing the pedagogy of the discipline, through co-authoring a piece of scholarship related to the SQE. In addition, as discussed, the team found no evidence to demonstrate how the engagement in the activities listed in the staff scholarly record inform informed learning, teaching and assessment practices at the college. On the contrary, the team considered that the college's weakness in its current approaches to maintaining a safe and accessible social learning environment and preventing and identifying unacceptable academic practice could be in part due to a lack of awareness and engagement with pedagogical development, as discussed under criterion B3.

350. In summary, the evidence reviewed led the assessment team to conclude that that there is not sufficient evidence of staff's active engagement with the pedagogic development of their disciplinary knowledge. Furthermore, the team determined that the college has not sufficiently

demonstrated that relevant learning, teaching and assessment practices are informed by reflection, evaluation of professional practice, and subject-specific and educational scholarship.

351.   While the team found evidence that learning, teaching and assessment practices are informed by subject-specific scholarship, it determined that there remains room for the college to further improve in this respect, to ensure that all staff demonstrate understanding of current research and advanced scholarship in their discipline, and that such knowledge and understanding directly inform and enhance their teaching. In its considerations, the assessment team carefully reflected on both the college's context as a small, specialist provider of legal education, and the FHEQ Level 7 descriptors, which go beyond a systematic understanding of knowledge at the forefront of professional practice to also include comprehensive understanding, originality of application and conceptual understanding.

352.   This consideration resulted in the team determining that the college should encourage further engagement with the advanced legal scholarship coming from research rather than practice. This is because, based on the team's experience, engagement with research is at the core of ensuring comprehensive understanding, originality of application and conceptual understanding of the subject being taught. Understanding of current research and advanced scholarship in the discipline of law will come from advanced practitioners, but also from researchers in the field. There was only limited evidence that staff in the college engaged with current research in the field, or that such knowledge and understanding directly informed and enhanced teaching at the college. For example, during the online visit to the college, the assessment team asked adjunct staff about opportunities to engage in research and advanced scholarship. Staff generally noted that engaging in such opportunities was likely to be possible if they had requested it, and it appeared that there would be some time, funds or both available to staff. However, staff also stated that their focus was on 'getting to grips with the day job' at the college rather than on advanced scholarship or professional development. The team's review of staff CVs showed that most staff did not have a record of engagement with research and/or advanced scholarship. Furthermore, as discussed earlier in this section in paragraphs 342 and 343, the college's Scholarship Framework gives examples of advanced scholarship such as contributions to practice-related journals, writing practice notes, authorship of texts, and engagement with policymakers. However, these were not commonly seen in training records or staff CVs, as discussed above in paragraph 344.

353.   The assessment team concluded that there was not sufficient evidence to demonstrate that the college's staff are actively engaged with research and/or advanced scholarship to a level commensurate with the Level 7 qualifications being offered. In the view of the assessment team this lack of engagement with research and/or advanced scholarship impacts the college and its particular teaching and learning context. This is because, although there is strong evidence of practitioner expertise, engagement with research and advanced scholarship is important for ensuring that the college's higher education delivery, specifically its Level 7 delivery, remain sufficiently grounded in developments of theory, methodology and empirical insight that derive from such research and advanced scholarship. Furthermore, in the context of a provider seeking Full DAPs, the team noted that this was a particularly relevant requirement with which the college should ensure that it demonstrates it meets.

354.   The assessment team considered that a lack of evidence of where staff are actively engaged with research and/or advanced scholarship could be due to inadequate development opportunities aimed at enabling the college's staff to enhance their practice and scholarship.

The assessment team found that the college has two key policies in place regarding staff development: the Scholarship Framework and a newly developed Professional Development Policy (dated August 2024). The team was of the view that these policies did not appear to be sufficient in setting out the college's support for staff to actively engage in development opportunities aimed at enhancing their scholarship, beyond practice-focused legal training and the SQE.

355.   The team reviewed the college's recently developed Professional Development Policy. It sets out that 'Once a member of staff has passed through their induction', which includes mandatory training on Prevent Duty and equality, diversity and inclusion (EDI), 'they are expected to retain and enhance their own subject knowledge, and be proactive in further developing themselves'. The policy also sets out that staff are encouraged to enhance their knowledge or qualifications 'wherever opportunity arises', for example through undertaking an external course with another training provider or attending sector conferences. However, the team noted that neither the Professional Development Policy, nor the accompanying Scholarship Framework, set out support mechanisms or ways in which the college can enable and encourage such opportunities through its own active management processes.

356.   In addition, the team noted that the Professional Development Policy makes explicit reference to meeting the professional development requirements of Education and Skills Funding Agency rules around professional development of staff engaged in delivery of apprenticeships. Furthermore, the policy notes that, in the future, it intends to consider outcomes from regulatory inspection reports see whether they identify any further professional development needs. The policy sets out that 'This will include analysing reports from Ofsted inspections or Early Monitoring visits and feedback from the end point assessment organisation (EPAO)'. While the team understood such references reflect the college's future development of degree apprenticeships, the team considered it unusual that the policy specified Ofsted and the end point assessment organisation but did not also specify more directly relevant and current higher education external points of reference, such as the QAA, OfS or Advance HE. In particular, the team found this to be an oversight considering the college's status as an OfS registered provider that currently holds New DAPs. Therefore, the team found that the policy was lacking in these areas, but overall set a baseline of development expectations for staff.

357.   The team found that the primary mechanisms for staff development in the college are peer observations, probationary periods, staff annual reviews, staff training records, supervisor quarterly meetings, module meetings and staff induction training. The college also sets out, in its self-assessment, that the head of curriculum works individually with staff to identify development opportunities within the staff development budget, and the assessment team heard evidence of this from staff during its online visit.

358.   However, despite these mechanisms being employed, the team determined that the mechanisms are not in practice delivering development opportunities aimed at enabling the college's staff to enhance their practice and scholarship. This is because, while staff report that they 'get the impression' that they could request training, in practice records show that such training and scholarship are not taking place sufficiently frequently or consistently. Furthermore, the team found that the existing mechanisms do not appear to be adequately directed, strategic or effective to ensure development opportunities are provided and accessed by staff. Therefore, the team concluded that the college does not provide, support or encourage

adequate development opportunities aimed at enabling staff to enhance their practice and scholarship.

359.   The team raised the topic of staff development with senior members of staff during the online visit, and heard how the college assures itself that its current staff development procedures and approaches are sufficient. The team determined that, in the view of the college's senior staff, this assurance was achieved through:

- its staff recruitment practices and expectations set out in the Scholarship Framework being sufficient to address staff development needs

- the ongoing development and training of professional services and support staff

- the requirement for all staff to record their scholarly activity.

360.   The team is of the view that this response did not appropriately or sufficiently address the college's deficiencies regarding the requirement to demonstrate that it provides opportunities for staff to engage in reflection and evaluation of their learning, teaching and assessment practice, or that it provides development opportunities aimed at enabling them to enhance their practice and scholarship. This is because recruitment practices and framework policies cannot, on their own, address the need for ongoing professional development, and because ongoing staff development must be undertaken by all staff and not only professional services and support staff, and should be supported and enabled by the college itself. Furthermore, in the view of the assessment team, the college's response both in its self-assessment and during the visit raises a further concern regarding its ability to critically self-assess. This further concern is discussed under criterion E1.

Conclusions

361.   In forming its conclusions, the team carefully considered the nature and context of the college and reached a balanced view, reflecting the mixed picture of evidence and findings set out relating to criterion C1.

362.   The assessment team concluded that the college has appropriate staff recruitment, numbers of staff and expertise to deliver high quality teaching and assessment. The college has appropriate staff recruitment processes in place and effectively ensures that staffing resource is sufficient for student numbers.

363.   However, the team concluded that the evidence has not demonstrated that everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately or adequately supported and developed to the level of the qualifications being awarded. The team identified deficiencies in the college's approach to staff development and determined that it is not providing adequate development opportunities to enable staff to enhance their practice, scholarship and pedagogic development of their discipline (outside their engagement with legal practice). Furthermore, the team found that the college is not providing adequate opportunities for staff to engage in reflection and evaluation of their learning, teaching and assessment practice.

364.   The team's view is that these deficiencies contributed to inadequate evidence of staff's active engagement with the pedagogic development of their discipline knowledge, and of how

the college demonstrates that relevant learning, teaching and assessment practices are informed by reflection, evaluation of professional practice, and educational scholarship.

365.   Furthermore, the team identified significant weakness in staff's engagement with research and/or advanced scholarship and educational scholarship. The team noted that these weaknesses could be linked to concerns raised under criterion B3, regarding the college's approach to maintaining a safe and accessible social learning environment and preventing and identifying unacceptable academic practice.

366.   The team noted that this has been an area of weakness in the college that required development during its probationary period. In particular, it was highlighted as an area that required action following the OfS New DAPs monitoring assessment in the second year of the probationary period. The team therefore determined that these weaknesses critically impact on the college's ability to demonstrate that everyone involved in teaching or supporting student learning, and in the assessment of student work, is appropriately qualified, supported and developed to the level of the qualifications being awarded.

367.   The team was also of the view that these weaknesses critically impact on the college's ability to demonstrate that it has a cohesive academic community comprising staff who are supported and developed to an appropriate level.

368.   Therefore, the team concluded that the college does not meet criterion C1.

Assessment of DAPs criterion D: Environment for supporting students

Criterion D1: Enabling student development and achievement

Advice to the OfS

369.   The assessment team's view is that the college meets the requirements for criterion D1: Enabling student development and achievement.

370.   The assessment team's view is based on its review of evidence which shows in summary that the college has appropriate academic procedures, frameworks and resources which effectively enable students to develop their academic, personal and professional potential. The systems for supporting this development are monitored and evaluated appropriately.

371.   However, while the team found that the college has a clear commitment to equity, it identified a particular weakness in how the college maintains a safe and accessible social learning environment to provide equitable opportunities for all students to develop skills that enable their academic and personal progression. These concerns are discussed in more detail under criterion B3. The team considered these did not prevent the college from meeting the evidence requirements for D1.

372.   This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

Criterion D1.1

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

Reasoning

373.   To assess the college's support provisions, arrangements and resources which enable students to develop their academic, personal and professional potential, the team reviewed a range of evidence including the following policies and frameworks:

- Exceptional Circumstances Policy

- EDI framework

- EDI review documentation

- Principles of Teaching and Learning Policy

- Programme Committee reports and minutes

- Programme Evaluation Reports

- Reasonable Adjustments Policy

- Staff-Student Liaison Committee minutes and action tracker

- Student Programme Handbook

- the college's organisation chart.

374. The team also discussed issues relating to student support mechanisms during the online visit to the college.

375. The assessment team reviewed the college's staff, governance and organisational structure to consider how it supports student development and achievement, and found that, in summary, the structure of the college's staffing and student-facing teams demonstrates an appropriate approach to academic and pastoral support provision. Overall, the team found that the college takes a strategic approach to determine and evaluate how it enables student development and achievement for its diverse body of students. For example, the college's Strategic Objectives for 2024 to 2027 specify that the aim of the college is to 'develop an inclusive, supportive and evolving student experience, that enhances pass rates for professional exams and increases opportunities to access the profession'. Furthermore, the college's higher education purpose, mission and vision is to 'develop excellent legal professionals through personalised, flexible learning', which is demonstrated throughout the college's student support and development mechanisms and approaches, such as strong links with employers and a keen commitment to employability. This is evidenced through a suite of events, communications, and resources offered to support students to develop relevant professional skills.

376. To support this strategic approach, the college has a range of student support structures and resources in place. The Academic Team consists of module leaders, programme leaders and supervisors (who also act as personal tutors). The professional services student function has three elements: a Student Services team, an IT Support team and an Academic Administration Support team. Each of these can be accessed through either the Student Hub or the ServiceNow student portal. Students also have access to an external Student Assistance Programme run by an external organisation, Spectrum, which provides dedicated counselling services. This external service is readily available to all students through the Student Hub and consists of a 24-hour telephone helpline, which gives access to qualified and experienced counsellors. Furthermore, the team found that the college's Student Hub and VLE signposts students to a wide range of support provision and topics including:

- IT support

- careers guidance

- programme or module enquiries

- academic progress and individual support

- mental health and wellbeing

- reasonable adjustments.

377. During the team's visit to the college, it found evidence of the academic teams working closely with the Student Services team to support students throughout their studies. For example, members of the college's academic team said that they hold regular meetings with the Student Services team. This is to monitor and review student engagement and to identify where further intervention and support might be required for students. The team also heard how the college's integrated online systems for managing student queries and monitoring student attendance enable effective and timely support for students. Throughout its probationary period, the college has continued to develop and enhance links between support mechanisms and teams. For example, links between academic teams and Student Services have recently been enhanced through the introduction of the ServiceNow platform in January 2024, which provides a case management system. Through this platform students can contact the Student Services team, the IT Support team and the Academic Administration Support team with queries through one route. During the online visit, the team observed a demonstration of the platform and found that ServiceNow provided a useful tool for students, with almost 5,000 cases being opened on the system since between January and September 2024. The team also heard from students who were positive about the effectiveness of ServiceNow.

378. Responsibility for student services and support across the college sits with the chief operations director and the head of curriculum. The team found that issues relating to student services and support are discussed regularly at Senior Leadership Meetings, although these items tend to be operational rather than strategic, for example reporting on updates of changes to Student Services personnel and any change in resourcing requirements. However, the team found that discussion of more strategic student support issues appears on the minutes of Programme Committee, where there is regular review and discussion of items reported from the Staff-Student Liaison Committee, a subcommittee of the Programme Committee. In summary, the team found that the Programme Committee appears to be the key forum for strategic and operational discussion around the college's student services provision, supplemented by the Senior Leadership Meetings.

379. The team also noted that feedback on student services is effectively reported to the Programme Committee, through the Staff-Student Liaison Committee. For example, positive feedback regarding the student induction process was discussed at the February 2023 Programme Committee. The team found that there have been difficulties in establishing wide engagement with student members on the Staff-Student Liaison Committee, as discussed in depth under criterion A1. However, the team considered that it does provide an effective forum for the discussion of student services and support. As noted, there is evidence of issues being effectively reported upwards, either to the Programme Committee or appropriate teams, as a result. For example, the Staff-Student Liaison Committee Action Tracker records the status of issues raised by students and details whether and how they have been addressed. An example is the Student Services team enhancing guidance in the Student Programme Handbook following feedback from students who expressed confusion about the college's careers centre.

380. In summary, the team determined that the college's approach to student support through its governance and management, together with the provisions in place through its staffing teams, demonstrated a comprehensive and suitable operational approach to providing appropriate support for students throughout their studies. The assessment team concluded therefore that the college takes a strategic and operational approach to determining and evaluating how it enables student development and achievement for its diverse body of students. Furthermore,

the governance of student support arrangements demonstrated that the effectiveness of student and staff advisory, support and counselling services, is monitored.

381.   The team found evidence that demonstrated how the college monitors the effectiveness of student and staff advisory, support and counselling services and how it considers any resource needs. For example, the team considered that, throughout its probationary period, the college has continued to review and enhance the arrangements and resources already established to enable student development and achievement. For example, the Student Services team has grown alongside the increase in student recruitment, through the appointment of an additional 0.8 full-time equivalent (FTE) student services officer. Furthermore, the college's Annual Policy Review ensures that all student-facing policies are reviewed on an annual basis, especially in light of growing student numbers. This demonstrated to the team that the college is regularly taking steps to improve and develop processes for students, which was an area previously identified for further monitoring in the June 2024 OfS New DAPs monitoring assessment report.

382.   In addition, the college ensures that the effectiveness of student and staff advisory, support and counselling services is monitored, and any resource needs arising are considered through student satisfaction and feedback through surveys. The team noted that student satisfaction scores, collated from July 2022 to June 2023 according to data taken from Module Review Forms, remain high when responding to the question 'overall how happy were you with this course?'. Students are also able to express specific views of services through free text comments. Results from student surveys feed into Programme Evaluation Reports, which consider all aspects of the student experience, teaching and learning. The team reviewed the reports that have been produced during the college's probationary period and found that these provide evidence of effective monitoring of student feedback, including relating to support services. This shows how the college ensures it is both monitoring the effectiveness of its services and reviews findings to take necessary action. Overall, the team was assured that the college routinely monitors its student and staff advisory, support and counselling services and any resource needs arising are considered.

383.   The college ensures that 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 Programme Handbook lays out the range of support and services available to students, and these are supported by the access students have to services online via the Student Hub and through its VLE, Canvas. The team found that the college recognises the Student Induction Programme as an initial and crucial part of the student journey. Students are provided with a pre-course study pack upon enrolment and are given an induction to their programme through Town Hall Meetings, which walk them through the requirements of their programmes and modules and signpost to sources of other information and support.

384.   As discussed under criteria B2 and B3, the college's programme specifications set out the programme learning outcomes. Module specifications supplement this by setting out the specific assessment requirements and tasks. The team considered that these specifications supplemented the induction materials provided to students. However, the team found that, while the specifications clearly and appropriately set out each module's assessment requirements, the specifications are not consistently clear with regard to the time and workload requirements. The team found that 'contact time' for individual modules is not explicit or consistent across all modules. For example, the team noted a difference between the module specification for the dispute resolution and solicitors legal knowledge modules in terms of the

breakdown of contact hours. The team also noted that the solicitors legal knowledge module specification is much vaguer in terms of the breakdown of activities. The team did not find evidence, or hear anything from students, to suggest that this was proving an issue in practice. However, the team considered that improving the clarity and consistency of contact hours across all modules could help students to manage their academic study and development, and noted that such an approach would further demonstrate how the college takes account of different students' needs.

385.   The team heard from students during the online visit that they had found it easy to access all relevant student support services and materials during the induction process, for example, one student expressed the view that being able to access the VLE application on their mobile phone made accessing online resources easy and convenient. Furthermore, the team found that the college is mindful of the need to continue to review the student induction process. For example, during its probationary period, the college established a Student Journey Working Group, to focus on induction procedures. This further demonstrated to the team that the college proactively monitors the effectiveness of its student and staff advisory and support services. Overall, the team found that the evidence demonstrated that students are advised about, and inducted into, their study programmes in an effective way.

386.   To consider how the college advises and inducts students into their programmes taking account or different students' needs, and how it approaches a commitment to equity, the team evaluated the college's approach to reasonable adjustments. The college's commitment to reasonable adjustments is set out in the Programme Handbook and on its website.[26] As noted under criterion B1, the college currently operates an 'approach' to reasonable adjustments that is not yet formalised in an operational policy, though this has been drafted for consideration by the Programme Committee in November 2024. The current approach sets out a number of 'core expectations', which, according to the Student Handbook, cover a 'considerable proportion of reasonable adjustments' needed by the college's students. These are that:

- all materials will be available on Canvas at least 48 hours in advance of the taught session

- reading lists will be published in advance

- students may use any type of electronic device to type up notes

- lecturers understand that students may need to take breaks during taught sessions without the need to ask for permission

- students may miss online classes for disability-related reasons.

387.   Students who require other adjustments may apply for them using the 'Individual Study Adjustment' process, which permits certain adjustments individualised to a student's need. The college's current approach to reasonable adjustments sets out the process and a non-exhaustive list of a range of adjustments that may apply:

- extra time and extensions for assessments

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[26] Available at College of Legal Practice, Supporting your Studies to Success.

- course materials in alternative formats

- scheduling one-to-one meetings at certain times of the day

- permission to record sessions

- the use of a person to read or write.

388.   Reasonable adjustments are put in place by the Student Services team and are reviewed as appropriate as students transition between modules. While the college's Reasonable Adjustments Policy is yet to be implemented, the team was assured that the current approach to reasonable adjustments is appropriate and effective. For example, during the online visit to the college the team heard from a representation of students who had arrangements in place for their disabilities. These students expressed positively their experiences of the procedures and support put in place. The team also noted that the college has acknowledged that the intensity of the programme can cause difficulties with regard to academic progression for students with reasonable adjustments or ad hoc difficulties, and has proactively addressed some of these issues during the periodic review of the LLM Legal Practice.

389.   The team also reviewed the college's Student Contract, which states that the college will make reasonable adjustments except in 'exceptional circumstances', when the college may not be able to offer a place or may need to terminate registration. The assessment team is concerned that this process does not appear to be transparent in giving further detail about these exceptional circumstances. The college has not set out any further detail as to what it considers these could be, although the team noted that the draft Reasonable Adjustments Policy mentions adjustments that the college might not be able to support. These are:

- dedicated study skills support (students may consult their personal tutor for study advice)

- materials in alternative formats (except in exceptional cases)

- in-person support (the college operates fully virtually)

- assistant software (not currently provided by the college)

- facilitating or funding of assessments for suspected disabilities.

390.   While the team found that the college's current approach to reasonable adjustments is effective in practice, the team has concerns about the proposed draft policy and the exclusions of support it sets out, and reflects that the college believes that students have high expectations for support which are not realistic for an online college. The team determined that the proposed policy continues the college's current approach to reasonable adjustments, with two further aims: to make clear and explicit what the college will not do, and to create a formal policy that will be subject to annual review. The team has carefully considered the policy in the context of the college's exclusively online provision, its development journey through the probationary period, and the interests of any applicant meeting the admission criteria who may wish to pursue the college's programmes. In the team's view there is a concern that the college is pre-setting limits to its obligations of reasonable adjustments that may not be appropriate or

justified in individual cases. The team noted that excluded adjustments are nuanced in a number of ways. For example:

- while there is no dedicated study skills support, the policy recognises that personal tutor advice is available through supervisor sessions

- the college will consider materials in alternative formats, albeit exceptionally

- through the policy, the college would promote the availability of the UK government's Disabled Students' Allowance[27]

- the policy does not exclude the possibility of investing in assistance software in the future.

391.   Furthermore, the team noted that this draft policy has not yet been finalised, and the team has not yet seen evidence of student engagement in the drafting of the policy. For example, the team reviewed minutes from the January and April 2024 meetings of the Staff-Student Liaison Committee, which reflected that no discussion of the draft policy, or topic, took place. However, the team noted that the college developed the policy in response to student feedback about the reasonable adjustment provisions currently in place at the college. On balance, the assessment team found that the college has in place appropriate and effective reasonable adjustment provisions that demonstrate how it takes account of different students' choices and needs, and that its approach is guided by equity. However, the team noted that the college should ensure appropriate engagement with students is sought before the proposed Reasonable Adjustment Policy is finalised, such as sharing a draft of the policy with the Staff-Student Liaison Committee.

392.   The team considered that the college has further support mechanisms in place that demonstrate that different students' choices and needs are taken into account and reflect that the college's approach is guided by a commitment to equity. The college's Teaching and Learning Strategy contains an explicit commitment to take account of diversity and inclusion issues as appropriate, and the team found this was evidenced through its policies and procedures. For example, the college has in place an Exceptional Circumstances Policy for unexpected circumstances that arise before or during assessments, and a Leave of Absence policy. The team found that both policies reflect normal and appropriate practice across the sector. Furthermore, the college's Fitness to Study Policy may be implemented:

- if there are serious concerns about a student

- where general health falls below what might be reasonably expected by the college

- where health problems are affecting the behaviour of a student.

393.   The team found that these policies are clear, transparent and easily available to students via a number of routes, such as Canvas and the Student Programme Handbook. In summary, the team found that the evidence showed that students are advised about, and inducted into, their study programmes in an effective way and account is taken of different students' choices

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[27] See Gov.UK, Help if you're a student with a learning difficulty, health problem or disability: Disabled Students' Allowance.

and needs. The evidence also demonstrated that the college's approach is guided by a commitment to equity.

394.   The team noted that the June 2024 OfS New DAPs monitoring assessment report found that the college demonstrated a commitment to EDI that is woven into staff and student practice and policies. The team triangulated this with its own findings; for example, the team reviewed the Selection and Admission of Students Policy and found that it explicitly encourages applications from a wide and diverse range of students and is in line with the college's Equality and Inclusion Policy for Students. The Equality and Inclusion Policy states that the college recognises diversity in the needs of students, and seeks to promote equality and diversity in its teaching and assessment. Furthermore, the team noted that the college's Teaching and Learning Strategy contains an explicit commitment to take account of diversity and inclusion issues. Although the team noted that the college's Principles of Teaching and Learning Policy does not explicitly include a commitment to an inclusive and diverse social learning environment, on balance the team considered that the college demonstrates a commitment to equity through its Teaching and Learning strategy and approaches.

395.   The college regularly reviews its data on gender, ethnic origin, religion and sexual orientation to enable analysis by the Programme Committee. For example, the Programme Evaluation Reports for the GFL and the LLM Legal Practice provide data on gender, ethnic origin, religion and sexual orientation. The Programme Evaluation Reports also include student feedback from module reviews, feedback questionnaires and external examiners. These reports are discussed at the Staff-Student Liaison Committee to enable any issues to be addressed, and an Action Plan is compiled detailing issues to be addressed, which is monitored by the Programme Committee. The team found that this evidence also demonstrated that the diversity and performance of the cohort are under regular review, which further reflects the college's commitment to equity.

396.   In addition, the team reviewed the college's first annual EDI report, issued in 2023, which sets out how the college's student body has a higher level of ethnic diversity than comparative institutions, using HESA data for postgraduate students, and outlines actions carried out during the year to address EDI issues. The EDI report goes to the Programme Committee for consideration and discussion and uses the report's findings to set priorities for the year ahead. In 2022 the college created an EDI framework, which carries the stated goal of increasing access to the legal profession and further reflects the college's commitment to equity. The team also found that EDI is a regular item on the agenda of Senior Team Leadership meetings and Programme Committees and is included as a required section on all new programme development forms as well as in the programme evaluation reports. There are also EDI awareness events, with details shared on the Student Hub for students to attend. In summary, the evidence reviewed assured the team that the college has a clear commitment to equity.

397.   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 found that the college takes a holistic approach to its integrated online systems, using student data at its heart as a means of monitoring student progression. The team considered that this data is used effectively, by both staff and students. For example, supervisors have access to attendance and engagement records using the Canvas platform and are reviewed regularly. This engagement data informs the discussions with students in one-to-one meetings, or, if needed,

to raise concerns with programme leads and Student Support teams. During its meeting with adjunct staff, the team heard of how effectively access to this data monitoring informs staff's ability to quickly intervene and support students where necessary.

398. The college produces several reports annually that include analysis and discussion of student progression and attainment data, including the Annual Report on Quality and Standards. Through this annual report, the Programme Committee considers Programme Evaluation Reports, Outcome of Examination Reports (which analyses student achievement over the academic year), minutes of the Programme Committee and approval and periodic review reports. These reports are presented to the Board. As discussed in detail under criterion B2, the team found that the 2023 Outcome of Examinations Report identified concerns with the non-completion rates on the Solicitors Legal Knowledge and the Solicitors Legal Skills modules of the LLM Legal Practice programme. The college has noted that further review and discussion of this data is required, and to support this the college has established a Pass Rates Working Group. The team found that this provided further evidence of how the college's administrative support systems enable it to monitor student progression and performance accurately and to provide timely, secure and accurate information to satisfy academic and non-academic management information needs.

399. Furthermore, the team noted that the Pass Rates Working Group is tasked with considering and identifying curriculum and communications developments that 'may assist in raising the performance of students' undertaking these two modules. As discussed under criterion B2, the team noted that 2023 Outcome of Examinations Report found that completion rates were 'broadly consistent across the protected characteristics', with some differences 'around ethnic origin and religion'. The team found that the establishment of the group supports the college's wider EDI objectives, demonstrating one way in which the college's approach is guided by a commitment to equity. However, the team considered that the group's terms of reference could be more explicit in their objectives to consider the attainment and completion rates of the identified categories of students. In summary, the assessment team determined that the various methods for monitoring and regular review of processes enable the college to monitor the effectiveness of student and staff advisory and support services. This evidence also demonstrated how 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.

400. The assessment team found that the college provides some opportunities for students to develop skills that enable their academic, personal and professional progression. For example, during their studies students are assigned a supervisor on each of their modules to provide one-to-one support. In Town Hall Meetings held at the beginning of, and throughout, each module the supervisor explains the nature of the module, content and assessment, and gives guidance to students about one-to-one sessions and support. For each module students have five one-to-one sessions to discuss their engagement, gradings, solutions and strategies for study. Engagement with these meetings and other teaching sessions, and individual student grades, are recorded on Canvas, to which students have access, and are discussed at these meetings. If there are ongoing concerns about student engagement then a 'safe and well' check can be instigated by student services, and once students return to their studies they will be invited to a meeting with a member of the academic team. The Fitness to Study Policy may be implemented if there are serious concerns about a student and their health.

401.   During the online visit to the college, the team heard from students that they were generally happy with the level of academic support they have received through the supervisor system, although they report that they would prefer one consistent supervisor throughout their programme, rather than changing when they change modules. This feedback from students was noted in the previous monitoring assessment report in June 2024, which identified this as an issue that required further monitoring. In its response to the report through its self-assessment, the college explained that it is not currently possible to guarantee continuity in supervisors for students throughout their studies because of the college's adjunct staffing and resource model. However, the college stated that it aspires to find a solution to this. The team was satisfied that there is sufficient support in place through the current supervisor model.

402.   The college provides guidance support for professional development through various means. For example, through the Student Hub students can access careers guidance called the 'COLP Careers Centre'. The Careers Framework provides a comprehensive overview of what is available, and this was updated following detailed student feedback on what students would like to see. The college provides a careers and employability hub for students in conjunction with an external provider, which is available to students via the Student Hub. Students receive a bespoke careers service, as they are required to complete a self-assessment when they first use the service. This service is offered in conjunction with other elements of the Student Hub, such as notification of opportunities for placements, and other careers events. As the college's learning and teaching strategy is built on professional study and links to the profession, it is expected that this is an area of strength and is supported by the nature of the learning on the programmes.

403.   The evidence showed that the college meets the needs for students in providing a number of opportunities for support through study with academic and support staff. However, as discussed fully under criterion B3, the team determined that the college is not sufficiently maintaining a safe and accessible social learning environment. The team has identified a lack of support for students to develop an online academic community and engage with a safe and accessible social learning environment where they might learn from peers and receive and give support. This was evidenced through student feedback, which reported a lack of a social learning environment and online community, expressing the feeling that there was a lack of a 'sense of place' in Staff-Student Liaison Committee meetings. As discussed under criterion B3, the extent to which a social learning environment supports the academic, personal and professional progression of students is an issue the college is aware of and has been discussed through the Programme Committee.

404.   The team noted that the June 2024 OfS New DAPs monitoring assessment report identified this area of weakness, setting out that 'Further monitoring of the provider's planned enhancements to develop to the social community aspect of the provider's virtual learning environment' was warranted. The college set out its response to this report in its self-assessment and identified some measures it had put in place to address the concern around social learning environments. For example, in some modules, one-to-one meetings have been supplemented with small group sessions, which the college reported would provide a more 'dynamic learning experience'. However, as discussed under criterion B3, students reported limited success with these groups because of the nature of the student cohort, who are often balancing studies with work in legal practice. Therefore, if students are unable to attend group sessions, they do not get fair and equal access to these as a source of social learning environment.

405.   Furthermore, as discussed in depth under criterion B3, a particular concern identified by the team was the promotion and use of student-led WhatsApp groups as a means to support student learning and provide a source of social learning environments. The team found that the WhatsApp groups are referred to and signposted to students during Town Hall Meetings and are referred to as 'buddy groups' by staff. The WhatsApp groups are ad hoc and student-led, with some students unaware of their existence. The team was concerned to hear how some students expressed unease around sharing their personal phone numbers, but did so in order not to miss out on the groups as a mechanism of social learning. As discussed under criterion B3, the college provides no oversight or guidance for the management of WhatsApp groups and does not intend to do so. Although the college has in place a Student Charter and Code of Conduct, the team considered that the college could be more explicit in its oversight and expectations of students when engaging with peers through social learning environments, to ensure that all environments are equitable and safe. In the view of the assessment team based on its experience across the sector, social media and WhatsApp among student communities can be problematic for encouraging bullying behaviour and inequality of opportunity. Therefore, the team considered that a lack of oversight in these groups, in lieu of any other mechanism for a social learning environment, is a weakness of the college in demonstrating its commitment to equity.

406.   The assessment team views student community through a social learning environment as particularly essential in the specific context of the college, as students are studying remotely and have little opportunity to make connections with peers through in-person interaction. The team considered that the college has a particular weakness in how it maintains a safe and accessible social learning environment and found that currently it is not effective or equitable. The team noted that this could, over time, further impact how the college provides opportunities for all students to develop skills that enable their academic and personal progression. This could also impact the college's approach to equity. The team considered that these issues are discussed with more detail and relevance under criterion B3, and therefore on balance, concluded that the college does provide adequate opportunities for all students to develop skills that enable their academic, personal and professional progression, and that this is guided by a commitment to equity.

407.   The assessment team found that the college provides opportunities for all students to develop skills to make effective use of the learning resources provided and the use of digital and virtual environments. As discussed under B3 the three main support and virtual learning resources to students are the Student Hub, Service Now and Canvas. The Student Hub provides access to a variety of resources, signposting and opportunities, including careers events; the new ServiceNow platform provides a case management system, which operates as the main link between students and student services; and the Canvas VLE operates as the basis for student learning, with access to learning resources, teaching calendars and assessment submissions. Access to these resources can be found through the Student Handbook as well as through the college's website.

408.   The team heard from students during the online visit that they found all the college's resources to be easily accessible and straightforward to navigate. Students also said that the Student Services and IT teams are readily available for support in navigating the virtual learning environments. Overall, the team was assured that the evidence reviewed demonstrated that the college provides opportunities for all students to develop 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.

Conclusions

409.   In forming its conclusions, the team carefully considered the nature and context of the college.

410.   The assessment team concluded that the college has in place appropriate academic procedures, frameworks and resources, which effectively enable students to develop their academic, personal and professional potential. This is reinforced by the college's Student Services team and the college's online learning and support platforms, together with the one-to-one academic support provided to students.

411.   Furthermore, the team considered that the college's development of its student services mechanisms and procedures demonstrated that the college has successfully implemented its New DAPs plan as intended.

412.   The team found that the college demonstrates a clear commitment to equity, as evidenced through its comprehensive EDI reporting processes. However, the team identified a particular weakness in how the college maintains a safe and accessible social learning environment to provide equitable opportunities for all students to develop skills that enable their academic and personal progression. These concerns are discussed in more detail under criterion B3 and the team considered that this did not prevent the college from meeting the requirements for criterion D1.

413.   Therefore, the team concluded that the college has met criterion D1.

Assessment of DAPs criterion E: Evaluation of performance

Criterion E1: Evaluation of performance

Advice to the OfS

414. The assessment team's view is that the college meets criterion E1: Evaluation of performance, although the team identified weaknesses in the college's ability to undertake self-criticality.

415. The assessment team's view is based on its review of evidence which shows in summary that the college takes effective action to meet the baseline requirements of the criterion in regard to assessing its own performance, responding to identified weaknesses and developing further its strengths. The evidence also shows that there are clear mechanisms for scrutiny and monitoring of academic provision, and there are some opportunities for ideas to be drawn into arrangements for programme design, approval, delivery and review.

416. However, the team also identified weaknesses in the extent of the expertise drawn into the college through its staff, and significant weaknesses in the college's ability to undertake critical self-assessment. The team considered that these weaknesses impact the college's self-criticality but, on balance, concluded that the criterion is met, because of the effectiveness of the college's formal review mechanisms and academic governance.

417. This view is based on specific consideration of the evidence requirements for this criterion, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

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

418. To assess the college's capabilities relating to evaluation of performance, the team reviewed the college's current approach and how it has evolved during the probationary period. The team reviewed a range of the college's documentation including:

- Annual Policy Review 2022 (Corporate) and Annual Policy Review 2021 (Student)

- Annual Report on Quality and Standards 2023

- periodic review and Programme Evaluation processes

- Review of Assessment Panel structures and operations.

419. The team also reviewed terms of reference and minutes of the following:

- the Board

- the Audit, Risk and Compliance Committee

- the Pass Rates Working Group

- the Programme Committee

- the Quality Systems Working Group.

420.	The team also discussed issues relating to evaluation of performance during the online visit to the college.

421.	The team found that this evidence shows that in some areas the college has developed its capabilities relating to evaluation of performance, and subsequent assigning and discharging action, during the probationary period. The team found that the college has implemented a range of mechanisms to demonstrate that it is beginning to embed self-assessment throughout the operation of its higher education provision. For example, as discussed under criterion A1, the college has clear governance mechanisms and lines of responsibility to allow it to deliver scrutiny, monitoring and action. These include a well-functioning Programme Committee, Board and Audit, Risk and Compliance Committee, and periodic reviews. One particular example is through the implementation of the Programme Evaluation process, the annual review of each of the college's programmes, which takes a holistic view of student feedback and external examiner reports as well as attainment and progression data. Student feedback is embedded into the process and is captured through module surveys at the end of each module, which feed into the Module Reviews completed by the Programme Team. Programme teams review this data and provide a commentary on academic standards through the interrogation of this data.

422.	Three Programme Evaluation Reports have been submitted by the college during the probationary period – two for the LLM Legal Practice programme and one for the GFL (since revised as the GDL). The Programme Evaluation process and reports are discussed in full under criteria B2 and B3. All Programme Evaluation Reports are submitted to the Programme Committee for discussion and consideration, and Programme Evaluation Reports feed into the college's wider review of its provision through the Annual Report on Quality and Standards, which is considered by the Board.

423.	This demonstrated to the team evidence of self-assessment through annual monitoring mechanisms that are effective in practice. The team also considered that the Annual Report on Quality and Standards demonstrated evidence of action being taken in response to matters raised through internal monitoring and review, and clear mechanisms for assigning and discharging action in relation to the scrutiny and monitoring of the college's academic provision. For example, through this Annual Report, the Programme Committee considers Programme Evaluation Reports, Outcome of Examination Reports (which analyse attainment and progression data), minutes of the Programme Committee and periodic review reports. As discussed under criterion B2 and earlier in this section in paragraph 398, the team found that the 2023 Outcome of Examinations Report identified concerns with the non-completion rates on the Solicitors Legal Knowledge and the Solicitors Legal Skills modules of the LLM Legal Practice programme, which led to the formation of the Pass Rates Working Group.

424. Furthermore, the college has determined actions and made some required changes to programmes, for example in respect of group learning sessions, in response to issues identified during the periodic review of LLM Legal Practice. These mechanisms, and the practice evidenced at the college, also demonstrated a flexibility and adaptability that the assessment team considered to be a strength in allowing timely changes to be implemented. For example, the college made the decision to bring forward the periodic review of the LLM Legal Practice when it established that there was a sufficient range of smaller issues that required modifications to justify an early review. In addition, the college undertook a review of Assessment Panel structures and operations, which led to a more flexible approach to enable the college to manage its continued growth in student numbers, for example by allowing for greater number of panels each year.

425. The team was also assured that the college has mechanisms for ensuring student feedback is acted on as a critical means of identifying weaknesses. The college uses module feedback in its review processes, and has a log of actions for ensuring the feedback arising from the Staff-Student Liaison Committee is acted on. Similarly, the team found that the college has a robust process for the reporting and analysis of the details of appeals and complaints through an annual report on academic appeals and student complaints. Through this process, the college includes anonymised case studies for information and precedent-setting, which are considered by the Programme Committee. The team considered this to be effective practice.

426. In summary, the team determined that the evidence demonstrated that the college has in place some effective self-assessment mechanisms that are integral to the operation of its higher education provision, and that action is taken in response to matters raised through these internal monitoring and review mechanisms. The team also determined that this evidence showed that clear mechanisms exist for assigning and discharging action in relation to the internal scrutiny and monitoring of its academic provision. However, the team also found some persistent gaps in the college's ability to:

- effectively draw on ideas and expertise from in the organisation

- understand its own weaknesses

- appropriately respond to them when they have been highlighted.

427. The team noted a theme in that some weaknesses identified through the probationary period monitoring have not been adequately examined or addressed by the college. These themes are further explored throughout this section in paragraphs 428 to 444.

428. The team considered that the evidence reviewed shows that the college has weaknesses in its ability to draw ideas and expertise from within the organisation. The college's structure relies on a smaller number of permanent academic staff (5.6 FTE) and a much larger pool of adjunct staff, called supervisors, totalling approximately 40 FTE. In the team's view, this structure makes it essential that the expertise, knowledge and experience of adjunct staff are appropriately drawn into programme design, approval and review. The team identified some positive examples of this; for example, during the online visit to the college the team heard from adjunct staff that they are actively involved in module meetings and felt that they could make suggestions for topics at the supervisor meetings.

429.   However, the team also identified concerning gaps in the adjunct staff's understanding of and involvement in the college's arrangements for programme design, approval, delivery and review. For example, during the online visit, the team heard how staff had a broad sense of the college's business model, but did not indicate a concrete understanding of its committees, review mechanisms, and quality assurance processes. In addition, adjunct staff appear not to be involved in the majority of the college's governance processes or committees, such as the Programme Committee and the Staff-Student Liaison Committee. The team also found that adjunct staff appeared not to be aware of policies on plagiarism, had not been actively involved in applying reasonable adjustments for student disabilities, and did not appear to have been actively consulted on the staff development policy. In addition to, and perhaps because of, this lack of awareness of key policies, adjunct staff did not appear to be involved in shaping policy or arrangements for programmes at the college. The assessment team concluded that this evidence represents a deficiency in how the college draws on ideas and expertise from within the organisation.

430.   The team determined therefore that the college's large body of adjunct staff evidenced significant specialist expertise, but that expertise did not appear to be used by the college to shape its provision. The evidence reviewed and weakness identified led the assessment team to conclude that the college has not demonstrated that ideas and expertise from within and outside the organisation are adequately drawn into its arrangements for programme design, approval, delivery and review.

431.   The team noted that this was a matter identified for further monitoring in the June 2024 OfS New DAPs monitoring assessment report. That report set out a recommendation for the college to make fuller use of the breadth of its staff expertise through 'increased, substantive involvement of staff as stakeholders in all aspects of the governance and management of its higher education provision'. The assessment team found that the college did not specifically respond to or address this concern in its self-assessment.

432.   The assessment team also found that the evidence reviewed did not demonstrate how the college ensures that action is taken in response to matters raised through external monitoring and review. The team determined that this is because the college has not been effectively and self-critically identifying its own weaknesses or responding to them. This weakness can be evidenced through three examples that have been identified and discussed through the relevant criterion of this report:

   a. The college's management of how it prevents and identifies unacceptable academic practice – criteria B2 and B3.

   b. The college's management of staff development – criterion C1.

   c. The college's approach to maintaining a social learning environment and engagement of students in its academic governance – criteria A1, B3 and D1.

433.   With respect to the first issue of the college's management of academic misconduct, specifically how it prevents and identifies unacceptable academic practice, the college is, in the experience of the assessment team, a significant outlier in the sector as it does not use a software tool, for example Turnitin, to assist in the detection of plagiarism and other forms of academic misconduct. In the absence of such software, the team considered that the college

could have employed an alternative comprehensive and evidence-based strategy, but there was no evidence that such a strategy had been developed, as discussed further under criteria B2 and B3. The college does not appear to have self-critically identified the risk that its approach to academic misconduct posed to its ability to meet criteria B2 and B3. For example, the team found evidence of only one internal discussion in the college regarding its academic misconduct procedures, at a 2022 Board meeting. The discussion at this Board meeting concluded that the college should develop and implement a tracking system for academic misconduct to include near-misses, and consider how this can be used to support staff and students in detecting and minimising misconduct. However, the team did not see evidence of this being followed up or developed into any new guidance for staff and students. In addition, in response to this issue being raised by a previous external assessment team during the college's probationary period, the college set out its view that there is no further action needed to detect plagiarism.

434.   Furthermore, the team noted that this concern was expressed by a previous external assessment team during the OfS year two New DAPs monitoring assessment. However, this does not appear to have prompted substantial additional action by the college. For example, in its self-assessment, which set out its response the year two monitoring assessment report, the college noted that its assessment structures presented a 'very low risk' for plagiarism. For instance, it cited that the Solicitors Legal Knowledge module, which has its largest cohort or enrolments and is a mandatory module of the LLM Legal Practice was assessed by multiple choice questions. The college did not propose any further action.

435.   Furthermore, in response to additional information requested by the team and to questions during the online visit, the college noted it had held some early discussions with an anti-plagiarism software provider, but did not express a commitment to implementing such software. The team found that these comments did not move the college's position forward and the college did not expressly state that it was prioritising this; rather, that it was still 'considering' the implementation of the software. The team was of the view that the college's apparent delay in advancing its approach to how it identifies academic misconduct, especially in response to explicit external concerns, demonstrated a weakness in the college's ability to undertake self-critical assessment.

436.   This raised a significant concern to the team because a lack of critical self-assessment in this area has potentially resulted in a number of poor outcomes. First, as discussed in detail under criterion B3, the college reported that it has not detected any cases of academic misconduct across any modules or programmes throughout its probationary period. The team considered that, in the context of the college and its student numbers, this is highly likely to indicate that instances of academic misconduct are going undetected. Second, the team heard from adjunct staff that they were unaware of mechanisms for plagiarism detection, which indicates a gap in the knowledge of those staff undertaking the majority of marking, and who are, as indicated by the college, the main mechanism through which the college currently detects academic misconduct. Third, students were vague about what constituted academic misconduct and reported a lack of specific guidance or training on the topic, which indicated that the college does not operate adequate processes for preventing unacceptable academic practice.

437.   With respect to the second issue, the assessment team found deficiencies in the college's approach to staff development, its engagement with scholarship, and the pedagogical

development of the sector. Consequently, the team concluded that criterion C1 was not met. The findings of the assessment team are discussed under criterion C1, but in summary it found deficiencies in the college's management of staff engagement with research and advanced scholarship, weaknesses in staff engagement with pedagogy, and weaknesses in the staff's engagement with and contributions to the pedagogical development of the discipline. During the college's probationary period and the team's online visit, concerns relating to these aspects of criterion C1 were raised with the college. Examples related to scholarship in job descriptions, management processes for ensuring there are opportunities provided for scholarship and engagement with pedagogy, and the emphasis on reflective practice.

438.   In the view of the assessment team, the college did not demonstrate effective action to respond to identified weaknesses in relation to staff development. This is because the college repeated previous information that it is content with its approach to staff induction, and encouragement to take training as required, and said that it has no future plans to develop in this area. The team considered that this raised a particular concern because, as set out in the DAPs overarching criterion, critical self-assessment should be integral to the operation of the college's higher education provision.

439.   Furthermore, as discussed under criterion C1, the team identified that the college has more limited engagement with the scholarship and pedagogy developed by other providers of higher education. This was observed through limited evidence of scholarship or pedagogical training connected with other providers of higher education, or staff discussion of their points of reference and learning, and of staff engagement as external examiners or reviewers at other higher education providers. The team determined that this weakness in approach limits the college's ability to draw on the ideas and expertise of other providers to the benefit of its programme design, approval, delivery and review. For example, the team considered that if staff had greater engagement with educational scholarship and advancing the pedagogy of the discipline, they may have been more aware of the prevailing minimum practices in other providers.

440.   In the view of the assessment team, it considered that gaining wider sector expertise through educational scholarship and pedagogical development would benefit the college's staff and could allow it to identify and address deficiencies identified by the team under criterion B3. For example, staff could gain a wider understanding and discussion of ideas regarding the maintenance of an inclusive social learning environment in a non-traditional provider. Furthermore, staff could engage with topics and discussion of alternative assessment strategies to mitigate the impact of plagiarism and generative AI and best practice in online-only learning.

441.   With respect to the third issue of the college's development of a safe and accessible social learning environment and engagement of students in its academic governance, the assessment team found a number of deficiencies in the college's approach to students and their place in the college. The three issues identified were:

a. The college's deficiencies in how it maintains an adequate social learning environment that is safe, accessible and reliable.

b. Weaknesses in the college's approach to equity and mechanisms to ensure that all students are supported to develop their academic and personal potential.

c. Lack of effective engagement of students as partners in the college's governance and management of its higher education provision.

442. These findings are not repeated here. However, in the process of making them findings, the assessment team considered the college's journey through its probationary period, including its ability to reflect and self-assess on this matter. The assessment team found that, despite having had prior issues identified, both through its own self-assessments during the probationary period and through reports produced by the QAA and OfS appointed New DAPs monitoring assessment teams, the college did not evidence additional self-assessment in respect of these issues at the online visit.

443. Each of these three examples was thoroughly examined during the team's online visit to the college through discussions with senior staff from the college. In respect of all three, the assessment team did not find new evidence of critical self-assessment. Often to the contrary, the topics were addressed in a manner that defended existing practices and approaches, with occasional assertions that changes were not required and would not be made. For example, that the college was assured that staff employed were of a uniform skill and that staff development was therefore less of a priority. Similarly, the team found that there were no substantial plans discussed or reflections regarding students' social learning environments.

444. Further, when prompted to reflect on its journey through the New DAPs probationary period, the college did not reflect on weaknesses or areas for development. Rather, there were notable assertions made by senior staff that the college considered itself to be now 'mature' in its development and that future priority would be given to growth in size. Overall, the assessment team found a general unwillingness to discuss and engage with potential areas of weakness that might exist within the college, in particular its approach to academic misconduct.

445. The assessment team considered the evidence reviewed and concluded that, on balance, although critical self-assessment is missing in some important aspects of the college's operations, there is strength in the college's embedded monitoring and review mechanisms and effective academic governance. These strengths are sufficient to allow the team to conclude that the college has met the baseline requirement of the criterion.

Conclusions

446. The assessment team concluded that the college has adequate mechanisms in place to assess its own performance, respond to identified weaknesses and develop further its strengths. This is because the team placed particular weight on the formal mechanisms of review and governance in the college, and the overall effectiveness of those mechanisms.

447. However, the team identified significant weaknesses in the extent of the college's ability to undertake critical self-assessment as an integral part of its operations. In forming its conclusions, the team carefully considered the nature and context of the college.

448. The team determined that, throughout its probationary period, several areas of weakness had emerged for the college, on which limited or inadequate action had been taken. The absence of such action raised a concern for the assessment team that the college was not adequately reflecting on its weaknesses or responding to them.

449.   The team considered that these weaknesses impact on the college's ability to demonstrate that it is a self-critical community. However, because of the effectiveness of its formal review mechanisms, the team concluded that on balance the college does take effective action to assess its own performance, respond to identified weaknesses and further develop its strengths.

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

Degree awarding powers overarching criterion

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

451.   The assessment team's view is that the college does not meet the DAPs overarching criterion because it does not meet all of the underpinning criteria.

452.   The assessment team's view is based on its review of the evidence which shows in summary that, while there is evidence to support how the college has a proven commitment to the assurance of standards supported by effective quality systems, the college is not a self-critical cohesive academic community.

453.   This view is based on consideration of the evidence requirements for the DAPs criteria, collated throughout the college's probationary period and for the purposes of this New DAPs end assessment, alongside any other relevant information.

Reasoning

454.   The team found that the college's commitment to the assurance of standards was demonstrated particularly through strengths in aspects of criteria A1.1 and A1.3, B1, B2 and D1. For example, its academic governance structures are effective and function appropriately, partnerships are engaged in strategically, the college's regulatory framework is well developed, and there are robust mechanisms for record-keeping. Additionally, the college has clear and consistent academic standards, it benchmarks those standards appropriately and has mechanisms in place to ensure students meet their academic, personal and professional potential.

455.   The college has also demonstrated some good practice in quality systems that are integrated effectively, as well as reliable monitoring and reporting of student data. Elsewhere, the college has good practice in its quality assurance procedures, such as Programme Evaluation Reports, how it engages with external examiners and assessment panels. Overall, the college's policies are appropriate and in line with the sector in most respects.

456.   However, the assessment team determined that the college is not a 'self-critical, cohesive academic community'. This is because the college's weaknesses and its approach to them, indicate a lack of effective self-criticality within the college. The college does not appear to be consistent in identifying its own weaknesses or responding to them, as the evidence demonstrated how there is sometimes inaction in the college in response to important matters raised through internal or external monitoring and review. As set out under criterion E1, this was particularly demonstrated though three key issues identified throughout the report, and throughout the probationary period:

   a.   The college's processes for preventing and identifying unacceptable academic practice – criteria B2 and B3.

b. The college's management of staff development – criterion C1.

c. The college's development of a social learning environment and engagement of students in its academic governance – criteria A1, B3 and D1.

457. While the assessment team found that, overall, the college had good formal mechanisms for self-assessment, there were weaknesses in the extent of the college's ability to undertake critical self-assessment as an integral part of its operations. The team considered that these weaknesses impact on the college's ability to demonstrate that it is a self-critical community. The team determined that, throughout its probationary period, several areas of weakness had emerged for the college, on which limited or inadequate action had been taken. The absence of such action, when weaknesses had been externally highlighted, raised a concern for the assessment team that the college was not adequately reflecting on its weaknesses or responding to them. This, in the assessment team's view, demonstrates that self-criticality is not yet sufficient in the college, and that this aspect of the overarching DAPs criterion is not met.

458. The team found that there is not sufficient evidence of a cohesive academic community throughout the college. This was particularly demonstrated through two key issues identified throughout the report, and throughout the probationary period:

a. The college's development of a social learning environment and engagement of students in its academic governance – criteria A1, B3 and D1.

b. The college's management of staff development – criterion C1.

459. The team determined that there were weaknesses in how the academic community is constructed at the college. These included weaknesses in the extent of student involvement as effective partners in the college's governance and management of its higher education provision, and weaknesses in the college's maintenance of an equitable social learning environment. These elements affecting the cohesiveness of the academic community among students were compounded by weaknesses in the college's approach to developing academic community among staff, through staff development. The team determined that staff development was not adequately managed to ensure that staff are engaged with scholarship or developing the pedagogy of the discipline. As set out under criterion E1, the team found that these issues were present throughout the probationary period and not adequately addressed.

460. The assessment team determined that the weaknesses in the college's approach to maintaining a safe and accessible social learning environment, student engagement in governance, and its management of staff development are sufficient to undermine the cohesiveness of its academic community. The deficiencies in each of these elements mean that there are:

a. Limitations to cohesiveness within the student academic community, as students are not adequately facilitated to engage in a social learning environment that is safe, accessible and reliable for every student.

b. Limitations to cohesiveness within the staff academic community, as there are not adequate opportunities to reflect together and to develop.

c. Limitations in how staff and student academic communities cohere together, which are due to weaknesses in how students are engaged by staff as partners in the governance of the college.

461. The assessment team weighed the positive elements of practice evidenced as relevant to the DAPs overarching criterion against the relevant weaknesses identified. In doing so, the team concluded that the weaknesses were clearly sufficient to mean that the overarching criterion was not met. While the college evidences many strengths in its quality assurance mechanisms, its setting and maintaining of standards and its integrated systems, a self-critical and cohesive academic community is, in the view of the assessment team, fundamental to the overarching criterion. As these elements are not sufficiently developed or mature, the team determined that, on balance, the DAPs overarching criterion is not met.

462. The team considered that, in addition to addressing the issues identified throughout this report, there were a number of achievable measures that the college might enact in order to meet the overarching criterion. In particular, it might benefit from an emphasis on developing an organisational culture of openness to criticism, emphasising the role of the whole academic community in guiding and 'owning' the college and its activities, and keeping in perspective the relative youth of the college and the many further steps that all providers are likely to have in developing and improving for the future.

Conclusions

463. The assessment team's view is that the college does not meet the DAPs overarching criterion, because it does not meet the important constituent elements of the overarching criterion and because it does not meet all the underpinning DAPs criteria, specifically B3 and C1.

464. The team concluded that evidence demonstrates that the college has a proven commitment to the assurance of standards supported by effective quality systems. However, the evidence also demonstrates that the college is not a self-critical cohesive academic community.

465. Therefore, the team concluded that the college does not meeting the overarching DAPs criterion.

Annex A: Abbreviations

Abbreviation	Meaning
COL	College of Law Limited (Australia)
DAPs	degree awarding powers
EDI	equality, diversity and inclusion
FHEQ	Frameworks for Higher Education Qualifications
FTE	full-time equivalent
GFL	Graduate Foundation in Law
GDL	Graduate Diploma in Law
HERA	Higher Education and Research Act 2017
HESA	Higher Education Statistics Agency
LLM	Master of Laws
OfS	Office for Students
OIA	Office of the Independent Adjudicator
QAA	Quality Assurance Agency
QAC	Quality Assessment Committee (of the OfS)
SQE	Solicitors Qualifying Examination(s)
VLE	virtual learning environment