

FOUNDATION DEGREE AWARDING POWERS

Guidance for Further Education Institutions in England: Criteria and Process for applying for Foundation Degree Awarding Powers

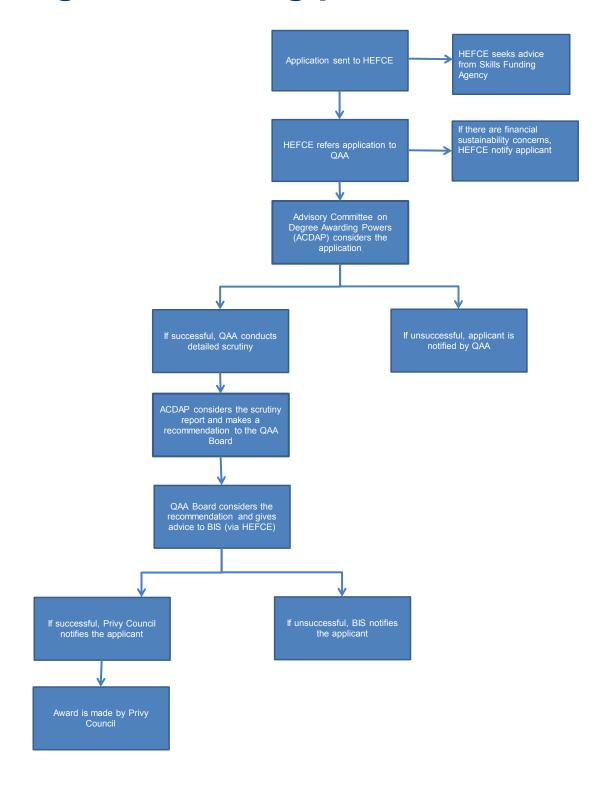
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Contents

Application process for foundation degree awarding powers	4
Introduction	5
Section 1: Who is eligible to apply?	6
The prerequisites	6
The detailed criteria	6
Scrutiny	6
Section 2: Submitting an application	8
Letter from validating institution(s)	8
Progression statement	8
Student consultation	9
The identity of the institution	9
Section 3: Assessment of an application	10
Section 4: Scope, duration and renewal of degree awarding powers	12
Limitations to powers	12
Renewal of powers	12
Amendments to Order of Council Issued by the Privy Council under Section 76 of the Further and Higher Education Act 1992	
Section 5: Rights and obligations applicable to holders of DAPs	14
Annex A: The Detailed Criteria	15
A: Governance and Academic Management	15
Criterion A1	15
B: Academic Standards and Quality Assurance	16
Criterion B1	16
Criterion B2	17

Criterion B3	18
Criterion B4	19
C: Scholarship and the pedagogical effectiveness of academic staff	20
Criterion C1	20
D: The environment supporting the delivery of foundation degree program	ımes21
Criterion D1	21

Application process for foundation degree awarding powers



Introduction

- 1. This document provides guidance for those institutions within the further education sector seeking foundation degree awarding powers (FDAPs) in England. In this document, we refer to these institutions as being "FEIs", that is further education institutions. The guidance and accompanying criteria have been approved by the Department for Business, Innovation and Skills (BIS) in consultation with the Quality Assurance Agency for Higher Education (QAA), the Higher Education Funding Council for England (HEFCE), and the Privy Council Office. This guidance applies to all new applications received on or after 15 September 2015. It replaces and supersedes the criteria and guidance set out in "APPLICATIONS FOR THE GRANT OF FOUNDATION DEGREE AWARDING POWERS: Guidance and criteria for applicant further education institutions in England and Wales" (1 October 2010).
- 2. This guidance should also be read in conjunction with the QAA publication <u>Degree</u> Awarding Powers: handbook for applicants.

This contains more detailed information on the application process, including:

- how to make an application
- documentary requirements
- timing of your application
- costs
- the scrutiny process
- appeals
- 3. Organisations with FDAPs can also award honorary foundation degrees.
- 4. There is separate <u>guidance</u> for taught and research degree awarding powers and for university title applications.

¹ The "Applications for the Grant of Foundation Degree Awarding Powers: Guidance and criteria for applicant further education institutions in England and Wales" (1 October 2010) continues to apply in Wales

Section 1: Who is eligible to apply?

- 1. Institutions in England within the further education sector may be granted powers to award foundation degrees². These FEIs are those incorporated under Section 15 or 16 of the FHEA1992, designated under Section 28 of that Act or conducted by sixth form corporations.
- 2. If your organisation wishes to award its own foundation degrees, it will be required to demonstrate that it satisfies the prerequisites and meets the relevant criteria.

The prerequisites

- 3. In order to be eligible to apply, your organisation must have had no fewer than four consecutive years' experience, immediately preceding the year of application, of delivering higher education programmes at a level at least equivalent to level 5 of The framework for higher education qualifications of degree awarding bodies published by QAA.
- 4. As part of your application, you will also need to provide the following information:
 - Letter of support from your validating partner(s)
 - Progression statement
 - Evidence of student consultation
- 5. Further information on the above is set out in sections 2.6 2.10.

The detailed criteria

6. These are set out in Annex A. In general terms, these are designed to test the effectiveness of your organisation's existing regulatory and quality assurance arrangements and your capacity to meet the expectations on academic standards and quality management as set out in the Quality Code for Higher Education and the Foundation Degree Qualification Benchmark (QAA, May 2010). The latter will apply to FEIs subject to scrutiny in the 2015-16 academic year. From 1 August 2016, the Foundation Degree Characteristics Statement will apply instead.

Scrutiny

7. Scrutiny by QAA is designed to assess whether or not your organisation is competent to exercise powers to award foundation degrees. You must clearly demonstrate that there

² Institutions who hold taught degree awarding powers may also award foundation degrees.

³ The UK Quality Code for Higher Education consists of three parts which address academic standards (including national frameworks for UK higher education qualifications; characteristics statements; credit frameworks and subject benchmark statement); academic quality; and public information

can be public confidence, both present and future, in your systems for assuring the academic standards and quality of your foundation degrees.

8. You are strongly advised to discuss any proposed application with QAA at an early stage to ensure that your organisation is eligible to apply and that you have a clear understanding of the criteria, documentation requirements and scrutiny processes conducted by the QAA. You may also wish to discuss your overall application with HEFCE.

Section 2: Submitting an application

- 1. Applications for the grant of FDAPs should take the form of a critical self-analysis (CSA), prefaced by a formal letter of application from the chair of your governing body. The QAA handbook referred to in the Introduction contains more detailed information on the documentation required, including application templates.
- 2. All applications for the grant of FDAPs should be submitted by the chair of your governing body to: gateways@hefce.ac.uk
- 3. Your application should be submitted at least five weeks before the meeting of the QAA's Advisory Committee on Degree Awarding Powers (ACDAP) at which you expect your application to be considered. Dates of ACDAP meetings are published on the QAA website.
- 4. Further information on how to apply can also be found on the HEFCE website.
- 5. The CSA should describe, analyse and comment clearly and frankly on the effectiveness of the means your organisation uses to satisfy itself that it is able to meet the criteria, as set out in Annex A. Although it is for you to determine how to structure the CSA, close reference should be made to the relevant criteria and supporting 'evidence requirements'.

Letter from validating institution(s)

6. The CSA should be accompanied by a letter from your organisation's validating partner(s) commenting on the nature of the operational relationship which has been established and offering comment on your capacity to discharge the responsibilities associated with the grant of FDAPs. Validating institutions will not have a power of veto over an application and negative comments will not necessarily invalidate an application, but will be considered by QAA as an element of the overall evidence submitted.

Progression statement

- 7. The application will need to include a separate statement on progression, demonstrating that your organisation has agreed and is promoting clear progression routes for learners wishing to proceed to a course of higher-level study on completion of the foundation degree. In particular, your organisation will be expected to put forward proposals to demonstrate what it intends to do to secure that any student awarded a foundation degree has the opportunity to progress onto at least one course of more advanced study.
- 8. You should list all the progression arrangements in place for each individual foundation degree course offered at the time of application.

9. QAA will need to be satisfied that your organisation's academic management is sufficiently robust to ensure that progression routes are, and will be established and promoted, both now and in the future. Progression routes or articulation agreements should be in compliance with the guidance on progression set out in QAA's Foundation Degree qualification benchmark which will apply to FEIs subject to scrutiny in the 2015-16 academic year and then the Foundation Degree Characteristics Statement (section 2.4) which will apply from August 2016. When your organisation is assessed for the grant of FDAPs, QAA will take a view as to the likely future performance of your organisation's academic management and, in particular, whether you can be relied on to renew progression arrangements or seek new ones if the old ones should lapse. The initial six year period that the Privy Council is likely to grant for your FDAPs if your application is successful (see Section 4.4) will be important to test your development and maintenance of progression arrangements.

Student consultation

10. Your organisation should also submit, at the same time as your CSA, evidence of consulting students about whether the organisation should seek to award foundation degrees; how that consultation was carried out; and the outcome of the consultation.

The identity of the institution

- 11. In granting FDAPs, it is important that there is clarity about the nature of the institution that will have these powers. Therefore, when you apply, it is important that it is clear which entity is applying and will be responsible for awarding the degrees i.e. the formal name of the institution that forms the cohesive and self-critical academic community that is to be assessed for the powers and which, if successful, would be awarding the degrees. You should provide a UK Provider Reference Number (UKPRN) if you have one.
- 12. In applying for FDAPs, you will need to submit information about the nature of your institution. This should include information about your current legal identity⁴, corporate structure (including any parent company, subsidiaries or fellow subsidiaries), your relationship with these entities (e.g. any teaching or services they provide for you), and any teaching partners (even if these are part of the same corporate group or under common ownership/control).

⁴ An institution may change its legal form but remain the same institution, Please note that a holder of FDAPs must be within the further education sector as defined with section 91(3) of the Further and Higher Education Act 1992

Section 3: Assessment of an application

- 1. HEFCE is responsible for processing applications on behalf of the Department. On receipt of your application, HEFCE will seek information from the Skills Funding Agency (SFA) on your financial sustainability. HEFCE will not undertake any assessment of this information. If the information from the SFA raises concerns about the financial sustainability of your organisation, for example the SFA has given you a financial health score of inadequate, or issued a Notice of Concern this does not mean that your application cannot proceed to QAA, however, this information may be taken into account and may, therefore, affect the consideration, and outcome, of your application. If the SFA has already notified you of your rating then HEFCE will share any concerns with you and you will have the opportunity to provide further information but you may decide to withdraw or defer your application at this stage, before incurring the costs of detailed scrutiny. If you wish to proceed HEFCE will forward the information provided by the SFA along with your application to the QAA. If the SFA is in the process of making an assessment of your financial sustainability at the time of your application HEFCE will need to wait until the results are known before asking the QAA for advice.
- 2. If you decide your application should proceed, HEFCE will ask the QAA to prepare formal advice based on the detailed criteria and evidence requirements. QAA's work in this area is overseen by the QAA Board's Advisory Committee on Degree Awarding Powers (ACDAP) which meets quarterly. At the next appropriate meeting, it will consider whether the application fulfils the basic eligibility requirements (i.e. the prerequisites) set out in section 2, and whether, on the basis of your CSA, the application warrants detailed scrutiny.
- 3. If your application proceeds to detailed scrutiny, QAA will inform HEFCE and make direct contact with you to discuss the next steps in the scrutiny process which is necessarily intensive and likely to last at least 12 months –18 months. Once the scrutiny has been completed, ACDAP will make a recommendation to the QAA Board as to whether your application should succeed. The QAA Board will then provide formal advice to the Department via HEFCE.
- 4. If your application is successful you will be formally notified by the Privy Council who will make an Order under section 76 of the Further and Higher Act 1992 conferring your award. If your application is not successful, you will be notified by the Department. In either case, this should be within a matter of weeks of receipt of the HEFCE advice.
- 5. Final reports will be published by QAA once you have been formally notified of the outcome of your application.
- 6. If ACDAP considers that your application does not merit detailed scrutiny, QAA will inform you of the reasons why your application has failed to proceed to detailed scrutiny.

7. If you decide to withdraw your application, either in the situation described at paragraph 1 above, or during detailed scrutiny, you should write formally to HEFCE and QAA referring back to your application, confirming that you have decided to withdraw it.

Section 4: Scope, duration and renewal of degree awarding powers

1. FEIs granted FDAPs will be able to award foundation degrees. Powers will be granted by an Order of Council.

Limitations to powers

- 2. Section 76 of the FHEA 1992 (as amended) by section 19 of the *Further Education* and *Training Act 2007* for England) gives the Privy Council authority to limit the foundation degree awarding powers by making the Order subject to the following restrictions:
 - preventing an FEI from authorising another institution to award a foundation degree on its behalf; and/or
 - preventing an FEI being able to award foundation degrees to students not enrolled with the FEI at the time they completed the course of study for which the award is granted.
- 3. The Department is likely to recommend to the Privy Council that an FEI should have restricted powers and that the powers should be time limited to six years.

Renewal of powers

- 4. The decision to renew FDAPs rests with the Privy Council before the end of each period of six years. The criteria for the renewal of degree awarding powers are that the organisation has:
- subscribed to QAA for the period it has held degree awarding powers
- been subject to an external review by QAA; and
- not received unsatisfactory judgements at the time of the QAA review. If it obtains an unsatisfactory judgement, it will be required to undergo a process of follow-up activity or partial or full review by QAA, and to achieve satisfactory judgements in all areas, as a criterion for the renewal of the degree awarding powers.
- 5. In the event of non-renewal of degree awarding powers, you will be expected to put in place secure and clearly stated arrangements to protect the rights and interests of students whose programmes of study may extend beyond the date when the powers lapse. Such protection will normally involve the transfer of students' registrations to an organisation with degree awarding powers. Students transferred in this way will, if successful in their assessments, be awarded the qualifications of the receiving organisation

- 6. If you wish to apply for the renewal of FDAPs, you should in the first instance contact HEFCE at gateways@hefce.ac.uk
- 7. You should submit your application at least six months before the date your current powers expire.
- 8. Your power to award degrees will automatically expire in line with the date on your FDAPs Order if you fail to apply for renewal.

Amendments to Order of Council Issued by the Privy Council under Section 76 of the Further and Higher Education Act 1992

- 9. The Privy Council does not provide a new Order to an institution with FDAPs if the institution changes its name, for example, since the institution itself remains the same. Consequently, when such a change takes place the Order remains valid.
- 10. However, at the point at which the powers are renewed, an institution can request that its change of name be shown on the new Order. As the powers are granted to the institution which is separate from the name and legal status, it is not necessary to reflect the legal status of the institution on the Order. This has been the policy position since 1992.

Section 5: Rights and obligations applicable to holders of FDAPs

- 1. If you obtain FDAPs, the following may be relevant to you:
- Subscription to QAA: a successful applicant for degree awarding powers is expected to subscribe to QAA. See the QAA handbook for further details.
- Office of the Independent Adjudicator (OIA): All holders of foundation degree awarding powers will be required to subscribe to the OIA.

Annex A: The Detailed Criteria

The overarching requirement for foundation degree awarding powers is that 'an institution needs to be a self-critical, cohesive academic community with a proven commitment to quality assurance supported by effective quality and enhancement systems' as set out in the House of Commons Official Report vol. 201 Written Answers col. 31 (16 December 1991).

The criteria A-D in this document, taken as a whole, are designed to enable a judgement to be made about whether you satisfy the overarching requirement set out in the House of Commons statement. The criteria assess your capacity to demonstrate firm guardianship of your academic standards and your capacity to contribute to the continued good standing of UK higher education. The criteria reflect the overarching requirements that are common to all bodies that award degrees in England including, in particular, demonstrating the effectiveness of its present regulatory and quality assurance arrangements and your ability to meet the expectations of academic standards and quality management as set out in the Quality Code. Indicative evidence is required to demonstrate how you meet the criteria.

To this end, QAA will be judging, through its examination of the evidence provided, and against the criteria, the extent to which you can engender public confidence in your capacity to maintain the academic standards of your foundation degrees. While some of the evidence you will provide will be quantitative, some will also be qualitative. All evidence will be subject to peer judgements by senior members of the academic community.

If you wish to award your own foundation degrees you will be required to demonstrate that you meet the relevant criteria. In particular, you must be able to show the effectiveness of your present regulatory and quality assurance arrangements and your capacity to meet the expectations on academic standards and quality management as set out in the Foundation-Degree-Characteristics.

A: Governance and Academic Management

Criterion A1

1. An FEI granted FDAPs is governed, managed and administered effectively, with clear and appropriate lines of accountability for its academic responsibilities. Its financial management is sound and a clear relationship exists between its financial policy and the safeguarding of the quality and standards of its higher education provision. As is generally the case for other organisations receiving degree-awarding powers that are not primarily a higher education institution, its principal activities are compatible with the provision of higher education programmes and awards.

Explanation

2. Foundation degree awarding FEIs must be soundly based in all respects (constitutionally, managerially, financially and academically) so that there can be full public

confidence in them and their foundation degrees. It is important that appropriate safeguards are in place to ensure that financial exigencies and other pressures do not jeopardise academic standards or the quality of programmes as specified in the programme specifications.

Evidence requirement

- 3. The applicant FEI will be required to provide evidence that:
 - its financial planning, quality assurance, and resource allocation policies are coherent and relate to its higher education mission, aims and objectives;
 - ii. its higher education activities take full account of the UK *Quality Code* and associated guidance;
 - iii. makes reference to QAA's Foundation Degree Qualification Benchmark Statement and its successor statement, *Foundation Degree Characteristics* which is part of the Quality *Code*.
 - iv. its higher education mission and associated policies and systems are understood and applied consistently both by those connected with the delivery of its higher education programmes and, where appropriate, by students;
 - v. there is a clarity of function and responsibility at all levels in the FEI in relation to its governance structures and systems for managing its higher education provision;
 - vi. there is depth and strength of academic leadership across the whole of its higher education provision;
- vii. it develops, implements and communicates its academic policies and systems in collaboration with those who have responsibility for the delivery of its higher education programmes, and with relevant stakeholders;
- viii. its academic policies, systems and activities are monitored and reviewed and that appropriate and timely action is taken when deficiencies are identified;
- ix. its academic risk and change management strategies are effective;
- x. it has in place robust mechanisms to ensure that the academic standards of its foundation degree awards are not put at risk; and
- xi. it has the capability of managing successfully the additional responsibilities that would be vested in it were it to be granted FDAPs.

B: Academic Standards and Quality Assurance

Criterion B1

1. An FEI granted FDAPs has in place an appropriate regulatory framework to govern the award of its higher education qualifications.

Explanation

2. The security of the academic standards of foundation degrees depends in large measure on the regulations which govern their award. These can be expected to cover a wide variety of topics ranging from the approval of degree schemes through to the conduct of student assessments and appeals against academic decisions. Many of them are dealt with in the *Quality Code* published by QAA. FEIs that award foundation degrees are required to have in place a comprehensive set of regulations covering these matters.

Evidence requirement

- 3. The applicant FEI will be required to provide evidence that:
 - i. the regulatory framework governing its higher education provision (covering, for example, student admissions, progress, assessment, appeals and complaints) is appropriate to its current status and is implemented fully and consistently; and
 - ii. it has created in readiness a regulatory framework appropriate for the granting of its own higher education awards.

Criterion B2

4. An FEI granted FDAPs has clear and consistently applied mechanisms for defining and securing the academic standards of its higher education provision, wherever, however and by whomsoever it is offered.

Explanation

5. FEIs with FDAPs need to ensure that their qualifications meet the expectations of the *Quality Code*, published and maintained on behalf of the academic community in the UK by QAA. Within the *Quality Code* the different levels of higher education qualifications and their distinguishing features are described in *The Frameworks for Higher Education Qualifications* of *Degree-Awarding Bodies* (QAA, October, 2014). In order to meet these expectations, FEIs seeking degree awarding powers will need to ensure that they have appropriate and effective quality assurance structures and mechanisms in place. This is particularly important where elements of a programme are offered outside the institution's own environment. The public interest in the consistency and comparability of higher education qualifications requires that all degrees awarded by recognised degree awarding organisations in the UK should at least meet the expectations of the *Qualifications Frameworks*.

Evidence requirement

- 6. The applicant FEI will be required to provide evidence that:
 - i. its higher education awards are offered at levels that correspond to the relevant levels of the *Qualifications Frameworks*;

- ii. the management of its higher education provision takes appropriate account of *the Quality Code*, qualification and subject benchmark statements, as appropriate, and the requirements of any relevant professional, statutory and regulatory bodies;
- iii. in establishing, and then maintaining, comparability of standards with other providers of equivalent level programmes, it explicitly seeks advice from and engagement with external peers and, where appropriate, professional and statutory bodies and relevant employers;
- iv. its programme approval, monitoring and review arrangements are robust, applied consistently, have at all levels a broadly based external dimension and take appropriate account of the specific requirements of different levels of award and different modes of delivery;
- v. where its programmes are delivered outside the college's own environment, appropriate and effective quality assurance mechanisms are used to ensure the maintenance of academic standards and quality; and
- vi. there is an explicit and close relationship between academic planning and decisions on resource allocation.

Criterion B3

7. The education provision of an FEI granted FDAPs consistently meets its stated learning objectives and achieves its intended outcomes.

Explanation

8. FEIs offering higher education awards are expected to consider carefully the purposes and objectives of the programmes they are offering. They are also expected to design their curricula and learning support provision in a way that will give diligent students the best chance of achieving the purposes and objectives and the necessary academic standards for the qualification being sought. FEIs offering higher education awards must have the means of establishing for themselves that their intentions are, in practice, being met.

Evidence requirement

- 9. The applicant FEI will be required to provide evidence that:
 - i. its strategies for learning and assessment are consistent with stated academic objectives and intended learning outcomes;
 - ii. relevant staff are informed of, and provided with guidance on, its policies and procedures for programme design, monitoring and review;
 - iii. responsibility for amending or improving new programme proposals is clearly assigned and subsequent action is carefully monitored;

- iv. coherence of programmes with multiple elements or alternative pathways is secured and maintained:
- v. close links are maintained between learning support services and the FEI's programme planning, approval, monitoring and review arrangements;
- vi. robust arrangements exist for ensuring that the learning opportunities provided to those of its students that may be studying at a distance from the FEI or in work based settings are adequate;
- vii. through its planning, approval, review and assessment practices, it defines, monitors, reviews and maintains its academic standards;
- viii. its assessment criteria and practices are communicated clearly to students and staff;
- ix. its assessment practices fully cover all declared learning objectives, learning outcomes and modes of delivery;
- x. appropriately qualified external peers are engaged in its assessment processes and that consistency is maintained between internal and external examiners' marking;
- xi. the reliability and validity of its assessment procedures are monitored and that its assessment outcomes inform future programme and student planning; and
- xii. clear mechanisms are in place for use when a decision is taken to close a programme or programme element, and that, in doing so, the interests of students are safeguarded.

Criterion B4

10. An FEI granted FDAPs takes effective action to promote strengths and respond to identified limitations.

Explanation

11. An FEI that has powers to award its own foundation degrees must have in place the means of critically reviewing its own performance. It needs to know how it is doing in comparison with other similar organisations and have in place robust mechanisms for disseminating good practice; it must also be able to identify limitations or deficiencies in its own activities and take timely and effective remedial action when this is called for. This implies both internal and external elements in the periodic review of its activities.

Evidence requirement

12. The applicant FEI will be required to provide evidence that:

- critical self-assessment is integral to the operation of its higher education provision and that action is taken in response to matters raised through internal or external monitoring and review;
- ii. clear mechanisms exist for assigning and discharging action in relation to the scrutiny, monitoring and review of agreed learning objectives and intended outcomes;
- iii. ideas and expertise from within and outside the FEI particularly from relevant employers (for example on programme design and development, on teaching, and on student learning and assessment) are drawn into its arrangements for programme design, approval and review; and
- iv. effective means exist for encouraging the continuous improvement of quality of provision and student achievement.

C: Scholarship and the pedagogical effectiveness of academic staff

Criterion C1

1. The staff teaching HE at an FEI granted powers to award foundation degrees will be competent to teach, facilitate learning and undertake assessment to the level of the qualifications being awarded.

Explanation

2. The capacity and competence of the staff who teach, and who facilitate and assess learning, are central to the value of the education offered to students. FEIs awarding their own degrees have a crucial responsibility to ensure that students' chances of receiving a worthwhile education and securing the necessary academic standards for their foundation degree qualification are maximised by effective teaching. This includes a responsibility for ensuring that staff maintain a close and professional understanding of current developments in scholarship in their subjects or vocational expertise and that structured opportunities for them to do so are both readily available and widely taken up. It also means that teaching for degree-level qualifications should reflect, in a careful, conscious and intellectually demanding manner, the latest developments in the subject of study. FEIs also have a responsibility for making certain that the assessment of their students is carried out in a professional and consistent way that ensures the maintenance of the academic standards of their degrees.

Evidence requirement

- 3. The applicant FEI will be required to provide evidence that all teaching staff engaged with the delivery of its higher education programmes have relevant:
 - i. academic and/or professional/vocational expertise;

- ii. engagement with the pedagogic development of their discipline (through, for example, membership of subject associations, learned societies and professional bodies);
- iii. knowledge and understanding of current scholarly developments in their discipline area at a level appropriate to a foundation degree and that such knowledge and understanding directly inform and enhance their teaching;
- iv. opportunities for accessing relevant employment experience and studying the implementation of relevant and up to date professional practice; and
- v. staff development and appraisal opportunities aimed at enabling them to develop and enhance their professional competence and scholarship.

In addition, the applicant FEI will be required to provide evidence that staff with key programme management responsibilities (for example, programme leaders and assessment coordinators) have relevant:

- vi. experience of curriculum development and assessment design; and
- vii. engagement with the activities of providers of higher education in other organisations (through, for example, involvement as external examiners, validation panel members, or external reviewers).

D: The environment supporting the delivery of foundation degree programmes

Criterion D1

- 1. The teaching and learning infrastructure of an FEI granted FDAPs, including its student support and administrative support arrangements, is effective and monitored. **Explanation**
- 2. The teaching and learning infrastructure all those facilities and activities that are provided to maximise students' chances of experiencing a worthwhile education and of obtaining the qualification they are seeking is a means to an end. FEIs that award their own foundation degrees are expected to have in place mechanisms for monitoring whether their teaching and learning infrastructure is meeting stated objectives and for responding to identified limitations in a timely and effective manner.

Evidence requirement

- 3. The applicant FEI will be required to provide evidence that:
 - i. the effectiveness of its learning and teaching activities is monitored in relation to stated academic objectives and intended learning outcomes;

- ii. students are informed of the outcomes of assessments in a timely manner;
- iii. constructive and developmental feedback is given to students on their performance;
- iv. feedback from students, staff, employers and other institutional stakeholders is obtained and evaluated and clear mechanisms exist to provide feedback to all such constituencies:
- v. students are advised about, and inducted into, their study programmes in an effective way and account is taken of different students' needs;
- vi. available learning support materials are adequate to support students in the achievement of stated purposes of their study programmes and all students, part-time or full-time, have equal access to learning resources and support materials;
- vii. the effectiveness of any student and staff advisory and counselling services is monitored and any resource needs arising are considered;
- viii. its administrative support systems are able to monitor student progression and performance accurately and provide timely and accurate information to satisfy academic and non-academic management information needs;
- ix. it has in place effective and confidential mechanisms to deal with all complaints regarding academic and non-academic matters;
- x. the staff involved with supporting the delivery of its higher education provision are given adequate opportunities for professional development;
- xi. the information that it produces concerning its higher education provision is accurate and complete; and
- xii. equality of opportunity is sought and achieved in its activities.



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