

LTC17D007

Title: Course withdrawal process
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Date: 5 October 2017
Circulation: Learning and Teaching Committee - 18th October 2017
Agenda: LTC17A001
Version: Final
Status: Open

Issue

Following the University's decision to close a number of counselling courses the Students Union have asked that the process for withdrawing course be reviewed and have suggested some amendments to strengthen the process.

Recommendation

Recipients are invited

To consider

1. that the process remains fit for purpose and meets the requirements of the QAA Quality Code.
2. that 2.8 (i), third bullet point, be revised to read:
 - The course recruited less than 10 students on the last occasion that it admitted new students
3. that 2.7 be revised to read
 - 2.7 Schools / Faculties should also take into account the point in the admissions cycle when the decision to close a course or courses takes effect and seek advice from the Associate Dean for Admissions, Head of Admissions and the Head of Learning and Teaching Services (Quality). The University's commitment to running a course comes at the point of making an offer to an applicant for the course, or onto another course which guarantees progression to the course in question. If a decision to close is made at a time when there are applicants in the system care must be taken to act reasonably and inform them of the closure and their options at a point in time when they can make other decisions e.g. whilst UCAS remains open to change choices. The University is required to remain compliant with guidance from the Competition and Markets Authority and each closure needs to be considered on a case by case basis.
4. that an additional question be asked on the form to prompt Schools to consider the role the course plays in providing a source of students who may assist in the provision of University services via placement as a part of their course, or by virtue of the skills and knowledge acquired on the course may be frequently employed on a part-time basis by other parts of the University.
5. that the wording of the process requires updating to accommodate various new job titles for specific role holders named in the process (Director of Student Services, Faculty Pro-Vice Chancellors)
6. that a list of new and closed courses could be presented to LTC on an annual basis.
7. that further changes to the process may be forthcoming with developments and enhancements to the "New course approval" process.

Resource Implications

The changes will not have any significant financial or resource implications.

Risk Implications

The proposed changes will not have any significant impact upon the level of risk facing the University. The risk of non-compliance with CMA requirements should reduce with this now being specifically mentioned in 2.7.

Equality and Diversity

The course closure process requires that an equality impact assessment is undertaken when this adds value to the decision making process. One of the proposed changes will have the result of more equality impact assessments being undertaken as one of the thresholds is reduced from the recruitment of “10 fte student numbers” to “10 students”. It is noted that this change in process will only impact the closure of part-time courses.

Timing of decisions

Recommendations from the Student Experience Committee can be considered by the next Learning and Teaching Committee and then introduced with immediate effect.

Further Information

The current process was approved by LTC on 25th June 2014.

<https://portal.uea.ac.uk/documents/6207125/8529662/procedure-for-the-withdrawal-or-closure-of-courses.pdf/038fe7bd-4063-4d2c-86b6-0dc14db5cb9d> and appended to this paper.

The QAA Quality Code – Chapter B8 Programme Monitoring and Review includes reference to the QAA expectations around course closure. <http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/quality-code-part-b> . The key section is appended to this paper.

For further information on the process please contact Laura Thompson, Head of LTS (laura.thompson@uea.ac.uk, x7374).

Background

The current process is appended to this paper – Appendix A with associated authorisation/ dissemination form – Appendix C.

Discussion

The Students Union make the following observations and proposals. A University response is given after each item and recommended changes are detailed in the conclusion.

1. Existing Students – SU observations

The current policy identifies existing students as a key group to consult with. It is not however clear that this should include those taking a break from study. In addition where a course has been sold or promoted as a progression route to a professional qualification from a different programme, legal advice suggests that “current students” should include those on that feeder programme (*CMA). Arrangements for teach out should take this into account. We also believe that an “in principle” number of weeks before a course is due to start should act as a trigger for a commitment to teach out given the potential implications for students planning to join a course.

SU Proposal: Include intercalating students (in those at risk of intercalation) and those on feeder programmes for professional courses. Set trigger date earlier than course start where students are considered “current” students.

University Response.

The current process says discussions should take place with students on courses which are being considered for closure (2.6). It explicitly says “all affected students and not just student representatives”. This definition covers intercalating students and students who have guaranteed progression onto the courses.

The current process also requires that attention and consideration is given to applicants (2.7). This section would benefit from referencing CMA requirements and expectations. A proposed revision is detailed in the conclusion.

2. Equality Impact Assessment – SU observations

At present, in reaching a decision to withdraw a course Schools/ Faculties have a legal duty to take into consideration the impact of the decision upon those groups covered by equality and diversity legislation. However the “10 fte recruited last time” threshold is arbitrary and does not take into account shared modules, strategic and significant equality impact for some courses under the threshold, and the potential cumulative impact of a range of closures in a range of schools/faculties in a given year.

SU Proposal: Remove the threshold for trigger of an EIA altogether. Develop proposal to monitor Equality Impact of multiple closures at Faculty and Institutional level.

University Response

The University course closure process includes a review of any business impact and in most cases, where the closure is not simply a matter of course replacement, decisions to close courses are driven by business needs. The current process takes a proportionate approach to impact assessment; recognising the importance of giving close consideration to protected characteristics and related factors alongside the need to operate efficient processes and to only engage in activities that will add value. Consequently an equality and diversity impact assessment is currently a requirement unless any of the following apply:

- The course is being replaced by a new course that will recruit from the same market segment and has the same or highly similar content and learning outcomes
- The course recruited less than 10fte student numbers on the last occasion that it admitted new students
- The continuation of the course would generate a net financial loss to the School
- The course has not recruited students in the two preceding admissions cycles.

As regards data protection we would not be able to generate data when there are five or fewer individuals involved.

The closure of the Counselling courses involved the closure of five related courses at different levels of study: PG Cert, PGDip and MA. The question has been asked as to whether it would be sensible in such situations to group the courses in order to determine whether or not an Equality Impact Assessment is required and undertake such assessment. The minimum requirement of the Equality Impact Assessment is to consider the following items and as such it would be difficult to group courses with learning outcomes at different levels as the results would not be meaningful or add to the decision making process:

- The demographic profile of students recruited in the previous three years
- The employment destinations of students who completed the course in the previous three years
- The existence of any links of the course with local or regional employers in terms of placements, graduate employment for example
- Whether the course meets a requirement of the Corporate Plan, particularly in relation to issues of regional engagement, that would not be met by an alternative existing course or a planned replacement course.

It is recommended that the reference to 10fte is changed to 10 students. At numbers below 10 individuals it is difficult to reach any particular conclusions about the characteristics of the cohort and the analysis would not add any value to the decision making process. This change will only affect the closure of part-time courses.

A list of new and closed courses could be presented to LTC on an annual basis.

3. Approval – SU Observations

It is clear that the individual effect of a single closure in a single school may be small, but the cumulative equality impact in a given year across the University could be dramatic. Given the level of scrutiny on new course approval and revision at LTC and CMA requirements it also seems odd that it is not this body that formally approves course withdrawal/closure. In addition we are very rare in not affording students the right to be consulted over a decision to withdraw a course in principle before formal approval.

SU Proposal: Ensure formal approval/scrutiny of proposals required from LTC. Develop opportunity for students to be consulted over proposal to close a course.

University response

The University closes courses for business reasons and closure entails the cessation of recruitment to the course. The interests of those studying on the course are protected through to the completion of their studies.

The main reason for course closures is that courses have become unpopular with applicants and therefore run with very small cohorts. Such small courses are uneconomic to deliver and resources, staff and financial, would be better deployed in the support of learning and teaching of students on other courses. It is also recognised that the student experience on small courses can be compromised by the cohort size if the course has modules solely studied by student registered on the course. As closure is fundamentally a business decision it is fitting that the decision is made by Schools/Faculties.

The current process meets the requirements of the Quality Code (Chapter B8 – Programme monitoring and review), see Appendix B which requires discussion of the implications of closure with all affected students at the earliest opportunity.

To ensure LTC has an overview of the situation a list of new and closed courses could be presented to LTC on an annual basis.

4. Context – SU Observations

There are often contexts to a closure which reach beyond the school/faculty that should be considered as part of the process. These could include module sharing or the role the course or its students/academics play in other parts of the University. For example instances where students studying the course are provided placement opportunities to practice their learning, formally or informally, in other areas of the University and so supplement/enhance the services provided.

SU Proposal

That the policy includes consultation with and consideration of any academic or service provision dependency implications (both internal and external to the University) arising from the proposal.

University response

The process covers the academic relationships. It involves the School Teaching Director, Head of School, Faculty AD(LTQ), potentially the Faculty Pro Vice Chancellor – depending on Faculty practice, Faculty AD (Admissions), Head of Admissions, Faculty Finance Manager, and in addition the Head of any other School sharing modules or otherwise involved and the AD(LTQ) of that Faculty.

An additional question could be asked on the form to prompt Schools to consider the role the course plays in providing a source of students who may assist in the provision of University services via

placement as a part of their course or by virtue of the skills and knowledge acquired on the course may be employed on a part-time basis by other parts of the University.

Conclusions

1. The process remains fit for purpose and meets the requirements of the QAA Quality Code.
2. That 2.8 (i) third bullet point be revised to read “the course recruited less than 10 students on the last occasion that it admitted new students”
3. That 2.7 be revised to read
 - 2.7 Schools / Faculties should also take into account the point in the admissions cycle when the decision to close a course or courses takes effect and seek advice from the Associate Dean for Admissions, Head of Admissions and the Head of Learning and Teaching Services (Quality). The University’s commitment to running a course comes at the point of making an offer to an applicant for the course, or onto another course which guarantees progression to the course in question. If a decision to close is made at a time when there are applicants in the system care must be taken to act reasonably and inform them of the closure and their options at a point in time when they can make other decisions e.g. whilst UCAS remains open to change choices. The University is required to remain compliant with guidance from the Competition and Markets Authority and each closure needs to be considered on a case by case basis.
4. that an additional question be asked on the form to prompt Schools to consider the role the course plays in providing a source of students who may assist in the provision of University services via placement as a part of their course, or by virtue of the skills and knowledge acquired on the course may be frequently employed on a part-time basis by other parts of the University.
5. That the wording of the process requires updating to accommodate various new job titles for specific role holders named in the process (Director of Student Services, Faculty Pro-Vice Chancellors)
6. that a list of new and closed courses be presented to LTC on an annual basis.

It should be noted that further changes to the process may be forthcoming with developments and enhancements to the “New course approval” process. If required such changes would be to improve the efficiency and effectiveness of processes surrounding the re-launch and re-branding of courses with new course titles, probably significant modifications but which have highly similar content and learning outcomes.

Attachments

Appendix A – Current course closure process

Appendix B – Extract from the QAA Quality Code Chapter B8.

Appendix C – Current course closure form

Procedure for the Withdrawal / Closure of Courses

(approved by LTC 25.6.14)

This procedure for withdrawing courses takes account of the need to safeguard the interests of any students on the course(s) being withdrawn and the interests of applicants, and of the need to ensure that relevant offices and parties within the University are informed of the decision.

The procedure covers the following

- A decision to close a course outright
- A decision to transfer a course from one School to another, involving the closure of the course in the original School
- A decision to stop recruiting to one version of a course, whilst creating a new version of the course which will only be available to new students.

1 Identifying Courses for Closure

1.1 Schools should undertake regular reviews of their provision to ensure that they remain current. Similar processes are undertaken by Admission, Recruitment and Marketing Service (ARM) through the ARM Executive Committee. Deans and Faculty Executives may similarly undertake a routine review of the portfolio of courses and programmes in the context of the Faculty's Strategic Plan. These processes may identify courses which have not recruited, which have recruited poorly, which are otherwise uneconomic, or which no longer fit the strategic plan of the School and Faculty. They may also identify the need to make significant modifications to a course for incoming cohorts to adjust to developments in the subject area, to better fit market needs, to more closely align with School or Faculty strategy, or to fit revalidation conditions where the course leads to Professional, Statutory or Regulatory Body recognition.

2 Decision Making

- 2.1 The following procedure is designed to cover a spectrum of situations, from a School undertaking housekeeping to withdrawing a course that has not recruited for some years, through pruning of low recruiting courses, to a decision by a Faculty to withdraw a substantial course for economic or academic reasons. As such, the decision making process will need to be adjusted to the circumstances. For example, where a decision is being taken to withdraw a course that has not admitted any students for a number of years, plans for safeguarding the student experience will not be required.
- 2.2 The decision to close a course may be an academic or financial one and rests with either the School of registration or the relevant Faculty Dean or Faculty Executive. Schools and Faculties have discretion to determine the appropriate decision making procedure, but any decision to close a course must take account of the position of any students who are currently registered in the course and anyone who has applied for admission.
- 2.3 The relevant Head of School / Faculty Executive and the Associate Dean for Learning, Teaching and Quality are required to satisfy themselves that the interests of any students currently registered on the course will be safeguarded before approving the withdrawal of a course.
- 2.4 It is recommended that a School / Faculty discusses a proposal to close a course with the Associate Dean for Admissions and the Head of Admissions.
- 2.5 Where the course to be withdrawn also draws on modules outside the School of registration (and particularly where these are core or compulsory), proposals to close a course must be discussed with the other School(s), not least for planning purposes. Where the withdrawal of a course in one School will have an adverse impact upon another School, the matter should be drawn to the attention of the relevant Associate Dean(s) for Learning, Teaching and Quality in the first instance.
- 2.6 Where there are continuing students registered on the course(s) which the School / Faculty proposes to withdraw, there must be early and ongoing discussions with students. These discussions should inform students of the School's plans, the measures that will be taken to

safeguard their educational experience, the options open to students (including transfer to alternative courses) and should seek to provide students with an opportunity to raise and discuss their concerns. Such discussions must be held with all affected students and not just student representatives on School committees.

- 2.7 Schools / Faculties should also take into account the point in the admissions cycle when the decision to close a course or courses takes effect and seek advice from the Associate Dean for Admissions and the Head of Admissions. It will be necessary to write to applicants to offer advice in respect of their options, and to formally release their choice within the UCAS system.
- 2.8 In reaching a decision to withdraw a course Schools/ Faculties have a legal duty to take into consideration the impact of the decision upon those groups covered by equality and diversity legislation. The University may be called upon to demonstrate that it considered and took steps to safeguard the interests of students and potential students from the main equality learning group. Schools will need to undertake an impact assessment screening before making a decision to withdraw a course as determined below. (There is a screening proforma to assist Schools with this process.) The purpose of the impact assessment is to determine and clarify whether the business case for course closure is justifiable against equality considerations, and to identify ways to mitigate adverse impact upon a particular group.
- i. Where a school is considering closing a course (i.e. a programme of study leading to a formal award) it should carry out an Equality and Diversity Impact Assessment unless any of the following apply:
- The course is being replaced by a new course that will recruit from the same market segment and has the same or highly similar content and learning outcomes
 - The course recruited less than 10fte student numbers on the last occasion that it admitted new students
 - The continuation of the course would generate a net financial loss to the School
 - The course has not recruited students in the two preceding admissions cycles.
- ii. Where a course is not excluded from the requirement for an Equality and Diversity Impact Assessment as part of the course closure process, this assessment should be carried out in advance of any final decision to close the course.
- iii. The Impact Assessment should consider the following factors as a minimum along with any course-specific issues that may arise following discussions with the University's Equality and Diversity Manager (Ms Helen Murdoch):
- The demographic profile of students recruited in the previous three years
 - The employment destinations of students who completed the course in the previous three years
 - The existence of any links of the course with local or regional employers in terms of placements, graduate employment for example
 - Whether the course meets a requirement of the Corporate Plan, particularly in relation to issues of regional engagement, that would not be met by an alternative existing course or a planned replacement course.

3 Procedure

- 3.1 The Learning and Teaching Committee of Senate has approved a proforma for use by Schools / Faculties and Associate Deans LTQ when considering and approving course closures. The proforma seeks to provide a framework for considering the various issues.

4 Process for Withdrawing a Course

- 4.1 Where a School / Faculty makes a decision to cease to recruit to a course, but where there are students continuing on the course, adequate provision must be made for the continuation of the course until such time as all students have completed the course. Schools should note that intercalations, part time study and reassessment may extend the lifetime of the course.
- 4.2 In preparing for the withdrawal of a course with continuing students, Schools must give consideration to the range and resourcing of modules required to complete the course. Plans

for the withdrawal of the course must be made available to the Associate Dean to inform their decision

- 4.3 In some circumstances it may be more appropriate to transfer students onto a newer version of the course or onto an alternative course offering similar module choices. Any transfer must be with the full agreement of the student.

5 **Notification**

- 5.1 Once the closure of a course has been approved by the relevant Head of School / Faculty Dean and the Associate Dean for Learning, Teaching and Quality the following should be informed via an electronic copy of the approved proforma:

- Learning and Teaching Service
- Admissions, Recruitment and Marketing
- Planning Office (action to include forwarding to library, Dean of Students and Union of UEA Students).

QAA Quality Code

Chapter B8: Programme Monitoring and Review

Indicator 3

Higher education providers operate a process to protect the academic interests of students when a programme is closed.

A higher education provider may decide to withdraw a programme from its portfolio of provision, either as an outcome of programme monitoring or programme review, or for other reasons, underpinned by analysis of management information. A number of factors may contribute to this decision, including changes in patterns of demand from prospective students, changes in staffing, a strategic realignment of the provider's portfolio or a major organisational change, such as merger with another provider. In these circumstances, higher education providers discuss the implications with affected students at the earliest opportunity and assess the possible impact on academic standards and the quality of learning opportunities, particularly with regard to specific groups of students, taking into account the diversity of protected characteristics and prior educational experience.

Higher education providers have an agreed and planned procedure for managing the closure of a programme, which includes protecting the academic interests of all students already studying on the programme (including those who have taken an agreed break from their studies) and those who have applied to study on it (see *Chapter B2: Recruitment, Selection and Admission to Higher Education*).

The quality of the learning experience is safeguarded during the period in which the programme is being withdrawn, for example, where current students continue studying to complete the programme although there are no new entrants. Higher education providers take account of the effect on partners, delivery organisations and support providers with whom they work to offer the programme, and on the students studying with them (see *Chapter B10: Managing Higher Education Provision with Others*).

Circumstances may arise in which the decision to close a programme is beyond a higher education provider's control, but the existence of a planned withdrawal process enables providers to manage this situation to protect the academic interests of students as far as possible.

<http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/quality-code-part-b>

COURSE CLOSURE

1. COURSE INFORMATION OF COURSE(S) TO BE CLOSED			
Faculty		School	
Course Title (incl. award)	Route Code	Admissions Code	UCAS Code
Are the above courses currently advertised?	In a prospectus or UEA website		
	With UCAS		
	Not currently being advertised		
Are there applicants for the above course(s) currently in the system?		Yes	
		No	
Academic year students will be / were last admitted to the above course(s)			
Will there be students continuing on the course after it ceases to recruit?		Yes	
		No	
If yes, how many?		Yr2	
		Yr3	
		Year Out (Industry/ Abroad)	
		Yr4	
¹ Expected date course will cease to be delivered (i.e. academic year in which final student(s) are expected to complete / completed)			

¹ This may be subject to change, due to commitments to intercalating students

The following sections are only required to be completed should the course closure not be linked to a new course proposal, or change in existing course, where a CP1 (Course Outline) form is completed. Please refer to new course proposal and approval process for further information on this.

2. RATIONALE & CONSULTATION		
Reasons for discontinuation of course (where closure is linked to the creation of new, replacement courses, give title of new course and attach this form to the CP forms).		
Have continuing students affected by the closure of the course been consulted?	Yes	
	No	
Has an Equality Impact Assessment been carried out? (Refer to procedure for requirements; attach form if carried out).	Yes	
	No (not required)	
What are the implications for students currently on the course(s)?		
Implications for, and consultations with, affected parties		
Please consider the following: <ul style="list-style-type: none"> • What are the implications, if any, for academic staff? • Has the School Teaching Director and Faculty AD Admissions been consulted? • Will any other Schools be affected? • Have Admissions, Recruitment and Marketing (ARM) been consulted? • Has the Faculty Finance Manager commented on the financial implications of the proposed closure? • Has the Faculty Dean been consulted? 		

Plans for phasing out (including when all students should complete, modules to be offered during the phase-out period)

3. APPROVALS	
Signature of Teaching Director	Date
Signature of Head of School	Date
Signature of Associate Dean, Admissions	Date
Signature of partner Head of School (for Joint Degrees only)	Date
Signature of Associate Dean, LTQ, on behalf of Faculty Learning, Teaching and Quality Committee	Date

4. ACTIONS REQUIRED AND NOTIFICATION OF ACTION TAKEN

Following approval by AD, LTQ, complete your section, confirming action taken, and forward electronically to next recipient for their action

Service	Responsible individual	Action Required	Date of Completion	Name/ Signature
Learning and Teaching Service	Secretary to FLTQC	Inform LTS coordinator responsible for the course		
		Inform LTS Manager (Course Review) to record on Course Review Schedule		
		Inform LTS Manager (LTC Secretary) for reporting to LTC		
		Date of LTC meeting reported to:	(LTC meeting date)	
		Forward form to ARM		
Admissions, Recruitment and Marketing	Arm.operations@uea.ac.uk	Admissions Code made out of use		
		Removal from web/UCAS/other publicity as required		
		Forward form to Student Records		
Planning Office	cams.records@uea.ac.uk	Note closure date on system		
		Forward for info to:		
	Library	Ustl.lib@uea.ac.uk		
	Dean of Students	dos@uea.ac.uk		
	Union of UEA Students	union.academic@uea.ac.uk		
		Retain completed file copy		
Planning Office		Close course on system when closure date reached		