

LTC13D094

Title: *Course Withdrawals – Internal Audit and Subsequent Amendments*
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Issue

In accordance with UEA Audit Committee's schedule of audit reviews, the University's internal auditor, Deloitte undertook an audit of Course Withdrawals in May 2014. The audit scope covered: the withdrawal from courses by students; the withdrawal of students from courses by the University and the closure of courses to future admissions by the University. In its consideration of course closure, the audit also explored our existing course review processes since these play a role in any course closure decision.

This paper provides members of LTC with the full report from Deloitte and a brief commentary thereon. In addition, the paper makes proposals regarding the approach taken to impact assessments in advance of course closure decisions.

Recommendation

Members are invited to consider and approve the enclosed mapping document

Resource Implications

There are no resource implications

Risk Implications

There are no material risks to the University associated with the approval of this document

Equality and Diversity

The proposed amendments to the course closure process relate directly to Equality and Diversity considerations. If approved, the proposals will improve our ability to ensure appropriate inclusion of Equality and Diversity aspects in decisions relating to the closure of courses.

Timing of decisions

Approval by LTC at its June meeting would allow the amended process to be implemented with immediate effect.

Further Information

Contact Mr Jon Sharp Head LTS (Quality) [jon.sharp@uea.ac.uk] with any enquiries about the content of the paper

Background

The final report from Deloitte makes a number of recommendations and acknowledges that with regard to the process of internal course review the University has, in the last year, already introduced significant changes in its process management that will address a number of the issues revealed through audit.

The University has provided a response to the main audit findings (see attached Final Report form Deloitte), which indicates a timescale and responsible office or individual for each action point.

One recommendation from Deloitte is that the University maintains some form of Impact Assessment to its course closure process. Within the Deloitte report, 'Impact assessment' indicates both a business impact assessment and the Equality and Diversity impact assessment with which we would perhaps more readily associate the term. 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 proposed amendments below are directed towards the Equality & Diversity aspect of Impact Assessment. The intention is to take 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.

Proposed Amendments

The following changes are proposed to the Procedure for the Withdrawal/ Closure of Courses:

- (i) Where a School is considering closing a course (ie 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

The following changes are proposed to Screening, Prioritisation and Equality Impact Assessment (Course Closure) Form:

- The 'Group Characteristics' be amended to read: Age, Disability, Gender identity, Ethnicity, Religion or Belief, Sexual Orientation, Socio-economic class



Procedure for the Withdrawal / Closure of Courses

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).

COURSE CLOSURE

1. COURSE INFORMATION			
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

2. RATIONALE & CONSULTATION		
Reasons for discontinuation of course		
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		