Responsive and Rigorous Approval of Work-Based Learning: Adjusting Regulations and Codes of Practice

Jenny Gilbert (jenny.gilbert@anglia.ac.uk), Ashcroft International Business Schools

Abstract
To satisfy future workplace skills requirements, universities are being urged to expand work-based learning provision and encourage employers to fund students (Leitch Report, 2006). In order to respond to and maintain public confidence, universities must design and implement tailored courses quickly and rigorously. While some universities are experienced and quality-assure their work-based learning courses effectively, developments are patchy. Response to a recent survey (Quality Assurance Agency (QAA), 2009) highlights two issues: firstly, the difficulty universities have making contact and building relationships with employers, and secondly, the perceived bureaucracy and complexity of validation processes. In delivering work-based learning courses universities must assure the standards of student achievement and maintain the quality of the student experience. This assurance begins with the design and approval of a course.

The research presented here is part of a larger research project sponsored by the Association for Business Schools (Gilbert, 2009) that traces quality assurance through the entire life cycle of curriculum development and delivery. This paper focuses specifically on the design and approval stages and makes recommendations for the modification of university regulations and processes. A university growing its work-based learning provision should review its curriculum framework, consider fast-track validations and the use of standing panels and phased approvals.

Background
The term work-based learning has been in use for over 20 years. Evans (2001) traces its conception back to his work in 1986, linking it to the development of accreditation of prior learning, credit accumulation and transfer, and learning contracts, concepts that are now well embedded in higher education. Brennan and Little (1996) present different categories of work-related learning that stretch from placements to employment-based learning programmes. QAA (2009) uses the recent term ‘employer engagement’ to cover this broad spectrum and reserves the terms work-based and workplace learning to refer to the corporate programmes that are under consideration in this paper.

The introduction of foundation degrees in 2001, with the defining characteristic of employer involvement in design and review, was a significant step forward (QAA, 2004). However, it has not delivered the number of students hoped for, as is clear from the Leitch Report (2006, p.4), which demands the expansion of foundation degrees and reinforces the need for greater employer engagement. It is here that the term ‘employer engagement’ was first extensively used. Subsequently, the Higher Education Funding Council for England (HEFCE) put out a call in May 2006 for projects on ‘Employer engagement in learning at HE level’. Sixty million pounds in capacity funding was awarded for infrastructure development, followed by an offer in February 2007 of additional student numbers for places co-funded by employers (HEFCE, 2007). The Quality Assurance Task Group on Employer Engagement and HE Learning Report (2008), exploring the quality assurance of ‘employer responsive provision’, raised concerns about quality assurance, and following its
release there has been further research described by QAA (2009). This research collected data via a questionnaire sent to each university in the UK in order to elicit the view of the lead quality assurance officer in that institution. The findings are reported by Stubbs (2009).

**Methodology**

There is a large volume of literature on work-based learning, and a recent Higher Education Academy publication (Tallantyne, 2008) provided the author with secondary data from universities that have considerable experience in the field. Primary data was collected from six universities; this included one pre-92 university and three institutions that had been delivering accredited work-based learning provision for some years. A variation on the snowball method (Cohen and Manion, 1989, p.104) was used to find respondents from universities at different stages of development. In each case, the respondent was asked to focus on one programme delivered to a cohort of students working for a single employer or sector. Telephone interviews were undertaken with the aim of covering all aspects of the development and implementation stages of the curriculum life cycle. Only the design and approval stages are presented in this paper.

**Findings**

**Design Stage**

A course has to be designed within the institutional regulatory and structural framework. Some universities have work-based learning frameworks, for example, Middlesex University (Garnett, et al., 2008, p.18). A common aspect of such frameworks is the description of generic level descriptors for work-based learning. It is common to provide a preliminary module that gives students the opportunity to self review and judge their current knowledge and development needs (Willis, 2008, p.40). For a fully negotiated programme, a coherent curriculum can be built on this foundation. A number of universities use shell modules, where the learning outcomes are defined and the precise content and learning and teaching methods are added later (Lyons & Young, 2008, p.89). Most universities require at least 60 credits for an award, thus constraining their offering; an exception is Staffordshire University, which offers awards for 30 credits of study.

The five post-92 universities surveyed were delivering or planning to deliver accredited courses. The respondents from these institutions made an implicit assumption that courses should be accredited, and one respondent even suggested accreditation to the client, explaining that students would be better motivated if working for a qualification. Widening participation and up-skilling are on the agenda for post-92 universities, and offering a qualification that can be topped-up or give progression is integral to curriculum development thinking. The red brick university, however, delivered a wide range of non-accredited short courses and had a clear rationale for this alternative approach. The respondent explained that their courses are always bespoke and companies rarely request accreditation as their staff are satisfied that a short course from Red Brick Business School on the CV is sufficient. Courses are also seen as too short to link to accreditation, but they are sometimes used as a diagnostic tool for further training needs, which may include progression to Master of Business Administration (MBA). The participants have a whole spectrum of motivations for doing a short course and there would have to be a compelling reason to consider accreditation.

All respondents reported clients being involved in the design of the course. In one case a regional employer steering group was set up. These employers wanted master's level
provision for first line managers, but as few of the staff had the entrance qualifications, a
level 5, 60-credit bridging course was devised for this course. Other universities worked in
partnership with just one client; the university contact generated ideas and identified
training needs to develop suitable programmes. Sometimes modules from the existing
portfolio were tailored during delivery. In contrast, the red brick university diagnosed the
organisation’s problems and then devised a course to respond to these problems, rather
than to the perceived training needs of the workforce.

The time taken to develop a course is often quoted as a problem for work-based learning
because employers expect an immediate start date. However, the non-accredited course
took a period of six to nine months from initial contact to delivery. Similarly, one of the
public sector courses had six months’ groundwork before the bidding process.
Respondents suggested that although speedy validation processes are needed it is
important to spend time up front developing and agreeing the right programme.

Approval Stage
Many authors refer to the slow pace of validation and the sluggish response to clients’
requests; Garnett, et al. (2008) refer to the ‘grinding prevarication of institutional validation
processes’. Consequently, a number of universities have devised frameworks that provide
the rules for a negotiated award (Willis, 2008, p.35), whether that be negotiation with a
single student or, more commonly, with a cohort in a particular organisation or work sector.
In some cases the framework discriminates between different models and defines
principles and procedures for each model, as does, for example, ‘The Northumbria
University Framework for Corporate and Community Collaboration’ (discussed in Graham,
et al., 2008, p.46). The creation of shell modules that can be tailored, with or without formal
approval, can reduce the need for scrutiny (Graham, et al., 2008). Despite prescribed
timescales for validation processes, market pressures can result in drastically shortened
timelines. To regularise these non-conformances and deal more speedily with approval
processes, some universities will permit customising within the parameters of their work-
based learning framework without the need for a full validation event (Willis, 2008, p.34) or
they will set up programme approval boards that meet as regularly as monthly (op cit,
p.39). Validation may be administered at university or faculty level, the latter reflecting a
greater level of trust and autonomy and often permitting faster turnaround.

In the telephone interviews respondents described the application of well-developed work-
based learning frameworks within their university, and these are described below. In one
case the university framework requires academic staff to take the generic learning
outcomes in the shell modules and tailor these outcomes. The template has an indicator for
assessment that has to be tailored such that students receive the detail in their module
assessment. The framework shell modules are at 5, 10 and 20 credits, so that smaller
chunks of learning are possible. The structure is tightly prescribed because the client
normally wants the entire cohort to take the same modules but occasionally students can
register for option modules from the standard offering on campus. Adaptations to validation
processes that speed up the process include cross-institutional standing panels that meet
frequently to validate work-based learning programmes, with each event focusing on
several programmes. The rationale and a couple of modules are validated first, with more
modules approved at a later panel, thus helping to meet the timescale of the client. This
approach achieves speed with rigour, with more time dedicated to reviewing modules,
though it does raise issues of pathway coherence.
Another respondent described the normal validation processes taking six to seven months from inception to delivery. To speed the process and start at a time to suit the client, work-based learning approvals are fast-tracked. This is not a light touch validation, as it is essential to convince employers of the rigour of the process. The panel is chaired by someone from the university work-based learning unit with a panel selected for their knowledge of work-based learning, including an employer representative on the panel as well as on the presenting party. Although the same areas are covered as in a standard validation, there is greater emphasis on meeting employer demands and employer support for the student in the workplace; approximately 70% of the discussion relates to work-based learning. The tension between academic and applied qualifications has led to the requirement that a minimum of 50% of the study must relate to the individual’s employment and a significant amount of learning must be in the workplace. Part of the requirement is that each module has two learning outcomes, one academic and one related to application, and there are centrally prepared module descriptors that provide exemplars for adaptation.

**Recommendations**

1. Spend time before the design stage addressing the problems of the organisation, leading to a better tailored and more sustainable model.

2. Review your institution’s approval framework to consider the use of:
   - generic framework structures and shell modules;
   - fast-track validations, standing panels and phased approvals;
   - smaller module and award credit values;
   - panels incorporating work-based learning experts and employers;
   - revision of the areas to be discussed in events.

**Review of Anglia Ruskin procedures**

To what extent has Anglia Ruskin University implemented formal procedures such as those recommended above? To address this question the recommendations in this paper have been mapped against Anglia Ruskin Academic Regulations, two Codes of Practice, a proposal paper ‘Moving forward with credit use – a system fit for 2010 and beyond’\(^\text{1}\) and the author’s perceptions of practices, in some cases irregular practices. The table in the appendix presents this mapping. The most recently produced Senate Code of Practice Procedural Document is for work-based and placement learning. Its publication is a clear recognition of the importance of work-based learning in higher education. The document advises on a large number of aspects of curriculum design, covering, for example, assessment, employer involvement and mentoring, but it does not refer to regulatory or structural issues. It does, however, present guidelines for good practice and proposes the use of a risk assessment tool. This could be a useful tool to determine the level of scrutiny a proposal requires and to allocate it to either a normal or fast-track approval.

The second document mapped is the Senate Code of Practice Procedural Document for the Approval, Annual Monitoring and Periodic Review of Taught Pathways, which refers to a 10-week indicative schedule between receipt of pathway and module documentation for an approval event and the event itself. The fact that there are now many instances when the schedule is cut short reflects the urgency of new developments, particularly with partnership developments. We would have much greater confidence in the rigour of our processes if there was a formally agreed fast track process and a clear rationale for fast-track approval based on the complexity and risk of the proposal. Work-based learning developments often require approval of small volumes of credit. These can be scrutinised by the existing Curriculum Revisions Sub Committee, which meets four times a year and is
thus a standing panel. The guidance notes in section 5.3 of this Code of Practice discuss the addition of modules to existing pathways but are silent on the creation of free standing credit. The number of revisions to a pathway is limited to three. If individual work-based learning modules are to be regularly accumulated under one of the framework awards then this would contravene our current procedures.

The third document considered is the Academic Regulations handbook. This has little direct relevance except for the limitations on module and award credit value. The final document ‘Moving forward with credit use – a system fit for 2010 and beyond’ suggests use of the framework award as a device to enable students to collect credits from work-based learning modules towards an overall award, potentially over a longer period of time than currently permitted. It also presents a Module Definition Form (MDF) for a variable credit/level shell module to be available for students to be assessed via a portfolio or patchwork text that encapsulates their learning at work. The other main area discussed relates to Accreditation of Prior Experiential Learning (APEL). With increasing numbers of requests for APEL, a faster and less resource-intensive method is needed, and permission to APEL more than 50% of an award would be beneficial.

The recent proposals (October 2, 2009) from the Head of Modular Programmes indicate that a number of the recommendations in this paper are already under consideration. The utilisation of the framework award to accumulate work-based learning credits and the introduction of a shell module are expected to be formalised. This will require clarification of the role of the Curriculum Revisions Sub Committee in approving small volumes of credit to add to framework awards. We should also introduce a formal fast track approval process and use the risk assessment tool to determine which pathways should be permitted to use this approach. Finally, we should reinforce in Procedural Documents the need for work-based learning experts to be on panels and for discussion to focus on work-based learning aspects.

Conclusions
The post-92 sector is stealing a march in the area of accredited work-based learning. This conclusion can be drawn from the exemplars described, the contrast between the responses of pre and post-92 universities, and the profiles of the universities that have been awarded ‘Employer Engagement’ funding. It is less clear whether universities new to work-based learning are emulating the leaders in the field or starting from scratch. Universities adopting work-based learning should study published case studies, and visit and study the documentation of universities leading the field in work-based learning. Additionally, key staff should attend dissemination events and conferences delivered through the auspices of agencies such as the Higher Education Academy and University Vocational Awards Council.

Notes
1) This paper was presented by the Head of Modular Programmes for discussion to the Quality Managers’ Liaison Group on 2 October, 2009. This is an informal group chaired by the Deputy Vice Chancellor (Academic), comprising Director of the Academic Office, Deputy Deans (Quality), and a large number of other Academic Office colleagues.

References


## Author's recommendations

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(A) Generic framework structure</td>
<td></td>
<td></td>
<td></td>
<td>Proposed: Use of framework award to collect learning over a longer period Use of stand alone credit not mapped against an award</td>
<td></td>
</tr>
<tr>
<td>(B) Shell modules</td>
<td></td>
<td></td>
<td></td>
<td>Proposed: Outline MDF with learning outcomes defined for each level and multiple credit values</td>
<td>Some evidence that these are used by default through very generic descriptions</td>
</tr>
<tr>
<td>(C) Fast track validations</td>
<td>10-week indicative schedule is expected from receipt of documentation to event, appendix G</td>
<td></td>
<td></td>
<td>Recommended: Devolved processes to faculties for short course accreditation</td>
<td>Numerous examples, especially in relation to partnerships, where this timescale is reduced considerably</td>
</tr>
<tr>
<td>(D) Standing panels</td>
<td>Curriculum Revisions Sub Committee section 5.3 permits addition of a new module to an existing pathway, check that this is not fourth revision to a pathway section 5.4.2, if so triggers a full re-approval event</td>
<td></td>
<td></td>
<td></td>
<td>Numerous additions of modules to framework awards are required</td>
</tr>
<tr>
<td>(E) Phased approvals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Sometimes these are planned by devising pathways with an expectation of early minor modifications</td>
</tr>
<tr>
<td>(F) Smaller credit value modules</td>
<td></td>
<td></td>
<td></td>
<td>Smallest is 15 credits</td>
<td></td>
</tr>
<tr>
<td>(G) Smaller credit value awards</td>
<td></td>
<td></td>
<td></td>
<td>Smallest is 60 credits</td>
<td></td>
</tr>
<tr>
<td>(H) Panels include WBL experts</td>
<td>Section 2.5.3 Proposal team responsible for recommending suitably qualified panel members</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(I) Adjust areas for discussion in approval event</td>
<td>Risk assessment tool could be a standard tool used during design and approval</td>
<td>Variation from standard design principles e.g. Non semester, non trimester design normally only permitted if PSRB requirement</td>
<td></td>
<td>Approaches to speeding up APEL of work-based learning and permission to APEL more than 50% of an award</td>
<td></td>
</tr>
</tbody>
</table>