BRITISH ACCREDITATION COUNCIL INSPECTION REPORT

INTERIM VISIT AND SUPPLEMENTARY INSPECTION
CHANGE OF MANAGEMENT
(Independent Higher Education)

INSTITUTION: INSTEP-WFU

ADDRESS: 18 Balderton Street
London
W1K 6TG

HEAD OF INSTITUTION: Mr Philip Davies

DATE OF INSPECTION: 1 February 2018

ACCREDITATION COMMITTEE DECISION ON ACCREDITATION: Continued accreditation 23 May 2018
PART A - INTRODUCTION

1. Background to the institution

The Institute of Economic and Political Studies (INSTEP) commenced teaching students from American universities in its London site from 1979 and in its Cambridge site from 1986. In the summer of 2017, INSTEP became a wholly owned subsidiary of Wake Forest University, which is based in North Carolina, United States of America (USA). This resulted in a name change to INSTEP-WFU.

The London site, which is the United Kingdom (UK) registered office, is located in central London. This teaching and administrative space is leased from the St Nicholas Training Centre for the Montessori Method of Education Limited. The Cambridge centre is based close to the centre of the city.

The aim of INSTEP-WFU is to work with a consortium of American universities to provide second and third year undergraduates with the opportunity to spend one or two semesters studying in London and Cambridge. This reflects the practice of many UK and American universities in offering credit rated study abroad opportunities at overseas universities. The purpose of such programmes is to broaden the experience for participants in respect of their academic courses as they are exposed to experiences that would not normally be on offer in their home universities. The programmes also permit students to experience different cultural environments.

INSTEP-WFU has five directors including two UK resident directors in London and Cambridge, both of whom report directly to the Program Director at Wake Forest University.

2. Brief description of the current provision

INSTEP-WFU delivers semester programmes. These offer a cross disciplinary approach in which central themes are examined from the areas of economics, business, finance, political economy, international relations, politics, law, history, English literature, and communications. The London centre’s courses include The Middle East and Political Islam, Law and Society, The New Europe and Contemporary Britain. The Cambridge centre courses include Economic Theory: the Cambridge tradition, Geopolitics in the Twenty-first Century and The Theory of Finance.

In recent years approximately 30 students have participated in courses each year. At the time of the inspection there were 11 American students, all aged 20 or over, enrolled at the Cambridge centre and none at the London centre.

The courses are taught by academics from Cambridge University and a number of London universities, who have significant research and publication profiles.

To be eligible to participate in the study abroad programme, students must have a grade point average of 3.0 or above. Grade point average is the mean average of the grades for all courses previously studied on a scale of one to four. Students must enrol for five courses, each of which carries three credits. Students therefore receive a maximum of fifteen credits on successful completion of their studies. These credits are confirmed through Wake Forest University and contribute towards their overall degree classification in their home university. Teaching is normally provided in small groups.

There are approximately ten American universities that are members of the INSTEP-WFU affiliate group including Tulane and Arizona State. All students on INSTEP programmes are second or third year undergraduates aged 20 or over. Each of the UK centres caters for a relatively small number of students.

Students can apply throughout the calendar year for admission to the autumn and spring semesters. The closing date for acceptance for admission is approximately three months prior to the semester commencement date.
3. **Inspection visit process**

The inspection was undertaken by one inspector who spent one day at the London Centre. The inspection involved interviews with the London Centre Director, who is also the Head of the Institution, a review of various documents and a tour of the centre teaching and office facilities. The website was also reviewed.

4. **Inspection History**

- **Full Accreditation**       17-18 November 2008
- **Supplementary**          28 May 2009
- **Interim**                 24 March 2010
- **Re-accreditation**        12 & 29 November 2012
- **Interim**                 29 January 2015
- **Re-accreditation**        19 & 26 October 2016
PART B – JUDGMENTS AND EVIDENCE

The following judgments and comments are based upon evidence seen by the inspector(s) during the inspection and from documentation provided by the institution

1. Significant changes since the last inspection

In the summer of 2017, INSTEP became a wholly owned subsidiary of Wake Forest University, North Carolina USA. The new company was registered with Companies House on the 1 July 2017. The change of ownership has not had any significant impact on the day-to-day operation of the Institution. The locations used and staff delivering programmes have not seen any notable change. It is expected that Wake Forest University will increase their level of oversight of the operation in the future, but currently the centres continue to operate in a very similar format to that prior to the change of ownership.

2. Response to action points in last report

4.7 The Institution must compile a comprehensive document containing principles and policies relating to student and staff conduct, discrimination, anti-bullying, harassment and equal opportunities and diversity and make this available to all members of the INSTEP community.

The document has been produced and approved. Future student cohorts will receive this document at the start of their study. It is appropriate and meets expectations. Its provision to all students and staff will ensure they are fully aware of expectations and enhance the supportive and community experience at INSTEP-WFU.

5.5 Regular classroom observations must be introduced to assist in the dissemination of good pedagogic practice.

Classroom observations have not been implemented.

7.5 Written policy and procedures must to be created in relation to equality and diversity.

INSTEP-WFU has developed a policy document which has very recently been approved for use. The policy on equal opportunities and diversity is appropriate to the Institution’s operation. It will ensure the understanding of all staff and students regarding the expected behaviour related to equality and diversity issues to ensure that appropriate behaviour throughout INSTEP-WFU continues.

13.4 The Institution must develop and publish polices to avoid discrimination and abusive behaviour.

INSTEP-WFU’s Student Handbook includes a section related to discrimination and abusive behaviour under the heading of Harassment and Bullying. This is appropriate and meets expectations and will ensure the understanding of all staff and students regarding the expected behaviour related to discrimination and abuse.

3. Response to recommended areas for improvement in last report

It is recommended that INSTEP should create a social media policy.

A social media policy has been developed and is included in the Student Handbook. The policy is appropriate and meets expectations.
The Institution should consider the creation of an intranet system onto which academic tutors could place learning materials, thus making them accessible to students at all times and in particular prior to the commencement of classes.

INSTEP-WFU has not yet developed an intranet. Teaching materials are made available to students as textbooks, folders of readings, and as email attachments. The Institution’s website is being redeveloped and consideration will be given, as part of this work, to provide a platform to further support student learning.

It is recommended that the Institution should ensure that all written feedback should at the very least be in word processed form.

Examples of written feedback were reviewed during the inspection. These were typed and of a good quality. However, there are still some examples where feedback is not typed.

It is recommended that INSTEP develops effective procedures for internal moderation to further enhance the quality of its provision.

Internal moderation procedures have not yet been developed.

It is recommended that the Institution should update the appearance of its website in order to make it a more interactive experience for prospective students.

There is currently a project underway to update the website, a revised website is expected to be launched in the summer of 2018.

It is recommended that INSTEP may wish to clarify, in future student handbooks, how and within what time frame any written complaints will resolved.

The INSTEP-WFU complaints procedure has been updated and provides details of expected response times.

It is recommended that the Cambridge centre manager investigates whether it will be possible in the future for INSTEP students to acquire cambridge.ac.uk e-mail addresses to assist in gaining access to university societies and clubs.

The Cambridge centre manager did investigate the possibility of INSTEP students acquiring a Cambridge.ac.uk e-mail address and this is not possible as the students are not enrolled students at the University of Cambridge.

4. Compliance with BAC accreditation requirements

4.1 Governance, Strategy and Financial Management

The numbers below refer to the standards as presented in the Independent Higher Education scheme document and main full inspection report

**INSPECTION AREA – GOVERNANCE, STRATEGY AND FINANCIAL MANAGEMENT**

<table>
<thead>
<tr>
<th>1.</th>
<th>The institution is effectively and responsibly governed</th>
<th>YES</th>
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<tbody>
<tr>
<td>1.1</td>
<td>The organisational structure, including the role and extent of authority of any owners, directors or governing body, is clearly defined, documented and understood by stakeholders</td>
<td>YES</td>
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<tr>
<td>1.2</td>
<td>The head of the institution, directors and other relevant persons are suitably qualified and experienced, understand their specific responsibilities and are effective in carrying them out</td>
<td>YES</td>
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<td>1.3</td>
<td>Policies, procedures and systems linking governance and management are well documented and effectively disseminated across the institution</td>
<td>YES</td>
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<td>1.4</td>
<td>The institution engages in appropriate risk management planning, which is administered and monitored by named individuals</td>
<td>YES</td>
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</table>
1.5 There is a clear separation of ownership and responsibility for financial matters from academic decision-making

1.6 The governing body conducts regular risk assessment exercises in all areas of the institution’s provision

1.7 All relationships with other educational institutions and organisations are defined formally and are fully transparent, with institutions compliant with partner or parent institutions’ requirements, where applicable

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This standard is judged to be

Comments:

The structure and roles of key staff are clear to those within the organisation. There is a diagram showing the reporting lines from each centre to the senior staff and directors based in the USA. The centre managers at the UK venues have a clear job profile and are able to act efficiently to support the student learning experience.

The Directors consist of staff in senior roles at Wake Forest University and the two centre directors in the UK. The Institution has close relationships with a number of American universities and the future nature of these relationships will be developed.

The structure of the organisation does not include a Governing Body. This is appropriate given that the provision is for approximately 30 students each year and there is a close relationship between the UK centres and Wake Forest University where oversight structures include senior committee reporting.

2. The institution has a clear and achievable strategy

2.1 The institution has a clear strategy for the development of its higher education provision which is supported by appropriate financial management

2.2 There is provision for stakeholder input to inform the strategic direction of the institution

2.3 The strategy is well communicated to all stakeholders within and outside the institution

2.4 The governing body and senior management conduct a regular and systematic review of their own and the institution’s overall performance and measure this performance against strategic targets

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Comments:

The current provision remains very similar to that which was previously offered, which was effective in meeting stakeholder needs. The new owners have made a strategic decision to ensure that the current provision remains stable. The existing strategy has been in place for some time and is understood by members of the consortium and is effectively shared with stakeholders through regular meetings and communications. A new long-term strategic plan is under development. The current approach to maintain stability, whilst developing a longer term strategic plan is appropriate at this stage of development of the Institution.

There is continuing involvement of stakeholders in the form of other American universities in the INSTEP-WFU affiliate group, and students continue to be drawn from a number of American Universities. These links are continuing in the form previously operated and are appropriate to provide the input required to operate effectively.

The senior management monitor the provision effectively through both financial and educational output data in a systematic way.
Financial management is open, honest and effective

The institution conducts its financial matters transparently and with appropriate probity | YES

The institution’s finances are subject to regular independent external audit | YES

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Comment:

INSTEP-WFU is overseen by the Wake Forest’s Center for Global Programs and Studies (GPS) which conforms to the financial procedures set out by Wake Forest University. The GPS budgets are internally audited and are included in the larger budgets of Wake Forest University that are externally audited. Wake Forest and all its departments follow US Generally Accepted Accounting Principles procedures.

4.2 Academic Management and Administration

The numbers below refer to the standards as presented in the Independent Higher Education scheme document and main full inspection report

INSPECTION AREA – ACADEMIC MANAGEMENT AND ADMINISTRATION

4. The institution is effectively managed

4.1 The management structure is clearly defined, documented and understood by all stakeholders including governors, management, staff and students | YES

4.2 The head of the institution and other senior managers are suitably qualified and experienced, understand their specific responsibilities and are effective in carrying them out | YES

4.3 There are clear channels of communication between management, the governing body, staff, students and other stakeholders | YES

4.4 There are clearly delineated responsibilities and reporting arrangements at institutional, faculty, departmental, programme and course levels. This should include provision for academic leadership at programme and individual course level | YES

4.5 There is an effective committee structure with appropriate reporting lines which informs management decision-making and provides feedback to stakeholders | NA

4.6 Committees and other meetings have clear and appropriate terms of reference, are scheduled to meet regularly and are minuted accurately | YES

4.7 There is a set of comprehensive policies, regulations and procedures for staff and student conduct | YES

4.8 Management ensures that all information, internal and external, including publicity material, is accurate and fit-for-purpose | YES

4.9 A policy exists and is administered effectively regarding collection of and refund of student fees | YES

4.10 Management compiles reports at least annually presenting the results of the institution’s reviews and incorporating action plans. Reports include analysis of year-on-year student satisfaction, retention and achievement, staff performance (including research and other forms of scholarship) and a review of resourcing issues | YES

4.11 Action plans are implemented and reviewed regularly, with outcomes reported to management and subsequently to the governing body | YES

4.12 Management monitors and reviews academic and administrative staff performance through a clearly documented and transparent appraisal system | NO

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Comment:
The management is clearly structured, defined and published. The senior staff at each centre have been in place for many years. They are experienced and competent and have clear role profiles. Channels of communication are simple and effective, both within the centres, between the UK centres and from the UK to Wake Forest University.

The academic programme is overseen by an Academic Director at each centre and each course and module has a leader, who has clear responsibility for the teaching, learning and assessment. The provision is small, with approximately 30 students participating each year across the two centres.

There is no committee structure. The provision is made up of discreet courses and modules that are overseen by course leaders. The provision is monitored by an Academic Director and the Centre Director who meet regularly and also discuss the provision with each course leader. The students undertake their own selection of courses and the provision is designed to provide this flexibility. A committee structure that required members of teaching staff to meet as a single committee would not be appropriate and would not enhance the provision. Therefore, given the nature of the provision and the small number of students, a formal committee structure would be overly bureaucratic whilst not adding value. The current approach of clearly defined executive responsibility, individual communication and recorded meetings between key staff provides an appropriate and effective way to ensure the effective delivery of a rigorous educational experience.

The Institution has produced clear policies which are appropriate and are shared with students and staff. All marketing material is reviewed by senior staff to ensure it provides an accurate oversight of the provision. The Institution’s website is being updated. It would be advantageous to make the new website more interactive for potential and enrolled students.

There are appropriate terms and conditions that students sign up to that clearly articulate the refund policy.

The provision is reviewed annually by teaching and administrative staff and appropriate actions are implemented to enhance the provision. This is communicated to the senior management and implementation is monitored. The review is undertaken effectively. However, it is not recorded in the form of a single formal annual action plan to ensure effective follow up.

There is an effective process in place to receive student feedback. The monitoring and review of teaching and learning, and therefore staff performance, is reviewed informally throughout the delivery period reflecting the nature of the provision.

4.12 There is no annual performance review scheme in place. However, the current arrangements enable informal discussions to take place.

5. Academic management is effective

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<tr>
<td>5.1</td>
<td>There are appropriate procedures for the proposal, design and validation of programmes of study which take cognisance of the mission of the institution, national imperatives, market demand and resource issues and reflect international norms</td>
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<tr>
<td>5.2</td>
<td>Management ensures that the stated curricula are delivered as presented in the prospectus and other related documentation, and that requirements from professional or other relevant bodies are met</td>
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<tr>
<td>5.3</td>
<td>There are regular scheduled and minuted meetings of academic staff to review academic programmes</td>
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<td>5.4</td>
<td>There is an appropriate policy and effective procedures exist for the acquisition of academic resources to support programmes</td>
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</table>
5.5 Appraisal of academic staff includes regular classroom observation which is used for the dissemination of good practice  | NO

5.6 Academic staff are supported in their continuing professional development and enabled to develop further pedagogic techniques to enhance the learning of students  | YES

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<td>This standard is judged to be</td>
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Comments:

Each course leader reviews their subject each year and makes the changes they consider necessary. The students’ feedback demonstrates their satisfaction with the provision. Each centre manages the provision in an appropriate informal manner, with the centre administrative director seeing staff and students regularly before and after classes.

The centre administrative directors effectively review the materials that are used to promote the provision.

The Institution does not hold formal academic meetings to review the provision collectively. Members of staff undertake reviews independently and informally with the administrative director at the centre. This approach, together with individual communication and recorded meetings between key staff, provides an appropriate way to ensure the effective delivery of a rigorous educational experience and to ensure that the academic programmes are appropriately reviewed.

Any resources required are requested from the academic director, who is able to source books and other learning materials requested by academic staff. The teaching materials that are created by the academic staff are made available to students through a variety of methods. It would be advantageous to the students if the development of the Institution website enabled an area for teaching materials to be shared with students in a consistent way.

5.5 There is no formal appraisal process in place and classroom observations are not undertaken.

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6. The institution is effectively administered

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<tbody>
<tr>
<td>6.1 Administrators are suitably qualified and experienced and understand their specific responsibilities and duties</td>
<td>YES</td>
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<tr>
<td>6.2 The size of the administrative team is sufficient to ensure the effective day-to-day running of the institution</td>
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<tr>
<td>6.3 The administrative support available to the management is clearly defined, documented and understood and appropriately focused to support its activities</td>
<td>YES</td>
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<tr>
<td>6.4 Policies, procedures and systems are well documented and disseminated effectively across the institution</td>
<td>YES</td>
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<tr>
<td>6.5 Data collection and collation systems are effective and accurate</td>
<td>YES</td>
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<tr>
<td>6.6 Classes are timetabled and rooms allocated appropriately for the courses offered</td>
<td>YES</td>
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<tr>
<td>6.7 Comprehensive administrative records are organised and stored efficiently, easily accessed and used effectively</td>
<td>YES</td>
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This standard is judged to be √

Comments:

The centre directors are experienced and competent and have been involved in the provision for many years.

The operation is small and each centre has one administrative director who is responsible for all aspects of the provision. This is appropriate and provides the necessary support.

Feb 2018
Students receive an appropriate handbook that outlines the support available and the policies of the Institution. Students do not currently receive a copy of the handbook prior to their arrival in the UK.

Administration is well managed and effective for the small number of students and good records are effectively maintained.

### 7. The institution employs appropriately qualified and experienced managerial and administrative staff

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<tr>
<td>7.1</td>
<td>There are appropriate policies and effective procedures for the recruitment and continuing employment of suitably qualified and experienced staff</td>
<td>YES</td>
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<td>7.2</td>
<td>There are effective procedures for the induction of all staff</td>
<td>YES</td>
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<td>7.3</td>
<td>There is a transparent and well-documented appraisal system for all staff</td>
<td>NO</td>
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<td>7.4</td>
<td>There are clear and appropriate job specifications for all staff</td>
<td>YES</td>
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<tr>
<td>7.5</td>
<td>All staff are treated fairly and according to a published equality and diversity policy</td>
<td>YES</td>
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<tr>
<td>7.6</td>
<td>The institution has a clear policy regarding the handling of legal issues relating to the employment of staff</td>
<td>YES</td>
</tr>
<tr>
<td>7.7</td>
<td>Staff have access to a complaints and appeals procedure</td>
<td>YES</td>
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<tr>
<td>7.8</td>
<td>Opportunities are provided for the continuing professional development of administrative and managerial staff</td>
<td>YES</td>
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This standard is judged to be

- Comments:

INSTEP-WFU has very little staff turnover. When vacancies arise, recruitment is generally undertaken based on recommendations from existing staff. Given the current size and nature of the Institution, this approach is appropriate.

Any new staff members are supported by the appropriate director, which is an effective approach and enables individual needs to be met in line with the requirements of the job profile.

7.3 There is no formal appraisal system operated by the Institution.

There is a clear job profile for each member of staff.

The Institution has a resident director at each centre and has developed a faculty handbook, the content of which has been recently approved by the senior management. The handbook meets expectations and includes an appropriate complaints procedure.

Administrative and management staff members undertake regular Continuing Professional Development (CPD), a recent example of which relates to the General Data Protection Regulation (GDPR). In addition, operational practice includes meetings between the centre directors, meetings and communications with Wake Forest University and visits to Wake Forest University to undertake required development.

### 4.3 Teaching, Learning and Assessment (spot check)

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<td>The standards are judged to be</td>
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- Comments

The review of student feedback indicates a high level of satisfaction.
A review of student assessments and staff feedback on assessments indicates effective teaching leading to positive student learning and performance in assessments. The quality of the staff feedback to students on their assessed work was of good quality.

4.4 Student Recruitment, Support, Guidance and Progression (spot check)

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<th>Partially met</th>
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<tr>
<td>The standards are judged to be</td>
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Comments:
The recruitment of students is undertaken in America.

Students are supported through a meeting with key staff in the USA, the provision of three pre-arrival newsletters and the Student Handbook on arrival at the centre.

4.5 Premises, Facilities and Learning Resources (spot check)

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Comments:
The premises at the London centre are suitable for the provision. Two classrooms are available and both have appropriate Information Technology (IT) and media provision to support learning. This is effective in providing an appropriate physical resource for the students.

The learning resources, which are provided, in the form of course texts, directly to students on a loan basis as well as the availability of library resources through access to the University of London or University of Cambridge libraries ensure that students have good access to excellent resources in order to complete their studies.

4.6 Quality Management, Assurance and Enhancement (spot check)

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<td>The standards are judged to be</td>
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Comments:
The centre director meets with staff regularly prior to and after teaching sessions. Student feedback is sought and reviewed, which leads to necessary actions to enhance the provision.

Academic oversight of the provision is undertaken by Wake Forest University and student outcomes are confirmed through Wake Forest University to enable the students to take the credits for their studies back to their own university where these are used towards their overall degree outcomes.
PART C – SUMMARY OF STRENGTHS AND ACTION POINTS

INSTITUTION’S STRENGTHS

INSTEP-WFU is a small institution, which ensures close relationships between the staff and students.

The provision enables a well-supported student learning experience.

Teaching and learning takes place in small groups and is thus able to focus on individual, as well as group, needs.

ACTIONS REQUIRED

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<tr>
<th>Priority</th>
<th>Action</th>
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<tbody>
<tr>
<td>H</td>
<td>5.5 Regular classroom observations must be introduced to assist in the dissemination of good pedagogic practice.</td>
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<td>M</td>
<td>4.12 5.5 7.3 A suitable performance review system, involving a scheduled recorded conversation, must be introduced.</td>
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RECOMMENDED AREAS FOR IMPROVEMENT

It is recommended that the Institution completes the up-date of their website and, if possible, makes the site more interactive for future and current students and uses the opportunity to include a platform for the dissemination of teaching materials for the students through a password protected section of the site.

It is recommended that all academic staff are encouraged to ensure the provision of feedback always meets the standards of the best practice by using detailed typed feedback on student’s written work.

It is recommended that INSTEP develop effective procedures for internal moderation to further enhance the quality of its provision.

It is recommended that the development of the strategic plan is completed and shared with all stakeholders. The Institution should consider creating a single formal annual action plan to ensure effective follow up.

It is recommended that students are provided with a soft copy of the Student Handbook when their place is confirmed, prior to their travel to the UK.

COMPLIANCE WITH STATUTORY REQUIREMENTS

| Declaration of compliance has been signed and dated. | YES |

Further comments, if applicable

During the inspection it was indicated by the Institution that a change of location is likely in the spring of 2018. The Institution was asked to ensure that the BAC office is kept informed of any likely change of location at the earliest opportunity.