

Accreditation of Examination Agencies - Assessor Report

Applicant organisation:	Queen Mary University of London (Centre for Commercial Law Studies) (QMUL (CCLS))
Authors:	██████████ ██████████ ██████████ ██████████ ██████████
Date of visit:	18 January 2022 (via Zoom)
Examination Agency staff met with:	Please see Annex 2
Date of report:	15/02/2022
Recommendation:	<p>The assessors recommend that the following programmes are accredited/reaccredited:</p> <p>Postgraduate Certificate in Intellectual Property Law, Postgraduate Certificate in Trade Mark Law and Practice, MSc in Management of Intellectual Property, on the basis that the mandatory requirements (listed in section 8) are implemented in full including the following mandatory requirement -</p> <p>Postgraduate Certificate in Intellectual Property Law, mandatory requirement : that the proposed postgraduate certificate in IP Law satisfies IPReg Accreditation Standards para 31.b) in terms of credit value.</p> <p>And on the basis that the recommendations (listed in section 8) are either implemented in full or if a decision is made not to implement a recommendation or to partially implement a recommendation that decision is adequately explained to the IPReg.</p> <p>All mandatory requirements and recommendations are to be complied with in discussion with IPReg before the start of the programmes in September 2022 (implementation timetable to be agreed with IPReg).</p>

1. General comments

QMUL (CCLS) Application dated 2 December 2021

1.1 This is an application for reaccreditation/ accreditation of three programmes (proposed start date September 2022) as attorney qualifying pathways. As such each programme must meet the appropriate standards as set by the IPReg in the IPReg Accreditation Handbook (second edition Summer 2021 update).

- Postgraduate Certificate in Intellectual Property Law (previously accredited 2017). The proposed course of study is for a dual patent attorney and trade mark attorney FLQ.
- Postgraduate Certificate in Trade Mark Law and Practice (previously accredited as 2017). The proposed course of study is for a trade mark attorney FLQ.¹

Mandatory requirement 1: all documentation to be corrected to reflect that Trade Mark Law and Practice is a postgraduate certificate.

- MSc in Management of Intellectual Property². The proposed course of study is for a dual patent attorney and trade mark attorney FLQ.

1.2 The CCLS team confirmed that the three Programme Specifications are currently in the last stages of the university approval process.

Organisational structure

1.3 During the visit the CCLS organisational structure was explained. From an educational perspective (not line management) Programme Level Programme Directors report to School Level CCLS committees, such as the Teaching and Learning (Education) committee, with a dotted line to the Director of Education. Directors of Education report to University Level, Faculty Deans for Education who, in turn, report to the VP Education.

1.4 After the visit the assessors were provided with organisational structure charts covering Quality Assurance membership and roles, CCLS Programme Review Structure, CCLS Management and Academic support and breakdown of responsibilities for each team.

Recommendation 1: that CCLS organisational charts be made easily accessible to all relevant stakeholders in particular programme level staff and students.

Evidence sources

1.5 It was made clear to QMUL in advance of the visit that the assessors would discuss how the CCLS team had implemented the recommendations from the last accreditation in 2017 and actioned

¹Please note that the application document is unclear as to whether this is a certificate or postgraduate certificate and whether the proposed course of study is for the trade mark attorney FLQ only- these issues were later clarified.

²This programme was not accredited as part of the accreditation exercise in 2017. However the modules required by IPReg were accredited in the accreditation exercise in 2017.

issues raised in the correspondence with IPReg and CITMA (2019-2021) and that therefore it was important for the assessors to see internal review documents for the past three years.

1.6 The evidence sources, as required by IPReg, were not provided promptly or with clear indexing. This made the application process significantly more time consuming than it should have been (Annex 4).

Student interviews

1.7 The assessors interviewed some QMUL students after the visit on the 31 January 2020 via Zoom. The results of that interview are in Annex 2 . The students comments are referred to throughout the report where relevant.

2. Quality

Assessment against the Required Features:

- *For a Foundation Level Qualification, the course provides the Foundation Level Qualification Core Subjects and Learning Outcomes (General Transferable Skills) as specified by IPReg*
- *For an Advanced Level Qualification, the course provides the Advanced Level Qualification Learning Outcomes [when in place]*
- *The course syllabus defines appropriate outcomes and attributes for each unit or module offered*
- *Regular review is undertaken to ensure continuing relevance*

Please provide comment on availability of evidence sources as per Annexure 'Evidence Sources Checklist'.

Please see Annex 1 and Annex 4

Credit value (the number of credits, at a particular level, assigned to a body of learning).

- Postgraduate Certificate in IP Law

2.1 IPReg Accreditation Standards, para 31.b) states “The course of study for a dual patent attorney and trade mark attorney FLQ comprises 80 QAA credits of study of the Intellectual Property law subjects at a minimum level 6.”

2.2 The proposal is for a 90 credit course at level 7. The programme comprises: IPLC 134 Fundamentals of Law and Ethics (15 QMUL credits, 10+1 IPReg credits), IPLC 140 Trade Mark Law (30 QMUL credits, 30 IPReg credits), IPLC 141 Patent Law (30 QMUL credits, 20 IPReg credits) and IPLC 132 Design and Copyright (15 QMUL credits, 10 IPReg credits).

2.3 The CCLS team explained that there had been a thorough review of all three programmes in 2021. New programmes are approved by the Education and Quality Standards Board and Taught Programmes Board (this was done in July 2021). The review had identified two anomalies:

2.4 That the Certificate in IP Law was a “...dual exemption³ of 60 credits...” which did not meet IPReg standards and that students were doing far more work than 600 study hours ie the course was under-credited. That QMUL requires credits to be in multiples of 15 eg 60/90/120 credits and a decision was made to propose a 90 credit course.

2.5 When asked if QMUL could consider an 80 credit programme the assessors were told that this was not impossible, but would be difficult, as a 20 credit course would lead to difficulties with student records.

2.6 The CCLS team asked whether this programme could be covered by IPReg Accreditation Handbook para 47. Courses of Wider Scope. The assessors explained that the proposed programme would fall foul of para 47.b) “[as courses of wider scope are] ...subject to : ...the Qualification Agency providing a standalone course relating only to the FLQ”.

Mandatory requirement 2: that the proposed postgraduate certificate in IP Law satisfies IPReg Accreditation Standards para 31.b) in terms of credit value.

Estimated learning hours

2.7 The number of credits is based on the estimated learning hours (where one credit typically represents 10 notional hours of learning)⁴.

2.8 An 80 or 90 credit course should have approximately 800/900 notional learning hours associated with it. The Postgraduate Certificate in IP Law programme specification states that the course is one semester in length ie 10/11 weeks. The assessors asked whether this was correct and if so how would a student be able to cope with approximately 80/90 hours of work a week?

2.9 It was explained that this programme starts with enrolment in the 1st week in September, pre-reading 2nd to 3rd week September, a teaching period 4th week September to 3rd week in December, revision period 3rd week December to 2nd week January, followed by examinations in the last week of January ie a 5 month study period.

2.10 After the visit the assessors were provided with programme calendars for each of the three programmes setting out the dates, modules covered, credits associated with modules, taught hours, revision/tutorials, examination hours, total study hours including examinations and IPReg content study hours.

2.11 Using these programme calendars the assessors are able to identify that at programme level there are 857 notional learning hours associated with IPReg core subjects and learning outcomes.

2.12 However, it is not completely clear, to the assessors, how much time of this time is spent in class, directed learning, independent study and assessment eg for Fundamentals of Law there are 40 hours assigned to pre-reading and pre-recorded videos, 14 taught hours, 7 hours of revision, 23.5 hours of total contact study hours including the examination of 2.5 hours, with a total given of IPReg Credit Content Study Hours as 140.

³ Please note that the concept of “exemption” is no longer used by IPReg

⁴ Higher Education Credit Framework for England: Advice on Academic Credit Arrangements second edition May 2021

2.13 The original application makes it clear that the IPLC 141 Patent Law and IPLC 140 Trade Mark Law modules were both previously 15 credit courses. It is unclear, from the documentation supplied, by what process these two modules have become 30 credit courses (especially as the module syllabi still show them as 15 credit courses).

2.14 It was explained that the syllabi are drafted at a very high level, that they contain more content than is shown “...words hide many things...” and that there is a mis-match between what is on paper and what is being taught. That, as part of the review of these modules, the CCLS team had identified 300 student study hours (rather than 150). That these modules comprised more lectures than self study. That the CCLS team had now devised a programme which met with the requirements of the profession in terms of a postgraduate certificate ie 2 x 30 QMUL credits. That IPLC 141 had always covered the IPReg requirement of 20 credits.

2.15 After the visit the assessors were provided with mapping documents and credit allocation for IPLC 136 Trade Mark Law A (15 credits), IPLC 137 Trade Mark Law B (15 credits), IPLC 141 Patent Law (30 credits), IPLC 140 Trade Mark Law (30 credits), British and European Patent Law IPLM 202 (30 credits), Patents: practice and procedure IPLM 203 (15 credits), Trade Mark Law: Registration and Filing Strategy IPLM 200 (30 credits) and Trade Mark Office Proceedings and Litigation IPLM 201 (15 credits).

2.16 The assessors confirm that the following modules in the postgraduate certificate IPLaw satisfy IPReg requirements:

IPLC134 - Fundamentals of Law and Ethics
IPLC132 - Design & Copyright
IPLC141 - Patent Law
IPLC140 -Trade Mark Law

2.17 This programme provides the Foundation level Qualification Core Subjects and Learning Outcomes (General Transferable Skills) as specified by IPReg, the course syllabus defines appropriate outcomes for each unit or module offered and the correct amount (in terms of credits) of IPReg core subjects and learning outcomes are being taught.

Mandatory requirement 3: all documentation to be corrected to indicate correct credit values.

- **Postgraduate Certificate in TM Law and Practice**

2.18 IPReg Accreditation Standards, para 31.a) states that “The course of study for ...the trade mark attorney FLQ comprises 60 QAA credits of study of the Intellectual Property Law and Professional Ethics subjects set out in Schedule A below at minimum level 6...”.

2.19 The proposal is for a 60 credit course at level 7. The programme comprises:

IPLC 134 Fundamentals of Law,
IPLC 136 Trade Mark Law A (15 QMUL credits, 15 IPReg credits), IPLC 137 Trade Mark Law B (15 QMUL credits, 15 IPReg credits) and IPLC 132 Design and Copyright.

2.20 The programme specification implies that this is a part time course over two semesters of 10/11 weeks each. The assessors asked whether the expectation is that a part time student (who is also probably in work) will do 30 hours of study a week? It was explained that this course is part time, and comprises 2 semesters of 11 weeks plus self study and examinations.

2.21 Using the programme calendar, supplied after the visit, the assessors are able to identify that the programme starts with enrolment in the 1st week of September, a teaching period 2nd week of September to 1st week December, and a revision period 3rd week March to 1st week April - approximately 19/20 weeks which equates to 30 hours a week. The assessors note that the documents states that there are 740 notional learning hours associated with IPReg core subjects and learning outcomes, which is significantly more in terms of workload than indicated by the credit value (600 notional learning hours). The assessors assume that this is a mistake because the Module Proposal Form states that lectures and tutorials amount to 20 hours, independent study 130 hours making 150 in total and the later mapping exercise states the total taught hours as 40; self study 110 making 150.

Mandatory requirement 4: notional learning hours need to be corrected across all documents for consistency.

2.22 The assessors confirm that the following modules satisfy IPReg requirements:

IPLC134 - Fundamentals of Law and Ethics

IPLC132 - Design & Copyright

IPLC136 & IPLC137 - Trade Mark Law A and B (together, these modules cover the IPReg Trade Mark Law content requirements).

2.23 This programme provides the Foundation level Qualification Core Subjects and Learning Outcomes (General Transferable Skills) as specified by IPReg and the course syllabus defines appropriate outcomes for each unit or module offered.

2.24 The documents reflect the correct amount of (in terms of credit) of IPReg core subjects and learning outcomes.

2.25 However even assuming that the notional learning hours are approximately 600, the assessors are concerned that this does not reflect the actual amount of workload the students are experiencing (see student comments Annex 2 and recommendation below).

- **MSc in Management of Intellectual Property**

2.26 The CCLS team explained that the second anomaly, identified in their 2021 review, related to the MSc. In the predecessor programme ‘the dual award potentially over-credited students..’. It was therefore decided to seek dual accreditation for a new MSc.

2.27 IPReg Accreditation Standards, para 31.b) states “The course of study for a dual patent attorney and trade mark attorney FLQ comprises 80 QAA credits of study of the Intellectual Property law subjects at a minimum level 6.”

2.28 Para 47. states that “A Qualification Agency may additionally provide a course of wider scope...which incorporates the teaching and assessment relating to ...dual FLQ. This is subject to ...allowing a student to obtain FLQ by successfully completing only those parts of the wider scope course relating to the FLQ ...even if the student does not successfully complete one or more other parts of the wider scope course...”.

2.29 The proposal is for a 180 credit course at level 7. The programme comprises the following modules to satisfy IPReg requirements: IPLC 134 Fundamentals of Law, IPLM 200 Trade Mark Law Registration and Filing strategy and IPLM 201 Trade Mark Law Office proceedings and Litigation (30 +15 QMUL credits, 30 IPReg credits), IPLM 202 Patent Law British and European Patent Law and IPLM 203 Patent Law Practice and Procedure (30 +15 QMUL credits, 20 IPReg credits), IPLM 204 Design and Copyright (30 QMUL credits, 10 IPReg credits). Please note that the assessors were told that this module is the same as IPLC 132 however that module has 15 QMUL credits (10 IPReg credits).

Mandatory requirement 5: Credits need to be corrected in IPLM 204, if this is the same module as IPLC 132, for consistency. The 10 credits required by IPReg must remain unaltered.

2.30 IPLM 202, 203, 200, 201 were in the original mapping document received, however that document refers to sessions that the assessors were unable to find in the module syllabi (eg according to the syllabus for IPLM 203 there are only 8 sessions in Patents 1 and 9 sessions in Patents 2). The CCLS team explained that the syllabus information had not been updated to reflect the new modules.

2.31 The changes were discussed and the assessors are able to confirm that the following modules satisfy IPReg requirements:

IPLM202 & IPLM203 - Patent Law (together, these modules cover the IPReg Patent Law content requirements).

IPLM201 and IPLM202, are mapped together in the mapping document received after the visit. The content is correct, except that there is a small gap - there is an IPReg requirement in Schedule A (d) for '...the law of passing off and the legal protection for unregistered trade marks in the UK and in other key jurisdictions...'. .

2.32 Module Session 21 is entitled 'Passing off' and the detailed coverage is stated as 'Passing Off: a. The elements of the action; limitations and remedies'. The assessors can see no reference to 'other jurisdictions', and this is a concern, in that most European countries have no common law equivalent, but instead have a statutory law of unfair competition. Students need to be alerted to this distinction.

2.33 The assessors checked the content of Session 21 of IPLC137 headed 'Passing Off' and the content there states specifically 'comparison with other jurisdictions', which is correct.

Mandatory requirement 6: content identified above in respect of IPLM201 and IPLM202 to be added to the syllabus.

2.34 Subject to the mandatory requirement above the assessors confirm that this programme provides the Foundation level Qualification Core Subjects and Learning Outcomes (General Transferable Skills) as specified by IPReg and the course syllabus defines appropriate outcomes for each unit or module offered and the correct amount (in terms of credits) of IPReg core subjects and learning outcomes are being taught.

IPReg Accreditation Standards para 47 Courses of Wider Scope.

2.35 It is not clear from the MSc programme specification that a student would know which of the compulsory modules, if successfully completed, would allow a student to obtain the FLQ and what award they would be given if that were the case.

2.36 The terminology in the Programme Specification is outdated and incorrect “...will gain an exemption..”.

2.37 The CCLS team explained that it is always possible to award an exit award if a student successfully completes certain modules which satisfy IPReg requirements. It was agreed that the wording in the programme specification would need to be changed to reflect paras 31.b) and 47. That there would be an exit award equivalent to the postgraduate certificate in IPLaw.

Mandatory requirement 7: the programmes specification must reflect the requirements of IPReg Accreditation Standards paras 31.b) and 47.

Workload

2.38 Despite the internal review (2021) of credit values in each of the modules in each of the three programmes it is clear that students (on all three programmes) find the workload heavy. Those students in employment (ie the majority) find balancing study with work commitments difficult. Only synchronous lectures are timetabled and employers can underestimate the total learning hours required (please see student comments Annex 2).

Mandatory requirement 8: now that the online course has bedded down each module convenor calculates the actual amount of notional learning hours (pre-reading, asynchronous lectures and synchronous lectures, MCQs, revision time and exam time etc) that is being set/expected of the students and carries out a pruning exercise of extraneous content (without compromising the IPReg requirements). That the amount of notional learning hours (workload) is made clear to all stakeholders including students and their employers.

Professional Ethics

2.39 The assessors are satisfied that Professional Ethics is adequately covered.

To what extent do QMUL teach the IPReg Accreditation Standards Schedule B transferable skills?

2.40 Students are given problem solving exercises in class, they now receive transfer of knowledge through pre-recorded lectures they also learn research and writing skills through a critical writing and thinking course designed specifically for postgraduate law students.

The assessors asked in what way the CCLS team used the Competency Frameworks?

2.41 It was explained that in the design and patent law module the CCLS team had the technical competency frameworks in front of them and used it.

2.42 There is a mismatch between the trade mark certificate and the competency framework in that practical skills are a significant part of the Nottingham finals course. The CCLS team find it difficult to assess to what extent the transfer of skills is for QMUL to teach and to what extent the transfer of knowledge is for Nottingham.

2.43 Students also learn skills with their employers. QMUL require 6 months experience before starting the course (note that statistics supplied show that some students attend the programmes with far less than 6 months experience). Students can have different levels of experience.

Recommendation 2: QMUL, and ideally other examination agencies, should liaise with Nottingham team to identify gaps that are evident to Nottingham when students arrive and adjust trade mark certificate course accordingly.

Level 7

How does the CCLS team ensure that:

- the intended learning outcomes are at level 7
- there is alignment between the intended learning outcomes of the programme and requirements of regulators
- the design of the curriculum and assessments is such that all students following the programme have the opportunity to achieve and demonstrate the intended outcomes

2.44 The CCLS team explained that all the students are graduates ie level 6 and therefore the courses have been designed for postgraduate LLM students. Students who are science graduates are given the opportunity to take the critical writing and thinking course. Problem solving is taught in the online synchronous sessions.

Recommendation 3: CCLS team consider additional learning sessions for students eg who have no work experience and or are not currently employed in the profession to help ease them into the subject matter (please see student comments Annex 2).

Regular review

2.45 The assessors were concerned on receipt of the original application documentation as to whether regular review is undertaken to ensure continuing relevance and enhancement of the programmes.

2.46 The application states “each programme is reviewed and approved at School level and programmes are reviewed and approved at university level by Taught Programmes Board ...”. The application also stated p5 that the certificate in Trade Mark Law underwent review 2019, and that in 2021 there was a comprehensive review of the other two programmes. Page 8 of the application refers to Programme Management Group oversight.

2.47 The assessors received very few documents relating to these internal reviews with the original application and it was difficult to assess how well the quality assurance cycle is working. Assessors need to see a clear documented process of quality assurance review eg documents identifying what issues were identified as a result of student feedback, external examiners comments and CITMA/IPReg comments, resulting action plans, documents showing how and what has been implemented, ie all of the documents that make up the review process. Helpful documents were received on 13 January 2022 (Annex 4).

2.48 What was made clear during the visit is that in terms of curriculum the CCLS team ensure regular review is undertaken to ensure continuing relevance. Module convenors are responsible for making sure that content is up to date.

2.49 Organisational charts, were provided after the visit, namely charts covering Quality Assurance membership and roles, CCLS programme Review Structure, CCLS Management and Academic support and breakdown of responsibilities for each team. Quality assurance is discussed further in section 5.

3. Student choice, access and teaching arrangements

Assessment against the Required Features:

- *Students are informed, in a clear and timely manner, when a module/exam is not an IPReg Core Subject and it is not mandatory to qualification as an attorney*
- *Students have appropriate and timely access to support, resources and teaching staff*
- *Cohort extremes, such as vulnerable or non-traditional route students, are supported*

Please provide comment on availability of evidence sources as per Annexure 'Evidence Sources Checklist'.

Please see Annex 1 and Annex 4

Learning opportunities and modes of delivery

The CCLS team were asked about the range of learning opportunities and types of provision offered?

3.1 It is not clear from the programme specifications as to the modes of delivery (full time, part time, distance learning/ online)? The assessors understand that this is in part due to the pandemic and that programmes that had been face to face had to be taught online, at very short notice.

3.2 The CCLS team explained that much of the teaching had gone online in 2020/21. The programmes are now in second year of online delivery 2021/22.

3.3 Teaching and learning methodologies were discussed and the need for a range of learning opportunities including eg problem based learning. The CCLS team explained that due to the pandemic the teaching methodology was work in progress. Generally prerecorded lectures covered transfer of knowledge, asynchronous lectures problem based learning exercises and skills. Each programme was discussed in turn:

- **Postgraduate Certificate IP Law**

3.4 Intake is between 80-120 a year.

3.5 It is a full time course of 12 hours of teaching a week and is delivered once a year. It is currently an online course with pre-reading, prerecorded videos (asynchronous) and synchronous online weekly lecture sessions. Students also have access to online MCQs.

3.6 The CCLS team plan to have discussions with their main client employers in February 2022 to identify their preference for modes of teaching. The CCLS team wish to satisfy both the demand for face to face and remote learning. It is intended that those students learning remotely will get additional support.

- **Postgraduate Certificate in TM Law and Practice**

3.7 Intake is between 20-40 a year.

3.8 The programme comprises similar teaching methodology to the postgraduate certificate in IP Law. The CCLS team explained that in the future classroom teaching will be streamed online via lecture capture ie some students will be in the classroom, some listening online. These will take the place of asynchronous lectures (where the tutor is speaking directly to an audience of students who are all listening online, learning in a similar way and given the same opportunities for engagement with the tutor).

- **MSc in Management of Intellectual Property**

3.9 This is a full time programme over 1 year or part-time over 2 years.

3.10 The mode of delivery is blended learning comprising pre-reading, prerecorded videos and live sessions which can either be accessed face to face in class or synchronously via Zoom. Face to face students engage directly with the tutor. Students learning remotely can, through communications with Teaching Assistants, ask questions during these lectures ie interactive sessions.

3.11 There is small group teaching both face to face and online for Masters students.

Consistency of approach

The assessors asked whether there was consistency of approach across modules and across programmes? Is access to learning equitable?

3.12 Module convenors can use whatever combination of different learning approaches based on the subject matter of their module.

What opportunities do postgraduate certificate students have for small group discussion?

3.13 There is no small group teaching for the postgraduate certificate programmes. The only opportunities for small group work is at the revision stage.

3.14 The assessors discussed the proposal that the asynchronous lectures on the postgraduate certificate courses will be replaced with face to face lectures which are captured. Their concern is that the current synchronous sessions are a different learning activity/experience for those students learning online than the proposed face to face lectures with capture. The latter offer far less opportunity to engage with the lecturer at the time of watching. In addition postgraduate students do not currently have opportunity for small group discussion or formative assessment with written feedback (other than online MCQs). The CCLS team explained that there will be top-up sessions for those not in class eg synchronous sessions on problem solving. Students feel that the lack of small group work and lack of opportunities to hand in formative assessments and receive written feedback hampers their progression (please see student comments Annex 2)

3.15 Assessors noted that in the first stages of the pandemic one might expect module convenors to make the best they could of the online resources but asked how things had changed in the second year.

3.16 There had been a harmonisation of module delivery ie use of common formats and structures - students would recognise terminology eg prerecorded lectures and synchronised sessions across modules and programmes. Each module now requires a certain amount of asynchronous and synchronous lectures so that they are balanced. Module convenors were guided in the overall methodology to use but left to sort out detail depending on the subject.

3.17 Assessors asked about sharing best practice, they noted that some students had identified modules that were particularly well taught in 20/21 (please see student comments Annex 2). The CCLS team took account of the student view in designing 21/22 delivery and had tried to replicate the opportunities across modules and programmes. This was done through the CCLS Programme Review Structure.

Mandatory requirement 9: QMUL to clearly state in the programmes specifications whether a course is full time or part time and the teaching methodology being used face to face/blended/online etc.

Mandatory requirement 10: confirmation that the learning experience of students learning online will continue to be equitable with studying face to face, with equivalent opportunities for engagement with the tutor.

Admissions policy

3.18 The process for admissions, admissions criteria, acceptance of prior learning etc is governed by QMUL Academic Regulations 21/22. The CCLS team explained that all prospective students are graduate students ie have studied up to level 6. That the majority have 6 months work experience and are financed by their firm. Therefore post-graduate entry to courses is the norm. They could not recall a situation where they had been asked to consider prospective students who do not have a first degree but hold equivalent qualifications or experience. The QMUL admissions team would involve them in the process if that situation did occur.

Mandatory requirement 11: ensure that vulnerable and non-traditional route students have opportunities to access and progress through the programmes.

Academic support/ individual student progression/ feedback opportunities.

3.19 The assessors asked how the programmes are designed to help with student progression - the formal journey that students take from their graduate learning to these postgraduate programmes and the journey they take through the programmes themselves to successful completion of examinations at level 7?

3.20 No opportunities are given for submitting written work and receiving written feedback (formative assessment). The CCLS team explained that this is due to the large cohort size and there not being enough time between students being able to answer an exercise (ie having learnt enough) and the examination. Written feedback from tutors on any formative assessment would be too late for students to use for the examination.

3.21 However, one tutor explained that they do give students two opportunities in one module on the postgraduate certificate programmes to submit problem based and essay questions and gives feedback via email/Zoom/Teams ie one to one sessions. The tutor does this to help with progression, otherwise students can remain confused about the subject matter throughout the module. On interviewing the students it was very clear that they felt that the few opportunities that had had to write out answers and get them marked individually were extremely helpful to them in understanding the subject.

3.22 For all other modules the only formative assessment is through MCQs which have automatic feedback ie self testing. Some tutors go through MCQs in class. Not all of the modules have MCQs as part of the final examination.

3.23 There are also available QMUL support sessions in how to write essays.

3.24 Students also have access to a critical thinking, writing and research course which has been specifically designed for postgraduate law students (ie LLM students). This is a very helpful resource for the science graduates on the programmes.

3.25 Student support is at team and university level. The assessors asked how students would know whom to approach for help with either academic or personal issues. The CCLS team explained that students usually started with their current tutor, if they were not able to help the tutor would pass them on to someone who could.

3.26 It was clear from interviewing the students (those whose study was completely online) that some felt more could have been done in terms of helping them get to know their peer group, working together in groups, small group discussion and written feedback on their work (please see student comments Annex 2).

Teaching assistants

3.27 The assessors asked how much of the teaching is being carried out by teaching assistants? They did not seem to be included in the list of staff that had been supplied. It was not clear what qualifications they have.

3.28 There are designated mixed-mode teaching assistants who help with the chat function (for those learning online) when face to face sessions are being streamed synchronously on Zoom. This is to give all students an equitable experience.

3.29 When asked as to whether teaching assistants teach one tutor explained that where you can identify a teaching assistant who has experience in a particular area they might deal with basic queries ie teaching support.

3.30 One of the external lecturers explained how useful teaching assistants are in helping visiting lecturers to negotiate their way through the online delivery ie in supporting them.

Progression of students

3.31 The assessors asked how, without formative assessments (other than MCQs) and with no small group tutorials tutors would know how an individual student was progressing.

Module convenors have access to a database called QEngage which contains Learner Engagement analytic data such as students accessing the Library, intranet etc.

3.32 On interviewing the students it was clear that opportunities for engagement with tutors and their peers varies between modules and that the use of breakout rooms was found extremely useful. That students had benefited from setting up their own study groups, but that some students had not had this opportunity. That there was no help given by QMUL in arranging opportunities to get to know their peers ie through bonding exercises (see student comments Annex 2). This leads to equitable access issues. The assessors are concerned that without formative assessment struggling students might easily not reach their potential.

Mandatory requirement 12: CCLS team to consider offering formative assessments with individual student written feedback (in addition to current MCQs) in each module. QMUL should be resourced sufficiently to provide formative assessment.

Recommendation 4: CCLS to consider introducing activities/exercises to encourage students studying online to get to know each other at the beginning of each programme, extending the use of breakout rooms, delivering small group sessions of less than 10-15 students and setting up online study groups for students.

Training of tutors

3.33 The assessors asked how tutor training took place both in terms of content and delivery. In particular how are external tutors supported? Teaching assistants play an important role in training externals re new programmes and new methods of teaching. Teaching assistants are regular points of contact for external tutors, they ask for materials one week in advance, make sure uploads in correct format and ensure no overlaps between different lecturers content. The students who were interviewed welcomed the input from external lecturers (please see student comments Annex 2).

Recommendation 5: guidelines for consistent, systematic training and review of tutors (including external tutors) and teaching assistants and use of teaching assistants across all modules should be developed.

Technical issues online learning

3.34 The students interviewed said that there had been numerous issues at the beginning of the programmes with enrolment online and therefore access to materials. On some programmes this had taken up to 4 weeks to resolve and as a consequence students affected had to make up 4 weeks work.

Mandatory requirement 13: QMUL to confirm that online technical issues have now all been resolved.

Information for students re IPReg Core Subjects

3.35 In respect of the Postgraduate Certificate in IP Law and Postgraduate Certificate in TM Law and Practice all the modules/examinations are IPReg Core Subjects and mandatory to qualification as an attorney and this is made clear to students.

3.36 In respect of the MSc currently students are not informed in a clear and timely manner when a module/exam is or is not an IPReg Core Subject and is not mandatory to qualification as an attorney -please see paragraph 3 above.

4. Assessment and appeals procedures

Assessment against the Required Features:

- *The assessment methods applied are fair*
- *Assessment methods allow for proper testing of the student's knowledge and competence against the syllabus topics*
- *Students with special educational needs or disabilities are not disadvantaged*
- *Students have clear information about the types of assessment, their dates and indications as to what constitute pass or fail marks, well in advance*
- *Assessment results are issued within a reasonable time frame, allowing students sufficient time to apply for re-sits or to enrol for new courses*
- *Students are provided with a written outline of appeal procedures governing examinations and course assessments*
- *There is at least one re-sit opportunity within a reasonable timeframe after results are available*
- *All final results are moderated in accordance with QAA requirements*

Please provide comment on availability of evidence sources as per Annexure 'Evidence Sources Checklist'.

Please see Annex 1 and Annex 4

Assessment methods

4.1 Effective and appropriate assessment is essential to a qualification based on learning outcomes. It is the setting and assessment of the outcomes of learning that is important, rather than the nature of any component element of study. Assessment is used to give students the opportunity to demonstrate achievement of the relevant programme learning outcomes.

4.2 The assessors did not receive any assessment criteria or marking schemes in the documentation received. The CCLS team explained that they used "points of answer", however learning outcomes are not broken down formally as assessment criteria. The primary marker is one person (the module convenor) and there is a second marker who carries out moderation. Points of answer are provided to external examiners.

External examiners reports

4.3 There are 4 external examiners divided between all the modules (covering IPReg requirements). The 4 external examiners cover all 3 programmes. It is not clear to the assessors which external examiners cover which modules. The assessors asked why there were no comments in the reports re particular modules (which makes it difficult to identify in which modules there may be issues). The CCLS team explained that external examiners can comment on individual modules within the programmes, whether they do so is up to them. There is usually an informal conversation between module convenors and external examiners. The formal report goes to the Programme Director and they respond and decide what changes are required.

4.4 The assessors were provided with 4 reports for 2018/19, 2 for 2019/20 and 2 for 2020/21 this meant that over the last 2 years 4 out of 8 reports were missing, in fact had not been received by QMUL. The assessors received no external examiners reports for TM Law and Practice. The Academic Registrar gives external examiners 3 months in which to submit the report, if they do not they do not receive their fee.

4.5 The examiners comments vary considerably. One describes the exam board as being thorough, being kept in contact with staff and a very “impressively run programme”. One external examiner asks for 3 years of statistics and use of model answers across all subjects. Another asks for clear marking schemes and example answers in order to ensure consistency and fairness in marking. The same examiner identifies a short period of time to review examination papers, delay in obtaining feedback to comments and changes not implemented correctly. Evidence is provided that the CCLS team does respond to external examiners comments for example MCQ answers are no longer released immediately after sitting (allowing time for correction of errors and decisions on moderation of marks).

4.6 The CCLS team explained how the external examiners approval processes work - they see every aspect of the draft examination papers.

4.7 The external examiners were not involved in the review of the programmes in 2021 or in changes to syllabus.

4.8 The CCLS team explained that they are bringing in a process to include Academic Reflective Summary on marking. It is not clear to the assessors when this will be implemented and how it fits within the external examiner process?

Mandatory requirement 14: review of assessment strategy to include introduction of assessment criteria and marking schemes for each module.

Mandatory requirement 15: review the number of external examiners and review roles to include input from external examiners into any module/programme review as the assessment is integrally linked to learning outcomes.

Mandatory requirement 16: review of process by which external examiners comments are responded to so that there is a consistent and adequate response.

Appeals procedure

4.9 This is governed by QMUL Academic Regulations 2021/22.

Examination results for last 3 years

4.10 The assessors received limited information about pass rates etc before the visit. On the visit the CCLS team explained that there was usually a 100% pass rate. Assessors explained that it was still not clear to them the number of drop outs, and the number of people who had to resit. They were told that drop outs are rare.

4.11 The summary of examination statistics was received after the visit. The pass rates on the IP Cert A (Normal) is 100% 18/19, 97% 19/20, 99% 20/21. Very few students need to resit. The pass rates on the TM Cert (Adv St) is similar - 97% 18/19, 90% 19/20, 100% 20/21. The results for the IP Cert (MSc Prof Stream) are much lower 59% 18/19, 41% 19/20, 63% 20/21. In 19/20 22 students enrolled on the MSc, 9 passed in 2010 and 4 the year after. No analysis is provided.

4.12 It is noted that examination statistics are contained in the Annual Report for IPReg.

4.13 Weighting/ condonation/ how results calculated / grades etc - are all governed by QMUL Academic Regulations 2021/22. Two attempts are given -this is standard QMUL practice. Weighting follows standard QMUL practice.

Mandatory requirement 17: Reports on progression, awards and destination data eg student profiles, results and outcomes, by degree classification, domicile, ethnicity, gender and disability should be used as part of the Annual Programme Review.

Recommendation 6: reports on trends over last 3 years should be used as part of the Extended Programme Review.

Summative assessment

4.14 The CCLS team explained that the Fundamentals of Law and Ethics module is not a hurdle but that if you fail on the second attempt you will not get a postgraduate certificate or satisfy the IPReg requirements.

Online assessment

4.15 The application states on p9 that "...external examiners have commented favourably on quality of online assessment...". The assessors could not see any specific reference in the external examiners reports received to online assessment.

4.16 Each exam is 24 hours long. The wording on the examination is as follows: the examination is designed to take 2/3 hours, but we are allocating all students 24 hours within which to complete the paper. This acknowledges the time zone issues students may face, issues with their internet connections, as well as the requirements of any students with Examination access arrangements, such as extra time. This approach is a great example of inclusive practice, in line with Queen Mary's core strategic objective of being the most inclusive university of its kind".

4.17 The CCLS team explained that in the first year of online exams students were given 2-3 hours, that they now had extended the window to 24 hours (this time period is based on experience in other programmes). There is also a word cap of 3300 words plus or minus 10%. Prior to the pandemic there were take-home examinations. Because the current examinations are open book and within the 24 hours students can search the internet the questions are now more problem based, it is not a test of memory. The students who were interviewed found that the 24 hour period

extremely difficult to navigate, often ending up with them spending hours on any one exam, they asked for help in how to approach a 24 hour exam. They were unclear as to how the word cap worked (see student comments Annex 2).

Recommendation 7: revision sessions cover how to approach and get the best out of a 24 hour exam.

4.18 There is an originality report at the end of each marked paper. This score is looked at by the marker. As marking is online the originality score is viewed at the same time as marking takes place. No particular % score requires investigation - it is up to marker based on their experience as to whether it is acceptable. This prevents collusion. However QMUL can not know whether the student taking the paper is the student named. Students do have to sign a declaration of conduct and are clearly told the consequences of cheating.

4.19 Summative MCQs -students no longer get the results of the MCQs immediately ie it is no longer a formative exercise. The CCLS team had issues with Fundamentals of Law summative MCQs in the first year of online examinations and had to recalibrate the results after students had received them.

Examination information

4.20 The assessors asked how and when students receive information about the types of assessment, their dates and what constitutes a fail or a pass.

4.21 Students receive a student handbook which contains the syllabus, assessment type, profile, date and this is also available on the QMPlus page. Tutors prepare students for examinations in the revision sessions.

Assessment results

4.22 The CCLS team explained the time frame eg in 2022 the last exam is on 21st January, students submit their Fundamentals of Law essay by the 28th January, they receive their results on 23rd March, and the one resit opportunity is in May 2022.

Appeals

4.23 When students receive their results in writing via email there is a direct link to the appeal process and they have 2 weeks to lodge an appeal.

Moderation

4.24 The CCLS team explained that QAA Academic Regulations 2021/22 are followed on all IPReg courses by the use of 2nd marking.

4.25 Students with special educational needs are covered by QMUL Academic Regulations 2021/22.

5. External assurance

Assessment against the Required Features:

- *The programme is subject to external review by the QAA, or an equivalent external assurance agency, that is acceptable to IPReg*
- *Student feedback is sought and acted upon as appropriate*
- *Mechanisms are in place to ensure that course/assessment content is up-to-date*

Please provide comment on availability of evidence sources as per Annexure 'Evidence Sources Checklist'.

Please see Annex 1 and Annex 4

External review

5.1 Note that the last QAA review was in November 2010 and was taken into account in the accreditation exercise carried out by IPReg in 2017.

Internal review

Student feedback

5.2 The assessors were supplied with some student feedback as part of the original application. On the 13 January 2022 the assessors received a useful Summary of Questionnaire Responses for the IP Cert for one year (November 2020) which repeated the student module evaluation data and contained responses about online teaching and assessment. The assessors requested sight of the November 2020 summaries for TM Law and Practice and the MSc and all three summaries for November 2021. After the visit the assessors received this additional summary information.

5.3 Throughout the accreditation process the assessors tried to identify the process for yearly and three yearly review and how well it is working. The document supplied after the visit, the CCLS Programme Review Structure, is helpful in explaining what should happen. There are clear processes set out for development/amendment of programmes and modules, how student staff liaison committees (SSLC) should work (with immediate and long term actions being followed up on) and programme review cycles (annual programme review cycle and the extended review cycle).

5.4 The assessors needed to be able to see evidence of these programme review structures being followed for the past three years. Some evidence was provided in the email dated 13 January 2022⁵.

5.5 The summary of questionnaires is extremely helpful as is the Reports on IP Cert focus groups 25 Nov 2020 and 10 Dec 2021.

5.6 The assessors feel that the way in which they received the internal review documentation is reflective of a quality assurance process, which although is certainly taking place, is disjointed and

⁵Action notes May 2020, Analysis of Phil Harris areas for action, Brief note on internal IP programme review, IPLC 136 TM draft structure, IPLC 137 TM draft structure, IPReg action update June 2021 (actions not completed), Meeting of TM working group agenda May 2020, Report on changes to design and copyright law since 2017, Report on changes to Fundamentals of Law since 2017, CCLS review, Summary of IP Programme Changes 2019-2021Jan 2022, Syllabus review of QMUL certificate content (no date), Complaint from CITMA and email reply.

disorganised with very little transparency for stakeholders including students (please see student comments Annex 2)

5.7 The assessors are unable to identify connected action plans with time scales for implementation for each student encounter whether that be questionnaires/focus groups/SSLCs (please see student comments Annex 2).

5.8 It is not clear whether the annual monitoring process covers eg examiners comments and evaluation of examination results ?

5.9 It would have been helpful for the assessors to be able to compare the student evaluation of the new online courses with those of the face to face courses delivered before the pandemic.

5.10 The assessors explained to the CCLS team that it was difficult for them to understand the cycle of quality assurance. The CCLS team explained that formal feedback includes analysis of student evaluation and SSLC meetings, which is then flagged up with the staff, actions are captured and changes are made ie incorporated into programmes. An additional channel are the student focus groups held by the programme director. QMUL are also introducing a “you said we did” system to close the loop.

5.11 The Programme Management Review Group chaired by an independent academic (which reviews content, structure and feedback of the accredited IP programmes) met twice in 2020 and nine times in 2019 (due to the pandemic requiring online teaching and to sort out technical and other issues). This group has action plans. This was a radical change to oversight and involved all stakeholders.

5.12 The CCLS team explained the Annual Programme Review (online) which has just been introduced is at a higher level of CCLS and will lead to an Extended Programme Review (3-5 years) dealing with strategic challenges.

5.13 Taking into account the CCLS teams explanation and the documents provided after the visit in particular the diagram explaining Postgraduate Certificates and MSc QA cycle (at the level of the review of individual modules and programme review) and how this fits into the wider CCLS QA processes the assessors are confident that the correct quality assurance processes are in place. They are concerned however as to how well the processes are being documented. Without consistent action plans, and easy access to these actions plans by all members of the team it is difficult to see how improvements can be made consistently.

5.14 Other concerns include: The continuing role of the Programme Management Review Group as an added level of review within the normal QMUL quality assurance cycle? Will there continue to be an independent academic chair ? Will the Director of Education continue to be involved? How often will it meet? When in the semester does the SSLC meet (is it too late to implement anything for that cohort?), how and when are student course representatives appointed, how are students made aware of their representative and the process for raising issues? Is there an SSLC for each programme? Where do issues go - what happens to actions? See student comments Annex 2.

5.15 The assessors note that no one team seems to have responsibility for the above under the new administration arrangements (see below).

Mandatory requirement 18: that the Programme Management Review Group has a continuing role in the internal review of modules required by IPReg.

Mandatory requirement 19: CCLS team to implement a simple system to capture in writing every element of the quality assurance process, ensure that actions are followed up on and to store these documents online so that they are easily accessible to all stakeholders.

New administration arrangements

5.16 The assessors also asked about the new administration arrangements. What were the issues re administration and how will the new administrative arrangements help?

5.17 The CCLS team explained that previously they had one administrator, this persons workload became impossible as programmes became more complex and as a result of the pandemic. To ensure full coverage functions were given to specialised teams. There is a generalised email address monitored by designated people within the functions. Reorganisation started pre pandemic but was not completed until the end 2021. The structure will be reviewed.

5.18 After the visit the assessors received an organisational structure chart showing the titles, roles and responsibilities of both academics and of administration team.

5.19 The assessors are concerned as to how students know whom to approach (see student comments Annex 2). The CCLS team explained that this is made clear at induction.

Recommendation 8: the teaching and learning team structure with names and contact details and breakdown of responsibilities for each team should be clearly available for students.

6. Other

- *Any planned major changes to the provision for which accreditation is sought*
- *Any examples of innovative course/assessment pathway features which benefit students*

6.1 The application states that “All there [sic] programmes have undergone a full comprehensive review in the last three years...”.

6.2 As a result of the pandemic all teaching and learning has been taken online.

7. Areas where expectations are met/any features of good practice

Identification of areas where there is confidence the expectations are met

7.1 Subject to para 8 below the required features as set out in the IPReg Accreditation Handbook are met across all three programmes.

Identification of any features of good practice

7.2 The CCLS team are professional, provide interesting content, committed to teaching and learning and engaged with their students. The assessors commend the way in which the CCLS team moved

the programmes online at short notice due to the pandemic. The programmes attract high performing and discerning students who enjoy the modules. The students would benefit from more help with progression, they also made it clear that programmes would benefit from better organisation and administration.

8. Areas where expectations are not met/any recommendations for action

Identification of areas where confidence is limited that the expectations are being met

8.1 Quality: although regular review is undertaken the documentation of the internal and external evaluation of status, effectiveness, and progress of the programmes is disorganised. Without clear and accessible information it is difficult to see how the CCLS team can identify the future direction, needs and priorities of the programmes.

Identification of any recommendations for action

8.2 Please note that unless otherwise indicated recommendations and mandatory requirements apply to all three proposed programmes and are set out in the same order as they appear in the main body of the report.

Mandatory Requirements

Mandatory Requirement 1: Postgraduate Certificate in Trade Mark Law and Practice: all documentation to be corrected to reflect that Trade Mark Law and Practice is a postgraduate certificate.

Mandatory Requirement 2: Postgraduate Certificate in Intellectual Property Law, mandatory requirement : that the proposed postgraduate certificate in IP Law satisfies IPReg Accreditation Standards para 31.b) in terms of credit value.

Mandatory Requirement 3: all documentation to be corrected to indicate correct credit values.

Mandatory Requirement 4: notional learning hours need to be corrected across all documents for consistency.

MSc in Management of Intellectual Property

Mandatory Requirement 5: Credits need to be corrected in IPLM 204, if this is the same module as IPLC 132, for consistency. The 10 credits required by IPReg must remain unaltered.

Mandatory Requirement 6: content identified in report in respect of IPLM201 and IPLM202 to be added to the syllabus.

Mandatory Requirement 7: the programmes specification must reflect the requirements of IPReg Accreditation Standards paras 31.b) and 47.

Mandatory Requirement 8: now that the online course has bedded down each module convenor calculates the actual amount of notional learning hours (pre-reading, asynchronous lectures and synchronous lectures, MCQs, revision time and exam time etc) that is being set/expected of the students and carries out a pruning exercise of extraneous content (without compromising the IPReg

requirements). That the amount of notional learning hours (workload) is made clear to all stakeholders including students and their employers.

Mandatory Requirement 9: QMUL to clearly state in the programmes specifications whether a course is full time or part time and the teaching methodology being used face to face/blended/online etc.

Mandatory Requirement 10: confirmation that the learning experience of students learning online will continue to be equitable with studying face to face, with equivalent opportunities for engagement with the tutor.

Mandatory Requirement 11: ensure that vulnerable and non-traditional route students have opportunities to access and progress through the programmes.

Mandatory Requirement 12: CCLS team to consider offering formative assessments with individual student written feedback (in addition to current MCQs) in each module. QMUL should be resourced sufficiently to provide formative assessment.

Mandatory Requirement 13: QMUL to confirm that online technical issues have now all been resolved.

Mandatory Requirement 14: review of assessment strategy to include introduction of assessment criteria and marking schemes for each module.

Mandatory Requirement 15: review the number of external examiners and review roles to include input from external examiners into any module/programme review as the assessment is integrally linked to learning outcomes.

Mandatory Requirement 16: review of process by which external examiners comments are responded to so that there is a consistent and adequate response.

Mandatory Requirement 17: Reports on progression, awards and destination data eg student profiles, results and outcomes, by degree classification, domicile, ethnicity, gender and disability should be used as part of the Annual Programme Review.

Mandatory Requirement 18: that the Programme Management Review Group has a continuing role in the internal review of modules required by IPReg.

Mandatory Requirement 19: CCLS team to implement a simple system to capture in writing every element of the quality assurance process, ensure that actions are followed up on and to store these documents online so that they are easily accessible to all stakeholders.

Recommendations

Recommendation 1: that CCLS organisational charts be made easily accessible to all relevant stakeholders in particular programme level staff and students.

Recommendation 2: Postgraduate Certificate in Trade Mark Law and Practice - QMUL, and ideally other examination agencies, should liaise with Nottingham team to identify gaps that are evident to Nottingham when students arrive and adjust trade mark certificate course accordingly. IPReg have

informed the assessors that they are to commission an independent review of the IPReg Accreditation Handbook to include looking at the Foundation (and Advanced) syllabi and all examination agencies will be invited to input into this.

Recommendation 3: CCLS team consider additional learning sessions for students eg who have no work experience and or are not currently employed in the profession to help ease them into the subject matter (please see student comments Annex 2)

Recommendation 4: CCLS to consider introducing activities/exercises to encourage students studying online to get to know each other at the beginning of each programme, extending the use of breakout rooms, delivering small group sessions of less than 10-15 students and setting up online study groups for students.

Recommendation 5: guidelines for consistent, systematic training and review of tutors (including external tutors) and teaching assistants and use of teaching assistants across all modules should be developed.

Recommendation 6: reports on trends over last 3 years should be used as part of the Extended Programme Review.

Recommendation 7: revision sessions cover how to approach and get the best out of a 24 hour exam.

Recommendation 8: the teaching and learning team structure with names and contact details and breakdown of responsibilities for each team should be clearly available for students.

9. Conclusion

Recommendation as whether to accredit (with or without measures being taken) and why

9.1 The assessors recommend that the following programmes are accredited/reaccredited:

Postgraduate Certificate in Intellectual Property Law,
Postgraduate Certificate in Trade Mark Law and Practice,
MSc in Management of Intellectual Property,

on the basis that the mandatory requirements (listed in section 8) are implemented in full including the following mandatory requirement -

9.2 Postgraduate Certificate in Intellectual Property Law, mandatory requirement : that the proposed postgraduate certificate in IP Law satisfies IPReg Accreditation Standards para 31.b) in terms of credit value.

9.3 And on the basis that the recommendations (listed in section 8) are either implemented in full or if a decision is made not to implement a recommendation or to partially implement a recommendation that decision is adequately explained to the IPReg.

9.4 All mandatory requirements and recommendations are to be complied with in discussion with IPReg before the start of the programmes in September 2022 (implementation timetable to be agreed with IPReg).

Annex 1– Evidence Sources Checklist

Evidence sources checklist	Evidence source	Provided
Quality	Programme Specification (PS)	Y
	Programme Learning Outcomes (to include how the IPReg Competency Framework has been used as a reference tool)	Y in PS but does not refer to Competency Frameworks (latter discussed on visit)
	How Professional Ethics is dealt with in the programme	Y
	Quality assurance arrangements including the most recent internal and external reports covering the last 3 years (i.e. 18/19, 19/20, 20/21) including action plans	Y, some Internal reports provided on 13/01/2022
	Evidence that the programme is at the required level	Y PS
	External Examiners Report and related action plans from the last 3 years	Y, some external examiners reports provided on 13/01/2022

	How previous accreditation reports, recommendations and requirements have been dealt with	Y. Note IPReg also provided correspondence dated 2019-2021 between IPReg, CITMA and QMUL regarding programme issues identified in November 2018
	<i>Other – please specify</i>	
Student choice, access and teaching arrangements	Programme Admissions Policy	Y QMUL Admissions policy p 61 Academic Regs cover PgCert IP law
	Programme Specification	Y
	Modes of teaching provision	PS, programme descriptions, module proposal forms -not clear moved to fully online
	The assessment strategies employed	Y Module proposal forms
	Staff/student ratios	Y Application p5
	Equality, Diversity and Inclusion policies	Y QMUL policy

	How the extremes of cohort entry will be supported	Y Application p6
	<i>Other – please specify</i>	
Assessment and appeals procedures	Methods of assessment (how much by assignment, project, examination etc.)	Y PS
	Quality assurance and provision of online learning and/or assessment	Y in part
	Sample examination papers/essay titles/tests – one example of each of last year’s (20/21) examinations	Supplied for existing modules
	Sample answers/scripts for last year’s examinations to include one example of each of the following – pass, borderline and distinction	Y although there were no fails
	Pass and fail rates for the last 3 years	Y supplied on 13/01/2022 and summary after visit
	Resits Policy	Y Application p7
	<i>Other – please specify</i>	
External assurance	Information on teaching staff/membership of professional bodies/practitioner input	Y Programme descriptions
	Most recent QAA Institution Audit Review (or equivalent) and any associated action plans and information as to how to comply with QAA general guidance for assessment and educational qualifications	2010
	The most recent (within the past years) student satisfaction surveys and any changes made as a result of feedback	Y
	Staff & Student Liaison Committee information & minutes of meetings (past two years)	Y some supplied

	Progression, awards and destination data to include student profiles, results and outcomes (i.e. employment statistics, if known) by degree classification, domicile, ethnicity, gender and disability), any reports re: trends over last 3 years, information re: student progression (i.e. students not yet complete, passed 2 or more attempts)	Y some information supplied after visit
	<i>Other – please specify</i>	
Other	Any planned major changes to provision	Y Application para 6
	Examples of innovation	

Annex 2: IPReg Accreditation - questions for students

1. The assessors interviewed 5 students via Zoom (2 hours) who between them had attended or were attending the IPCert, TM Cert and MSc.

Course content

2. Questions asked:

Was the content of the course what you expected?

Or was it more/ less comprehensive than you thought it would be?

Were procedural issues covered in sufficient depth?

Was the content relevant to your practice?

3. Overall the students felt that the courses were the right balance of practice and theory. The content was comprehensive, accessible and they enjoyed the study. The website described the course content well and it was as they expected. Students who had little prior experience found it difficult at first.

4. Some felt that Fundamentals of Law was “crammed into the first 2 weeks”.

5. Copyright and design -the scheduling of 4 hours of synchronous lectures with associated reading and watching of prerecorded lectures in a 2 day period at the end of the first 2 weeks, and just before the Fundamentals in Law MCQs was difficult especially as the trainees had little experience in this area. Lecturers sometimes seemed surprised at how little the trainees already knew in this area and sometimes assumed a legal background.

6. Masters students found content was comprehensive and thoroughly explained.

How would you describe the workload?

7. The certificate students found the first few weeks difficult as there was very little information given pre course as to workload. The synchronous sessions are timetabled, but the associated prerecorded lectures are not. Employers sometimes assumed that trainees had 2/3 hours of lectures a week when it was considerably more. The number of hours study including synchronous, asynchronous lectures and reading needs to be made clear and be timetabled.

8. For each 1 hour of synchronous lecture there was over 2 hours of asynchronous lecture to watch beforehand and associated reading ie 5 hours of work associated with 1 timetabled lecture. Sometimes prerecorded lectures that were labelled as being 1 to 2 hours long ended up being 4 hours long, this made managing time extremely difficult. Sometimes students are doing 10 hours of work a day for 3 days a week. The part time course does not feel part time. Some employers and line managers were understanding and would allocate 3 days a week for study and 2 days a week for work, others are less so.

9. Sometimes seminars that were scheduled for 7-9 pm in the evening also overran.

10. The Masters students sometimes found the quantity of material in Fundamentals of Law difficult to cope with and had fallen behind. Some used the additional reading list to catch-up on eg the Fundamentals of Law. Others found the workload reasonable and manageable, although this seemed dependent on prior experience. Some struggled with the workload associated with the patent study project.

Teaching and learning methods

11. We understand that the course is currently an online course with a mixture of teaching and learning methods including asynchronous (prerecorded) lectures, synchronous lectures, online MCQs with immediate feedback and private study?

12. The Masters students had experienced some of their study face to face eg the trade mark law module lectures (tutorials are online).

13. The synchronous lectures involved seeing the lecturer and their power point slides but not the other students. To ask questions students use the raised hand function. Depending on the size of the class (varies between 15-150 depending on the module) students felt more or less inclined to ask questions during lectures. Some students who did not feel comfortable asking questions, emailed their questions later, most of the time they received an answer but not always.

14. Some lecturers use breakout rooms which enabled students to discuss issues with their peers. The students enjoyed this. Some used the chat function and forums on Moodle. However, because students had not met each other before this was not easy. There had been no bonding exercises at the beginning of the courses. A student who is working for a firm where there are other students has the benefit of a study group and they will create their own WhatsApp group. There was no group mailing list, this meant eg that when two Zoom sessions were mistakenly going on at the same time for one module there was no way of communicating which was the correct one to all the students. One student had attended a face to face induction. In one module there was a Linked in group but as students did not know each other some felt embarrassed to ask questions. Students felt QMUL could have done a "fair amount more to help students" get to know each other.

15. Questions asked:

Was the balance of this type of teaching/ private study appropriate?

How would you rate your learning experience of the synchronous and asynchronous lectures - good/bad/ indifferent?

16. Did not have small group tutorials apart from revision.

17. Sometimes lectures cancelled at extremely short notice, more than 1 or 2 had been cancelled per course. Sometime rescheduled at very short notice (1 hour) for PT students on non teaching days.

18. Did you have opportunities to access large/small group (tutorial) discussions ?

Did you have opportunities to submit written exercises to tutors and receive written feedback?

Did you get helpful feedback on written exercises you submitted?

19. In design and copyright there had been an opportunity to do an exercise/essay and then attend an online session to go over the answer. In trade mark law there had been an opportunity to go through 2 essays one each term. In the copyright course students had submitted work and received individual feedback which was helpful. In trademark law the marking had been done by the assistant and was not extensive but still better than not having had the opportunity.

Some students had no opportunities for individual feedback and this had been “a huge issue” for them, they felt they had mastered the content but had no idea about how to approach essay questions ie examination technique. Others had “pushed hard” for feedback opportunities and got some.

20. Masters students had opportunities in trade mark law to learn how to write essays but not in patents law.

21. Questions asked

When you had questions about issues raised in lectures or discussions, did you get sufficient opportunity to have them answered?

Did you have opportunities to discuss how to prepare for the examinations?

22. There are revision sessions. Students email questions and either get individual replies or sometimes answered at the beginning of the next lecture (so that all students benefit).

23. Best practice - Patents Law has a formal structure of pre recorded lectures (all available at the beginning of the course), synchronous lectures, MCQ App etc which really worked well. In Patents law there are MCQ quizzes, an App that shows how you have done, correct answers and allows you to ask questions. There is nothing similar in the trade mark module.

24. Some felt that the assessment of Fundamentals Of Law through 30/40 MCQs did not reflect the breadth of subject matter that the students were expected to learn. They would have preferred an alternative method of assessment.

25. The scheduling of the exam in design and copyright at the end of semester 2, when the course had been taught in semester 1, had not helped with student learning.

26. In design and copyright there are MCQs and an opportunity to go through problem questions as a class and ask questions.

27. Some lecturers did not seem to be aware of who was in their class eg referred to work covered last year when students had only just started.

28. Were there any technical issues with the online teaching and learning and if so how were they dealt with?

29. There were issues re enrolment for some students at the start of the course. Some were told that they would be “guests” and if they had not heard back within 3 weeks they could assume they had not been accepted. For some it took 4 weeks before they transferred from guest status to enrolled, and it was only at that point that they got access to the full materials. This meant that they had had to catch up on 4 weeks work. For others it had taken 1 or 2 weeks to get fully enrolled.

30. Student support/ feedback question

Was it made clear to you how to address any concerns about course content, delivery of lectures etc while the course was actually running?

31. It was not clear who and how concerns could be sorted out. Class representatives had been sent a lot of complaints and 2 opportunities to attend SSLC. At the SSLC they had raised communication, access to materials, confusing organisation of materials. At second SSLC it was clear that some staff had not followed up on actions points from first meeting. Students had ended up filling their own google form to give feedback, had had an informal meeting but did not remember having received action points.

32. Some class reps only just appointed in January 2022, course started Sept 2021, not sure other students knew who they were?

33. Were you offered opportunities to give feedback on the course? Yes via questionnaires.

34. Overall question

If you had to choose how to sum up your impression of the course overall how would you describe it?

35. Is there anything you would suggest to improve the delivery of the course ?

36. The students made the following suggestions:

- Introduce face to face classes
- Introduce MSc study projects in trade marks and patents
- MSc -more practical skills needed

- Better organisation and communications
- Sort out that the same problems recurring year after year
- Administration - no cover
- 24 hour exams with no advice on how to tackle them, some students are up until the dead of night, the word count is not clear.
- Correct errors in MCQs
- Liaise with firms re workload

37. What was the best thing about the course?

- Formalised structure of prerecorded lectures and live/synchronous online lectures.
- Getting practical aspect from professionals -“made it exciting”
- Content very interesting and relevant

Annex 3 Attendees IPReg Re-Accreditation Meeting 18 January 2022

Ms Laura Edgar, Director of Education CCLS

Prof Chris Reed (External Chair) Programme Management Group

Prof Guido Westkamp g.westkamp@qmul.ac.uk

Chair in Intellectual Property and Comparative Law; Programme Director, MSc IP

Prof David Musker d.musker@qmul.ac.uk

Professor of International Design Law

Prof Christina Perry c.perry@qmul.ac.uk

Professor of Law, Dean for Education - Faculty of Humanities and Social Sciences

Prof Stefan Krummaker s.krummaker@qmul.ac.uk

Professor of Leadership Practice; Deputy Vice-Principal (Education)

Prof Noam Shemtov n.shemtov@qmul.ac.uk

Deputy Director, CCLS; Professor in IP and Technology Law

Dr Guan Tang g.h.tang@qmul.ac.uk

Senior Lecturer in IP; Acting Programme Director, Cert IP and Cert TM

Dr Apostolos Chronopolos c.apostolos@googlemail.com

Senior Lecturer in IP; Programme Director, Cert IP and Cert TM

Attended the afternoon session

Prof Phillip Johnson phillipjohnson@ipprof.org.uk

Visiting Professor; Professor of Commercial Law at Cardiff Law School.

Mr Gordon Harris gordon.harris@gowlingwlg.com

Visiting Lecturer; Solicitor (tbc)

Mr Gavin Sutter g.sutter@qmul.ac.uk

Senior Lecturer

Ms Chinelo Igboayaka c.igboayaka@qmul.ac.uk

Teaching and Learning Services Manager

Mr Jack Osborne j.p.osborne@qmul.ac.uk

Quality Manager, CCLS

Annex 4 Summary of evidence sources received after the initial application dated 2 December 2021.

- Email sent 13 December 2021 to CCLS team stating that application was incomplete and that the missing documents included:

“1. Internal quality assurance reports for the last 3 years, your application refers to reviews and approvals at School level and by Taught Programmes Board and Programme Management Group oversight.

The application also refers to a 2019 review of the TM Law certificate and a 2021 comprehensive review of the other 2 programmes. IPReg have supplied the assessors with various correspondence between yourselves and IPReg and CITMA which we list below. Please can we be sent any other relevant documentation eg your related review documents and action plans which supports this correspondence:

Letters/emails dated

28 Feb 2019 IPReg to Prof Colin Bailey includes High Level Feedback

12 March 2019 QMUL to IPReg

2 April 2019 IPReg to Dr A Chronopoulos

29 May 2019 QMUL to IPReg

2 July 2019 IPReg to Dr A Chronopoulos

13 Feb 2020 IPReg to Prof Ian Walden

6 July 2020 QMUL to IPReg

16 Feb 2020 email IPReg to Prof Chris Reed

Update on progress 25 July 2021 programme administration/management review

2. Although your application refers to external examiners reports being in the pack we do not believe that we received any. We must have sight of external examiners reports and related action plans for 20/21,19/20 and 18/19 please. If there are any other examiners comments eg the application refers to “external examiners have commented favourably on quality of online assessment...” please send them to us.

3. Pass and fail rates for the last 3 years. You have supplied a summary of the pass rate for 20/21, we will need to see the full examination statistics for each module that we are accrediting /reaccrediting ie the stats that come from your assessment office. These can be provided on the day of the visit but please can we have them at the beginning of the day.

4. Progression, awards and destination data, you mention this in the text of your application. Please refer to full IPReg requirements, we do expect to see student profiles, results and outcomes etc. again these can be provided on the day of the visit but please can we have them at the beginning of the day.

5. Thank you for including the student questionnaires, please note that there are some missing (and some duplicated). As the numbering of the modules has changed please can you provide us with a document setting out the relationship between the previous numbering of modules and the numbering in your application.

The missing questionnaires are:

20/21 IPLC 141 previously 133

20/21 IPLC 137

6. Mapping

Thank you for including the mapping document. It would also be helpful to to have a simple diagram in order understand the modules shared between programmes?

The absence of an index of QA Documentation, and the lack of consistency in presentation of syllabi has made initial review of completeness of documentation challenging.

The contrast can be seen in the helpfully mapped (with a 'IPReg content covered 'column) syllabus for Module IPLC 137 (TMs Part B) at pages 126 to 129 in the soft copy of the complete application, and the unmapped syllabus of Module IPLC 136 (TMs Part A). Module IPLC 134 also has the useful 'IPReg Content Covered'

Please ensure that all syllabi include an 'IPReg Content Covered 'column and please resubmit.

IPLM200 and IPLM 201 analysis in Annex II do not refer to any sessions or lectures (all other mapping entire in Annex II contain a reference either to a session or a lecture). Please rectify this.

There is no syllabus at all in the 'Programme and Module Documentation 'for IPLC132 and related IPLM 204 Design and Copyright Law Modules. A syllabus presumably exists because mapping Annex II refers to sessions between 1 and 12. Please provide the relevant syllabus, suitably mapped as requested above.

Please also note that spot checking of mapping examples in Annex II give rise to concern. Two examples:

IPLC140 (predecessor IPLC131) has 'International and trans-national options for trade mark protection (notably via the EUIPO) 'mapped against IPLC131 Session 12. But Session 12 of IPLC131 is entitled 'EUTMs (overview of the system – all you need to know in 3 hours) 'suggesting complete focus on EUTMs.

IPLM202/203 (predecessor module IPLM041) maps 'Inventorship' against Session 14 'Inventors and employees'. But that is Session 14 of IPLC133 with that title; the relevant module of IPLM202 is 'Patents 1 Session 8' entitled 'Inventors and employees (entitlement, employee/employer disputes and compensation', so the mapping is incorrect".

- [Email sent by assessors to CCLS team 6 January 2022](#)

"...we still need to see the following documentation please:

Internal quality assurance reports (eg minutes /action points from programme and module team meetings) re modules for the past 3 years and the 2019 review of the TM Law certificate and 2021 comprehensive review (the last 2 were mentioned in your application).

Pass and fail rates for the last 3 years.

Progression awards and destination data.

The missing student questionnaires, if you can retrieve them.

And most importantly external examiners reports for each of the modules regulated by IPReg - without these we really cannot proceed because they're integral to any review -please could you get them to us by Wednesday 12th January in order for us to proceed with the review on the 18th January".

- [Email received by assessors 13 January 2022](#)

"Requested documents received including:

- The document QUALITY ASSURANCE-pages-deleted corresponds to what you already have but with the repeated pages deleted – nothing new added.
- The document QM Enrolment Trends contains figures on student numbers which form part of our draft 2020-21 annual report to IPReg (not yet completed)... The folder External Examiner Reports is data you already have – nothing new added, just for reference.
- The folder 3, 4 Pass Fail ... contains the pass rate and per-module data you requested... please do let us know if you would like an explanation of any of the terminology.
- Within the folder 1 Program Reviews is a variety of data. This is summarised in the overview document SUMMARY OF IP PROGRAM CHANGES...suggest that you start with that document, then look at the document Brief Note on ..., then the document Review of ... Workstreams, before considering the rest of the supporting evidence.
- The folder Student Focus Groups ... contains various material, but you may wish to look at the Summary of Questionnaire Responses which (as well as repeating the student Module Evaluation data you already have) contains responses about online teaching and assessment.

You asked for the student Module Evaluation forms for "20/21 IPLC 141 previously 133 and 20/21 IPLC 137" ... with written feedback sorry, but we have been unable thus far to locate them. The responses of the IP Certificate group to 20/21 IPLC 141 are replicated in the Summary of Questionnaire Responses. We suspect that there was a zero response to the 20/21 IPLC 137 form..."