Concerns about standards and quality in higher education

Grafton College Ltd t/a Grafton College of Management Sciences, December 2017

Contents

Introduction

1   This report sets out the findings of a full investigation of Grafton College Ltd carried out as a result of a concern raised under the Quality Assurance Agency for Higher Education's (QAA) Concerns Scheme.

2   Grafton College Ltd (the College) is an alternative provider of higher education and English language training based in London, where it operates from premises in Oxford Street.

3   A BBC Panorama programme entitled 'Student Loan Scandal' broadcast on 13 November 2017 ('the BBC programme') featured the College and made a number of allegations, including alleged fraud, that raised concerns about the management of academic standards and quality at the College.

4   On the basis of the BBC programme, QAA initiated a Concern according to its Concerns Scheme, and wrote to the College on 22 November 2017, opening a full investigation.

5   At the time the investigation was opened, the College offered the Pearson Higher National Diploma (HND) in Business, with 495 students enrolled, and the Pearson HND Human Resource Management, with 111 students enrolled. The College also offered a level 6 BA (Hons) Business and Management top-up under a validation agreement with the Open University.

Concerns raised

6   The BBC programme alleged, and included evidence to show, that:

- recruitment agents operating from the College's premises recruited bogus and inadequately qualified students onto higher education programmes at the College in order to obtain student finance
- the College accepted fraudulent entry qualifications, and guidance was given on how to obtain them; including a level 3 certificate from an awarding body which is located in the same building as the College and co-owned by the brother of the College's Head of Operations and the wife of the College's Director
- students were encouraged and assisted to falsify their attendance records
- students were encouraged and assisted to have assignments written by others and then submit the work as their own.

The College's initial response to the allegations

7   The allegations underlying the QAA investigation were first drawn to the College's attention in a letter from the BBC of 3 November 2017 informing the College of the scheduled broadcast. The senior management team, meeting on 6 November to consider the BBC's letter, strongly refuted the allegations, approved an internal investigation and agreed that extended security measures be adopted on College premises. Following an Academic Board meeting, also on 6 November, an action plan was implemented concerning proposed legal action associated with the allegations; reassuring communications to all stakeholders including staff and students; and the instigation of the internal and external investigations described below.

8   The Grafton College website, states that 'The Head of Operations for Grafton College who was wrongly accused by one of the agents has stepped down from his position at the College to facilitate independent investigation 14/11/17'.

9   An internal investigation, with a specific remit to examine the allegations raised by the programme, undertaken by the College's Head of Human Resource, and involving staff and student interviews and surveys, was commenced immediately following the Panorama broadcast. Senior staff told the team that this investigation was ongoing at the time of the Concerns investigation, and that information was being gathered from 100 students and staff. An interim report dated 14 December 2017, which addressed all the allegations and records the inspection of documentary evidence including minutes of meetings, student files, and external verifier reports, and the testimony of the persons interviewed, concluded that there was no evidence to support the Panorama allegations.

10   The College also commissioned an external investigation to ascertain the level of complicity of the College (if any) with unscrupulous recruitment and academic practices. This investigation, conducted by what the College called 'independent academic quality reviewers' on 6 and 7 December 2017, also concluded that there was no evidence to support the accusations made, though the report made a number of recommendations relating to academic governance, student recruitment and admissions processes, and security arrangements. The QAA concerns team noted that one of the external reviewers engaged in this investigation had attended meetings of the College's Advisory Board and was later engaged by the College as an academic consultant.

11   The College further commissioned what it referred to as another external academic to conduct an 'academic audit' of its HND provision. The resulting report, completed in November 2017, makes no reference to the BBC Panorama programme or the allegations, and the QAA concerns team was unable to establish the precise nature and scope of the author's brief. The report, which considers quality management, the student journey (including admissions), and teaching, learning and assessment, is overwhelmingly positive about the College's provision. It concludes with only one identifiable recommendation concerning the use of benchmark achievement data and recording of major trends.

The investigation process

12   QAA initiated a full investigation, which included a visit to the College on 12 December 2017, to examine documentary evidence and to meet senior managers, academic staff and students. Further visits, in coordination with the Department for Education ('the Department'), took place on 4 January, 22 February and 15 March 2018. QAA attended the January visit as an observer; documentation retrieved during this visit led to the Department referring further concerns back to QAA under the Concerns Scheme. The visits in February and March were intended to form part of the investigation but the team was unable to retrieve all the documentation required during either of these visits. This report, therefore, set outs the QAA investigation's findings based on the evidence that was provided in advance of and during the 12 December visit, and evidence shared by the Department from the 4 January visit.

13   The QAA concerns team (the team) comprised Mr Neil Casey (investigation coordinator and reviewer), Dr Sylvia Hargreaves (reviewer) and Ms Rozina Hashmi (Quality Assurance Manager, Concerns Scheme).

14   The Panorama programme's principal focus was alleged fraud. While in the course of its investigation the QAA team provided the opportunity for the College's senior managers to respond to the fraud allegations, the determination of the truth or otherwise of the fraud allegations falls outside the scope of QAA's investigation. The QAA team investigated the allegations raised by the BBC programme within the context of QAA's remit for the safeguarding of academic standards and quality. Thus:

- The allegations about the activities of recruitment agents and fraudulent student entry qualifications were considered in the wider context of the College's oversight and management of student recruitment and admission (paragraphs 23-95).
- The allegation that students were encouraged and assisted to falsify attendance records was considered in the wider context of the management of student attendance monitoring and recording (paragraphs 96-118).
- The allegation that students were encouraged and assisted to have assignments written by others and then submit the work as their own was considered in the wider context of the College's mechanisms for minimising the risk of academic misconduct and identifying and responding to any instances of academic misconduct should they occur (paragraphs 119-128).
- The team's examination of the College's oversight and management of student recruitment and admissions raised additional issues concerning teaching staff appointments. These issues are addressed within the specific context of the College's procedure and practice with respect to the recruitment of teaching staff (paragraphs 129-139).

15   The review team did not consider allegations of financial fraud since fraud is not within QAA's remit.

16   The qualifications under consideration comprised all of the HND programmes offered by the College.

17   The documentary evidence seen and used by the team included (but was not limited to): College policies; the College website; College organograms; minutes of meetings; listings of students at the College; a sample of students' admission files; sample student assignments and assessment feedback; student attendance records; student handbooks; and sample staff files.

18   A draft of this report was sent by QAA to the College on 26 January 2018 and 28 April 2018 for comments on matters of factual inaccuracy. Comments were received and have been taken into account in this final version of the report.

Result of the investigation

19   While not making any determination as to alleged fraud, the team nonetheless identified significant weaknesses in the College's recruitment, admissions, attendance monitoring and assessment processes, which could enable some of the alleged practices to take place. Concerns about the College's management of a number of areas relating to the allegations were therefore found to be justified.

20   These issues are summarised in the Conclusions to this report. The College requires improvement to meet the expectations of five sections of the UK Quality Code for Higher Education (Quality Code): *Chapter B2: Recruitment, Selection and Admission to Higher Education; Chapter B3: Learning and Teaching; Chapter B4: Enabling Student Development and Achievement; Chapter B6: Assessment of Students*; and Part C: Information about Higher Education Provision. In view of all the concerns addressed in the investigation the team made 13 recommendations.

Explanation of findings

Student recruitment and admission

21   The allegations about the activities of recruitment agents and fraudulent student entry qualifications were addressed in the wider context of the College's oversight and management of student recruitment and admission.

The use of recruitment agents

22   The Panorama programme alleged that recruitment agents operating from the College's premises recruited bogus and inadequately-qualified students to higher education programmes at the College in order to obtain student finance.

23   Senior managers denied that the College employs agents to recruit students or permits recruitment agents onto its premises to arrange for students to be admitted to its programmes.

24   All the students whom the team met confirmed that they received advice and information about the College only from College staff and personal contacts such as family members and work colleagues, had completed their applications themselves, without help from anyone, and had submitted these direct to the Student Loans Company. The team did not find any evidence of the use of recruitment agents in the sample of student admissions files it reviewed.

25   However, the team viewed an online social media account in the name of the 'recruitment agent' shown in the Panorama programme claiming that the person worked for Grafton College Ltd. The account also included photographs of the 'recruitment agent' standing against a promotional College banner in a location that appears to be different to that shown in the Panorama programme. While the account still appears to be active, any photos and references to Grafton College Ltd have since been removed.

26   With regard to the use of recruitment agents, the available information from the College was very limited, being confined to the oral and written testimony of the College's senior managers and statements made by current students. Conflicting evidence makes it difficult to establish whether the College was complicit in any recruitment activity undertaken by unauthorised recruitment agents or knowingly allowed recruitment agents to operate on its premises to recruit students to its programmes.

The College's security arrangements

27   The BBC footage of the individuals portrayed as the 'recruitment agent' and his 'assistant' on College premises, raised doubts about the adequacy of security at the College: specifically, whether there were weaknesses in the College's security arrangements which could allow unauthorised persons to enter its premises to engage in unauthorised student recruitment activities without its knowledge.

28   Indeed, it was clear from College Management Team meeting and Academic Board meeting minutes that the BBC's letter informing the College of the proposed broadcast had alerted the College to weaknesses in its security arrangements which could, potentially, expose prospective students to the activities of persons posing as agents of the College. At Academic Board it was noted that '…the entrance of intruders in the building could have been a direct result of weak security conditions', indicating that the College was aware that unauthorised persons had succeeded in gaining access to its premises.

29   The College's premises are located in a 6-storey building in Oxford Street. The College holds a lease of the entire building and has occupied floors 1-3 since 2016. Floor 4 was sublet by the College to the Awarding Body for Vocational Achievement (AVA), now known as the British Awarding Association (BAA), until November 2017. The team was given to understand that the College has recently used some of the space on floors 4 and 5 and that floor 6 is unoccupied.

30   Entry to the building is at ground floor level and the College's reception, where visitors are asked to sign-in, is located on the first floor. The College acknowledged that until very recently, there was no security at all on the ground floor, raising the risk of unauthorised entry to the building. From the ground floor, unauthorised visitors could by-pass reception and gain access to other parts of the College's premises.

31   Academic Board minutes record that, after the College had received the BBC's letter, it employed a security guard 'to be present at all times on the ground floor between 6:00am-8:00pm with immediate effect'. In the meeting with the team, senior staff described a slightly different arrangement, whereby ground floor security was provided between 9.00am and 8.00pm. Nonetheless, the team noted the presence of a ground floor security guard when they arrived at the College. On their arrival the security guard accompanied one member of the team to the lift and the first-floor reception, leaving the ground floor unattended. During their visit, the team saw additional security personnel on duty throughout the building. Senior staff said that CCTV is in place but offered no information on how this is used to enhance security.

32   Academic Board minutes reported in November 2017, and senior staff confirmed to the team, that external professional advice was being obtained, with a view to ensuring the safety and security of College premises and stakeholders.

33   The Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education* expects that recruitment, selection and admissions policies are 'underpinned by appropriate organisational structures and processes' and that, as an indicator of sound practice, 'recruitment, selection and admission processes are conducted in a professional manner by authorised and competent representatives of the higher education provider'.

34   The team concludes that weaknesses in the College's security arrangements raise the risk of prospective students being exposed to the activities of unauthorised recruitment agents gaining entry to College premises to engage in practices alleged in the BBC programme. These weaknesses contribute to the finding that the College requires improvement to meet this Expectation.

Recommendation

35   The College should:

- formalise, document and implement clear and comprehensive security arrangements to ensure that any risk of prospective students being exposed to the activities of unauthorised recruitment agents on College premises is eliminated or minimised.

Senior executive responsibility for student recruitment and admissions

36   The team sought to establish where responsibility for student recruitment resided among the College's senior management. The team pursued this matter by examining documentation provided during and after the visit on 12 December and at the visit itself in the two separate meetings with the College's senior managers.

37   When asked in the first of these meetings where responsibility lay, senior managers were unable to provide a clear and definitive answer. They said that the Head of Operations and the Head of Academics have some, but not overall, responsibility for these areas and that the Operations Manager and the Admissions Officer manage these areas operationally.

38   The Head of Academic's job description, which sets out responsibility for teaching, curriculum development and research, makes no mention of student recruitment and admissions.

39   Returning to this matter in the second meeting with senior managers, the team was told definitively that responsibility rested with the Head of Operations. On reviewing the relevant documentation, the team found that the Head of Operation's job description lacked clarity as to the post-holder's precise responsibility for student recruitment and admissions. To quote directly from the job description, the 'Job overview' section states that 'The Head of Operations will be responsible for all matters relating to the administration of administrations and recruitment'.

40   In a subsequent written statement, the team was told that role of Head of Marketing/Admissions, a position set out in the College's organogram of executive, management and operational roles, but at the time vacant, was held by the Head of Operations as 'additional responsibilities'. Admissions Committee minutes for 2016 set out the chair's title as the 'Head of Operations/Admissions Officer'. More recent minutes, and the relevant organogram, referred simply to the 'Head of Operations' as the chair.

41   According to the relevant job description, the Head of Marketing/Admissions is responsible for marketing, the oversight of admissions and the implementation of the College Admissions Policy. However, the post holder is not a member of the Admissions Committee which, under its formal terms of reference, is chaired by the Head of Operations.

42   The team concludes that the documentary and other evidence did not describe clearly and definitively who had responsibility for student recruitment and admissions, raising a risk of ineffective institutional oversight.

Recommendation

43   The College should:

> review, clarify and formally document senior executive responsibility for marketing and student recruitment and admissions, to provide for appropriate and effective institutional management.

Appointment of the Head of Operations

44   As noted in paragraph 8, the current Head of Operations stepped down from duties on 14 November 2017 pending the outcomes of the various investigations into the issues raised by the BBC programme. Given that senior managers regarded this post as having responsibility for student recruitment and admissions, and the allegations levelled against the most recent post-holder, the team examined the effectiveness of the College's processes and practice for the appointment of appropriately qualified and experienced senior staff.

45   The College Staff Recruitment Policy sets out the requirements of the staff recruitment, selection and appointment process. The policy explicitly applies to all teaching and administrative staff appointments and, by implication, also to senior staff appointments. All candidates must be interviewed, and comments or notes recorded on an Interview Assessment Form; at least two written references must be provided or, where verbal references are obtained, these must be recorded; relevant certificates must be supplied,

and copies marked 'original seen' and placed on the staff file; and an offer of employment must be made in writing.

46   The most recent Head of Operations was first employed by the College in December 2014 as an Operational Manager. He was subsequently appointed to the post of Head of Operations, in March 2016. On examining all the relevant documentation contained in his staff file, the team found no evidence or record of interviews taking place or of references being taken up by the College either on his initial appointment as Operational Manager or on his subsequent appointment as Head of Operations. The copy qualification certificate in his file was unverified.

47   When asked about the College's selection and appointment practices, and more specifically about references being obtained in this particular case, senior staff pointed out that the Head of Operations progressed to this post from a more junior position. They explained that many posts at the College are filled in the context of 'meeting the right person at the right time' and with the benefit of information gleaned via networking with similar small organisations, implying that such factors render formal references unnecessary.

48   The College has a responsibility to ensure recruitment and admissions processes are undertaken by competent individuals with the appropriate knowledge, skills and experience. The team found that the College did not follow its documented policy and processes when appointing the most recent Head of Operations to his previous and most recent posts. Consequently, the team concludes that the College had not assured itself that the Head of Operations was appropriately qualified to fulfil his responsibilities for admissions.

Recommendation

49   The College should:

• ensure that its policy and processes for the appointment of staff at all levels is understood by all relevant staff, and fully and consistently implemented.

The College's processes for student recruitment and admissions

50   Addressing allegations about bogus and inadequately qualified students in the wider context, the team considered whether the College's processes are sufficiently robust, and implemented fully and effectively, to ensure that students admitted to the College's HND programme are appropriately qualified. The team evaluated the effectiveness of the College's recruitment and admissions process by scrutinising the College website and a range of documentary evidence including 26 sample student files, and in meetings with College students and staff.

51   The College's Admissions and Enrolment Policy and annexed admissions flowchart set out the student admission process which, in summary, comprises scrutiny of the application form and supporting documents, UK NARIC checks if necessary, literacy and numeracy testing where deemed necessary, and enrolment interview.

52   Under the documented process, all these stages are completed by College admissions staff, save where an 'assessment of suitability' for the course identifies 'particular curricular or special needs', when the interview is conducted by a member of academic staff. The policy gives no guidance as to the precise nature of these 'needs' or when and by whom they would be identified.

53   Neither the College policy nor the annexed flowchart available on the College website before and immediately following the December visit indicated any internal academic sign-off requirements or authorities, either as the admissions process progresses

or on its completion. The documented process states that, once a student has provided the required documents and has been seen by an admissions officer, an enrolment letter will be issued.

54   On request from the team, the College provided a more detailed admissions flowchart indicating sign-off stages, including 'Academic Team' sign-off at the final decision stage. Senior and admissions staff said that all admissions approvals are signed off by the Head of Academics, and that this is recorded on student files.

55   However, there was no evidence of Head of Academic (or other academic) admissions approval sign-off in 10 of the 26 sample files examined by the team. All these 10 files related to students admitted to the College HND on the basis of an AVA level 3 qualification completed at the College. The College stated that these students, as 'continuing' students, would have been signed off by the Head of Academics on admission to the College. However, this does not render final academic sign-off specifically to the HND programme unnecessary.

56   The team concludes that the College's documented student admissions policy and process and current College practice do not ensure that all student admissions decisions are fully considered and approved at an appropriately senior academic level. The lack of approval in accordance with the College's own policy raises the risk of fraudulent qualifications being accepted.

Recommendation

57   The College should:

- establish, document, publish and implement a revised student admissions and enrolment policy and process to ensure that all proposed admissions decisions are fully considered, approved and signed-off at an appropriately senior academic level.

Entry qualifications

58   The BBC programme alleged that the College accepted fraudulent entry qualifications, and guidance was given on how to obtain them; including a level 3 certificate from an awarding body which is located in the same building as the College and co-owned by the brother of the College's Head of Operations and the wife of the College's Director.

59   The BBC footage showed a person, which the College has confirmed was a member of its staff, speaking to the 'student' about admission to the College. According to the BBC programme, the student was enrolling on the basis of a level 3 qualification, which had been obtained fraudulently.

60   Within the scope of the QAA investigation, the College's response to these allegations was limited to its own oral and written testimony. Senior managers stated that, so far as they were aware, all students enrolled at the College are genuine students.

61   With respect to the alleged family connections, College senior managers confirmed to the team that the AVA/BAA was indeed co-owned by the brother of the College's Head of Operations and the College Director's wife. However, oral and written statements made to the team about the extent of the College's current contacts with the AVA/BAA are inconsistent. In the first meeting with the team, senior managers referred to an ongoing investigation of the AVA/BAA by Ofqual. The team was told that following an Ofqual investigatory visit to AVA/BAA premises, which senior managers indicated took place in October 2017, the College terminated the AVA's sub-lease of floor 4 of the Oxford Street building and the AVA moved out in November 2017. Senior staff also stated that they

believed the AVA was still operating elsewhere, but did not know where. However, the team noted that a previous written statement from the College stated that it is 'in touch with the BAA concerning the outcomes of the said enquiry'.

62   According to the College, only one cohort of students (10 in total) with the level 3 AVA qualification obtained at the College was ever admitted to its HND programme, in September 2017; no students were ever admitted on the basis of AVA/BAA qualifications obtained elsewhere; and, because of the Ofqual investigation the College has withdrawn its registration as an AVA centre. At the visit on 12 December 2017, the team was provided with a list of these 10 students, together with all the relevant student files.

63   However, additional evidence obtained by QAA indicates that more than 10 students studied the level 3 AVA qualification at the College and subsequently enrolled on a HND programme at the College. The evidence also indicates that the College enrolled students that had completed the level 3 AVA qualification at another provider.

64   While it is outside the scope of this investigation to determine whether the College was complicit in any fraudulent activity associated with level 3 AVA qualifications, the QAA team has concerns about the inaccuracies in the information provided by the College as part of this investigation. The information provided by the College regarding the number and identity of students admitted to the HND on the basis of level 3 AVA qualifications was incomplete and the College's responses to the team's enquiries were inconsistent.

65   On the basis of all the evidence available, the team considers that there are weaknesses in the College's admissions process which raise the risk of students with non-genuine qualifications being able to gain entry to HND programmes.

Recommendation

66   The College should:

- ensure that all qualifications upon which it places reliance in establishing applicants' eligibility for the HND, are authenticated before students are admitted to the programme.

67   Applicants are required to produce all original qualification certificates at enrolment. On examining the sample student files, the team confirmed that copies of these, marked by admissions staff as certified against the originals, are placed on student files.

68   The status of qualifications awarded by overseas institutions is checked through the UK NARIC database. However, there is no College process for verifying the authenticity of individual applicants' UK or overseas qualifications externally, with the relevant awarding body or otherwise. In this respect, the College places reliance on the original certificates, supported by applicants' statements at interview and in their personal statement.

69   The Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education* expects that recruitment, selection and admissions policies 'adhere to the principles of fair admission', are 'underpinned by appropriate organisational … processes' and 'support the selection of students who are able to complete their programme.'

70   In the case of qualifications awarded by overseas institutions, the team acknowledged that external evidence may in some circumstances be difficult to obtain or even unavailable. However, the team concludes that the absence of an effectively operated formal process for seeking verification of UK and overseas qualifications significantly increases the risk of students being admitted to the College's HND programme using fraudulent qualifications.

71   The College has stated that, following an internal audit of admissions for the most recent batch of students, it is to review the admissions process and 'intends to externally verify the transcript and references'.

72   The team reasserts the recommendation made in paragraph 66 that the College should ensure that all qualifications upon which it places reliance in establishing applicants' eligibility for the HND, are authenticated before students are admitted to the programme.

Academic entry requirements

73   Information for prospective students set out on the College website states that the College will need to review the profile of qualifications and/or experience held by applicants, considering whether their profile shows an ability to progress to a higher-level qualification. The site then lists the qualifications and experience that a successful entrant to the College's HND programme is 'likely to include'. The range of acceptable formal qualifications includes 'A-Level/(AS Level) or (GCSE)) achievement ('A' to 'E' grade) ….'. The team considers that the reference to GCSE, apparently as an alternative to A-Level, was at best confusing and at worst inconsistent with Pearson's HND entry requirements, which specify 'A GCE Advanced Level profile…. likely to be supported by GCSE grades A* to C and /or 9 to 4…' as one of the qualifications that an entry profile is 'likely to include'.

74   The lack of clarity and consistency in the College's published information on academic requirements for entry to the College's HND programme raises the risk of confusion for prospective students and College admissions staff, potentially compromising the integrity of the HND admissions process.

Recommendation

75   The College should:

- ensure that its published information sets out clearly, unambiguously, and consistently with Pearson requirements the academic entry requirements for the HND course.

76   One student file examined by the team included an application form stating that the student had a UK Level 3 qualification, however, there was no evidence of the qualification on file. The College stated that the student did not have a level 3 qualification and the reference in the application form was an 'administrative error'. However, there was no other evidence of academic qualifications or verified work experience to demonstrate the student's eligibility for the HND programme. Based on the evidence available, the team concludes that this student had not demonstrably met the College's requirements for entry to the HND.

Recommendation

77   The College should:

- ensure that all students admitted to HND programmes are demonstrably qualified to enter the programme.

English Language entry requirements

78   With respect to English language ability for entry to the HND, the College website sets out a requirement for 'all students who are non-native English speakers, or who have not studied the final two years of school in English' to provide evidence of proficiency (at a level which is specified). This requirement is inconsistent with the College's Admissions and Enrolment Policy which sets out specified English proficiency requirements for a student

whose 'first language is not English or … is not a national of a majority English-speaking country'.

79   Moreover, the website information is inconsistent with Pearson requirements with regard to the level of English proficiency required in IELTS tests. The College website sets out a requirement for proficiency equivalent to 'at least IELTS 5.5, with a minimum of 5.0 on all sections' whereas Pearson requirements state 'IELTS 5.5; Reading and Writing must be at 5.5'.

80   The inconsistencies in College published information about English language requirements for entry to the College's HND programme raise the risk of confusion for prospective students and College admissions staff, potentially compromising the integrity of the HND admissions process.

Recommendation

81   The College should:

- ensure that its published information sets out English language requirements for entry to the HND consistently and in accordance with Pearson requirements.

Admissions based on work experience

82   Approximately 11 per cent of the HND cohort comprises students admitted on the basis of work experience.

83   The College's entry requirements, as set out on its website, state that, as an alternative to formal academic qualifications, 'mature learners may present a more varied profile of achievement that is likely to include work experience'. However, the website does not provide full and complete information regarding work experience requirements. The College Admissions and Enrolment Policy gives more detail, stating that 'the College welcomes applications to level 4 from mature students who have a combination of basic study alongside at least three years' relevant work experience… such applicants will normally be at least 21 years' old'. All these provisions are consistent with Pearson HND entry requirements.

84   The team heard from senior managers and admissions staff that three years' work experience is required and that the College checks its relevance and sufficiency on the basis of an applicant's CV, personal statement and interview. No references or similar external verification are sought, reliance being placed entirely on applicants' verbal and written statements. The team found the checks in place to assess the quality and relevance of work experience to be inadequate.

85   The College has no established, documented guidelines to assist admissions staff in assessing the quality of work experience and its relevance to the HND course. The reasons supporting a decision to accept or reject an application based on work experience are not recorded on the student file.

86   The team concludes that the inadequacy of processes for verifying the sufficiency and relevance of applicants' work experience, the absence of associated, documented guidance for admissions staff, and the lack of records detailing the basis for admissions decisions relating to work experience raise the risk of inappropriate and inconsistent decision making in the College's admissions process.

87   Admissions staff told the team that applicants seeking admission to the HND on the basis of work experience are also required to complete English and Maths tests during the

application process. Students in this category whom the team met confirmed that they had taken these tests before being accepted on the course. The team was unable to determine whether these tests are designed to provide additional evidence of the appropriateness of an applicant's work experience or evidence of applicants' 'basic study', a term which is not defined in the College Admissions Policy.

Recommendation

88   The College should:

- establish, formally document and implement processes to ensure that admissions decisions based on an applicant's work experience are supported by clear guidelines and independent external verification, and that the basis for all such decisions is fully recorded.

The selection of appropriate students

89   The team examined 21 student admissions files relating to students admitted to the HND programme in 2017. Several examples of plagiarised content, inconsistencies and anomalies were found. Four applicants had submitted plagiarised CVs; two were extensively plagiarised and one was entirely plagiarised. One application included a plagiarised personal statement.

90   In a number of these cases, inconsistencies and anomalies in the completed applications were so clear and obvious as to raise reasonable suspicions about the veracity of the information provided in the relevant CVs/personal statements or elsewhere in the application documents.

91   Examples included a male applicant who described himself as 'a young and creative lady' in his personal statement; an applicant whose employment experience comprised work in a grocery store and whose CV included 'tidying clothes' and 'negotiating skills' among his key skills; an applicant whose personal statement referred to working for a named coffee shop chain while the accompanying CV referred only to a different coffee shop chain; another whose application form stated that he works as a 'delivery driver' and whose personal statement stated 'this work has taught me….dealing with youth and solving their problems is the hardest' and whose CV included 'taking care of passengers and their luggage' as one of his duties; and another whose application stated that his current employment comprised 'working in office [sic]' and 'managing an apparel store'.

92   There was no evidence on file that the veracity of the various statements had been investigated by admissions staff.

93   The significant inconsistencies, anomalies and plagiarism identified by the team in the CVs and personal statements in student files raises concerns about the College's processes for selecting appropriate and genuine students that are able to complete the programme.

Recommendation

94   The College should:

- establish and implement processes, and associated training for all staff who deal with student admissions, to ensure that the scrutiny of completed applications is sufficiently robust to enable the selection of appropriate students.

95   In summary, the team found significant weaknesses in the College's admissions practices which could, in theory, enable non-genuine and inappropriately qualified students to secure admission to its HND programme. These weaknesses include the absence of an appropriate sign-off for all students admitted with a level 3 AVA qualification, inconsistent entry criteria, the lack of verification of qualifications and work experience, and inadequate scrutiny of the veracity of statements made in student applications.

Student attendance

96   The BBC programme alleged that students were encouraged and assisted to falsify their attendance records.

97   In the programme, the 'recruitment agent' is heard to claim that he will 'fix it', through internally faked attendance records, so that the 'student', once enrolled on the College's HND, 'barely has to attend'. He is later heard to advise the 'student' to arrive for classes at 10.00 a.m., stay for two hours, then leave for the rest of the day.

98   College senior managers denied the allegation that students were encouraged and supported to falsify their attendance records.

99   Addressing this allegation in its wider management context, the team examined the effectiveness of the College's policy and processes for monitoring and recording student attendance. The team found weaknesses in the College's system for recording and monitoring attendance which would, in theory, enable the alleged practice to take place.

The College's management of student attendance monitoring and recording

100   The College Attendance Policy sets out the expectation that students attend classes at all times and maintain a 95 per cent level of attendance. The College stated that the 95 per cent level of attendance is 'not a requirement but an expectation that the College would like its student [sic] to commit'. However, the policy also states that 'The College reserves the right to cancel the registration of students who have not met the minimum 95 per cent attendance requirements'.

101   It was clear from meetings that, in practice, the College minimum attendance requirement is universally understood by teaching staff and students to be 80 per cent. While this may well constitute a minimum requirement for other purposes, such as entitlement to student loan payments, this figure is inconsistent with the formally documented College requirement. Further inconsistency is found in the HND programme handbook, which sets out an 85 per cent attendance requirement.

102   Under the policy, students who arrive up to ten minutes late due to a valid reason are permitted to remain and are counted as present. Students who arrive after the first ten minutes are not allowed to remain but may join the class after the timetabled break, and their attendance will be counted for the second part of the session.

103   Students said that they are marked absent if they arrive more than ten minutes late. Tutors said that students can 'join the class' (expressed with the clear implication that these students are allowed to remain in the class) even if they have been marked as 'absent' because they are late. This tutor practice is not in line with the College policy.

104   Moreover, information provided to students at induction is inconsistent with the College policy, stating that students arriving up to 30 minutes late are allowed to remain and are marked present; those arriving later may only attend the second session of the class, after the break, for which they are marked present.

105   The College stated that the 'ten minutes policy' is for the Open University (level 6) programmes and not the HND programmes 'for which the policy stipulates 30 minutes'. However, the formally documented attendance policy makes no mention of a 30 minute policy, and the HND students met by the team clearly believed that a ten minute policy applied.

106   The attendance policy requires students to register their presence in the class by 'marking the attendance registers'. However, students are not required to 'mark the registers' at any stage.

107   Student attendance at classes is recorded manually on paper registers completed by class tutors after the first ten minutes of each morning and afternoon session. The tutor calls out names from the register and enters a 'Y' (present) or 'A' (absent) as appropriate against each name, as students respond by calling out and/or raising their hand.

108   The tutor-completed registers provide the only class-level record of student attendance. The team reached the conclusion that this is not an effective method for recording student attendance at the large HND classes, which typically comprise between 40 and 65 students, and in one case identified by the team, comprised over 100 students, where not all students would necessarily be personally known to the tutor. While, according to tutors, headcounts are made after the morning and afternoon mid-session breaks, no further registers are taken at this point, raising the risk that students initially marked as present could later leave without this being recorded on the attendance register.

109   During its visit to the College on 12 December 2017 the team examined a sample of completed class attendance registers. The team found that, while some of the attendance coding ('Y' for presence, and 'A' for absence) was correctly used, there were unexplained ticks (not part of the coding system set out on the register sheet) against a significant number of student names, on registers marked with 'Y' against other student names.

110   With respect to the rigour of attendance recording as required by the formal documentation, the College Attendance Policy requires only the 'marking' of registers by students, rather than explicit sign-in, sign-out by students. Even if the policy were fully and correctly implemented in this respect, it would not ensure the effective monitoring and recording of student attendance at class level.

111   Sample completed student attendance registers for 23 HND sessions for the week commencing 30 October 2017, examined by the team during the visit on 12 December, indicated student attendance levels ranging between 90 per cent to 75 per cent, and typically around 85 per cent to 90 per cent. During subsequent visits, the team examined completed attendance registers for HND classes held in early November 2017, before the BBC Panorama broadcast on 13 November. These showed falling attendance levels, typically in the 50-65 per cent range, and for three classes attendance was recorded below 25 per cent. During its (unannounced) visit to the College on 22 February 2018, the team examined the timetable and completed attendance registers for all the five HND classes scheduled for that morning. These registers recorded, as at 11.00 a.m. (one hour after the start of the sessions), very poor levels of student attendance, ranging between 7 and 26 per cent, with an overall attendance level of only 17 per cent across the five HND groups.

112   In the light of its finding of weaknesses in the College's attendance monitoring policy and procedures, the team recognised that the available attendance records should be treated with a high degree of caution. However, on 22 February senior staff, acknowledging by implication that the morning's registers were accurate, stated that students had stopped attending because they were concerned about the College's future.

113   The same registers, together with a larger sample of completed registers covering the current term, also examined by the team on 22 February 2018, showed in a number of cases that the same tutor had signed for more than one class running at the same time. This appeared to indicate that classes had been merged (a circumstance that could impact adversely on the quality of the student experience), though a senior manager told the team that this would only occur in an emergency situation. Very few of the completed registers examined by the team had been signed or initialled by the tutor. For example, from a class batch of 107 registers (March to November 2017), only 23 were signed and from another batch of 52 registers (January to May 2017), none were signed.

114   The Quality Code, *Chapter B4: Enabling Student Development and Achievement* expects that higher education providers have in place '…arrangements…which enable students to develop their academic …. potential' and that, as an indicator of sound practice, 'policies, practices and systems facilitate successful…. academic progression'.

115   The team concludes that neither the system currently being operated, nor the requirements set out in the College policy are appropriate in ensuring reliable and auditable attendance monitoring at class level, raising a risk that any students in need of support remain unidentified. Further, the policies and systems currently in place are insufficiently robust to provide any additional checks on the effectiveness of the College's admissions processes in screening out any non-genuine applicants, in support only of students who are able and intend to complete the programme, in line with the Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education*.

Recommendation

116   The College should:

* establish, document and implement secure and reliable processes for recording and monitoring attendance to ensure that any students in need of support and any non-genuine students are identified.

117   Completed class registers are passed to the Operations Manager, who enters individual student data by module, session, and programme in the central attendance database. Although not incorporated into its formal terms of reference, the Attendance Committee, in practice, receives periodic overview reports from the Operations Manager. The team heard from senior staff that responsibility for maintaining the central record lies with a single individual, the Operations Manager, who has exclusive access to the database via a password known only to her. The team found that this raises the risk of records not being effectively maintained should the Operations Manager be unavailable for any reason. Acknowledging this issue, senior managers said that a process to appoint a 'back-up' administrator is underway.

Recommendation

118   The College should:

* expedite the appointment and training of a second administrator to ensure continuous central attendance recording and the prompt identification of students in need of support or any non-genuine students, should the Operations Manager be unavailable.

Academic misconduct

119   The BBC Panorama programme alleged that students were encouraged and supported to have assignments written by others and then submit the work as their own.

120   In the programme, the 'recruitment agent' is heard telling the 'student' that assignments could be sent to his agent in Pakistan 'for his people to do'.

121   College senior managers denied the allegation that students were encouraged and supported to have assignments written by others and then submit the work as their own.

122   The team addressed this allegation in its wider management context, examining the College's mechanisms for minimising the risk of academic misconduct and identifying instances of academic misconduct, and their effectiveness in practice

123   The College has a clear and detailed Academic Misconduct Policy which sets out definitions, procedures and penalties and is published on the College website.

124   In meetings, senior staff, tutors and students provided consistent accounts of the various elements of the College's approach to minimising and identifying academic misconduct: clear information to students on the scope of 'academic misconduct' and how to avoid it; the requirement that students confirm by signature on each piece of work that the work is their own; individual oral presentations required for many unit assessments; use of plagiarism prevention software by students for the first draft of their assignments; assignments submitted and checked through plagiarism-detection software (no hard copies accepted since June 2017); and individual learning plans and progress reviews (ILPs) to track student performance, allowing any 'anomalous' performance to be identified. Some of the available documentary evidence, including student handbooks, external reviewer reports, oral presentation reports and ILPs supported these accounts.

125   The College stated that, as a result of its 'robust approach' to assessment, there have been no instances of academic misconduct over the past three years.

126   However, nine out of 27 assignments reviewed by the team were found to have substantial amounts of plagiarised content. Recorded plagiarism-detection software scores (not shown on all assignments) appeared to be inaccurate, frequently showing the extent of plagiarised work as being substantially lower than the team's examination found; one high score, recorded at 39 per cent had not been followed up by staff; and staff had not identified obvious inconsistencies of written expression and style in the assignments submitted by one particular student.

127   The team concludes that mechanisms for identifying and responding to plagiarism in student assignments are not implemented effectively, raising the risk of unfairness and unreliability in assessment processes.

Recommendation

128   The College should:

- ensure that mechanisms for identifying and responding to plagiarism in student assignments are robust and implemented effectively.

Recruitment of teaching staff

129   In the light of its finding that the College had not followed its documented policy and processes when appointing the Head of Operations to his previous and current posts (paragraphs 46-49), the team examined the operation of the College's processes for the appointment of teaching staff for the HND programmes.

130   As noted above, the College Staff Recruitment Policy requires all candidates to be interviewed and comments or notes recorded on an Interview Assessment Form, at least two

written references to be obtained (or where verbal, to be recorded), relevant certificates to be provided and copies marked 'original seen' and placed on the staff file, and an offer of employment to be made in writing.

131   On reviewing the files of the three most recently appointed HND tutors, who were engaged by the College in January 2014, September 2016 and September 2017, respectively, the team found that none of these files provided evidence that the recruitment process fully complied with College requirements.

132   One file contained third party evidence of recent teaching experience, and another contained two testimonials written four years previously specifically to confirm the candidate's suitability for doctoral study, one of which referred to the candidate's teaching ability. None of the files had any record of references being obtained specifically for the purposes of the proposed employment with the College or from the referees named by the applicants.

133   In one file, none of the copy qualifications certificates was certified as a true copy of the original by College staff. In another, the certification stamp was dated but signed only with a first name. In the third, the certification stamp was neither signed nor dated.

134   One file contained a copy 'Approval sheet' bearing the name of a University in Pakistan (but no logo, crest or official stamp), together with supervisor and examiner signatures, and recording the approval of an MPhil thesis 'presented by' named person X (the applicant to the College post) and 'written by' named person Y. No enquiry into, or explanation of, this apparent discrepancy was recorded on the file, nor was there any indication that the College had confirmed the ultimate MPhil award. The 'Approval sheet', which recorded the approval of the thesis 'in partial fulfilment' of the MPhil, was accompanied by a copy transcript recording results against an unfamiliar (to the UK/European reader) credit framework. There was no copy award certificate or other evidence of the award. None of this copy documentation was certified as a true copy of the original.

135   None of the files contained interview records or a copy of the offer of employment.

136   The team concludes, from the cases it examined, that the College teaching staff appointment process did not operate in accordance with formally documented College policy, and that, therefore, the College could not assure itself that everyone involved in teaching on its HND programme is appropriately qualified, in accordance with the UK Quality Code for Higher Education (Quality Code): *Chapter B3: Learning and Teaching*.

137   The team reasserts the recommendation made in paragraph 51 that the College should ensure that its policy and processes for the appointment of staff at all levels is understood by all relevant staff, and fully and consistently implemented.

Conclusion

138   On the basis of its analysis of documents and its meetings with students, staff and senior managers at the College, the team identified significant weaknesses in the College's recruitment, admissions, attendance monitoring and assessment processes which could enable the alleged practices referred to in the BBC *Panorama* programme to take place. Concerns about the College's management of a number of areas relating to the allegations were therefore found to be justified.

139   The College requires improvement to meet the expectations of five sections of the UK Quality Code for Higher Education (Quality Code): *Chapter B2: Recruitment, Selection and Admission to Higher Education*; *Chapter B3: Learning and Teaching*; *Chapter B4: Enabling Student Development and Achievement*; Chapter B6 Assessment of Students; and Part C: Information about Higher Education Provision.

Student recruitment and admission

- weaknesses in the College's security arrangements raise the risk of prospective students being exposed to the activities of unauthorised recruitment agents on College premises (Quality Code, *Chapter B2*)
- the significant degree of confusion within the senior management team as to senior executive responsibility for student recruitment and admissions raises a risk of ineffective institutional oversight (Quality Code, *Chapter B2*)
- the College did not follow its documented policy and processes when appointing the current Head of Operations, apparently responsible for student admissions and recruitment, to his previous and current posts (Quality Code, *Chapter B2*)
- the student admissions policy, process and current practice do not ensure that all student admissions decisions are fully considered and signed-off at an appropriately senior academic level, raising the risk of students being accepted on the basis of fraudulent qualifications (Quality Code, *Chapter B2*)
- there are weaknesses in the College's admissions process which enabled a student with a fake entry qualification to gain admission to the HND programme at the College (Quality Code, *Chapter B2*)
- the absence of an effectively operated formal process for seeking external verification of applicants' UK and overseas qualifications significantly increases the risk of students being admitted to the College's HND programme on the basis of fraudulent qualifications (Quality Code, *Chapter B2*)
- lack of clarity and consistency in the College's published information on academic requirements for entry to the College's HND programme raises the risk of confusion for prospective students and College admissions staff, potentially compromising the integrity of the HND admissions process (Quality Code, *Chapter B2*, *Part C*)
- there are weaknesses in the College's admissions processes which enabled a student that had not demonstrably met the College's academic requirements to gain entry to the HND programme (Quality Code, *Chapter B2*)
- inconsistencies in College published information about English language requirements for entry to the College's HND programme raise the risk of confusion for prospective students and College admissions staff, potentially compromising the integrity of the HND admissions process (Quality Code, *Chapter B2*, *Part C*)
- inadequacy of processes for verifying the sufficiency and relevance of applicants' work experience, the absence of associated, documented guidance for admissions staff, and the lack of records detailing the basis for admissions decisions relating to work experience raise the risk of inappropriate and inconsistent decision making in the College's admissions process (Quality Code, *Chapter B2*)

- The significant inconsistencies, anomalies and plagiarism identified by the team in the CVs and personal statements in student files raises concerns about the College's processes for selecting appropriate and genuine students that are able to complete the programme (Quality Code, *Chapter B2*).

Student attendance

- neither the College policy nor the system currently in operation are appropriate in ensuring reliable and auditable attendance monitoring at class level, raising a risk that any students in need of support remain unidentified (Quality Code, *Chapter B4*)
- policies and systems currently in place are insufficiently robust to provide any additional checks on the effectiveness of admissions processes in screening out non-genuine applicants, in support only of students who are able and intend to complete their programme (Quality Code, *Chapters B2* and *B4*)
- exclusive access to the central attendance database by a single administrator raises the risk of records not being effectively maintained in the event of that individual's unavailability (Quality Code, *Chapters B2* and *B4*)
- weaknesses in the College's system for recording and monitoring attendance would, in theory, enable the alleged falsification of attendance to take place (Quality Code, *Chapters B2* and *B4*).

Academic misconduct

- mechanisms for identifying and responding to plagiarism in student assignments are not implemented effectively, raising the risk of unfairness and unreliability in assessment processes (Quality Code, *Chapter B6*).

Recruitment of teaching staff

- the teaching staff appointment process did not operate in accordance with College policy and, therefore, the College could not assure itself that everyone involved in teaching on its HND programme is appropriately qualified (Quality Code, *Chapter B3*).

Recommendations

The team makes the following recommendations for improvement. The College should:

- formalise, document and implement clear and comprehensive security arrangements to ensure that any risk of prospective students being exposed to the activities of unauthorised recruitment agents on College premises is eliminated or minimised. (Quality Code, *Chapter B2*) (paragraph 35)
- review, clarify and formally document senior executive responsibility for marketing and student recruitment and admissions, to provide for appropriate and effective institutional management. (Quality Code, *Chapter B2*) (paragraph 43)
- ensure that its policy and processes for the appointment of staff at all levels is understood by all relevant staff, and fully and consistently implemented (Quality Code, *Chapters B2* and *B3*) (paragraphs 49 and 138)
- establish, document, publish and implement a revised student admissions and enrolment policy and process to ensure that all proposed admissions decisions are fully considered, approved and signed-off at an appropriately senior academic level (Quality Code, *Chapter B2*) (paragraph 57)

- ensure that all qualifications upon which it places reliance in establishing applicants' eligibility for the HND, are authenticated before students are admitted to the programme (*Quality Code, Chapter B2*) (paragraphs 66 and 72)
- ensure that its published information sets out clearly, unambiguously, and consistently with Pearson requirements the academic entry requirements for the HND course (Quality Code, *Chapter B2*, *Part C* (paragraph 75)
- ensure that all students admitted to HND programmes are demonstrably qualified to enter the programme. (*Quality Code, Chapter B2*) (paragraph 77)
- ensure that its published information sets out English language requirements for entry to the HND consistently and accordance with Pearson requirements (Quality Code, *Chapter B2*, *Part C* (paragraph 81)
- establish, formally document and implement processes to ensure that admissions decisions based on an applicant's work experience are supported by clear guidelines and independent external verification, and that the basis for all such decisions is fully recorded (Quality Code, *Chapter B2*) (paragraph 88)
- establish and implement processes, and associated training for all staff who deal with student admissions, to ensure that the scrutiny of completed applications is sufficiently robust to enable the selection of appropriate students. (Quality Code, *Chapter B2*) (paragraph 94)
- establish, document and implement secure and reliable processes for recording and monitoring attendance to ensure that any students in need of support and any non-genuine students are identified (Quality Code, *Chapters B2* and *B4*) (paragraph 116)
- expedite the appointment and training of a second administrator to ensure continuous central attendance recording and the prompt identification of students in need of support or any non-genuine students, should the Operations Manager be unavailable (Quality Code, *Chapters B2* and *B4*) (paragraph 118)
- ensure that mechanisms for identifying and responding to plagiarism in student assignments are robust and implemented effectively (Quality Code, *Chapter B6*) (paragraph 128).