



Concerns about standards and quality in higher education

East End Computing and Business College Ltd,
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Introduction

1 This is a report of a full investigation of East End Computing and Business College arising from concerns raised by the Student Loan Company and by the Department for Education to the Quality Assurance Agency for Higher Education's (QAA) [Concerns Scheme](#).¹

2 East End Computing and Business College Ltd (the College) offers HNDs in Business and Health and Social Care; the awarding organisation for these programmes is Pearson. In 2016-17 the College had 359 students studying on its programmes.

Concerns raised

3 The Department for Education referred a concern identified by the Student Loans Company to QAA's Concerns Scheme, which investigates concerns about standards, quality and information that higher education providers produce. The concern related to suspected academic malpractice by students enrolled on higher national diplomas (HNDs) at the College. The team addressed the concern in its management context, considering whether:

- procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice
- recruitment processes are effective in ensuring that students have the appropriate level of English language for the programme they are enrolled on.

The investigation process

4 QAA initiated a full investigation, including analysis of documentary evidence and a visit to the College on 13 December 2017. The College cooperated with the investigation. The QAA concerns team (the team) comprised Dr Stephen Ryrie (investigation coordinator and reviewer) and Professor Diane Meehan (reviewer).

5 The team considered documentary evidence provided by the College including College policies, minutes of committee meetings, records of student admission processes, programme handbooks, materials relating to student assessment, external examiners' reports, internal monitoring reports and marketing materials. In the course of the visit the team held meetings with senior staff of the College, with students and with teaching staff.

6 The team addressed the allegations by considering aspects of the College's arrangements, specifically those for:

- preventing, identifying, investigating and responding to unacceptable academic malpractice
- assuring itself that its processes for identifying plagiarism are effective
- ensuring during the recruitment process that students have the requisite level of English for the programme they have applied for
- addressing any disparities between the standard of a student's written work and spoken English
- taking action in respect of any recent cases of academic malpractice.

¹ QAA Concerns Scheme: www.qaa.ac.uk/concerns/concerns-about-providers

Result of the investigation

7 The concerns were found to be justified. In undertaking the investigation, the concerns team made a number of recommendations.

Explanation of findings

Arrangements for preventing, identifying, investigating and responding to unacceptable academic malpractice

8 The College has in place policies and procedures designed to prevent, identify, investigate and respond to unacceptable academic malpractice, including its Academic Malpractice Policy which came into operation in 2015. The policy sets out the College's procedures for handling plagiarism and academic malpractice and applies to both staff and students; the policy is accessible on the College's VLE. A range of possible penalties for proven cases of academic malpractice is included in the policy. The policy makes reference to, and aligns with, Pearson's Centre Guidance for dealing with malpractice.

9 The College's Teaching and Learning Strategy sets out its aim that 'assessments are designed in such a way that reduces the possibilities of plagiarism' and academic staff who met the team gave examples of the use of different forms of assessment that support this aim. Training is offered to academic staff in relation to assessment practice, including the detection of academic malpractice.

10 The College's Quality Handbook draws together the policies, processes and codes of practice that constitute its quality monitoring and enhancement framework; the Quality Assurance Handbook contains a section on the College's approach to dealing with academic dishonesty.

11 The College's Attendance and Punctuality Policy is set out in its Student Handbook. The College records and monitors student attendance and unsatisfactory attendance, defined in the policy as that which falls below 85 per cent or where a student is absent for two consecutive weeks, is followed up. The most recent Pearson Annual Management Review (AMR) Report 2016-17 commented positively on the process but noted that the minimum attendance requirement is 80 per cent, with follow up by the Administrative Manager taking place if attendance falls below 60 per cent.

12 Students stated that that they are made aware during induction of the need to avoid plagiarism and to ensure that they correctly reference source material, and that academic tutors remind them regularly during classes. Students also confirmed that they have access to the Academic Malpractice Policy on the College's VLE. Assignment briefs include a statement on plagiarism/collusion and/or the need to reference material appropriately, and the College's Student Handbook contains a section on plagiarism and academic malpractice. Students submit their assignments electronically, which staff noted confirms the work as their own.

13 Students can present part, or all, of their draft assignments for informal, formative, feedback from their academic tutors prior to final submission, and staff commented that this process helps to verify that a student's work is authentic at the time of final submission. Students submit their assignments through plagiarism-detection software and training is provided in its use for both staff and students. Students confirmed that they can re-submit their work as often as they wish prior to the submission deadline and, where relevant, can reduce a high similarity index; academic staff noted that the plagiarism-detection software takes longer to respond on successive uploads and that this constrains the number of resubmission attempts, although the College sets no limit on the number of

such attempts. However, the team also noted comments in the 2017 external examiner's report for Business regarding the long period between issue and final submission for one assignment which ran from 26 September 2016 (issue date) to 4 January 2017 (submission date). The College allows a maximum similarity index of 27 per cent, although the College also states in its Quality Assurance Handbook that, 'there is no percentage of similarity to decide conclusively whether a work is plagiarised or not'. The absence of a limit on the number of submissions of a piece of work to the plagiarism-detection software indicates that the College does not operate assessment processes that reliably prevent unacceptable academic practice and gives rise to the recommendation at paragraph 17.

14 Student assignments are marked by academic assessors and are internally verified. The Quality Handbook notes that 'the final decision on plagiarism is given by the assessor on the basis of quality of work and proper referencing'; assessors are expected to flag cases of academic malpractice to the Assessment Coordinator. The team heard in meetings that initially the Assessment Coordinator checks student work with respect to the similarity index, and assessors do not mark work that shows a similarity index greater than 27 per cent. Students confirmed that if the similarity index is high following submission of their assignment, the work is returned to them and they are asked to re-submit. Academic staff noted that the process for dealing with malpractice had been made more formal and 'auditable'.

15 Senior staff stated in a meeting with the team that where an assignment still shows a high similarity index on second submission the issue is referred to the assessment board, which would recommend that the student be referred, and the final grade be capped at a 'pass' mark. Nevertheless, the team could find no discussion of plagiarism in assessment board minutes. However, the College's Academic Malpractice Policy states that the Assessment Coordinator investigates and reports any suspected cases of academic malpractice to the Principal and that a panel is convened to interview the student and investigate the case; the policy also states that a failure by the College to investigate allegations of suspected Academic Malpractice in accordance with its requirements also constitutes malpractice. The team was informed of only one recent case of academic malpractice where the formal route for investigation had been used. The failure to use its Academic Malpractice Policy consistently indicates that the College does not operate an effective policy for ensuring the standard for the award of credit and gives rise to the recommendation at paragraph 18.

16 Students confirmed that they had not been approached by individuals or companies offering to write their assignments and that they had no knowledge of such enterprises.

Recommendations

17 In order to ensure that assessment processes are valid and reliable, the College should impose a limit on the number of submissions for each assignment that a student may make through plagiarism-detection software.

18 The College should ensure that all instances of suspected academic malpractice are formally managed according to the College's Academic Malpractice Policy.

Arrangements for assuring itself that its processes for identifying plagiarism are effective

19 The College's Academic Malpractice Policy is reviewed annually through its Quality and Academic Standards Committee (QASC), the last review having taken place in August 2017. Staff receive relevant training on assessment practices, academic malpractice and the use of plagiarism-detection software, and senior staff informed the team that standardisation

meetings are also used to discuss academic malpractice. In its response to the concerns raised, the College noted its reliance on the use of plagiarism-detection software to assure itself that it is effective in identifying and dealing with cases of plagiarism. Senior staff pointed to the small number of cases of academic malpractice as evidence that its processes are effective. The number of students who are awarded referrals is a key concern to the College and academic staff also cited it as evidence that standards are being maintained.

20 External examiners are responsible for ensuring that the College is operating in accordance with Pearson's requirements. The external examiner's reports for Business in 2016 and 2017 note the College's effective use of plagiarism-detection software and while generally positive in relation to the maintenance of standards and the quality of the student learning experience, also note issues in relation to the accuracy of some assessment decisions/outcomes and the long length of time allowed for submission of an assignment. The external examiner's reports for Health and Social Care in 2016 and 2017 were positive overall in relation to the maintenance of standards and the quality of the student learning experience.

21 The College's annual monitoring processes includes the production, to a standard template, of an annual programme monitoring report (APMR) for each programme. These reports comment on various aspects of the delivery of the programmes including learning, teaching and assessment, include discussion on feedback from external examiners and students, and identify strengths and weaknesses; an action plan is included in the report. No mention is made of academic malpractice in either of the 2016-17 reports for the HND programmes including, for example, in relation to the number of assignment resubmissions as a result of detection of a high similarity index.

22 In discussion with the team, senior staff commented that in relation to academic malpractice the College follows Pearson Centre Guidance, and that any cases of suspected malpractice are reported to Pearson. In addition, senior staff noted that the Assessment Coordinator can track repeat offenders and reports internally at weekly meetings on academic malpractice cases. However, the College presented no evidence of these discussions nor of any College-level oversight of the effectiveness of its approach to identifying and addressing academic malpractice/plagiarism. These shortcomings indicate that the College does not operate assessment processes which reliably prevent unacceptable academic practice and fails to enable itself to evaluate and enhance its assessment policies systematically. These shortcomings give rise to the recommendation at paragraph 23.

Recommendation

23 The College should take steps to ensure College-level oversight of the effectiveness of the application of its Academic Malpractice Policy.

Arrangements for ensuring during the recruitment process that students have the requisite level of English for the course they have applied for

24 The College's admissions criteria and admissions process are set out in its Admissions Policy and Selection Procedures, first adopted in 2013, and are also clearly set out on the College's website. The stated admissions criteria meet the requirements of the College's awarding organisation, Pearson. The Admissions Policy is reviewed annually through the College's Quality and Academic Standards Committee (QASC). The policy takes account of the College's strategic plan and relevant external reference points and sets out the College's aim to 'ensure that the learners are recruited and admitted on different programmes based on their academic potential to complete the course/programme'.

Students confirmed that the information they had received about their courses, including the College's admission requirements, was clear and accurate.

25 The College also utilises a number of recruitment agents; currently, the College has seven active agents, its list of agents having been refreshed in the past two years. In meetings with the team, senior staff commented that the College has had some issues with agents in the past and now takes a more formal approach to their use which includes issuing contracts and providing agents with an induction. For the September 2017 intake, 134 students were recruited through agents. Students who met with the team confirmed that they had been recruited directly by the College rather than through an agent.

26 The College's stated admissions criteria include Pearson's English Language entry requirements, that is that all students who are non-native English speakers and who have not undertaken their final two years of schooling in English, must demonstrate capability in English at a standard equivalent to the Common European Framework of Reference (CEFR) level B2, Pearson Test of English (PTE) Academic 51 or International English Language Testing Scheme (IELTS) 5.5 (with Reading and Writing at 5.5). Until the academic year 2017-18 applicants were initially interviewed by the administrative team, which checked an applicant's documentation and their motivation for applying to the College, as well as spoken English capability. This was then followed by an in-house English language test. In the report of its Annual Management Review (AMR) in February 2017, Pearson commented that the recruitment process appeared to be detailed but recommended that the process should include an interview with a senior member of academic staff and hence commencing with the 2017-18 intake, the initial interview with the administrative team has been followed by an interview with the relevant programme leader or Principal of the College. The academic member of staff assesses the candidate's overall ability to complete the course and completes a standard interview template which includes the recommendation of whether to accept or reject the applicant; the final decision is made by the Principal. In addition, applicants without evidence of the required level of English language proficiency are rejected and the in-house test is no longer utilised. All staff involved in admissions and interview processes undergo training.

27 Staff and students confirmed that ongoing support for English and academic writing skills is made available to students through their tutorial sessions.

28 Not all students who met the team were able to interact with fluency and spontaneity in spoken English. The team also considered a sample of 21 student files which contained admissions-related information including evidence of academic and English language qualifications/levels, a record of the interview and, in some cases, the outcome of the in-house test and a written personal statement, together with samples of the students' assignments. These files showed evidence that some students did not appear to meet the required standards on entry. For example, two students had presented evidence of achieving a level 1 English Language qualification and in one of these instances the interviewer recorded that the student's English was 'basic'; there was also no evidence that these students had taken the College's in-house test even though this would have been in operation at the time. The evidence of a low level of competence in written English in one of the students' files was also at odds with the fluent and precise English present in the student's written assignments. In another sample the student's written test failed to show the clear and detailed text expected at the CEFR B2 reference level, while a significantly higher level of English was evident in the student's written assignments. The failure to consistently apply its requirements in respect of English language competence indicates that the College does not operate reliable procedures for the selection of students and gives rise to the recommendation at paragraph 30.

29 The APMR for Business for 2016-17 states that for this academic year (2017-18), senior management has taken the following decision 'to make sure student recruitment is robust and meets awarding body expectations', namely that all students admitted meet the following requirements: 'English language level - Minimum B2; Considerable previous knowledge in Business subjects/discipline; Eligible for Finance'. The APMR states that the required action is for the Admissions Department to monitor English language and qualifications at level 3 or equivalent professional experience more closely. The APMR also records under the list of weaknesses that 'Language, Education and other background matters faced by students would be causes for concern'. In a meeting with the team, senior staff acknowledged that the College needs to be more rigorous in English testing before admission and that some students had been admitted with inadequate English because admissions decisions were previously taken by 'marketing staff'. Senior staff also commented that the changes made to the interview and admissions process would address this issue. Academic staff noted the variable ability of students in relation to English Language but commented that they had seen an improvement in this year's intake.

Recommendation

30 The College should consistently apply its requirements in respect of English language competence as stated in the College's Admissions Policy and Selection Procedures.

Arrangements for addressing any disparities between the standard of a student's written work and spoken English

31 In its response to the concerns the College noted that the assessor will flag such disparities and that the College's emphasis on formative feedback allows the assessor to identify whether the work is authentic or not during the summative stage. The College also noted that if such a disparity is detected, the student is interviewed by the assessor to find out whether he/she can answer the assignment questions verbally, and if the student fails to answer these questions satisfactorily the case is dealt with according to the College's Academic Malpractice Policy. In a meeting with the team academic staff confirmed that if such a situation occurred they would first discuss the issue with the student but would issue an informal warning and allow the student to resubmit the work. This apparent informality of approach contributes to the recommendation in paragraph 19. The team also noted, as described in paragraph 29, evidence of disparities between some students' ability in written English language on admission and that demonstrated in their assignments.

Have there been any recent cases of academic malpractice and what action was taken to address this?

32 In its response to the concerns the College noted that there has been only one recent case of academic malpractice, which occurred in the academic year 2016-17. The College provided evidence that this case had been dealt with formally in accordance with its Academic Malpractice Policy. However, as discussed in paragraphs 15 and 20, other cases of academic malpractice have been dealt with only informally.

Conclusion

33 Concerns about the College's processes for managing academic malpractice and the recruitment of students were found to be justified. However, the team was unable to find evidence to uphold the specific allegation that students identified by the Student Loans Company had engaged in academic malpractice.

34 The concern relating to whether procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice, is upheld. The College does not consistently apply its own processes for responding to allegations of malpractice. This has led to the recommendations that the College should impose a limit on the number of submissions for each assignment that a student may make through plagiarism-detection software, that it should ensure that all instances of suspected academic malpractice are formally managed according to the College's Academic Malpractice Policy, and that it should take steps to ensure College-level oversight of the effectiveness of the application of its Academic Malpractice Policy. The shortcomings that give rise to these recommendations mean that the College's provision fails to meet Expectation B6 of the UK Quality Code for Higher Education.

35 The concern relating to the effectiveness of recruitment processes in ensuring that students have the appropriate level of English Language for the programme they are enrolled on, is upheld. The College has admitted students whose level of English is not consistent with its admissions requirements. This has led to the recommendation that the College consistently applies its requirements in respect of English language competence as stated in the College's Admissions Policy and Selection Procedures, and means that the College's provision fails to meet Expectation B2 of the Quality Code.

36 In light of the conclusions of the report, the College is required to provide an action plan to QAA within four weeks of publication setting out how it will address the findings from this investigation.

Recommendations

37 The College should:

- in order to ensure that assessment processes are valid and reliable, impose a limit on the number of submissions for each assignment that a student may make through plagiarism-detection software (paragraph 13)
- ensure that all instances of suspected academic malpractice are formally managed according to the College's Academic Malpractice Policy (paragraph 15)
- take steps to ensure College-level oversight of the effectiveness of the application of its Academic Malpractice Policy (paragraph 22)
- consistently apply its requirements in respect of English language competence as stated in the College's Admissions Policy and Selection Procedures (paragraph 28).

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