

Specific Course Designation: report of the monitoring visit and concerns investigation of Inter-Ed UK t/a The City College, December 2017

1 Background to the visit

1 This is a report of an extended monitoring visit to Inter-Ed UK t/a The City College (the College) on 11 to 12 December 2017. The annual monitoring visit serves as a check on the provider's continuing management of academic standards and quality of provision in relation to recommendations, and subsequent internal actions, arising from the October 2015 [Higher Education Review \(Alternative Providers\)](#). In line with the approach described in QAA's published process on [referring concerns to reviews](#), the monitoring visit was extended to incorporate a concerns investigation.

2 The Department for Education had referred a concern identified by the Student Loans Company to QAA's Concerns Scheme, which investigates concerns about standards, quality and the information that higher education providers produce. The concern was that Higher National Diploma (HND) students may be engaged in academic malpractice. The review 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 on which they are enrolled.

3 The College submitted an annual return with supporting evidence for the monitoring visit and cooperated with the investigation of the concern, both in providing additional documentary evidence and in facilitating the extended annual monitoring visit to enable the review team to meet students, teaching staff and senior managers.

4 The extended monitoring visit was carried out by QAA reviewers, Stephen Harris and Mark Davies, and QAA Review Coordinator, Brenda Hodgkinson.

2 Outcome of the visit

5 From the evidence provided, the review team considers that the College is generally making progress against the actions identified from the previous review, with the exception of one affirmation where the team identified shortcomings in the annual monitoring process and significant delays in the implementation and completion of periodic review. Through the Concerns investigation, the team identified weaknesses in the College's processes for managing academic malpractice and the recruitment of students. Issues identified by the team through the annual monitoring process, together with those identified through the Concerns investigation, have the potential to put academic standards and quality at risk and demonstrate insufficient engagement with relevant external reference points, notably the UK Quality Code for Higher Education (the Quality Code), *Chapter B2: Recruitment, Selection and Admission to Higher Education* and *Chapter B6: Assessment of Students and the Recognition of Prior Learning*.

6 The review team concludes that the College is making progress but further improvement is required with continuing to monitor, evaluate and enhance its higher education provision from the October 2016 monitoring visit.

3 Changes since the last QAA monitoring visit

7 There are currently 322 students enrolled on Pearson HND programmes in Business, Health and Social Care, Hospitality Management, and Travel and Tourism. There are 16 students registered on the Licentiate in Acupuncture.

8 Since the last monitoring visit, the Principal retired. A new Principal was appointed and took up position in April 2017. In addition, a new Head of the Health and Social Care Department has been appointed, who is now also the College lead internal verifier, as this role had previously been undertaken by the former Principal.

4 Findings from the monitoring visit

9 The College is making progress with the good practice and recommendations of the 2015 review. Pastoral care and academic support at the College continue to be helpful, with students reporting an open-door policy and valuable academic reviews. Students are involved in committee meetings, and procedures for ascertaining student feedback work well. The Complaints Policy remains untested but other review mechanisms identify issues to be addressed from student meetings and feedback. A review of College handbooks has been completed and there is increased use of the intranet and virtual learning environment (VLE). The College continues to engage with employers. Although the College complies with Pearson monitoring requirements, because of a complicated deliberative reporting structure, it is unclear how internal procedures for annual monitoring are strategically and systematically actioned. A periodic review of programmes was significantly delayed, and has yet to be completed and considered at management level.

10 The College continues to deliver a good level of pastoral care to all its students, through the implementation of clear pastoral care and student engagement policies. Students met by the review team confirmed that staff have an open-door policy and can be contacted by email or through the College intranet. The Welfare Officer assists students with miscellaneous student pastoral issues. The Staff Student Liaison Committee is scheduled to meet once a year, or as required. Senior staff reported that this formal scheduling is sufficient, as the College is small and staff are readily available. Students find the 'suggestion box' particularly useful, as it allows for ideas to be put forward confidentially. Additionally, as part of its 2016-17 action plan, the College has improved its system of student academic reviews. These now take place more regularly and are a valuable source of feedback both for students to assess their academic progress and for the College to obtain feedback from students on their experience.

11 Students continue to attend College committee meetings. Student feedback is collected using online questionnaires. Both staff and students outlined effective procedures used to ensure a high level of return.

12 In relation to the first review recommendation, the Complaints Policy has been revised and effectively communicated to students and staff. As no formal complaints have been made, it has not been possible to test the effectiveness of the revised policy. Senior staff reported that any issues raised by students have been addressed through one-to-one meetings between staff and students and the College open-door approach, without needing recourse to the formal complaints process. Senior staff are clear as to the distinction between complaints and academic appeals. There have been two academic

appeals since the last monitoring visit and these have been dealt with at an early stage in the procedure.

13 The second recommendation from the review required more detail to be available to students in handbooks and on the College website regarding non-core units. This recommendation has been completed. Students reported that the information they receive through the College intranet and VLE is good. A general College handbook is distributed at induction, and programme handbooks are also made available.

14 In relation to the third recommendation from the review, the College continues to provide good arrangements in respect of employer engagement and career guidance. A representative from the National Careers Office continues to attend the College when necessary. An Employability Strategy has been developed and a guest speaker programme continues. Acupuncture students run a clinic in their final year and the Health and Social Care programme requires 200 hours of appropriate work experience.

15 The College has increased the use of the VLE by both staff and students. Staff have had further training in its use and all marking is now completed using this resource. Teaching material is also uploaded to the intranet. Students and staff confirmed that its use has been an effective means of communication and a positive development for teaching and learning.

16 The College meets all Pearson requirements in relation to annual monitoring. It also undertakes monitoring of its programmes at programme team meetings and has developed a template for its own annual monitoring reports. However, the review team could not clearly identify through the committee structure how the College gives strategic consideration to outcomes from the internal monitoring process. The structure is complex and does not demonstrate how responsibility for taking action is managed. The College states that the quality cycle is 'conventional' but also 'detailed and complex'. The 'Description of Quality Cycle' and the 'Deliberative Meeting Structure' diagram do not make clear how each element of the quality cycle combines to create an evaluated decision-making process leading to clear managed monitoring of programmes at programme and senior management levels.

17 The College developed an action plan, dated October 2016 to September 2017, that addresses the recommendations from the 2015 review. Although this identifies some actions as 'continuing' or 'ongoing', and new actions arising from internal processes, there is no formal plan for 2017-18. As noted at the last monitoring visit, the College has recognised the variable ability of students and restructured the academic year accordingly to allow students to study fewer modules concurrently. The impact of these changes is an example of one of the aspects of College provision that was to be scrutinised as part of a periodic review, due for completion in November 2016. Due to the Principal's retirement, this periodic review was not completed until November 2017, and related documents were not made available to the team. A projected review of other programmes has also been delayed. A review of the business programmes undertaken by an external consultant in October 2016 was made available to the team and the attached action plan indicated that recommendations had been completed by October 2017. However, it is unclear how this report was integrated into the quality cycle. For example, it is not referred to in the March 2017 or December 2017 Academic Board minutes.

18 The data return for this monitoring visit and the assessment board minutes of September 2017 show an increase in 2016-17 of student progression from year one to year two of 77 per cent, in contrast to 63 per cent the previous year. Academic Board minutes record that students performed better as a result of the restructuring. There is, however, inconsistency in the presentation of student data at assessment boards, with variable levels of detail. It is not clear therefore how analysis is made of the figures presented year on year.

The new Principal is currently working to produce retention statistics in a more manageable format.

5 Progress in working with the external reference points to meet UK expectations for higher education

19 The College continues to work with external reference points. In particular, it has drafted a Social Media Policy using the UCISA Social Media Toolkit. The College also made reference to the QAA report from the Contract Cheating Advisory Group in its recent review of the College's academic malpractice policy and guidance. The College has invited external speakers to address employment issues with the students.

20 Through Academic Management Review with its awarding organisation, the College ensures that its programmes are delivered with reference to the Quality Code. However, evidence from the Concerns investigation indicates insufficient engagement by the College with some parts of the Code, particularly *Chapter B2* and *Chapter B6*.

6 Findings from the concerns investigation

21 This section summarises the findings from the Concerns investigation. The review team identified a number of issues regarding the College's processes for managing academic malpractice and the recruitment of students, resulting in five recommendations on the appropriateness and effectiveness of procedures for identifying and responding to academic malpractice, and the assessment of students' English language ability during recruitment and admissions.

The College's procedures for identifying and responding to academic malpractice

22 The College has an academic malpractice policy and procedures document that clearly defines malpractice. This document identifies both student and staff malpractice. Teaching staff met by the review team indicated that they were aware of a malpractice policy for students, but were not aware that it also covered malpractice by staff. During the visit, the College supplied two versions of an academic conduct and practice document, each of which defines classes of malpractice and the penalties to be applied. The difference between the two versions is small but significant in terms of procedure, relating to responsibilities for College staff and the rights of students. The team considered each document to be fit for purpose. However, although the Academic Board minutes for December 2017 refer to one of the documents, it is unclear which of the three is being referred to, whether approval is given, or whether the Board is noting simply that a policy has been produced and uploaded to the College's intranet site. There is no clarity, therefore, on the definitive, approved document(s) in operation, as the relationship between the three documents, and whether one supersedes the others, is unclear.

Recommendation

The review team **recommends** that the College:

- clarify, for all stakeholders, the definitive procedures to be followed when academic malpractice is suspected.

23 The College is aware that plagiarism is an issue and it is discussed at internal verifiers' meetings. However, a College strategic approach to the monitoring of academic malpractice is not evident. For example, data on the extent and type of malpractice have not been systematically collected. At the review team's request, the College produced an

analysis of detected academic malpractice compiled from assessment board minutes and other sources for the 2016-17 academic year. Given their recent production, these data have yet to be considered by the College.

Recommendation

The review team **recommends** that the College:

- using complete longitudinal data, ensure systematic, College-level oversight of the extent and nature of academic malpractice, and evaluate the effectiveness of its academic malpractice policy.

24 Students are alerted to issues of plagiarism and collusion in a number of ways, including at induction, in some assignment briefs, programme handbooks and in the study skills course. Students met by the review team were aware of what constituted academic malpractice. All assessed work is submitted using plagiarism-detection software. An internal verifier's report states that a 25 per cent similarity score is 'an automatic fail', although the team received contrary evidence that indicated that up to and including 25 per cent is acceptable. While staff and students understood that there was not necessarily a direct link between the generated similarity index and academic malpractice, the College's approach to interpreting the outcomes of the software is unclear and potentially inconsistent. Staff are provided with guidance on using Turnitin and reminded of their responsibility to assess whether an assignment is genuine in a document titled 'How to mark in Moodle'. When questioned, staff cited the handbook for HND lecturers as offering guidance on this responsibility, though in this document contains very brief information on checking for plagiarism.

Recommendation

The review team **recommends** that the College:

- provide clear, detailed and unambiguous guidance to staff and students on interpreting the results of plagiarism-detection software.

The College's recruitment processes for ensuring that students have the appropriate level of English language for the programme they are enrolled on

25 If the College suspects a student's written English in an assessment does not accord with her/his spoken English, the student is subject to an interview. However, neither the academic malpractice policy and procedures document, nor the academic conduct and practice document, specifies the conduct of this interview. A small number of interviews have been conducted but no further action was required. The review team discovered a single case where significant plagiarism had gone undetected by the College (the work attracting a 'merit' grade). While extrapolating this finding to the totality of student work would be unjustified, the College could further assure itself that changes in writing style within a single piece of student work are systematically investigated for plagiarism. The team examined a small sample of 14 assessment scripts from 11 students, and noted no discrepancy between the level of written English and spoken English. Marked scripts viewed by the team indicated that when plagiarism is detected, feedback sheets inform students appropriately. Examples of written warning letters to students were appropriate.

26 The College has a relatively open policy towards admissions, and admits students with a wide range of prior qualifications. As such, there is no formal requirement for English-language qualifications as a condition of admission. In the past, this policy led to the admission of some students who were unable to benefit from the programmes offered. In order to address this issue, in September 2015 the College introduced in-house literacy

and numeracy tests. The tests did not indicate how they were designed to align with any established, national or international level of competence. The requirement to complete the tests is clearly identified to prospective students. A positive outcome results in the student being called to a mandatory interview. The Student Recruitment and Admissions Policy sets out briefly the requirements for admission, including the passing of the literacy test. Students met by the team confirmed that they had taken the tests.

27 The tests have an identified pass mark. However, applicants not reaching the pass mark may be admitted based on an interview. The review team saw examples of prospective students being denied admission, both following the testing and interview stages. The team saw a small number of variants of each type of test and noted that there was scope for improving the factual correctness, grammar and use of phonetics to ensure clarity for students, so that the College can be confident the tests are fit for purpose, particularly in the English comprehension test. In the sample the team reviewed, there were some errors, both factual and in respect of use of English that were worthy of review.

28 The review team examined 18 student files relating to the students it met. Only eight (44 per cent) of the files examined indicated that the student had sat both the literacy and numeracy test. One file contained the numeracy test but not the literacy test, and the remaining nine did not contain either test. Senior management reported to the team that some test details were held centrally rather than in the student files. An interview checklist, completed at the time the student was interviewed, was in the majority of files. The team also noted one occasion where the application form of a currently enrolled student had not been signed by the student. Through its review of the student files, the team identified issues regarding the adequacy and consistency of the College's record keeping.

Recommendation

The review team **recommends** that the College:

- conduct a full audit of its student records to ensure that each is complete in all respects, in particular the inclusion of test results and the signatures of students.

29 If students whose first language is not English do not have a formal English language qualification, they are encouraged to enrol on a separate English course in parallel to their HND studies that meets with Common European Framework of Reference for Languages B2 requirements. This is helpful for students, as possession of this qualification may facilitate entry to a bachelor's degree programme. Students met by the review team were appreciative of the opportunity to study the course. The College provides free tuition and there is a fee of £50 for the assessment, which is external to the College. The Student Recruitment and Admissions Policy and the College's 'Commentary on Data Return' document state that the English course is mandatory, and while this was confirmed by students, some teaching and senior staff considered this to be optional.

Recommendation

The review team **recommends** that the College:

- clearly articulate English language requirements and communicate these effectively to all staff, current students and prospective students.

Summary of recommendations

The review team **recommends** that the College:

- clarify, for all stakeholders, the definitive procedures to be followed when academic malpractice is suspected (paragraph 22)
- using complete longitudinal data, ensure systematic, College-level oversight of the extent and nature of academic malpractice, and evaluate the effectiveness of its academic malpractice policy (paragraph 23)
- provide clear, detailed and unambiguous guidance to staff and students on interpreting the results of plagiarism-detection software (paragraph 24)
- conduct a full audit of its student records to ensure that each is complete in all respects, in particular the inclusion of test results and the signatures of students (paragraph 28)
- clearly articulate English language requirements and communicate these effectively to all staff, current students and prospective students (paragraph 29).

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Southgate House, Southgate Street, Gloucester GL1 1UB
Registered charity numbers 1062746 and SC037786

Tel 01452 557050
Web www.qaa.ac.uk