



Concerns about standards and quality in higher education

London Churchill College Ltd, December 2017

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Introduction

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

2 London Churchill College Ltd (the College) is an alternative provider of higher education and training based in East London. It offers Pearson Higher National Diplomas (HNDs) in Business, Health and Social Care, and Hospitality Management. It also offers foundation degrees in Business Management and Events and Hospitality Management, and level 6 top-up degrees in Business Management and Health and Social Care, in partnership with the University of Bedfordshire. In 2016-17, the College had 872 students studying across its HND 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 the information that higher education providers produce. The concern related to suspected academic malpractice by students enrolled on HNDs at the College. The concerns 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.

4 A television programme entitled 3GBoss, an educational and business task-based reality show, was produced and broadcast by Channel S in 2015, and featured members of the public competing to recruit students to the College. Subsequently, the Department for Education expressed concern that marketing activity of this nature may place the College in breach of its designation. As a result of this, QAA also considered whether:

- any involvement by the College in the production of 3GBoss was consistent with principles of fair admission.

The investigation process

5 QAA initiated a full investigation, including analysis of documentary evidence and a visit to the College on 12 December 2017. The QAA concerns team comprised Dr Stephen Ryrie (investigation coordinator and reviewer) and Professor Diane Meehan (reviewer). The College cooperated with the investigation.

6 This report sets out the results of QAA's findings in relation to the concerns raised by the Student Loans Company and the Department for Education. As a result of the short space of time between the submission of a concern on 8 December and the visit to the College, the concerns team was able only partially consider the allegation raised in that submission and to testing its supporting evidence.

7 The concerns 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, marketing materials and communications

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

concerning 3GBoss. In the course of the visit the team met senior College staff, students and teaching staff.

8 The concerns 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.

9 In addition, the concerns team considered:

- the involvement of the College in 3GBoss and its alignment with principles of fair admission.

Result of the investigation

10 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

11 The College has in place policies and procedures designed to prevent, identify, investigate and respond to unacceptable academic malpractice, including its Academic Disciplinary Policy, which is relevant to the College's HND and foundation degree courses; and its Learning, Teaching and Assessment Policy and Strategy. Both documents can be found on the College website, and students confirmed that they can access the Academic Disciplinary Policy on the student portal. The former policy, approved by the College's Academic Board in July 2017, was developed to ensure a clear distinction between academic concern and academic offence. The policy sets out the College's approach to, and procedures for, identifying, investigating and responding to unacceptable academic malpractice.

12 The College's Learning, Teaching and Assessment Policy and Strategy includes a statement on academic malpractice and states that 'all assessed work should be a student's own and correctly referenced (using Harvard referencing) where material has been sourced'; it also provides a link to the College's Academic Disciplinary Policy. As part of its assessment strategy, the College includes an oral element in assignments, which helps to ensure that the student understands the work being submitted, has moved away from a reliance on essays and utilises non-generic assignments; the College is also considering the introduction of examinations into its HND Business course. Training is offered to academic staff in relation to assessment practice, including external training by the Higher Education Academy; staff are also encouraged to achieve Fellowship.

13 The College records and monitors student attendance and, in accordance with its Student Attendance Policy, follows up on students with poor attendance records.

14 Students confirmed that they are made aware of the need to avoid plagiarism and to ensure that they correctly reference source material pre-admission, during the interview stage; post-admission, for example during induction; and on an ongoing basis through their personal tutors and assignment briefs. Assignment specifications include a statement on plagiarism and instructions on how to properly acknowledge sources of information. Students are expected to submit an authenticity statement, signed and dated for each assignment. The concerns team heard in meetings that this is not always signed, but as assignments are submitted electronically via the student's individual login this also confirms the work as their own. Students are provided with a guide to Harvard referencing and student handbooks also refer to academic malpractice.

15 Students can present part, or all, of their draft assignment submissions for informal, formative, feedback from their personal tutors, who also develop Individual Assessment Learning Plans with students, and track their progress on assignments using individual tracking sheets. These sheets are used to both track progress and confirm the origin of a student's work. The role of the personal tutor in this respect is detailed in the College's Personal Tutoring and Enabling Student Development Policy. The College's Expected Answer Guidelines (EAG), identified as good practice in the report of the College's 2016 Higher Education Review, provide students with an understanding of what is expected from them in their assignments. Students who met the concerns team spoke positively about the opportunity to gain formative feedback and the utility of the EAG, particularly for mature students returning to higher education.

16 Students submit draft 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 in draft form as often as the two-week period prior to the submission deadline allows. Where relevant, students can reduce a high similarity index, which they explained may occur for reasons other than plagiarism, such as including the assignment question in the submission. The College does not set a specific target similarity index. Although the College sets no limit on the number of submissions to each assignment that a student may make to the plagiarism-detection software, students noted that the software takes longer to respond on successive submissions and that this constrains the number of resubmission attempts. Students also noted that this may give an advantage to those students who submit their work early. Nevertheless, 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.

17 Student work is checked for plagiarism by assessors and internal verifiers. If a student's final submission shows a high similarity index or other evidence of academic malpractice the programme leader is alerted. Until recently, the programme leader would have carried out an investigation into the allegation of academic malpractice, and made a decision on the outcome after giving the student an opportunity to respond to allegations. The concerns team was informed in meetings with both staff and students that if a student admits to plagiarism, they are referred to their personal tutors and asked to resubmit the work with a capped 'pass' grade.

18 The College provided the concerns team with an extensive list of over 700 recent (in the past three academic years) cases of plagiarism. In each case, students had been allowed to resubmit the work with a grade capped at a pass: this included cases in which students had plagiarised in more than one unit, indicating variation in the severity of offences, which is not reflected in the penalty. Senior staff acknowledged that penalties for plagiarism offences have insufficiently discriminated between the circumstances of each case. Under the recently approved Academic Disciplinary Policy, the programme leader is expected to differentiate between an academic concern (leading to the provision

of 'guidance' to the student) and an academic offence where a student is deemed to have 'deliberately (knowingly) or through culpable negligence (unknowingly) achieved an assessment or some other aspect of their academic or academically related progress...'. If the programme leader decides that the student has committed an academic offence, the matter will be referred to an Academic Offences Panel comprising three members of staff. The Policy also sets out five possible penalties, which vary according to the severity of the offence. The Academic Offences Panel will meet for the first time in January 2018. The College has not yet fully implemented its Academic Disciplinary Policy.

19 The College has recently removed its name and logo from a site offering to write assignment for its students. Students who met the concerns team confirmed that they had not been approached by this organisation, or similar companies or individuals.

Recommendations

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

- 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
- fully implement its Academic Disciplinary Policy and make appropriate use of the full range of penalties for academic malpractice.

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

20 The College's Academic Disciplinary Policy is reviewed annually through the Quality Enhancement Steering Group and signed off by the Academic Board. A staff development programme is also in place, which includes training on assessment practices, academic malpractice and the use of plagiarism-detection software.

21 External examiners are responsible for ensuring that the College is operating in accordance with its awarding partners' requirements. External examiners sample assignments and can block certification should they find that a student's work contains plagiarised material. In its response to the concerns raised, the College commented that over the last seven years, external examiners have not identified any cases of plagiarism that had not already been identified and acted on by the College. Recent external examiner reports are generally positive in respect of the achievement of standards and the quality of the learning environment.

22 The College's annual monitoring process includes the production of an annual course report for each programme, which include an action plan and a comprehensive College Annual Monitoring Report. The Report for 2015-16 notes the College's concerns in relation to the number of cases of plagiarism, which, while lower in percentage terms from the previous year, still shows an increase in the actual number of cases. The Report also showed that 22 per cent of all submissions were found to include plagiarism in 2014-15 (a total of 211 cases) and that this figure had decreased to 15 per cent overall in 2015-16 (but with a total of 238 cases).

23 Pearson's most recent Academic Management Review (AMR) of the College took place in January 2017 and found that 'there are robust systems for recording and managing all assessment appeals and malpractice, including plagiarism' and also noted the College's effective use of plagiarism-detection software. The AMR visit had been brought forward at the request of Pearson due to the number of withdrawals from the College. The AMR report also notes 50 students who enrolled but subsequently withdrew because they were unable to gain funding, and 14 cases of malpractice. The College explained that it was fairly

common for students to enroll only to find that they cannot obtain funding; the malpractice cases in this instance referred to a breach of its Student Code of Conduct rather than to academic malpractice, and that for reasons of poor attendance and/or non-submission of assignments these students were withdrawn from the course.

Assessment and progress boards monitor submission and pass rates, including instances of plagiarism

24 The College has in place various mechanisms for monitoring the effectiveness of its approach to identifying academic malpractice/plagiarism. In discussion with the concerns team, senior staff commented that they believe that their approach is effective and that this is evidenced by the high detection rate. However, they also commented that: as yet, they are not succeeding in preventing malpractice; there is a need to raise awareness; and guidelines are being developed by the Quality Enhancement Steering Group.

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

25 The College's Recruitment, Selection and Admission Policy is available on the College's website. The Policy and associated procedures meet the requirements of Pearson and the University of Bedfordshire, adhere to the principles of fair admission, and support the College's aim to select applicants who can successfully complete their programme. Entry requirements for each course offered by the College are clearly set out on the College's website; these include English language requirements, which are also included in the College's Recruitment, Selection and Admission Policy. Students commented that the entry requirements were made clear to them when they applied for their course, including the College's English language requirements. The College's Recruitment and Admissions Committee reviews the outcomes of the recruitment process and provides a report to the Academic Board.

26 The College also utilises a number of recruitment agents, referred to as brand advocates. The College currently has 13 active brand advocates; six of whom are new, while a further five or six were discontinued last year. Contracts are in place between the College and its brand advocates. The Director of Marketing provides training for brand advocates both individually and through group training sessions. The College made a strategic decision not to use these brand advocates for their September 2017 intake; however, following a drop in the number of students recruited, the College decided to recruit 50 per cent of its students for the January 2018 intake through its brand advocates.

27 The College requires that applicants who are non-native English speakers, or who have not undertaken their final two years of schooling in English, or who are not otherwise exempted from English language proficiency test requirements, must demonstrate capability in English at Common European Framework of Reference for Languages (CEFR) level B2, equivalent to 5.5 - 6.5 (depending on the level of the course) on the International English language Testing System (IELTS) framework. Applicants who do not already hold appropriate qualifications in English language are required to undertake the College's English language proficiency test; the current test having been in place since April 2015. The test was devised in consultation with an independent qualified English as a Foreign Language and English for Academic Purposes teacher/assessor, with experience in preparing candidates for Cambridge 'English for Speakers of Other Languages' and for IELTS. The test is conducted under examination conditions and applicants complete reading, writing, listening and speaking elements, which are marked according to IELTS band scores. The College's academic staff act as invigilators in accordance with the

College's invigilation guidelines, and the assessor attends to oversee and mark the test and assess the oral element.

28 All applicants are interviewed by an academic member of staff at the application stage, and this was confirmed by students who met the concerns team; these staff make the decision whether to admit the applicant. A record of the interview is made on a standard template, which includes prompts/questions for discussion with the applicant; the interviewer records their decision, along with comments in relation to the applicants' academic qualifications, English language/communication skills, and motivation for applying to the College/course. Applicants who are academically qualified but do not meet the College's English language requirements are rejected; all applicants must pass the interview to be accepted. Student documentation, such as academic certificates, are checked by admissions staff. Every interview is conducted by a permanent member of academic staff; all staff involved in admissions and interview processes undergo training. The admission process for the level 6 top-up programmes has recently been strengthened to include the use of pre-interview questionnaires, which are also to be utilised for applicants to the recently developed foundation degrees.

29 All students who met the concerns team could interact with fluency and spontaneity in spoken English. Staff commented that, while a student's English language may be adequate, they may need support with academic terminology and academic writing. The team considered a sample of 23 student files, which contained records of students' admission, including evidence of academic and English language qualifications/levels; a record of the interview with the student; and, where appropriate, the outcome of the English language test, together with samples of each student's written assignments. In some cases, students had gained an acceptably high score (5.5 or above) in the various components of the English language test, although the evidence within the files failed to show the clear and detailed text expected at the CEFR B2 reference level. While the College provided the CV of the English language assessor, no further evidence was provided to demonstrate that the test had been externally benchmarked to ensure it was at the appropriate CEFR level.

Recommendation

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

- take steps to ensure that the in-house English language test is set at a level that corresponds to the Common European Framework of Reference for Languages level B2.

The involvement of the College in 3GBoss and its alignment with principles of fair admission

30 In 2015, the College agreed to sponsor a Channel S programme entitled 3GBoss; Channel S is a community channel for the Bangladeshi community. 3GBoss was an 'educational and business-task based reality TV show' aimed at bringing together 13 young entrepreneurs aged 15-18 years old from across the UK to compete in tasks; the programme has since been discontinued. The proposal from Channel S outlined the benefits to the College, which included: an increase in company profile; an interview with the College director/representative, to be televised: and for the College name to be mentioned in the 'end credits' of every episode and in all publicity materials. The College stated that its involvement was limited to providing facilities and that no members of staff were involved in the programme. The College also allowed 3GBoss to enquire about College courses and use the information gained in the tasks. The participants in the programme interviewed people on the street about their awareness of the College; the College stated that it had no input into the interview questions. The College noted that, as well as being a

community project, 3GBoss was part of a marketing campaign that included advertisements on buses, billboards and television, to create brand awareness. The College confirmed that no students were directly recruited because of the programme, and in meetings with the concerns team senior staff stated that the admission process for all applicants was the same no matter how they were referred to the College.

31 The College failed to exercise control over the information relayed by the participants in the programme. The use of the 3GBoss programme as part of its marketing strategy was not consistent with the aims of the College's Recruitment, Selection and Admission Policy, which commits it to procedures that are transparent, reliable, valid, inclusive, and underpinned by appropriate organisational structures and processes.

Recommendation

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

- ensure that all promotional activities are consistent with the principles of fair admission.

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

32 The College acknowledged that there can be disparity between a student's ability to produce written and spoken English, in different contexts. However, staff confirmed that if a member of staff detected a disparity of this type in a student's written assessment, they would follow it up in the same way as for an allegation of malpractice. Staff and students confirmed that English language support is offered to students following admission and in some cases attendance at classes is required. The concerns team considered these arrangements to be satisfactory.

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

33 The 2015-16 College Annual Monitoring Report commented on the decrease in the incidence of identified cases of plagiarism, from 22 per cent of submissions in 2014-15 to 15 per cent in 2015-16. However, data from September 2015 to September 2017 shows more than 700 cases across the three HND programmes. All cases resulted in students being asked to resubmit their work with a capped pass grade. This preceded the development and approval of the College's Academic Disciplinary Policy, and led to the recommendation identified earlier in this report in respect of its implementation.

Conclusion

34 Concerns about the College's processes for managing academic malpractice and the recruitment of students were found to be justified. However, the concerns team was unable to find evidence to uphold the specific allegation that students identified by the Student Loans Company had engaged in academic malpractice. It was not possible to meet the students concerned, as the visit took place after the College's term had ended.

35 The concern relating to whether procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice is upheld. The College is not yet implementing its own processes for responding to allegations of malpractice. This has led to the recommendations that the College should implement fully its Academic Disciplinary Policy and make appropriate use of the full range of penalties for academic malpractice; and that it should impose a limit on the number of submissions for

each assignment a student may make through plagiarism-detection software. The shortcomings that gave rise to these recommendations mean that the College's provision does not meet Expectation B6 of the UK Quality Code for Higher Education (the Quality Code).

36 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. This has led to the recommendation that the College take steps to ensure that the in-house English language test is set at a level that corresponds to the Common European Framework of Reference for Languages level B2. The shortcomings that gave rise to this recommendation mean that the College's provision does not meet Expectation B2 of the Quality Code.

37 The concern relating to the involvement of the College in the production of 3GBoss is upheld. This has led to the recommendation that that the College ensure that all promotional activities are consistent with the principles of fair admission.

38 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

39 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 19)
- fully implement its Academic Disciplinary Policy and make appropriate use of the full range of penalties for academic malpractice (paragraph 19)
- take steps to ensure that the in-house English language test is set at a level that corresponds to the Common European Framework of Reference for Languages level B2 (paragraph 29)
- ensure that all promotional activities are consistent with the principles of fair admission (paragraph 31).

QAA2091 - R9874 - Mar 18

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