



Concerns about standards and quality in higher education

London College of Business Sciences, July 2018

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Introduction

1 This report is a stage two investigation of the London College of Business Sciences as a result of an application to the Quality Assurance Agency for Higher Education's (QAA) [Concerns Scheme](#).¹ This followed an investigation by Pearson.

2 The London College of Business Sciences Ltd (the College) is a private education provider which was established in January 2010 and recruited a first cohort of students in April 2011. It has recently relocated to Ilford from the London Docklands. At the time of the QAA investigation it had 30 higher education students of which four were full-time and 26 part-time. All students had been enrolled for the BTEC Level 5 Higher National Diploma in Education and Training.

Concerns raised

3 On 25 May 2018 the Department for Education (DfE) informed the QAA that Pearson had undertaken an investigation into the London College of Business Sciences. The allegations received by Pearson were an anonymous report of suspected malpractice at the London College of Business Sciences concerning the conduct of BTEC Level 5 Higher National Diploma in Education and Training.

4 Subsequently the QAA undertook a stage two investigation, in accordance with its Concern Scheme, as the findings of the Pearson investigation raised issues about the College's management of academic standards and the quality of learning opportunities. In particular, the full QAA investigation explored whether:

- recruitment processes are effective in ensuring that only genuine and appropriately qualified students are admitted to the College;
- procedures for managing assessment are appropriate and operating effectively, including the assessment of work-based learning;
- assessment processes are sufficiently robust to ensure that credit and qualifications are awarded only where the achievement of relevant learning outcomes has been demonstrated and where the academic standards of the awarding organisation have been satisfied
- procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice.

The investigation process

5 QAA initiated a stage two investigation, which took place on 30 July 2018. The QAA concerns team was Mr Colin Stanfield, QAA Reviewer and Mr Derek Hamilton QAA Quality Manager and the Case Officer for the investigation. The concerns team found that the College had no current students or higher education programmes other than the BTEC Level 5 Higher National Diploma in Education and Training, which had been subject to the Pearson investigation.

6 The QAA concerns team requested and considered a range of documentary evidence from the College that focused on the four main aspects identified for investigation. It also held seven meetings with staff at the College, including the Vice Principal, who was supported by a representative of the Board of Directors, senior staff, tutors, students and employers. The College cooperated fully with the investigation.

¹ QAA Concerns Scheme: www.qaa.ac.uk/reviewing-higher-education/how-to-make-a-complaint.

Result of the investigation

7 The QAA concerns team who undertook this investigation reached a conclusion of serious issues found in three of the areas it explored. The team made a number of recommendations for the provider to address in these three areas and one recommendation in a further area.

Explanation of findings

Recruitment processes are effective in ensuring that only genuine and appropriately qualified students are admitted to the College

8 The QAA concerns team examined a range of documents provided by the College to ascertain if their recruitment processes are effective and that only genuine and appropriately qualified students are admitted to the College.

9 These documents included the College Prospectus the Student Handbook the Student Admissions Policy the Student Recruitment and Enrolment Procedures the Student Attendance Monitoring Procedures, Student Induction and Declaration Procedures, the Student Record Policy Admission Interview forms, Application Assessment forms the qualifications and training of staff involved in admissions decisions the Admission Procedure Flowchart and Minutes of the Admission Committee July 2016. In addition the team viewed the College's website.

10 The documentary evidence was tested in the meetings the team held at the College and in particular in those with two groups of students. In total the concerns team met with fourteen students including two previous students of the College. The team met the students in two random groups of seven in back-to-back meetings.

11 The Student Admissions Policy has clear objectives which are, where relevant, referenced to the Quality Code. More amplification and further detail regarding the College's recruitment processes is provided in the Student Recruitment and Enrolment Procedures, the Student Attendance Monitoring Procedures, Student Induction and Declaration Procedures and the Student Record Policy. These include information on enrolment conditions, timescales for enrolment, the enrolment processes and the documents required from prospective students.

12 In the meetings with students the concerns team sought evidence of the students' experience of the recruitment process and of the documents required of them by the College during the admission's procedure.

13 The concerns team found that there was a consistency of experience within and across both student meetings that matched the written policies and procedures of the College. The team also found consistency reported by students with regard to the documents required by the College prior to admission. Both meetings described process of registration including requests for original certificates, passport, and CVs. In addition students said they were tested for competence in English and Maths, attended an induction event, had to produce personal statements and were chased for any outstanding documents.

14 However, the concerns team found the information on the College website about its higher education provision was out of date. In addition the College Prospectus 2017-18 refers to it having a wide range of courses. The concerns team considered this to be a moderate issue since, while the College's procedure for recruitment are broadly adequate, there are shortcomings in the information for prospective students. The concerns team

recommends that the College ensure its information is up to date, accurate and commensurate with its position to recruit prospective students and retain them on higher education programmes.

Recommendation

15 The College should:

- ensure its information is up to date, accurate and commensurate with its position to recruit prospective students and retain them on higher education programmes.

Procedures for managing assessment are appropriate and operating effectively, including the assessment of work based learning

16 The concerns team examined a range of documents provided by the College to ascertain if their procedures for managing assessment are appropriate and operating effectively, including the assessment of work-based learning (WBL). This included the Programme specification for the BTEC HND in Education and Training (DET), the Student Handbook, the assignment submission procedure, assignment brief and the Guide to Assessment and Internal Verification. The College Assessment Plan was examined alongside the Quality Assurance Plan. The team also examined a range of student portfolios and associated internal verification documents. The team undertook examination of the Terms of Reference of College Committees, the minutes of the Academic Board, the Standardisation Meeting for the DET, the Standards Verifier Report, the Lead Verifiers Report, the Annual Monitoring Report, the Annual Programme Report, and the Internal Quality Assurance Improvement Plan.

17 With respect to WBL the concerns team examined a range of documents additional to those listed above. These were the Guide to Mentoring and Observing DET Student Teachers, the (revised) Procedure for Work Placement, the Observation Record Sheet, the Risk Assessment Questionnaire for Student Placements and the qualifications and training records of staff engaged in WBL assessment.

18 This documentary evidence was tested in meetings with senior College staff, tutors for the DET programme, meetings with students and a meeting with employers.

19 The Programme Specification for the DET places the responsibility on the College for the design and delivery of assessment, with post assessment external verification undertaken by the awarding organisation through its standards verification processes. The concerns team found that the standards verification by the awarding organisation had resulted in positive reports with no substantive issues being identified.

20 The College Principal, who is also the Director of Studies, is responsible for all assessment activities, while the Guide to Assessment and Internal Verification sets out the general framework within which assessment, including that of WBL, is managed. This Guide states, that there is a requirement for the verification of all assessments prior to their release, to ensure that they assess the intended learning outcomes derived from the Programme Specification. This was confirmed in meetings with senior staff and DET tutors.

21 Completed assessments are marked by tutors and are subject to internal verification by nominated College staff, with the Principal acting as lead internal verifier. A minimum sample of 15 per cent is subject to internal verification, although the concerns team heard from senior staff and DET tutors that for new or inexperienced staff up to 100 per cent sampling may take place.

22 The concerns team also scrutinised a range of student portfolios to assess these procedures and found they included useful comments from verifiers to assessors on the quality of marking and feedback to students. DET tutors also confirmed that their assessment practice was subject to internal verification.

23 In their meetings with students the concerns team were informed that marking of, and feedback on, their assessed work was timely and valuable in helping them to improve their academic performance.

24 However, the team was unable to ascertain, from documentary evidence or in meetings with staff or students, the College's policy on the deadline for feedback on summative assessments. Therefore, the team **recommends** that the College clarify and implement deadlines for summative feedback on assessments and ensure students are informed of the deadlines.

25 Assessment of WBL on the DET programme requires students to undertake a minimum of 100 hours of teaching in their assigned placement and for there to be a minimum of eight observations of their teaching practice. The concerns team saw evidence of a planned approach to both of these requirements and in meetings with senior staff, DET tutors, and students indicating there was a understanding of these requirements in the context of the assessment of WBL.

26 Student portfolios examined by the team also confirmed that teaching hours were logged and signed off by employers and tutors and that teaching observations were undertaken within the timeframes set out in the Assessment Plan. The related feedback to students was timely and helped them develop their teaching practice.

27 Employers whom the team met had a clear understanding of the expectations placed on them in respect of the students WBL and referred to the comprehensive Guide to Mentoring and Observing for DET Student Teachers. Tutors, students and employers reported on the measures in place to ensure the WBL is undertaken in a safe and appropriate environment with procedures in place to ensure safeguarding.

28 The concerns team also examined the College's approach to ensuring that the observations of trainee teachers consistently meet the required standard of the awarding organisation. The team heard in meetings with DET tutors, students and employers that observations are mostly undertaken by work-place mentors and that the College undertakes a check on the qualifications and experience of the mentors to do so. However, the team found no evidence of consistent procedures in place to enable the College to be assured that teaching observations undertaken, by either its own tutors, or work based mentors, meet the required standard. The team **recommends** that the College develop and implement procedures to ensure that teaching observations of students meet the requirements of the awarding organisation.

29 The concerns team considered the absence of consistent procedures to enable the College to be assured that teaching observations meet the required standard of the awarding organisation to indicate a significant gap in its quality assurance procedures. As such this is a systemic problem and a serious issue.

Recommendations

30 The College should:

- clarify and implement deadlines for summative feedback on assessments and ensure students are informed of the deadlines.
- develop and implement procedures to ensure that teaching observations of students meet the requirements of the awarding organisation.

Assessment processes are sufficiently robust to ensure that credit and qualifications are awarded only where the achievement of relevant learning outcomes has been demonstrated and where the academic standards of the awarding organisation have been satisfied

31 The concerns team examined a range of College documents to examine if their assessment procedures are sufficiently robust to ensure that credit and qualifications are awarded only where achievement of relevant learning outcomes has been demonstrated and where the academic standards of the awarding organisation are maintained. This included those documents identified in paragraphs 16 and 17 with particular reference to the Programme Specification for the BTEC HND in Education and Training (DET), the Terms of Reference for College Committees, the Minutes of the Academic Board the Standardisation Meeting of the DET and The Guide to Assessment and Internal Verification. The team also examined the awarding organisations Lead Verifiers Report and Standards Verifiers Report.

32 This documentary evidence was tested in meetings with senior College staff tutors and with students.

33 The College Guide to Assessment and Internal Verification clearly identifies procedures for the internal verification and subsequent external verification of assessed work. The concerns team heard from senior staff and DET tutors how these processes work in practice, with the College Principal (Director of Studies) responsible for all assessment activities. Portfolios of work examined by the team also evidenced these processes with signed and dated internal verification records and feedback from verifiers to assessors.

34 The concerns team examined the standards verification reports from the awarding organisation and found that they were positive. No substantive issues were raised in respect of the College's processes to ensure the appropriate award of credit and qualifications, or in satisfying the academic standards of the awarding organisation.

35 While, the College Academic Board has responsibility for the oversight of the assessment of students it does not consider final grades prior to their submission to the awarding organisation. It does, however, receive standards verifier reports from the awarding organisation and oversees the college's responses.

36 The concerns team found that the responsibility for assessment procedures rests with the College's Principal (Director of Studies). Likewise, the Academic Board, as the College's senior academic body, has responsibility for all matters concerned with academic management, teaching and learning, and assessment. The concerns team found that decision making related to the award of academic credit and qualifications is not robust since the decisions of the Academic Board are not informed by rigorous consideration of student learning outcomes by a wider group of College staff. The team **recommends** that the College ensure the Academic Board considers the outcomes of student final summative grades prior to their submission to an awarding organisation.

37 Consequently the concerns team considered that the assessment processes were not sufficiently robust to ensure that credit and qualifications are awarded only where the achievement of relevant learning outcomes has been demonstrated and where the academic standards of the awarding organisation have been satisfied. As such the team considered this to be a systemic problem and a serious issue.

Recommendation

38 The College should:

- ensure the Academic Board considers the outcomes of student final summative grades prior to their submission to an awarding organisation.

Procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice.

39 The concerns team examined a range of documents provided by the College to ascertain if their procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice. This included the College Malpractice/Maladministration Policy, the Student Handbook, evidence of student plagiarism software check, the Terms of Reference for Disciplinary Subcommittee, a Malpractice Students Letter, and the minutes of a Disciplinary Committee meeting held on in February 2017.

40 This evidence was tested through the meetings the concerns team held at the College and in particular the two meetings held with the students.

41 In their examination of the Student Handbook the concerns team found a reference to plagiarism that was descriptive and did not clearly convey to students the implications of this and other forms of academic malpractice and the sanctions that could follow. Any reference to potential disciplinary sanctions are subsumed into the section 20 of the Student Handbook in a section concerned with general disciplinary procedures that are applicable to both employees and students of the College. This presentation of information makes it difficult to discern what aspects of the disciplinary procedures may be applied to students along with a lack of precision about how breaches of academic malpractice will be managed.

42 Likewise, the concerns team found that the College Malpractice/Maladministration Policy has applicability to both employees and students. Indeed, references to students are minimal and there is no section of this policy that provides distinct and clear procedures for identifying and responding to academic malpractice.

43 The examination of the Terms of Reference for the Disciplinary Subcommittee provides no further clarity. They are located in a generic document titled 'Committees Terms of References' that outlines a range of committees of the College including the Board of Governors and Academic Board. It also outlines the Terms of Reference for the Disciplinary Subcommittee which are referenced in the Student Handbook. However, the 'Committees Terms of References' document also includes a section that refers to the 'Terms of Reference for the Student Committee'. Its terms include a responsibility to 'to inform students about academic malpractice and appeals'.

44 The concerns team, therefore, found a lack of clarity in College's policy documents relating to their procedures for identifying and responding to academic malpractice. It was also difficult to understand and separate their applicability between employees and students and there were no procedures that clearly conveyed to students the implications of academic malpractice and the sanctions that could follow. When the concerns team conducted their meetings with students it was evident that, while students knew about plagiarism and its

applicability to the writing and submission of their summative assessments, their understanding of academic malpractice was limited. The concerns team **recommends** that the College to develop and implement a policy document that sets out the procedures for handling cases of academic malpractice by students. It should give full explanation to students of the range of practices that constitute academic malpractice, set out the procedures staff should follow if they discover a case of suspected academic malpractice by students, and the tariff of disciplinary sanctions that may be applied.

45 The concerns team concluded that the significant gaps in in the College's processes and procedures for identifying and responding to academic malpractice indicates systemic problems in its management of academic standards and this is a serious issue.

Recommendation

46 The College should:

- develop and implement a policy document that sets out the procedures for handling cases of academic malpractice by students. It should give full explanation to students of the range of practices that constitute academic malpractice, set out the procedures staff should follow if they discover a case of suspected academic malpractice by students, and the tariff of disciplinary sanctions that may be applied.

Conclusion

47 The QAA concerns team found serious issues. This means that the College does not meet the expectations of the Quality Code, in particular Part B, *Chapter 6* and Part C.

48 In light of the conclusions of the report, QAA will carry out a full QAA review to ensure the recommendations in this report have been effectively addressed by the College as a matter of urgency.

Recommendations

49 The concerns team recommends that the College should:

- ensure its information is up to date, accurate and commensurate with its position to recruit prospective students and retain them on higher education programmes (paragraph 14)
- clarify and implement deadlines for summative feedback on assessments and ensure students are informed of the deadlines (paragraph 24)
- develop and implement procedures to ensure that teaching observations of students meet the requirements of the awarding organisation (paragraph 28)
- ensure the Academic Board considers the outcomes of student final summative grades prior to their submission to an awarding organisation (paragraph 36)
- develop and implement a policy document that sets out the procedures for handling cases of academic malpractice by students. It should give full explanation to students of the range of practices that constitute academic malpractice, set out the procedures staff should follow if they discover a case of suspected academic malpractice by students, and the tariff of disciplinary sanctions that may be applied (paragraph 44).



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