



Educational Oversight: report of the extended monitoring visit of Meridian Business School Ltd, May 2015

Section 1: Outcome of the monitoring visit

1 From the evidence provided in the annual return and at the monitoring visit, the review team concludes that Meridian Business School Ltd (the School) is not making acceptable progress with continuing to monitor, review and enhance its higher education provision since the previous [monitoring visit](#) in May 2014.

Section 2: Changes since the last QAA monitoring visit

2 The School began recruiting students again in summer 2014, and, at the time of the submission of its annual return form, had enrolled 36 students to a Pearson BTEC level 7 Diploma in Strategic Management and Leadership, and 10 students to an Education for Business Managers and Administrators (EBMA) level 7 Diploma in Health and Social Care Management. By the time of the visit, the total student enrolment stood at 106: 40 for the Pearson programme and 66 for the EBMA programme. The School employs six full-time and four part-time permanent members of staff. The Director of Studies role, which has oversight for the quality assurance of academic standards, is currently vacant.

3 The School underwent an ISO (International Organisation for Standardisation) 9001 surveillance visit in November 2014, and a Pearson Academic Management Report 2014-15 in February 2015. Its Tier 4 sponsor licence was suspended in March 2015.

4 This monitoring visit was extended to encompass an investigation under QAA's Concerns Scheme, which is covered in Section 5 of this report.

Section 3: Findings from the monitoring visit

5 The School is not maintaining its own institutional action plan to ensure continual monitoring, review and enhancement of its higher education provision on an ongoing basis. Some action points arise in Academic Board minutes, but they are vague and do not contain completion dates: for instance, 'ongoing' occurs regularly.

6 The School's academic strategic decision-making and management of academic standards are not secure. The review of and reporting on modules by School staff is not embedded, although a module review form has recently been created for future use. The School recently introduced an unregulated level 7 programme with a new awarding organisation, EBMA. The organisation was chosen to differentiate the School's offer from its 'sister' institution, the College of IT & E-Commerce Ltd. In engaging with EBMA, the School was aware that its level 7 programme is not recognised or regulated by Ofqual, but the School prospectus states that it is Qualifications and Credit Framework level 7 accredited. The School had difficulties in registering students with EBMA in December 2014, and is waiting for assessment designs to be confirmed. There does not appear to be a checklist of responsibilities with any of the School's awarding organisations.

7 The School has a student representative system, which is partially effective. Student representatives are drawn from each programme and are members of the School's

Academic Board, although they are excluded from part of the Board's business. No student representatives attended Academic Board meetings in 2014. External standards verifier reports from Pearson are not discussed directly with the student body. Programme committees are not used effectively to keep students informed on aspects of academic standards that directly affect their programme.

8 Data management, particularly the reporting of student progression, is not effective. The review team was unable to reconcile figures for the two level 7 programmes either from the documentation supplied before the visit or the explanations offered during the visit, although the School attributes the discrepancy to visa delays. The School considers information on the number of submissions and student achievement within a module in quarterly reports, but this data does not acknowledge the different entry cohorts. The School does not provide annual programme monitoring to review data across a cohort.

9 The School recognises the value of review, but does not effectively maintain some of its key documents or record decisions carefully. The draft Quality Manual had not been updated since February 2014. The Learning and Teaching Strategy will be reviewed in September 2015, but has not been updated since 2012, even though the Strategy states that the objectives 'will be developed systematically over the three year period (2012-15)'. Letters to students recording their academic malpractice did not indicate any resulting actions. The review team was presented with two programme specifications that were dated the day before the monitoring visit.

10 The information provided to students is not complete. Students confirm that the virtual learning environment (VLE) is a key resource for holding module learning resources, but individual programme specifications are not provided, although there is an incomplete generic programme specification in the Quality Manual. Students also confirm that they had not seen any programme information in hard copy, although there are student handbooks for programmes.

11 The School's Director has oversight of all admissions, with assistance from two other members of staff. The School interviews all students, and the interviewer completes a personal assessment sheet as a record, including assessments of previous qualifications and English language ability; however, the dates of previous awards are not recorded, and sometimes awarding bodies and organisations are not recorded.

12 The School usually checks all academic and English language qualifications by examining original documents. Staff are required to complete a Pro Forma Request for Verification of Academic Documents, and a Pro Forma Request for Verification of English Language Qualifications, and send them to the 'relevant awarding body, professional body, university, previous sponsor and the SELT provider'. Staff admit that this practice had proved ineffective and had been abandoned. The School now relies on email exchanges, with PDF file copies and British Council IELTS (International English Language Testing System) certification attached. For those students who have previously completed an award at another UK institution, the School relies upon that institution's English language checks. The review team was unable to confirm either uniformity or consistency of verification procedures.

13 Standards verifier reports for the Pearson BTEC level 7 Diploma in Strategic Management and Leadership programme raised fundamental issues with assessment, internal verification processes and assessment design, which required the School to take immediate remedial steps. Assessment briefs had been issued unapproved to students. These were required to be amended for re-issue across the majority of units. The standards verifier reports required essential activity to develop the internal verification systems, correct interpretation of assessment decisions, re-check assessment records and develop staff to

align assessment criteria with the tasks. The School's reliance on its awarding organisations to ensure valid and reliable assessment practice remains significant.

14 The School is extending the processing of student work through software that provides similarity indices. Students and staff confirm confusion regarding School approaches to the interpretation and use of these systems for developing academic practice. The School acknowledges that the Malpractice and Maladministration Policy does not specifically define 'plagiarism', although students are briefed on it at induction.

15 Students confirm that staff are supportive and helpful, providing, for example, extra case study contexts and an external visit to enhance programme study. Student representatives have also requested improvements to student facilities, which have been provided.

Section 4: Progress in working with the external reference points to meet UK expectations for higher education

16 The School has produced an action plan to map many of its handbooks, policies, practices and procedures with the UK Quality Code for Higher Education. Entries to map the latest Expectations, particularly in Part A: Setting and Maintaining Academic Standards, and Part C: Information about Higher Education Provision, are incomplete. Staff acknowledge that mapping has highlighted the need for a substantial amount of rewriting of documents. This is yet to be undertaken to complete the process for current programmes by the target date, which is the end of May 2015.

Section 5: Investigation conducted under the Concerns Scheme

17 A concern was raised on behalf of a former student, which was investigated as part of the monitoring visit. The issue dates back to November 2011, when the student was studying on a level 7 programme at the School, and it is alleged to have affected up to eight other students on the postgraduate Diploma in Hospitality Management. The cohort was expecting to graduate but their qualification was withheld by the awarding organisation, NCFE, because its verifier judged the level of assessment in the programme undertaken by the students, and set by Element 10 under NCFE's Investing in Quality (IIQ) licence to not meet the requirements for level 7. The complainant blames both the School and NCFE for shortcomings in their duty of care.

18 The allegation concerned a historical incident whose details are difficult to uncover after the passage of time, and since the School is no longer an NCFE approved centre. Nevertheless, in following up the concern, QAA investigated the specific issue so far as was possible to assess whether the problems that arose might be systemic issues with the potential to put standards at risk or affect current and future students. Consequently, the investigation particularly focused on:

- the partnership agreements in place to protect student interests
- the suitability of the recruitment procedures, internal assessment verification and academic support provided to students to enable them to achieve their awards
- the quality of the information provided for students about their programmes, particularly the assessment verification procedures and awarding organisations.

19 The School cooperated fully with the investigation of the concern, both in providing relevant documentation and in facilitating an extended annual monitoring visit to enable direct discussions with senior staff, and with four students currently studying on level 7 programmes. The Concerns Officer had access both to documentation elicited in relation to the concern, including a report by UK Visas and Immigration (UKVI), and to the

documentation and preliminary findings for the monitoring visit of 2015, and the outcomes of previous QAA engagements. Taken together, these enabled the circumstances of the concern to be seen in the wider context of the School's activities and relations with external organisations. However, since the School no longer has relations with NCFE, and Element 10 is no longer operating, the investigation could rely only on the available written communications between these organisations and the School.

20 The monitoring report findings in paragraph 6 discuss the School's procedures in relation to its awarding organisations. By the School's own admission, it did not have a contract with NCFE or Element 10 clarifying relationships and responsibilities; the review team found in its discussion with staff that their due diligence in choosing accrediting partners was inadequate, consisting largely of word-of-mouth from other alternative providers, and the identification of a handful of universities who recognised these organisations' qualifications. In this respect, the concern is upheld and a recommendation for action is given in paragraph 27. However, the overall responsibility for ensuring the level of its award rests with Element 10, who wrote the course content and assessment, and ultimately with NCFE which accredited Element 10 under its IIQ licencing procedure.

21 The monitoring report findings in paragraphs 11 and 12 describe the School's admissions procedures. In discussion with students, the review team found that three of the four had appropriate qualifications from other higher education providers, including universities, and one was a graduate of the School. All had been interviewed, had their qualifications checked and undertaken recognised English language proficiency tests. The majority clearly understood *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland*. UKVI had recently suspended the School's Tier 4 sponsor licence and a redacted version of its report was made available, as was the School's response in an appeal still awaiting an outcome. Though UKVI had criticised the School for some of its admission decisions, arguing, for instance, that a student with an MBA would not have good reason to register for a postgraduate Diploma in Health and Social Care Management, students gave convincing explanations for their study choices. The School and its 'sister' institution on another floor of the same building, the College of IT & E-Commerce Ltd, operate a similar award from a different awarding organisation, but different entry qualifications apply and cohorts are not taught together. Indeed, the School is very mindful of the requirements of UKVI in all its recruitment and delivery policies, and does not exercise Accreditation of Prior Experiential Learning, even where awarding organisations would allow this. The School does exercise flexibility in the timing of student registration for programmes, to allow for a time lag in visa applications, and this has implications for its ability to analyse student achievement at a level beyond that of the module. Paragraph 8 of this report discusses the School's data management. Although the module data provided was straightforward and unexceptional, the School was not able to produce overall progression and completion statistics.

22 Paragraph 13 of this report covers the serious failings found in a recent external verification report. Corrective action was taken within the required timeframe on these failings, including inadequate checking for plagiarism. However, in answering questions in relation to plagiarism, staff met by the review team were uncertain about its distinction from similarity reporting and believed a proportion of plagiarism was permitted at level 7.

23 Paragraph 15 of this report indicates that students were satisfied with the support of the School and the quality of the teaching, comparing them favourably with those of their previous institutions. They had not received career or progression advice, but believed it would be forthcoming once they had completed their studies. Each student had specific career plans, including one who had already been accepted for a PhD at a university, and one who was committed to working as a manager in a health care setting. Staff told the review team that the School would always enable students affected by visa delays, or the

withdrawal of their own Tier 4 sponsor licence, to complete their programmes by intensive tuition. Two of the students were expecting this in their own cases, either by one-to-one tuition, supported by the VLE, or by taking modules out of sequence. Staff confirmed that three terms' work might be accelerated into two, and did not appear concerned about how study hours could be fitted into such intensive study patterns. The only concern expressed by students was the absence of specific software appropriate for their programmes.

24 The Concerns Officer pursued with staff the particular support given to students affected by the Element 10 problem. The School had already provided evidence that all affected students had been kept informed about the situation, and one of their number had been recruited to manage the liaison and consultation process. The School had sought solutions from Element 10 directly, including the threat of legal action, as well as through NCFE, and had paid to be a licensed centre for an alternative awarding organisation. However, matters were complicated by the disappearance of Element 10 and by the different assessment regimes of alternative creditors who might otherwise have audited the student work for credit. Staff admitted their responsibility to the students and stated that they thought they had done everything in their power to enable students to complete, as they believed most eventually had. They had also tried to respond positively to the family of the Complainant. However, the review team concluded that, if the School had managed data better and kept discrete cohort records, it could have communicated more effectively with affected students, and would have been in a position to detail exactly what had happened to each of them, including the student who was the focus of the concern.

25 Students met by the review team had been kept informed about the possibility of the School losing its Tier 4 sponsor licence and how this would impact on them, although one student appeared not to understand the personal implications. In general, students knew where to find information about their programmes and how to appeal or complain, if necessary. They understood how their assessments were devised, marked and verified, but did not all know when their qualifications would be obtained.

26 The review team concluded that the School does not bear the whole, or even the major part, of responsibility for students on the IIQ Level 7 Diploma in Hospitality Management programme not obtaining their awards. That responsibility rests with Element 10, who were responsible for the assessment, and with NCFE who accredited Element 10. However, the School must bear some responsibility for its choice of partner and lack of contractual fallback, and it is aware of these shortcomings. There are also aspects of the School's current practice that still have the potential to put students at similar risk:

- a lack of robust due diligence procedures in the choice of accrediting partners (and an absence of formal progression or articulation arrangements)
- a lack of clarity in registration and cohort data recording and tracking
- inadequate oversight of assessment design and marks verification
- supportive but potentially academically inappropriate modes of study and approaches to assessment for postgraduate level work.

27 The School should produce an action plan, which details how it will implement the following recommendations.

The School should:

- draw on best practice in the higher education sector in establishing a procedure for due diligence in selecting accrediting partners
- ensure that it does not recruit students to a programme without a contract with an awarding body or organisation, which sets out the respective duties and responsibilities of each party

- improve its data management to ensure clarity and facilitate tracking in the recording of student outcomes by cohort
- take steps to ensure oversight of assessment design and grading to ensure students meet learning outcomes
- revisit and review regularly the adequacy of its learning resources and study hours requirements for postgraduate students.

Section 6: Background to the monitoring visit

28 The monitoring visit serves as a short check on the provider's continuing management of academic standards and quality of provision. It focuses on progress since the previous review. In addition, it provides an opportunity for QAA to advise the provider of any matters that have the potential to be of particular interest in the next monitoring visit or review.

29 The monitoring visit was carried out by Professor Edward Esche, Coordinator, and Ms Deborah Trayhurn, Reviewer, on 12 May 2015.

30 The concerns investigation was carried out by Ms Kathryn Southworth, Concerns Officer; Professor Edward Esche, Coordinator; and Ms Deborah Trayhurn, Reviewer, on 13 May 2015.

QAA1267 - R4345 - July 15

© The Quality Assurance Agency for Higher Education 2015
Southgate House, Southgate Street, Gloucester GL1 1UB

Tel 01452 557000
Email enquiries@qaa.ac.uk
Web www.qaa.ac.uk

Registered charity numbers 1062746 and SC037786