Concerns about standards and quality in higher education

West London Vocational Training College Ltd, Alperton, January 2016

Contents

Introduction

1   This report is a full investigation of West London Vocational Training College Ltd as a result of an application to the Quality Assurance Agency for Higher Education's (QAA) Concerns Scheme.[1]

2   West London Vocational Training College Ltd (the College) is an alternative provider of further and higher education and training based at Alperton, London. The College also operates a vocational training centre in Cardiff.

3   A BBC Wales programme Week In Week Out, broadcast on 1 December 2015 (the programme), featured the College's Cardiff centre, and included allegations that raised concerns about academic management at that centre of the College.

4   On the basis of the evidence and allegations in Week In Week Out, QAA initiated a Concern in line with the procedures of its Concerns Scheme,[2] and wrote to the College on 22 December 2015, opening a full investigation.

5   In addition to investigating the concerns at the Cardiff centre QAA considered it prudent to seek assurance that similar concerns do not exist at the Alperton centre. It therefore investigated the matters identified below at both the Cardiff and Alperton centres. The Concerns report on the Cardiff centre was published on the QAA website on 9 June 2016.[3]

Concerns raised

6   The programme alleged, and included evidence to show, that:

- in the recruitment and admission of students, fake entry qualifications were accepted, and guidance was given on how to make them; applicants were advised to give false information on application forms; inappropriate tests were given to applicants at interview; the College did not check information given by applicants about their qualifications; the Principal 'knows everything'
- students were encouraged to give incorrect information in their applications to Student Finance Wales for funding
- low levels of student attendance were accepted at the College
- students could pay for assignments to be written by others
- the former Principal of the Cardiff centre had given a false account of their qualifications and academic experience.

The investigation process

7   QAA initiated a full investigation, totalling four visits to the College. An initial visit, to learn about the management of the College as a whole and at Cardiff in particular, was made to the College's Alperton centre on 11 January 2016. A visit to the Cardiff centre was made on 22 January 2016, followed by a second visit to the London centre, to discuss Cardiff-related matters, on 11 March 2016. A visit to the Alperton centre, to discuss Alperton-related matters, was made on 28-29 April 2016. The College cooperated fully with the investigation (see also paragraph 14).

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[1] QAA Concerns Scheme: www.qaa.ac.uk/concerns/concerns-about-providers
[2] See: www.qaa.ac.uk/concerns/concerns-about-providers.
[3] Available at: www.qaa.ac.uk/reviews-and-reports/provider?UKPRN=10023130

8   The QAA concerns team (the team) comprised Mr Alan Hunt (investigation coordinator and reviewer), Dr Sylvia Hargreaves (reviewer), Professor Ian Robinson (reviewer) and Ms Mahfia Watkinson (notes and documentary analysis). Ms Watkinson was replaced for the visit on 29 April by Mr Cameron Waitt.

9   This present report sets out the QAA investigation's findings at the Alperton centre. A separate report addresses Cardiff-related aspects of the investigation.

10   QAA also reserved the right to investigate any other matters regarding the management of academic standards, quality and information about the College's higher education provision which may come to its attention during this Concerns investigation.

11   During its investigation QAA worked closely with the Welsh Government, the Department for Business, Innovation and Skills, and the South Wales Police, and exchanged information with each of these bodies.

12   The team addressed the allegations in their management contexts, considering to what extent there were systemic weaknesses in these areas, as follows.

- Allegations about the recruitment and admission of students were addressed in the wider context of the College's management of student recruitment and admission (paragraphs 35-86).
- Allegations about student attendance were addressed in the wider context of the College's management of student attendance (paragraphs 95-105).
- Allegations about misconduct in the assessment of students were addressed in the wider context of the College's management of assessment (paragraphs 106-131).
- Allegations about the qualifications of staff were addressed in the context of the College's management of staff (paragraphs 132-138).

13   The team considered these areas of the College's management in the context of its overall ownership, governance and management (paragraphs 30-34).

14   The team, at its first visit to the head office at Alperton on 11 January 2016, met senior managers of the College to learn about the overall management of the organisation and its centres. At a later visit to Alperton, on 28 to 29 April, to address matters specifically related to the HND provision at Alperton, the team met a group of 15 students, four teaching and support staff, and senior managers.

15   Most of the documentary evidence used by QAA in its investigation at Alperton was supplied directly to QAA by the College from its London centre at Alperton. This documentary evidence included (but was not limited to): College policies; the College website; College organograms; minutes of the Strategic Planning Committee and the Academic Quality Assurance Committee; listings of students at the College; a selection of students' admission files; samples of student assignments and assessment feedback; a spreadsheet of Alperton students' assessment results for 2014-15; the awarding organisation's Standards Verifier report for 2014-15; and attendance records. The College provided a demonstration of its electronic student records system.

16   A draft of this report was sent by QAA to the College on 13 May 2016 for comments on matters of factual inaccuracy. Comments were received on 28 May 2016 and have been taken into account in this final version of the report.

The College's response to the investigation

17   The College cooperated with this investigation. On 6 January 2016 it provided a copy of its response to the BBC regarding the Week In Week Out programme and the

allegations made in it. In this response the College described the BBC's allegations as being made against individuals - 'an independent agent and the principal of the Cardiff campus of the West London Vocational Training College' - rather than the College as such. It went on to say that 'Whilst the BBC's investigation has tried to link their allegations with the wider College, it is important to clarify that the responsibility for their actions rest solely with the two individuals who were the focus of the programme'. However, it also noted that 'The College continues to maintain high operational standards and procedures' and 'Any allegation of wrongdoing is taken very seriously by West London Vocational Training College Ltd and is acted upon immediately'. Details of specific actions taken by the College after the broadcast on 1 December 2015 are discussed in the relevant sections of this present report.

Result of the investigation

18   The QAA team did not find evidence to prove that the specific allegations made in the BBC Week In Week Out programme broadcast on 1 December 2015 (paragraph 6), about the College's Cardiff centre, could be upheld at the Alperton centre. However, other significant concerns were identified during the investigation. These issues are summarised in paragraphs 140-146. The College requires improvement to meet the expectations of four sections of the UK Quality Code for Higher Education (the Quality Code): *Chapter B2: Recruitment, Selection and Admission to Higher Education*; *Chapter B3: Learning and Teaching*; *Chapter B6: Assessment of Students and the Recognition of Prior Learning*; and Part C: Information about Higher Education Provision. In view of all the concerns addressed in the investigation the QAA team made 18 recommendations (paragraph 148).

The College and its provision

19   The College is a private limited company (company registration number 05831249). It was established in 2006 and is based in a modern building at Alperton in West London. The College also has a centre in Cardiff that has been occupied since summer 2015. The College currently has no other study centres.

Relationships with other institutions

20   In its first meeting with the team, and in a document submitted later, the College reported that it had links with a further education college, a local alternative provider offering courses mainly at levels 1-3: an institution that QAA was later told is now closed. The College has also had a relationship with another alternative provider of higher education. This relationship emerged in discussion with the team, and when QAA requested further documentary information it was presented with an undated 'collaboration agreement' whereby the other provider assists the College with the recruitment of students and the College provides tutorial support for the other provider's online provision. However, the team was later told that this agreement had not been fully activated and had been discontinued.

QAA review

21   A QAA Adapted Review for Specific Course Designation in November 2013 reported confidence in standards and quality, and reliance on information. However, the report made three advisable and three desirable recommendations. This review addressed provision at the Alperton centre, and also referred to a study centre in Bow, East London, which later moved to Barking and has subsequently closed. The College had no other delivery centres at the time of the 2013 review. In 2014 QAA concluded, on the basis of its annual return submitted in August 2014, that the College was continuing to maintain academic standards and enhance the quality of student learning opportunities and information about learning opportunities. The scheduled 2015 annual monitoring was set

aside and replaced by a full Concerns investigation. This substitution reflects QAA's normal practice in such cases.

Educational oversight

22 Oversight of the College was provided by the Independent Schools Inspectorate (ISI), which made its final inspection visit on 9 June 2015. The report of this inspection concluded that the College met the ISI's Standards for Educational Oversight.

Designation for student funding

23 According to the College's website, the higher education programmes for which Student Loans Company funding is available are the Pearson Higher National Certificate and Diploma (HNC/D) in Business; the Association of Accounting Technicians level 4 Diploma in Accounting; and the ATHE Ltd Diploma in Management. A decision on the College's 2016-17 designation application was paused pending the outcome of this Concerns investigation.

Explanation of findings

The College's higher education provision and student numbers

24 In January 2016 the College offered the following higher education programmes at Alperton:

- Association of Accounting Technicians Access to HE and Diploma programmes in Accounting (levels 1-4)
- Oxford, Cambridge and RSA (OCR) Diplomas in Business Administration (levels 2 and 3)
- Pearson Diploma in Business (level 3)
- Pearson HNC and HND in Business (levels 4 and 5)
- OCR Diploma in Technology (level 3)
- Awards for Training and Higher Education (ATHE) Diploma in Management (level 4)
- SAGE Accounts and Payroll programmes (level 2 and below).

25 Of this provision, only the Pearson HND in Business, delivered at Alperton, is addressed in this present report.

Relationship with Pearson as the awarding organisation

26 Pearson, as the awarding organisation, requires that students following the academic year cycle must be registered by 1 November; and where courses do not follow the academic year, 'Learners must be registered within one month of enrolment at the centre'. All students admitted by the College to the HND at Alperton in September 2015 were registered by 15 October 2015.

27 Pearson blocked certification for the College's HNC/D provision on 20 November 2015. Registration was blocked on 24 November 2015, and this was confirmed to the College on 2 February 2016. Nevertheless, despite this block on the registration of new students, there was evidence to indicate that five students were admitted to the HND course at Alperton in March and April 2016. The team found that each of these students had a College enrolment number and a file. The College, at a late stage in this investigation, explained to QAA that 'none of [these five] students was registered in College', and that the files were 'created by the staff for the purpose of training only'. The team found this explanation unsatisfactory. It did not fit all the evidence available: see, for example,

paragraph 28. Indeed, on 28 April one of the five attended a meeting with the team as a current student. The team considered that if this had been a training exercise, it would be highly inappropriate, given its confusing results. The team also considered, that if, as the balance of evidence suggested, the five students had indeed been admitted to the HND in March/April, at a time when registration with the awarding organisation was not possible, their best interests had not been served.

28   Some aspects of this matter also gave rise to concern about the consistent accuracy and reliability of student records at the College. One of the students admitted in March 2016 had a March date recorded in their file, but this date had been partially obscured with correction fluid and a September 2015 date substituted. This file also showed that the student had reapplied in February 2016. Moreover, in October 2015 a person with this student's College enrolment number had been registered with Pearson for the HND, but that registration was made in another name. The team also found a second instance where a single student number was attached to two names, on file and in registration records. Another student, also admitted in March 2016, had two numbers, one on the student record system and another on their file. Commenting on issues in relation to its student records, the College explained that its electronic record system, a proprietary package, had been introduced in September 2015 and had experienced technical problems. It further asserted, at a later stage in the investigation, that some 'old' numbers may have been taken from 'working sheets', and that all student numbers are now generated by the electronic records system. Nevertheless, the team considered that, whatever the explanation, confusions remained in the student record system. Taking into account these matters, and those discussed in paragraph 27, the team concludes that the College had not always complied appropriately and consistently with Pearson's requirements for the registration of Higher National students. The team also concludes that the College did not consistently maintain accurate and reliable records of all its students.

Recommendation

29   The College should:

- ensure that it complies appropriately and consistently with Pearson's requirements for the registration of Higher National students, and not recruit students while registration is blocked
- ensure that it has, and consistently maintains, accurate and reliable records of all its students.

Governance, management and deliberative functions at the College

30   The College is owned by the Principal and Vice-Principal (see also paragraph 31). There is no governing body as such, but strategic decisions are taken by a Strategic Committee (also known as the Strategic Planning Committee), which comprises the Principal, Vice-Principal, members of other colleges and representatives of industry.

Management

31   The overall management of the College is based at the Alperton centre and is led by the Principal, who is also the Head of Finance. The Principal is assisted by a Vice-Principal, a Head of Administration, a Head of Academics, and a Head of Human Resources. A person was named on this organogram as responsible for 'Overall QA', and was elsewhere described as 'Extension Quality Controller', but their role was later explained as that of an internal verifier who operated remotely from the College. The Vice-Principal is referred to as the 'quality nominee' in some committee minutes. In January 2016 a quality assurance consultant began to work for the College, initially by giving advice on quality

management structures, but at the time of this investigation it was too soon to determine the impact of this role.

Deliberative bodies: the College's committees

32   The College's Strategic Committee (paragraph 30) oversees strategic planning; monitors College performance against targets; reviews policies, procedures and publications; discusses and evaluates new accreditations and courses; and oversees the admissions process. It is not clear how it can fulfil all these roles effectively, given that it normally meets once a year, or when necessary at the call of the committee chair, who is the Principal. Minutes of this Committee included a series of Quality Improvement Plans for 2014-15 and 2015-16 and tabulated annual monitoring reports.

33   The most senior academic committee is the Academic and Quality Assurance Committee, also known as the Academic Committee. It is chaired by the Vice-Principal and its responsibilities include making recommendations to the Principal for the approval, review and modification of courses. It also serves in a role akin to that of an assessment board.

34   An Admissions Committee is chaired by the Principal and Head of Finance, a combination of roles that potentially involves a conflict of interest in this context. The terms of reference for this Committee were 'formulated' on 6 January 2016, suggesting that it came into being around this time. It is not clear how this Committee's responsibilities for admissions relate to those of the Strategic Committee (paragraphs 30, 32). The Admissions Committee has an Attendance Subcommittee, which appears to be a very recent formation whose role does not appear to be clearly defined; for example, its membership is not specified.

Student recruitment and admission

35   It was alleged in the BBC programme broadcast on 1 December 2015 (paragraph 3) that faked entry qualifications were accepted by the College and that guidance was given on how to make them by a person acting as a recruiter of students for the College. This person, described as 'Recruitment Director' on an advertising flyer, was shown on video instructing a BBC Wales employee, posing as a business person offering to supply students to the College, how to make a false GCSE certificate for another BBC employee presenting as an applicant to the College. The recruiter was also shown advising another 'applicant' to fake an Italian qualification. On the basis of these faked documents, both 'applicants' were accepted on the HND Business course at the College.

36   It was also alleged that 'applicants' were advised to give false information in application forms. Two 'applicants' were told to say that they wished to set up their own businesses. It was also alleged that an 'applicant' was advised to give incorrect information on their application to Student Finance Wales for funding.

37   During an interview filmed in the programme the former Cardiff Principal was shown setting a very simple test for an applicant, asking them how they would set up a restaurant. The applicant wrote three paragraphs in poor English with little content, and was accepted on the HND Business course. The recruiter was filmed saying that the College did not check information given by applicants about their qualifications, and that the Principal was aware of these matters ('knows everything').

38   During the BBC programme the College responded to these allegations by stating that students were carefully selected for the HND course, and were given English and maths tests. The then Principal told the BBC reporter that he had refused a place to one of the

'applicants' and advised them to do an English course first. However, the undercover filming confirmed that the Principal had accepted this 'applicant' on to the course.

39   In its response to the BBC, also given to QAA, the College stated that 'Neither of these "students" had actually been enrolled by the College, and the standard processes and verification of qualifications had not been completed. Qualified students are only accepted following full verification of qualifications...While the BBC programme effectively exposed the activities of two individuals, it was wrong and misleading to extrapolate from the experience of these two prospective "students".'

The College's use of agents in the recruitment of students

40   The team found no evidence that the agent acting as a recruiter for the College at Cardiff (paragraph 35) had recruited any students at the Alperton centre.
Another, London-based, agent had played a part in recruiting a number of the students admitted in September 2016, but the team found no documented details of this agent's activity. However, the team explored the College's wider policy and practice for the use of recruiting agents. During its investigations the team saw four agreements made by the College with recruitment agents. In January 2016 the College listed three agents that it had employed in its recruitment of students. This list was incomplete. The QAA investigation team found, at the Cardiff centre, a contract, signed on 18 November 2015, with a fourth agent in London whose contract referred both to the College's Alperton and Cardiff offices. When this omission was discussed with College senior managers they appeared unaware of the fourth agent and suggested that this was one of the three agents already made known to QAA, using an alternative name. However, the company number, name and address of the fourth agent did not match any of the others. The team considered that the College either did not have, or did not make consistent use of, records of its contracted agents.

41   Although it had these four agreements with recruiting agents, in December 2015 it was found that the College had not complied with requirements by the Higher Education Funding Council for England (HEFCE) that it should be informed about the use of agents to recruit students.

Recommendations

42   The College should:

- maintain and make use of accurate, complete and effective records of all agents that it uses for the recruitment of students
- ensure that it informs HEFCE of all agents that it uses in the recruitment of students.

The College's admissions processes

43   The QAA investigation sought assurance that problems of the kind alleged at Cardiff (paragraphs 35-37) had not arisen at Alperton, and that sound policies and procedures for the recruitment and admission of students' attendance were in place.

44   The team considered whether the College's processes were sufficiently robust, and implemented fully and effectively, to ensure that students admitted to the HND Business course at Alperton were appropriately qualified to enter this course, including the ability to study at this level and to benefit from the course. The team evaluated the effectiveness of the College's admissions process by examining the documented process, and the student files for 31 students who were successful in their applications to the HND at Alperton and admitted to the course in June and September 2015. The team also held meetings with

senior staff, teaching and administrative staff, and students during its visit to the College on 28 and 29 April 2016.

45   In advance of this visit to the College, the team was provided with a College Admissions Policy, dated May 2014, which was initially identified by the College as the policy in place when students currently enrolled on the HND programme were admitted. However, at the visit, the team was told by senior managers that the policy had been reviewed and revised twice since 2014 - in March 2015 and January 2016 - and that the March 2015 version applied when students were admitted in June and September 2015. At the date of the visit the College website displayed the May 2014 version, potentially creating confusion for prospective students and College staff (see also paragraph 88).

46   The College Admissions Policy of May 2014 sets out admissions principles, procedures and entry requirements for the HND programmes for UK/EU and international students. The March 2015 version of the policy also sets out principles and procedures, but does not specify entry requirements for the HND, which senior managers confirmed remained the same as those set out in the May 2014 policy. The latest version of the policy, provided to the team after the visit, is in fact dated December 2015. Like the March 2015 policy, the December 2015 policy does not specify HND admission requirements. Instead, it sets out a list of examples of certificates of qualification that applicants will be asked to produce, raising a risk of confusion as to the definitive entry requirements (see also paragraph 90.)

47   Senior managers confirmed that no international students have been enrolled on the programme to date. All the students whom the review team met described themselves as UK students.

48   The 'eligibility criteria' set out in the College Admissions Policy and Procedure of May 2014 align with Pearson 2014 and 2015 academic (as distinct from English language requirements) requirements for entry to level 4/5 qualifications. For learners who have recently been in education, the entry profile is 'likely to include' one of the following: a BTEC level 3 qualification in business; a GCE A Level profile that demonstrates strong performance in a relevant subject or an adequate performance in more than one GCE subject, likely to be supported by GCSE grades at A* to C; other related level 3 qualifications; an Access to HE certificate awarded by an approved further education institution; or related work experience. The College website indicates that at least one of these requirements must be satisfied. Mature learners may present a more varied profile of achievement, which is likely to include extensive work experience (paid or unpaid) and/or achievement of a range of professional qualifications in their work sector.

49   With respect to English language capability for entry to the HND, the College policy states that 'Learners will be expected to have good literacy…skills and pass the skill test at the appropriate level'. Academic Committee minutes dated April 2015 record that the College requires level 2 English for entry to the HND. This was confirmed by senior managers, who stated that for June and September 2015 entry, the College required a level of proficiency equivalent to CEFR (the Common European Framework of Reference for Languages) at level B2/IELTS (International English Language Testing System) 5.5, (a level that satisfies Pearson requirements), and that this was evidenced through completion of the BKSB Initial Literacy Assessment (an online functional skills tool), which all applicants were required to take. In a later written statement, the College added that the BKSB test is used in combination with other internally set diagnostic tests; however, this was not evidenced as a systematic practice in the sample files examined.

50   Senior managers also stated that the equivalency of the BKSB Initial Literacy Assessment to CEFR B2/IELTS 5.5 had been confirmed in email correspondence between

the College and BKSB. Email correspondence between the College and BKSB provided what BKSB described as a 'rough indication' of the equivalency of BKSB levels and IELTS levels. However, this information did not specify the level of the BKSB Initial Literacy Assessment, which is only one of a number of skills tests/checks produced by BKSB.

51   The BSKB Initial Literacy Assessment (like other tests such as the Basic Skills Agency Initial Assessment) is designed as a tool to allow tutors to identify a learner's working level in a subject. When the results are combined with the results from a Functional Skills diagnostic assessment, tutors are provided with the key information they need to support learners within the Functional Skills programme. These tests are not designed to act as a substitute for recognised full level 2 tests, such as GCSE grades A*-C, Functional Skills level 2, CEFR level B2 and IELTS 5/5.5/6.0.

52   Ofqual specifications require the duration of assessment leading to a Functional Skills qualification in English to be a minimum of one hour (entry levels 1 and 2); or two hours (levels 1 and 2). The BKSB Initial Literacy Assessment taken by applicants to the HND at Alperton was considerably shorter. BSKB's online information states, in relation to the BKSB initial assessments that: '…We suggest you allow approximately 20 minutes for each assessment'. The team found that, where the time taken to complete the initial literacy assessment was recorded in the sample student files, typically this ranged between five minutes and 15 minutes.

53   The team concludes that the College was using a test that was not designed to act as a substitute for a full level 2 qualification in English to assess applicants' proficiency in English against the College's required minimum of CEFR level B2 or equivalent. It was therefore in breach of its own policy.

54   The team heard from senior staff that the College is to replace the BKSB Initial Literacy Assessment with a new test, which all HND applicants and current HND students will be required to complete. The new test, which senior managers described as more rigorous and of one hour's duration, has been designed internally by a number of other colleges; any existing students falling short of the required proficiency level will be offered English language support.

Recommendation

55   The College should:

- undertake a formal assessment of the new English language proficiency test to ensure its equivalence to CEFR level B2, and formally document the basis and outcomes of this assessment.

56   Recent minutes of the new College Admissions Committee, which was established in January 2016 to oversee recruitment and Admissions Policy and processes, record that the College has now revised the HND English entry requirements 'to match with Pearson requirement for competency level of 5/5.5 (IELTS)' and the 'upgrade' of the website 'to CEFR B1'. At the visit on 28 to 29 April 2016, senior staff confirmed that this revised requirement was now in place. The team verified that the website had been amended accordingly, although the 'upgrade' referred to was in fact a downgrade from level B2 to B1.

57   Senior staff explained that, although the Pearson requirement for English proficiency does not apply to native English speakers, the College's policy is to require the same level of English proficiency for all students, thereby exceeding Pearson requirements. However, the team noted that the College was referencing its policy to Pearson requirements for 2014, which required Tier 4 students to demonstrate proficiency at level B1. Current Pearson requirements for non-native English speakers or those who have not

studied the final two years of school in English specify IELTS 5.5 (equivalent to CEFR B2), with a minimum of 5.0 being awarded on individual sections, for a level 4 or 5 qualification.

58   The team also noted that Pearson has introduced a new English language requirement for entry to the HND from September 2016, namely English language proficiency at CEFR level B2/IELTS 5.5, with reading and writing at 5.5 (or equivalent) for non-native English speakers who have not undertaken their final two years of schooling in English. In a meeting with the team, senior managers made no reference to these new requirements.

59   In addressing the suitability of the academic qualifications of applicants admitted to the HND at Alperton in June and September 2015, the team examined 24 sample student files.

60   The College Admissions Policy requires all documents submitted by applicants to be verified by administrative staff. Senior managers stated that applicants' UK qualifications are verified online through the national Learner Record System or directly with the institution of study. Administrative staff confirmed that they carry out checks on the authenticity of UK qualifications. However, while there was documented evidence that checks were carried out in some cases, this was not consistently the case.

61   With respect to overseas academic qualifications, senior managers told the team that checks on equivalency to level 3 were previously made through the NARIC system, to which the College no longer subscribes. Currently, checks are made using UCAS guidance information. As to the authenticity of applicants' overseas qualifications, senior managers said that verification is always sought. However, four files in the sample indicating overseas qualifications, all GCSEs and/or A Levels awarded in Sri Lanka, held no evidence that confirmation of authenticity had been sought.

62   The review team concludes that the College failed to establish the authenticity of all applicants' academic qualifications.

Recommendation

63   The College should:

- ensure that all academic qualifications upon which it places reliance in establishing applicants' eligibility for the HND are authenticated before students are admitted to the programme.

64   The College's expectation is that the authentication of qualifications obtained within the last three years will be provided within a reasonable time; for older qualifications the College anticipates less timely responses, or none at all. In the absence of a response, admissions decisions rest on the applicants' signed declaration of authenticity, together with the College's assessment of any other qualifications and/or experience. The team considered that signed applicant declarations are not, in themselves, reliable evidence of the authenticity of applicants' qualifications. As noted in paragraph 70, there was evidence that a number of applicants with neither authenticated qualifications nor demonstrable related work experience had been admitted to the HND.

65   The distribution of level 2/level 3/BTEC qualifications across the sample files was broadly in line with the distribution of qualifications described by students whom the review team met. Twenty three of the 24 files examined indicated that the applicants held level 3 qualifications. The remaining file indicated that the applicant's highest entry qualification was at level 2. Thirteen of the level 3 qualifications comprised the BTEC level 3 Subsidiary

Diploma completed at the College and were therefore capable of internal authentication. Ten files indicated level 3 qualifications completed elsewhere.

66 As noted in paragraph 64, senior staff told the team that, where level 3 qualifications cannot be authenticated, a declaration of authenticity signed by the applicant, together with an assessment of their suitability for the HND at interview and/or through completion of a business skills test, provides a sufficient basis for admissions decisions; after admission, students' progress is carefully monitored. This account of the process made no reference to any discussion or investigation of related work experience which, in the absence of authenticated level 3 qualifications, must be demonstrated, in line with College and Pearson requirements of applicants without level 3 qualifications.

67 Two of the 10 files indicating level 3 qualifications completed at institutions other than the College contained copy certificates; however external authentication, though sought, had not been received. Six of the others held no copy certificates or evidence of certification. In the absence of authenticated level 3 qualifications, these eight applicants, to be eligible for the HND, would need to demonstrate related work experience. The team found that none of these files recorded the extent of discussion or external verification required to establish conclusively that the applicants' experience constituted 'related' work experience. Where interviewer judgements were recorded these were typically brief and generalised, indicating, for instance, '..[the applicant] has been interviewed and has adequate information and knowledge..', '…accepted on his business acumen….' One of these six files recorded a tutor statement that the applicant 'successfully completed his business level 3…' though there was no evidence of this on file, nor any discussion or evidence of work experience. Another file recorded that the applicant had been unemployed for 10 years, and provided no evidence of work experience.

68 The team was informed by senior staff that a small number of current students had met entry requirements through evidence of related work experience, rather than through completion of level 3 qualifications. The team met some of these students during the visit, and heard from them that admission interviews had included discussion of this experience. One student had brought along to interview a letter from their employer, though they did not know whether the College had sought any information directly from this employer. From the documentary evidence examined, the team was unable to reach a conclusion on the adequacy of the College's verification of the 'relatedness' of work experience with respect to the students who were present at this meeting.

69 However, in one of the 24 sample files examined, the applicant indicated his highest academic qualifications at level 2 (comprising Sri Lankan GCSEs), so the applicant's eligibility for the HND depended on 'related' work experience. The file contained a reference from an employer, but no useful indication or discussion of the applicant's skills and experience.

70 From its examination of the 24 sample files, the team concludes that the College had admitted eight students with unauthenticated level 3 academic qualifications and one student whose highest academic qualifications were at level 2, without external verification of the 'relatedness' of their work experience. These nine students were not demonstrably qualified to enter the HND course at Alperton, with respect to their academic qualifications or related work experience.

71 In assessing the suitability of the English language qualifications of applicants admitted to the HND at Alperton in June and September 2015, the team examined a sample of 12 student files (five of which were also examined with respect to applicants' academic qualifications, as mentioned in paragraph 65). Some of these files indicated formal English language qualifications, but none of these was higher than Entry Level or Foundation Level

1. The 12 files indicated a range of academic qualifications held by applicants, such as the BTEC level 3 Diploma in Business completed at the College; A Levels in undisclosed subjects; A Level Information Technology; overseas level 3 qualifications; and overseas level 2 qualifications in undisclosed subjects. The team found no record of any assessment by the College of these various academic qualifications, as evidence of English language proficiency; the College had relied on the BKSB test (which all applicants had completed) for this purpose. However, as discussed in paragraph 51, this test was not suitable to assess applicants' proficiency in English against the College's required minimum of CEFR level B2 or equivalent.

72   The team concludes that none of the 12 sample student files it examined contained evidence that the respective applicants had the required level of English language proficiency for entry to the HND. Thus 12 students admitted to the HND at Alperton had not demonstrably met the English language proficiency requirements for entry to the programme.

Recommendation

73   The College should:

• ensure that all students admitted to the HND are demonstrably qualified to enter the course, both in terms of academic qualification and English language proficiency.

74   The College's stated policy is to 'adopt a range of criteria to evaluate all the evidence submitted by the candidates in a professional manner to judge the suitability of the candidate for the chosen programme of study'. In the case of the applicant referred to in paragraph 69, whose file indicated the completion of Sri Lankan GCSEs, there were no copy certificates on file, nor was there any indication of the subjects studied. The team concludes that the College failed to follow its own policy to evaluate all evidence in a professional manner to judge the suitability of candidates for the HND.

Recommendation

75   The College should:

• fully evaluate all evidence to judge the suitability of applicants for the HND, in accordance with its Admissions Policy.

76   The team heard from senior managers that applicants' personal statements, together with the information, advice and guidance session (a one-to-one 'interview' with a College assessor) which are designed to explore candidates' reasons for choosing the course, qualifications, experience, goals and aspirations, are key elements of the recruitment and decision-making process. All the students whom the team met confirmed that they had completed personal statements, spending around 35-40 minutes on this task. All had been interviewed by a College assessor, and all had second interviews, with the Principal, lasting around 30 minutes. Students considered that the interview process had explored appropriately their qualifications and experience. However, the student files examined by the team contained little or no record of such discussions, with no, or very brief, interviewer notes. The team concludes that the College had failed to record fully and formally the basis of decisions for admission to the HND.

Recommendation

77   The College should:

- fully and formally record the basis of all decisions for admission to the HND.

78   Teaching staff have no involvement with the recruitment and admission of students, functions which are performed by senior managers and administrative staff. Administrative staff had received training from the Principal, and generally spoke confidently about, and with understanding of, the processes. However, they were much less confident about the entry criteria for applicants without level 3 qualifications and about the processes for investigating and verifying the nature and scope of the related work experience required in these cases.

79   The team concludes that the College had failed to ensure that all staff involved in student admissions have a full understanding of the HND entry requirements and the processes for assessing applicants' suitability for the course.

Recommendation

80   The College should:

- ensure that all staff involved with student admissions have a full understanding of the HND entry requirements and the processes for assessing applicants' suitability for the course.

Management of student admissions: conclusions

81   The BBC Week In Week Out programme broadcast on 1 December 2015 made allegations about the College's admission of students at its Cardiff centre (paragraph 6). These included evidence that, at Cardiff, faked entry qualifications were accepted, and guidance was given on how to make them. The team did not see evidence of these particular issues at the Alperton centre. However, on the basis of the evidence discussed above, the team drew the following conclusions.

82   The College was using a test which was not designed to act as a substitute for a full level 2 qualification in English to assess applicants' proficiency in English against the College's required minimum of CEFR level B2 or equivalent. It was therefore in breach of its own policy (paragraphs 49-53).

83   The College failed to establish the authenticity of all applicants' academic qualifications (paragraphs 60-62).

84   Nine students (of a sample of 24) were not demonstrably qualified to enter the HND course at Alperton, with respect to their academic qualifications or related work experience (paragraphs 64-70). Twelve students (all of a sample of 12) admitted to the HND at Alperton had not demonstrably met the English language proficiency requirements for entry to the programme (paragraphs 71-72).

85   The College failed to follow its own policy which required it to evaluate all evidence in a professional manner to judge the suitability of candidates for the HND (paragraph 74). It failed to record fully and formally the basis of decisions for admission to the HND (paragraph 76). It also failed to ensure that all staff involved in student admissions have a full understanding of the HND entry requirements and the processes for assessing applicants' suitability for the course (paragraphs 78-79).

86   On the basis of the evidence and findings discussed above, the team concludes that the College does not meet the Expectation of the Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education*.

Information provided for students and prospective students

87   In connection with its concerns about the admission of students (see above) the team also considered whether appropriate information is provided to prospective students.

88   As discussed in paragraph 45, in advance of the visit to the College, the team was provided with a College Admissions Policy dated May 2014, which was initially identified by the College as the policy in place when students currently enrolled on the HND programme were admitted. However, at the visit, the team was told by senior managers that the policy had been reviewed and revised twice since 2014, in March 2015 and January 2016, and that the March 2015 version applied when students were admitted in June and September 2015. At the date of the visit, the College website displayed the May 2014 version, potentially creating confusion for prospective students and College staff. The team concludes that the College failed to have in place effective version control processes for its policy and other formal documentation.

Recommendation

89   The College should:

•   establish, document and implement clear version control processes for its policy and other formal documentation.

90   As also discussed in paragraph 46, the College Admissions Policy and Procedure of May 2014 sets out admissions principles, procedures and entry requirements for the HND programmes for UK/EU and international students. The March 2015 version of the policy, which applied when students were recruited in June and September 2015, also sets out principles and procedures, but does not specify entry requirements for the HND. The latest version of the policy, provided to the team after the visit to Alperton on 28-29 April, is in fact dated December 2015. Like the March 2015 policy, the December 2015 policy does not specify HND admission requirements. Instead, it sets out a list of examples of certificates of qualification that applicants will be asked to produce, raising a risk of confusion as to the definitive entry requirements. The team concludes that the College failed to ensure that the Admissions Policy and Procedure in place when students were recruited to the HND programme in June and September 2015 set out full and complete information.

Recommendation

91   The College should:

•   ensure that its Admissions Policy and Procedure document sets out full, clear and complete information.

92   The team also found that information provided to students about cheating in assessment was inadequate (paragraphs 114-117, 122).

Management of information for students and prospective students: conclusions

93   The incomplete and inconsistent information found on the website, and in marketing material and the agent contract raised significant risks of confusion for current and prospective students and of confusion and error in the student recruitment and admission

process (paragraphs 88-91). Some information provided for current students was also inadequate (paragraph 92). On this basis the team concludes that the College had paid insufficient attention to its management of information for prospective and current students. It had not met the Expectation of the Quality Code, Part C: Information about Higher Education Provision, which states that 'Higher education providers produce information for their intended audiences about the learning opportunities they offer that is fit for purpose, accessible and trustworthy'.

Recommendation

94   The College should:

- ensure that it systematically manages and monitors all information provided for current and prospective students, to ensure its accuracy.

Student attendance

95   The College should be able to demonstrate that it has in place effective arrangements to enable and support student progression and retention in ways consistent with the Quality Code, *Chapter B4: Enabling Student Development and Achievement*. This includes the ways in which it monitors and responds to students' non-attendance in order to facilitate their access to and engagement with learning opportunities.

96   It was alleged in the BBC programme broadcast on 1 December (paragraph 3) that low levels of student attendance were accepted at the College. An 'applicant' was told that they did not have to attend classes. Another 'applicant' who was offered and accepted a place attended the College on the first day of their HND course, signed the register and left after 15 minutes, following advice given by the Cardiff recruiter.

97   The College responded to these allegations by referring to its 'well-supported disciplinary systems covering attendance and performance'. By its own account it 'operates stringent procedures to ensure that students' attendance on their courses are satisfactory and sufficient to enable the students to pass. Students are required to sign in and sign out at reception when attending classes. They are also required by the College to have a minimum 80 per cent attendance record. If attendance falls below this minimum for three months, then the student is suspended, resulting in their student finance also being suspended.'

98   The QAA investigation sought assurance that similar problems had not arisen at Alperton, and that sound policies and procedures for the management of students' attendance were in place.

99   The College's Student Handbook for its Alperton-based students indicates that its monitoring procedure at Alperton aligns with that described in its response to the allegations; students are expected to maintain at least an 85 per cent attendance record. It advises students that persistent late arrival or absence may lead to suspension of studies, although the detailed process for monitoring attendance and invoking warnings is not described. It additionally indicates that were any international students to be on the programme, then the attendance threshold is set at 80 per cent, in line with UK Government immigration requirements.

100   Discussions with staff and students revealed that the published procedures described above are in use; the procedures are widely promulgated on posters in classrooms as well as in the student handbook. The team heard that each morning and afternoon staff either called a register or circulated nominal lists for signature during class. Both groups opined that it would not be possible for students to absent themselves without notification. The subsequent register sheets are transcribed at least weekly into the

College's proprietary student record system, from which attendance reports are routinely produced for consideration by managers. Students arriving over 15 minutes late are required to report to the management office and sign a separate attendance register; three late arrivals results in the recording of an unauthorised absence.

101   Students reported that the College expected a high level of attendance, saying that short periods of absence were followed up immediately with SMS messages to the student; longer periods of unauthorised non-attendance resulted in a formal email warning of the consequences of further absence. Students are able to request authorised absence for legitimate reason (illness, accident, family emergency or similar), although student records indicated that such requests were generally sought in retrospect, thus potentially undermining the legitimacy of attendance figures.

102   Scrutiny of student records confirmed that formal warning emails are sent to students with a poor attendance record. Analysis of the records of level 4 students who enrolled in September 2015 indicate that, of the 43 entrants, 39 (91 per cent) remain.

103   The College has, since the BBC programme on 1 December, reviewed the terms of reference of its Academic Quality Assurance Committee to include oversight of student attendance, and, with effect from January 2016, has established an Admissions Committee, with an associated Attendance Subcommittee. The terms of reference of the Attendance Subcommittee include the formulation of attendance policy and the direct management of student attendance. It began its work during the period of this investigation, and records of its first three meetings demonstrate alignment with its terms of reference. The attendance policy was reviewed each meeting, and was considered to remain fit for purpose. Students whose attendance drops below 85 per cent are considered on a case-by-case basis, and a number of persistent non-attenders were compulsorily withdrawn from study. The committee issued instructions in each case for the administrative team to notify both Pearson and the Student Loans Company of the termination.

Management of student attendance: conclusions

104   The team found no evidence of the lax management of student attendance which it had previously found at the College's Cardiff centre, and which was also alleged in the BBC programme (paragraph 96). The rigorous use of class registers and weekly monitoring of attendance at Alperton now provides a mechanism which enables the College to rapidly identify non-attending students, and instigate immediate follow-up action with the students concerned. The College's electronic student record system, introduced in September 2015, has experienced technical difficulties (see paragraph 28) but at the time of the team's April 2016 visit appeared to be working effectively for the management of student attendance records. The new Attendance Subcommittee (paragraph 34) now provides an organisation-level oversight of the monitoring of student attendance, and a mechanism for making informed decisions about termination of a student's study.

105   On the basis of the evidence available, the team concludes that following the introduction of its Attendance Committee, the College's management of student attendance at its Alperton centre has been strengthened.

Assessment of students

106   The College should be able to demonstrate that its assessment policies, regulations and procedures are consistent with the Expectation of *Chapter B6* of the Quality Code, including its operating processes for preventing, identifying, investigating and responding to academic malpractice.

107   The BBC programme alleged that, at the College's Cardiff centre, HND students can pay for coursework assignments to be written by others. The agent (recruiter) recruiting students on behalf of the College (paragraph 35) was shown on video advising a person posing as a potential supplier of applicants that assignments, written by unnamed external persons, could be bought for '£100 each' and would 'guarantee a pass'.

108   The College responded to these allegations by asserting that 'All coursework is assessed by qualified markers and tested with plagiarism-detection software'. Students met by the team said that they were unaware of the alleged practice of buying assignments.

The College's management of assessment

109   The QAA investigation sought assurance that similar problems had not arisen at Alperton, and that sound policies and procedures for the assessment of students were in place.

110   The College's approach to assessment is framed by its Quality Assurance Manual; Assessment Policy; Internal Verification Policy; Malpractice and Maladministration Policy, and an Appeals Policy. The Quality Assurance Manual provides a top-level framework within which there is emphasis on the provision of a supportive learning environment with opportunities for both formative and summative learning. Summative assessment should address the student's own achievement of module learning outcomes.

111   The Assessment Policy does not give staff any detailed advice regarding good or expected practice in the design of assessment instruments, but provides an operational manual for the administration of assessment in the College. It emphasises the need for assessment briefs to have been verified internally by other staff, before assessment has taken place. The policy permits students to resubmit (on one occasion only) previously graded work to improve marks. While scrutiny and feedback on elements of draft work is often regarded as a useful formative exercise, and resubmission to achieve a passing grade in failed work is quite normal within the sector, resubmission to improve a previously passing grade is not. Pearson's guidance to Centres advises that such practice should be considered in exceptional circumstances and only with express approval from those in authority at the College. Staff and students made it clear that custom and practice was not for students to be given such opportunities. Nevertheless, the College should review its policy and practice in this area to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines.

Recommendation

112   The College should:

- review and revise its policy regarding resubmission of work to improve grades, to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines.

113   The Internal Verification Policy is comprehensive, and requires that the entire assessment process be verified, from the design of assessment, through formative and summative assessment and including the final grading decisions. It emphasises that assessed work should be verified as the students' own, and that in the case of any doubt, the College's malpractice procedures should be invoked.

114   The Malpractice and Maladministration Policy details procedures for the investigation of alleged cheating. The Assessment Policy contextualises and defines academic malpractice for students. Students do not have access to these policies. The

Student Handbook and virtual learning environment give only a very succinct summary of procedural matters relating to assessment and plagiarism (see also paragraphs 122-126).

115   Given the paucity of information in the Student Handbook, the team enquired how students would be made aware of the need for submitted work to be their own. The team learned that students would be briefed on such matters during induction. It was also pointed out that students would receive a briefing on the use of the College's proprietary plagiarism-detection software. In meetings with students it was clear that they were aware that submitting others' work as their own was not acceptable academic practice.

116   The team formed the opinion that the College's regulatory framework had been developed by reference to the regulations of its various awarding organisations, including Pearson for its Higher National provision. While the various policies provide a broadly sound basis of policy and procedure for secure and consistent management of assessment, the very limited written and online information available to students provides insufficient guidance to avoid unintended plagiarism (see also paragraph 122).

Recommendation

117   The College should:

- ensure that all students have access to College policies, in particular its Assessment Policy, and Malpractice and Maladministration Policy.

Assessment practice and internal verification

118   The College has established an internal verification process for its Higher National Diploma courses. Teaching and assessment at the Alperton site is delivered principally by two staff, one of whom is the lead academic for the College. In times of need, the teaching staff are augmented by staff from the Cardiff campus. Verification is conducted within the team, with the lead academic taking a coordinating role. Assessed work and the verification records are retained for scrutiny by the Lead Internal Verifier, a part-time member of staff who is retained to lead on quality assurance matters.

119   A sample of assessed summative student work and verification records demonstrated that the internal verification processes were in operation. The complete student assessment records and files were not available to the team. However, in the small sample of graded assignment scripts available, only brief and very general feedback was evident.

120   A significantly larger sample of formative assignments was made available. These short pieces of work were additional to, and different from, the final assessed assignment in a unit, but nevertheless aligned well with the learning outcomes. The sample contained detailed feedback that students would find helpful in their future assignments.

121   In addition, the team was able to sample a large number of feedback sheets used by the College. Tutor-Learner Discussion sheets are used to structure and record face-to-face individual feedback to students after formal summative assessment, and Learner Review sheets are to reflect on performance every few months. These contained detailed written feedback to the students as well as written reflection from the student. Of particular note, staff encouraged students to apply themselves to better addressing the various criteria for merit and distinction, and pointed out when it was evident that students had drawn materials from published sources without appropriate recognition.

Assessment misconduct

122   The College Malpractice and Maladministration Policy is verbose, but not sufficiently clear for a student audience. Neither this policy nor the Assessment Policy gives any indication of penalties for plagiarism. There is no indication of students' rights, nor timelines for investigation, nor what burden of proof is required. It is not clear how staff or students are made aware of the policy.

123   While the team recognised that it would not be possible conclusively to identify student work that had been produced by an external author, it was able to explore the thoroughness of the College's procedures to detect academic misconduct. Students confirmed that they had been briefed in some detail on the requirement for original work, and intimated that assignment briefs warned explicitly against the uncited use of others' material. Student work was submitted using a cover sheet on which students signed to confirm that the submission was their own work, and that they understood the College's policies.

124   The College uses a proprietary plagiarism-detection package to support tutors in their assessment. Of the two detailed samples of verified work seen by the team, one submission produced a significant potential similarity index. The similarity report itself only highlighted one section of the student's work, although the review team was able to confirm beyond doubt that other aspects of the same work had also been sourced from work published by others. The team thus concludes that, either the similarity report relating to an early draft of the work had been presented during the grading and verification process, or only certain elements of the student's script had been tested.

125   Discussions with staff in the early stages of this investigation uncovered the use of an unwritten 'plagiarism index threshold' of 25 per cent, based on the colour coding in the software's similarity report. During the team's more recent meetings with staff and students at Alperton, it became clear that the threshold in use is 20 per cent. Students are only investigated for suspected academic misconduct if this 'similarity index' is exceeded. Thus students might copy large sections of material without sanction, and be led to believe that such practice is acceptable. There was no appreciation in the Malpractice Policy of the need to use the similarity index to inform assessment intelligently, and to tease out what is appropriate citation or inappropriate copying. Senior staff did, however, appreciate the need to support both staff and students in properly understanding the varying forms of malpractice, and the intelligent and formative use of plagiarism-detection packages to inform students' learning.

126   The team found that the College has a Malpractice and Maladministration Policy and an Assessment Policy and procedures in place which could, but do not yet, make effective contributions to its management of assessment. Senior academic staff appreciate that further work is required to encourage staff and students to make use of the tools that the College has made available. The team considers that there remains a risk that without further development and support, changes in styles of writing might go unrecognised if purchased material were to be submitted within students' work.

Recommendations

127   The College should:

- provide training and development in the detection of cheating in assessment, including a more informed use of plagiarism-detection software
- review its policies regarding academic malpractice to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines.

Student performance in assessment: progression and attainment

128   The team found that HND students' assessment performance at Alperton was satisfactory. Assessment results at the end of the academic year 2014-15 were presented in a spreadsheet dated August 2015. Of 44 students listed, 36 (82 per cent) had passed enough units to receive HND award certificates. Almost all grades were at pass level: one student achieved three merits, one had two merits, and four had one merit. No distinctions were achieved. The current level 4 students were progressing smoothly, but as at April 2016, none of the students enrolled during 2015-16 had achieved any merit or distinction grades. Staff took the view that students chose to focus their attention on achieving the pass criteria, observing that failure to attain merit and distinction grades in general reflected a failure to attempt those aspects of the assignments rather than a weakness in students' achievement of the learning outcomes.

Management of student assessment: conclusions

129   The team found that, while there was no specific evidence that students could, or did, pay for assignments to be written by others, as alleged at the College's Cardiff centre (paragraphs 6, 107), the College's management of assessment displayed weaknesses that would limit its capacity to address assessment misconduct of this and other kinds, should they occur (paragraphs 122-127).

130   The team concludes that the College's approach to assessment had to some extent been properly informed by the requirements of its awarding organisation. However, the College's policy regarding resubmission of work to improve grades does not reflect Pearson guidance (paragraph 111) and should be reviewed and revised. In addition, the academic misconduct guidance available to staff and students is insufficient, both in detail and availability, to give adequate information about the dangers of unintended plagiarism (paragraphs 115-116). The immature guidance and procedure with respect to academic malpractice does not currently provide a sound basis for the secure and consistent management of assessment overall (paragraphs 122-126). These weaknesses would, in the team's view, limit the College's capacity to address assessment misconduct.

131   The College should be able to demonstrate that its assessment policies, regulations and procedures are consistent with the Quality Code, *Chapter B6: Assessment of Students and the Recognition of Prior Learning*, particularly in relation to preventing, identifying, investigating and responding to academic malpractice. On the basis of the evidence discussed above, the team considers that some aspects of the management of assessment were satisfactory. However, policy regarding resubmission of assignments to improve pass grades, and both policy and practice with respect to the prevention and treatment of academic malpractice, require further attention. Taking particular account of the issues around academic malpractice, the team concludes that the College did not fully meet the Expectation of the Quality Code, *Chapter B6: Assessment of Students and the Recognition of Prior Learning*.

Management of staff

132   It was alleged in the BBC programme broadcast on 1 December that the person who was Principal of the Cardiff centre until 1 December (the former Cardiff Principal) had given a false account of their qualifications and academic experience. According to the programme, the former Cardiff Principal claimed to have a PhD from Cambridge, that they had been an associate professor and a member of Trinity College, Cambridge, that they had a teaching qualification and had taught at Cardiff University. BBC Wales reported that it had investigated these claims and found them to be false.

133   At Cardiff, the team also found evidence that the former Cardiff Principal had misrepresented their qualifications and academic experience. The College's procedures for the appointment of staff at Cardiff had been unsatisfactory in this and in another case: they lacked rigour and were inadequately documented, and had proved unfit for the purpose of securing appropriately qualified and experienced staff for the management and delivery of higher education courses at Cardiff.

134   The team sought assurance that similar problems had not arisen at Alperton, and that sound policies and procedures for the appointment of staff were in place. The team was told that the College's present procedures for appointing staff at both Alperton and Cardiff involve a two-stage process managed at Alperton by the Head of Human Resources, all appointment decisions being signed off by the College Principal. The process is documented in the Staff Recruitment Policy, updated in January 2016. The team saw documents recording the very recent appointment of a part-time member of staff who worked initially at Cardiff but was then transferred to London to cover a temporary vacancy there. These documents indicated a more transparent and better documented appointment process than that which had been used at Cardiff. However, no written references were provided in the file; thus, while the candidate's academic qualification was reliably attested, independent evidence of professional ability was lacking.

135   Other aspects of the management of staff appeared more satisfactory. The team heard that all teaching and support staff are given appraisals, and that continuing professional development (CPD) opportunities are made available, at least in some cases. Some training sessions are provided by external consultants. Appraisal and CPD records are kept, and the College provided examples of these.

Management of staff: conclusions

136   The team found that the College's procedures for the appointment of staff at Cardiff had been unsatisfactory in the period before 1 December 2015. They lacked rigour and were performed in breach of procedure. They were inadequately documented and had proved unfit for the purpose of securing appropriately qualified and experienced staff for the management and delivery of higher education courses at Cardiff. However, these failings were not replicated at Alperton, where the team found a more transparent and better documented process for appointing staff, though there remains room for further improvement.

137   The College should be able to demonstrate that its staffing policies and processes are consistent with the Expectation of the Quality Code, *Chapter B3: Learning and Teaching*. To meet the Expectation, the College should ensure that those involved in teaching or supporting student learning are appropriately qualified. The evidence discussed above indicates that the College has made significant improvements in this direction, but further work is required in order to take full account of *Chapter B3* of the Quality Code.

Recommendation

138 The College should:

- consistently implement rigorous, reliable and fully documented procedures for the making of all staff appointments.

Conclusion

139 On the basis of its reading of documents and its meetings with students, staff and senior managers at the College, the team did not find evidence to prove that the specific allegations made in the BBC Week In Week Out programme broadcast on 1 December 2015 (paragraph 6), about the College's Cardiff centre, could be upheld at the Alperton centre.

140 However, in relation to the admission of students at Alperton, the team also concludes that:

- the College either did not have a full and complete central record of all its contracted recruitment agents, or did not make consistent use of it (paragraph 40)
- the College was using a test which was not designed to act as a substitute for a full level 2 qualification in English to assess applicants' proficiency in English against the College's required minimum of CEFR level B2 or equivalent. It was therefore in breach of its own policy (paragraph 53)
- the College failed to establish the authenticity of all applicants' academic qualifications (paragraph 83)
- nine students (out of 24 sampled) were not demonstrably qualified to enter the HND course at Alperton, with respect to their academic qualifications or related work experience (paragraph 84)
- 12 students (out of 12 sampled) admitted to the HND at Alperton had not demonstrably met the English language proficiency requirements for entry to the programme (paragraph 84)
- the College failed to follow its own policy to evaluate all evidence in a professional manner to judge the suitability of candidates for the HND (paragraph 85)
- the College failed to record fully and formally the basis of decisions for admission to the HND (paragraph 85)
- the College failed to ensure that all staff involved in student admissions have a full understanding of the HND entry requirements and the processes for assessing applicants' suitability for the course (paragraph 85)
- the College failed to have in place effective version control processes for its policy and other formal documentation (paragraph 88)
- the College failed to ensure that the admissions policy and procedure in place when students were recruited to the HND programme in June and September 2015 set out full and complete information (paragraph 90).

141 The team found no evidence of the lax management of student attendance which it had previously found at the College's Cardiff centre, and which was also alleged in the 1 December BBC programme (paragraphs 6, 96).

142 The team also found that, while there was no specific evidence that students could, or did, pay for assignments to be written by others, as alleged at the College's Cardiff centre (paragraph 6), the College's management of assessment displayed weaknesses that would limit its capacity to address assessment misconduct of this and other kinds, should they occur (paragraphs 129-131).

143   The team found that the failings in the College's procedures for the appointment of staff at Cardiff (paragraphs 6, 132-133) were not replicated at Alperton, where the team found a more transparent and better documented process for appointing staff, though further improvement is required, notably in the more transparently recorded use of referees (paragraph 134).

144   However, as it addressed these allegations in the context of the College's systems for managing the relevant areas, the concerns team also found other issues at the Alperton centre which it considers to be matters of concern, and which bring into question the management of academic quality and standards at the College. These issues are as follows.

145   The team found that:

- the College had not always complied appropriately and consistently with Pearson's requirements for the registration of Higher National students; in particular, it appeared to have admitted HND students at a time when registration with the awarding organisation was not possible (paragraphs 27-28)
- the College did not consistently maintain accurate and reliable records of all its students (paragraph 28)
- the College either did not have, or did not make consistent use of, records of its contracted agents (paragraph 40)
- the College had not complied with HEFCE's requirement that it should be informed about the use of agents to recruit students (paragraph 41)
- the College had failed to have in place effective version control processes for its policy and other formal documentation (paragraph 88)
- the College had failed to ensure that the Admissions Policy and Procedure in place when students were recruited to the HND programme in June and September 2015 set out full and complete information (paragraph 90)
- the College had paid insufficient attention to its management of information for prospective students (paragraph 93)
- the College's policy regarding resubmission of work to improve grades does not reflect Pearson guidance (paragraph 111)
- the College's academic misconduct guidance available to staff and students is insufficient, both in detail and availability, to give adequate information about the dangers of unintended plagiarism (paragraphs 115-116, 122)
- the College's Malpractice and Maladministration Policy and Assessment Policy and procedures do not yet make effective contributions to its management of assessment (paragraph 126)
- the College's immature guidance and procedure with respect to academic malpractice does not currently provide a sound basis for the secure and consistent management of assessment overall (paragraph 126).

146   Taking account of all these findings, the team concludes that the College requires improvement to meet in full the expectations of the Quality Code, notably: *Chapter B2: Recruitment, Selection and Admission to Higher Education*; *Chapter B3: Learning and Teaching*; *Chapter B6: Assessment of Students and the Recognition of Prior Learning*; and Part C: Information about Higher Education Provision.

147   In response to this report and its recommendations, the College should provide an action plan to QAA, within four weeks of publication, setting out how it will address these recommendations.

Recommendations

148   The team makes the following recommendations for improvement.
The College should:

- ensure that it complies appropriately and consistently with Pearson's requirements for the registration of Higher National students, and not recruit students while registration is blocked (paragraph 29)
- ensure that it has, and consistently maintains, accurate and reliable records of all its students (paragraph 29)
- maintain and make use of accurate, complete and effective records of all agents that it uses for the recruitment of students (paragraph 42)
- ensure that it informs HEFCE of all agents that it uses in the recruitment of students (paragraph 42)
- undertake a formal assessment of the new English language proficiency test to ensure its equivalence to CEFR level B2, and formally document the basis and outcomes of this assessment (paragraph 55)
- ensure that all academic qualifications upon which it places reliance in establishing applicants' eligibility for the HND are authenticated before students are admitted to the programme (paragraph 63)
- ensure that all students admitted to the HND are demonstrably qualified to enter the course, both in terms of academic qualification and English language proficiency (paragraph 73)
- fully evaluate all evidence to judge the suitability of applicants for the HND, in accordance with its Admissions Policy (paragraph 75)
- fully and formally record the basis of all decisions for admission to the HND (paragraph 77)
- ensure that all staff involved with student admissions have a full understanding of the HND entry requirements and the processes for assessing applicants' suitability for the course (paragraph 80)
- establish, document and implement clear version control processes for its policy and other formal documentation (paragraph 89)
- ensure that its Admissions Policy and Procedure document sets out full, clear and complete information (paragraph 91)
- ensure that it systematically manages and monitors all information provided for current and prospective students, to ensure its accuracy (paragraph 94)
- review and revise its policy regarding resubmission of work to improve grades, to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines (paragraph 112)
- ensure that all students have access to College policies, in particular its Assessment Policy, and Malpractice and Maladministration Policy (paragraph 117)
- provide training and development in the detection of cheating in assessment, including a more informed use of plagiarism-detection software (paragraph 127)
- review its policies regarding academic malpractice to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines (paragraph 127)
- consistently implement rigorous, reliable and fully documented procedures for the making of all staff appointments (paragraph 138).