



Concerns about standards and quality in higher education

West London Vocational Training College Ltd, Cardiff,
January 2016

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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 this 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 campus 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.

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 later in April 2016. The College cooperated fully with the investigation.

8 The QAA concerns team (the team) comprised Mr Alan Hunt (investigation coordinator and reviewer), Dr Sylvia Hargreaves (reviewer), Professor Ian Robinson (reviewer) and Mrs Mahfia Watkinson (notes and documentary analysis).

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

² See: www.qaa.ac.uk/concerns/concerns-about-providers.

9 This present report sets out the QAA investigation's findings at the Cardiff centre. A separate report addresses Alperton-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 that 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 45-107).
- Allegations about student attendance were addressed in the wider context of the College's management of student attendance (paragraphs 115-130).
- Allegations about misconduct in the assessment of students were addressed in the wider context of the College's management of assessment (paragraphs 131-151).
- Allegations about the qualifications of staff were addressed in the context of the College's management of staff (paragraphs 152-169).

13 The team considered these areas of the College's management in the context of its overall ownership, governance and management (paragraphs 38-44).

14 The team, at its first visit to the head office at Alperton on 11 January 2016, met senior managers of the College. During the visit to Cardiff on 22 January the team met two groups of students, 24 in total, the two current members of teaching staff, and the Cardiff Principal. On 11 March the team visited Alperton and discussed Cardiff-related matters with a former member of the Cardiff management team and senior managers at College level. A later visit to Alperton, on 28-29 April, addressed Alperton-related matters (see paragraph 7).

15 Documentary evidence used by QAA in this investigation came from two main sources. Some documents were supplied directly to QAA by the College from its London centre at Alperton. All documents, in hardcopy and electronic formats, at the Cardiff centre were removed from the premises by the South Wales Police Economic Crime Unit (ECU) under a Crown Court warrant on 17 December 2015, and were subsequently released to QAA for the purposes of this investigation. The premises were comprehensively photographed by the ECU during the removal process. A QAA representative was present to give academic advice.

16 The documentary evidence seen and used by the QAA investigation team 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; and attendance records.

17 A draft of this report was sent by QAA to the College on 15 April 2016 for comments on matters of factual inaccuracy. Comments were received on 3 May 2016 and have been taken into account in this final version of the report.

The College's response to the investigation

18 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 'While 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 rests 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'. Specific actions taken by the College after the broadcast on 1 December are discussed in the relevant sections of this present report.

Result of the investigation

19 The concerns raised by the programme (paragraph 6) were found to be partially justified, and other significant concerns were also identified during the investigation. These issues are summarised in paragraphs 170-176. The College requires improvement to meet the expectations of five 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 B4: Enabling Student Development and Achievement; 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 19 recommendations (paragraph 179).

The College and its provision

20 The College is a private limited company (company registration number 05831249). It was established in 2006 and is headquartered at its Alperton centre in West London. Until 2012, when it began to offer Higher National Certificate and Diploma (HNC/D) Business courses at its Alperton centre, the College's main provision was the training of accounting technicians at level 4 and below, and of apprentices.

21 The College's Cardiff premises, which it has occupied since August 2015, are in a city-centre multistorey building. The initial accommodation was on one floor, where administrative records, including student files, were held. Later, the College added some teaching rooms on another floor. However, the College's main teaching appeared to have been carried out, at least recently, on a third floor, where there was a reception desk, an administrator's desk, IT facilities and a library. There was some evidence to suggest that this floor had been occupied at some time by another London-based alternative provider, and senior managers confirmed that this was so.

Relationships with other institutions

22 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; and an institution that QAA was later told is now closed. The College did not acknowledge in either of these initial evidence sources that it also had a relationship with another alternative provider of higher education. This relationship emerged in a later discussion, 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.

QAA review

23 A QAA Adapted Review for Specific Course Designation in November 2013 reported confidence in standards and quality, and reliance on information. The report made three advisable and three desirable recommendations. This review addressed provision at the present London centre at Alperton, and also referred to a study centre in Bow, East London, which has since closed. The College had no other delivery centres at the time of the 2013 review. Thus QAA had not carried out any review visits to the Cardiff centre before this Concerns investigation was opened.

Educational oversight

24 Oversight of the College as a whole is provided by the Independent Schools Inspectorate (ISI), which made its most recent inspection visit to the Alperton centre on 9 June 2015. The report of this inspection concluded that the College met the ISI's Standards for Educational Oversight. However, the Cardiff centre had not been opened at the time of that inspection; thus, it has not yet been subject to educational oversight.

Designation for student funding

25 The College's HND Business course at Cardiff was designated for student funding by Student Finance Wales in 2015.

Explanation of findings

The College's higher education provision and student numbers

26 In December 2015 it was reported that 'nearly 90' students were studying on HND courses at the College's Alperton centre, and that 42 of these had been recruited in September 2015. The team was told by the College in January that there were 'about 90' HND students at Alperton, but this number was later corrected to 125 by Pearson, the awarding body.

27 Since it opened in the summer of 2015, the College's Cardiff centre has offered two courses: the Pearson Diploma in Business (level 3), and the Pearson HNC and HND in Business (levels 4 and 5). However, in December 2015 recruitment to all Cardiff programmes was suspended, although the College website continued to offer the level 3 Diploma in January 2016. The College stated that no recruitment had taken place at Cardiff after 1 December 2015.

28 This present report addresses only the HNC and HND Business provision delivered at Cardiff, albeit in the context of the College's overall policies and procedures.

29 Three groups (referred to by the College as 'batches') of HND students were recruited at Cardiff between September and November 2015. In March 2016 the College provided lists of students in each batch at the point of entry. According to these lists, 52 students in 'batch' 1 started on 7 September, 60 in 'batch' 2 on 9 November, and 51 in 'batch' 3 on 11 November. This total of 163 students was later contradicted by the College, which stated that only 126 students had been recruited, the differences being in 'batch' 2, where the College revised the initial numbers from 60 down to 46, and 'batch' 3, which was revised down from 51 to 28. The team concludes that the College's records of its Cardiff students were unreliable and unsatisfactory.

30 The QAA team initially found some confusion about the number of batches. Senior managers, in a meeting with QAA on 11 January 2016, referred to two batches,

admitted in September and November. During a visit to the Cardiff centre on 22 January, the QAA team found evidence that students were taught, and their attendance was monitored, in three batches as indicated above. Further confusion was evident in the admission documentation. Of two students offered places on the same date and told to begin their studies on 28 October 2015, one was assigned to 'batch 4', a batch designation not documented elsewhere. The College later explained that this student 'might have been [on a] waiting list', but did not offer evidence in support of this.

31 Batch lists contained incomplete or inaccurate information. Two students who attended a meeting with the QAA team at the Cardiff centre on 22 January 2016 did not appear on the student attendance listings for the week beginning 18 January 2016, nor on lists of students currently on the roll at Cardiff, which were sent to QAA on 26 January 2016. One of these was listed in a batch 3 attendance list on 3 December 2015. The second person, who indicated on the 22 January QAA meeting attendance list that they started their course on 4 November 2015, did not appear on the 3 December 2015 attendance list. They were among those who were present in the College on 17 December 2015 and who gave their names to the South Wales Police. This reinforced the team's view that the College's management of its student records was unsatisfactory (cf paragraph 29). The QAA team was also unable to find files bearing the names of these two students, and two others, among the documents taken from the Cardiff centre by the ECU on 17 December 2015. The team also learned that files for three other Cardiff students could not be traced either by the College or by the ECU, although the College later explained that 'these files along with other files appear to have been seized by Pearson on 26 November 2015'.

Recommendation

32 The College should:

- ensure that it has, and consistently maintains, accurate records of all its students.

Relationship with Pearson as the awarding body

33 Pearson, as the awarding organisation, approved one floor of the College's Cardiff centre as a 'subsite of WLVTC' on 21 August 2015. A subsequent 'approval visit' was made by Pearson on 17 October, apparently to approve the additional accommodation on two floors acquired by the College (paragraph 21).

34 Pearson 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'. Pearson further explains to providers that 'registration initiates our Quality Assurance processes. Exams Officers and delivery staff are required to make sure that learners are registered on the correct programme at the outset. Learners enrolling into flexible start programmes are registered within one month of enrolment. Your procedures need to facilitate accurate, timely registration'.

35 The College did not comply fully with Pearson's requirements in this regard. No HND students enrolled at the Cardiff centre had been registered by 21 October 2015, when Pearson expressed its concern to the College about this and was assured that 'we have now registered the students on the Edexcel portal'. Pearson records confirmed that 47 students, out of a total of 52 in batch 1, were registered on 21 October. As the College (by its own account) was following the academic year cycle, all 52 students in this batch should have been registered by 1 November. However, five were not. The College explained that students were not registered until their financial support had been approved, 'which may take 2 to 4 weeks'; and that 'during this period' it was able to 'monitor whether

students are committed to joining a full time course for duration of one to two years'. However, given that the students had begun their course on 7 September, a delay of four weeks would have enabled registration significantly earlier than 21 October. Moreover, according to Pearson records, the 47 students registered on 21 October were registered as 'London' (Alperton) students. The College stated that it had attempted to register these students at Cardiff but was not able to access a Cardiff-specific subsite on Pearson's Edexcel portal. Information supplied to QAA by Pearson indicated that no students had been registered specifically at Cardiff by 27 January 2016.

36 Pearson blocked certification for all the College's Higher National provision on 20 November 2015, and blocked registration on 24 November 2015.

Recommendation

37 The College should:

- ensure that it complies fully and consistently with Pearson's requirements for the registration of Higher National students.

Governance, management and deliberative functions at the College

Ownership and governance

38 The College is owned by the Principal and Vice-Principal (see also paragraphs 39-41). 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

39 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.

40 Until 1 December 2015 the Cardiff centre was managed by the former Cardiff Principal. The Alperton-based (overall) Principal of the College informed QAA that they visited the Cardiff centre once a week to oversee this operation, and at these visits they checked '100 per cent of files'.

41 The Cardiff centre is currently managed by the Head of Cardiff Operations (also referred to as the Cardiff Principal), who is responsible to the College Principal and Vice-Principal based at Alperton. A Cardiff organogram dated December 2015 and supplied to QAA on 6 January 2016 also identified a Head of Academics (who was also the Student Welfare Officer). This person, appointed shortly before the end of November 2015, also has some administrative roles.

Deliberative bodies: the College's committees

42 The College's Strategic Committee (paragraph 38) 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.

43 The most senior academic committee is the Academic 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.

44 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 (paragraph 38). 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

45 It was alleged in the BBC programme broadcast on 1 December (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.

46 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.

47 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 former Cardiff Principal was aware of these matters ('knows everything').

48 During the broadcast 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 former Cardiff 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 former Cardiff Principal had accepted this 'applicant' on to the course.

49 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

50 The College stated that the person shown acting as a recruiter on behalf of the College during the programme (paragraph 45) was an agent. He 'was not a member of staff of the College and had no role there. The title which he used in the investigative programme was one which he had given to himself and without any knowledge of the College. The agent worked on solely a commission basis, recruiting pupils for various universities and colleges. He had been introduced to the College through an independent and reputable recruitment agency in London. The agent's actions and false recruiting methods were not known to the College and as soon as the corrupt practices came to light, the College terminated their commercial arrangement with him.' The College further informed the team that the agent (the recruiter) did not have an office at the Cardiff centre, as he claimed on his Facebook page (shown in the 1 December broadcast), but that he used a prayer room (described as 'a small multipurpose room with a computer') for meetings with students. College managers said that, because this was a prayer room, they were unwilling to intrude and were thus unaware of what the recruiter was doing there. The College later told QAA that 'We had stop recruiting the students from the agent even before the incident happen' and provided emails to an agent as evidence. However, those emails were addressed to a different agent based in London.

51 During its investigations the QAA team saw four agreements made by the College with agents for the recruitment of students (see also paragraph 55). One of these agreements was with a limited company registered at Companies House on 9 September 2015 by the agent (the recruiter) referred to above (paragraphs 45, 47, 50). The contract, signed on the date of registration, required the agent, as an 'intermediary', to provide 'non-exclusive student recruitment services'. Under the terms of this agreement, the College reserved to itself 'the right to accept the students and the decision of college administrator will be final' [sic]. The recruiter was required, as 'intermediary', to 'advertise, promote and market' the College's courses, and 'consider each student prior to submitting an application to ensure the student...meets the College's entry requirements'. They could also 'assist student[s] with their application if requested'.

52 A College publicity leaflet, which was supplied to QAA by the College, and which current Cardiff students recognised, invited prospective students to 'Contact us for registration or more information' and, for the Cardiff centre, gave as a contact the name and phone number of the recruiter. This document was at the very least ambiguous; the team considered that it was possible for a prospective student to infer from this leaflet that the recruiter was a member of College staff. College sign-in sheets indicated that the agent was a frequent visitor to the College premises in October and November 2015, sometimes remaining on the premises for hours at a time. The team was told that the recruiter held meetings with prospective students during these visits to the College.

53 The team took account of the evidence shown in the BBC programme broadcast on 1 December, which showed the agent acting and speaking in ways that it considered inappropriate and unprofessional in the recruitment of higher education students (paragraph 45). Further instances of this kind could not be proved on the basis of documents in students' admission files. However, in discussion with the team, a senior manager of the

College indicated that this agent had significantly influenced the recruitment of students to the College's Cardiff centre.

54 The Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education* expects that, as a matter of sound practice, 'recruitment, selection and admission processes are conducted in a professional manner by authorised and competent representatives of the higher education provider'. The team considered, on the basis of the evidence presented, particularly the videotaped evidence used in the programme broadcast on 1 December, that the recruiter had not acted competently or professionally. The team also considered that the College had not monitored the activities of this recruiter with appropriate care, and thus had not been sufficiently aware of his actions or methods of recruitment. The team could not concur with the College's view that the recruiter bore the sole responsibility for their actions (paragraph 18), since this person had been working under a contractual agreement with the College, which should have taken steps to assure itself that this agent was representing it professionally and competently, and in line with the College's obligations as defined in the expectation referred to above.

55 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, among documents from the Cardiff centre, a contract signed on 18 November 2015 with a fourth agent in London (though this contract referred specifically 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 agencies 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 a full and complete central record of all its contracted recruitment agents, or did not make consistent use of it.

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

56 The QAA team concludes, on the balance of probabilities, that the College had in this case used the services of an agent who had not acted professionally and competently on its behalf in the recruitment of students at its Cardiff centre. It had not taken adequate steps to monitor the activities of the agent in question (paragraphs 50-54). More widely, it 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 55). It had not fully met the Expectation of the Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education*.

Recommendations

57 The College should:

- select and monitor the activities of all its recruitment agents so as to ensure that they are competent and that they act in a consistently professional manner
- maintain and make use of accurate, complete and effective records of all agents that it uses for the recruitment of students.

The College's admissions processes

58 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 Cardiff were appropriately qualified to enter this course and to complete it, as expected by the the Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education*. The team evaluated the effectiveness of the College's admissions process by examining the documented process, and the student files for 45 students who

were successful in their applications to the HND at Cardiff and admitted to the course in September and November 2015.

59 Two Admissions Policy and Procedure documents were in place when the Cardiff HND students were admitted. The College Admissions Policy and Procedure (which remained in place in the same form at the date of the QAA investigation) sets out the College student application and admissions process, and the eligibility criteria for international and UK/EU students respectively. For Cardiff student admissions, which have comprised home students only, this document was supplemented by the Cardiff Admissions Procedure for Students: HND (which has undergone some revision since the BBC investigation), which detailed the stages of the Cardiff admissions process. A pack containing enrolment - and Information, Advice and Guidance (IAG) - record templates and initial literacy tests was seen by the QAA team.

The effectiveness of the College's admissions process: are appropriate students admitted to the courses?

60 The 'eligibility criteria' set out in the College Admissions Policy and Procedure align with Pearson 2014 and 2015 academic requirements (as distinct from English language 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, which 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. As also discussed below, there were inconsistencies between these documents and other College documentation and published information, raising significant risk of confusion for College staff and prospective students (see paragraphs 61, 68-69).

61 With respect to formal academic qualifications, the Cardiff Admissions Procedure, in its precise wording, was unclear and inconsistent with the College and Pearson provisions on entry requirements, referring to certification of qualifications being accepted for 'at least level 3 or GCSE or A Levels for HND' [emphases added]. The QAA team considered that this lack of clarity in College documentation regarding academic entry qualifications raised a risk of serious error in the decision-making process. As noted below, the sample student files examined by the team included six cases in which applicants indicated completion of GCSEs as their highest level qualification and were admitted to the HND despite making no mention of related - or indeed any - work experience during the application process.

Recommendation

62 The College should:

- ensure that all College documentation sets out clearly, unambiguously and consistently the academic entry requirements for the HND course.

63 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'. The team heard from senior managers that 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)

at 5.5 (a level that, in the team's view, satisfied Pearson requirements), and that this was evidenced through completion of the BKS 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 BKS test is used in combination with other internally set diagnostic tests; however, there was no evidence of this in any of the sample files examined by the team. Senior managers also stated that the equivalency of the BKS Initial Literacy Assessment to CEFR B2/IELTS 5.5 had been confirmed in email correspondence between the College and BKS. Email correspondence between the College and BKS, which post-dated the meeting with senior managers, provided what BKS described as a 'rough indication' of the equivalency of BKS levels and IELTS levels. However, this information did not specify the level of the BKS Initial Literacy Assessment, which is only one of a number of skills tests/checks produced by BKS.

64 The BKS 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.

65 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 BKS Initial Literacy Assessment taken by applicants to the HND at Cardiff was considerably shorter. BKS's online information states, in relation to the BKS 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 four minutes and 23 minutes.

66 The team found 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.

Recommendation

67 The College should:

- review its processes for assessing applicants' English language proficiency to ensure that all students admitted to the HND at Cardiff demonstrate that they meet the English language entry requirements.

68 The Cardiff Admissions Procedure, while also satisfying Pearson English entry requirements, was inconsistent with the College Admissions Policy and Procedure, providing that 'If the prospective student has not passed GCSE or A Levels from UK, he/she will be given literacy test on computer (BKS) or manual literacy test'. It was unclear whether this was a requirement for English at GCSE/A Level or for completion of any GCSE/A Level. The College website sets out a requirement for a minimum of CEFR level B2 for students whose first language is not English, but makes no reference to English requirements for applicants whose first language is English. Cardiff marketing material stated that UK and EU applicants will be required to attend an interview and take a skill test, and that overseas applicants must have A Levels or equivalent qualification with IELTS at 5.0, or equivalent.

69 The College's stated position on the English language entry requirement for the HND, namely proficiency at a minimum of CEFR level B2 or equivalent, was not fully and/or

accurately reflected in the Cardiff Admissions Procedure, the College website and Cardiff marketing materials, raising a risk of confusion and error in the admissions process.

Recommendation

70 The College should:

- ensure that all the information it publishes internally and externally fully and accurately reflects the College's English language requirements for entry to the HND at Cardiff.

71 College senior managers stated that they maintained oversight of the admissions process at Cardiff through checks on student files, comprising sampling by the (overall) College Principal of 20-30 per cent of files for batch 1 students and 10-15 per cent of files for batches 2 and 3, and that further checks of all files were carried out by the Cardiff Principal. They reiterated the opinion expressed by the current Cardiff Principal to the Academic Committee following his own checks on student files (in the wake of the BBC investigation, and before these were removed by the police) that there were 'no discrepancies'. Such confidence in the effective operation of the Cardiff admissions process not was supported by the documented evidence.

72 In examining the 45 student files the team found that, on the basis of their records, 11 applicants did not meet College or Pearson entry requirements as to academic qualifications and/or work experience. These 11 applicants, whose highest recorded academic qualifications were at level 2, made no claims to any past or current work experience. The entry profiles of these 11 students are set out below.

73 Three of these 11 students indicated that they had completed the Secondary School Certificate (SSC) and Higher Secondary Certificate (HSC) in Bangladesh. No additional formal qualifications were mentioned in their files. The higher of these two qualifications, the HSC, is equivalent to GCSE on a subject-by-subject basis (and, for instance, would need to be supplemented by GCE A Levels for University entry through UCAS). None of the eight remaining files recorded formal academic qualifications higher than level 2.

74 To be eligible for admission to the HND applicants with the entry profile of these 11 students would need to evidence 'related work experience', as well as sufficient proficiency in English, in accordance with College and Pearson requirements. None of these 11 student files showed any evidence of any work experience, or any indication of the basis on which the admission decisions had been taken, save for one brief note affirming that the student 'can do very well, very able and confident'.

75 The QAA team considered that these 11 applicants had not demonstrably met the College's academic and/or related work experience requirements for entry to the HND at Cardiff.

76 As to their proficiency in English, seven of these 11 students indicated that they had completed at least one GCSE. Two of the seven files held no record of which GCSE subjects had been taken. In the other files, in which the specific GCSE subjects were identified, the records showed that five applicants had completed GCSE English, but only two of them at grade C or above. Four of the 11 applicants provided no record of formal English qualifications on entry. All these applicants had completed initial literacy tests, identified as either the BKSB Initial Literacy Assessment or the equivalent Basic Skills Agency Initial Assessment, or simply referred to as an 'initial literacy test'. However, as discussed above, initial assessment tests are not designed to act as a substitute for

recognised full level 2 tests. In the case of these 11 applicants, only two demonstrated English proficiency at level 2 or equivalent.

77 The sample files revealed 25 cases in which the applicants had academic qualifications no higher than level 2, but referred to work experience. In all these cases save one there was little more than a hint or brief mention of past work experience ('I just came [sic] unemployed'; 'I had my own sewing business years ago') or current work experience ('I'm doing a part-time job'; '2yrs...in employment'; 'in employment'; 'I have experience of working with people of all ages'). Where, in one file, the information provided by the applicant on paper was more extensive, there was no record of any discussion of this during the application process, nor of the assessor's conclusions about the extent to which the work experience was related or relevant to the course. Despite senior managers' assertion to the team that references would normally be sought in these circumstances, in none of these cases was there any record of the College exploring with applicants the nature and scope of their experience, or of seeking or receiving references or other external independent verification.

78 As to proficiency in English, 10 of these 25 files recorded completion of GCSEs, although four of these held no evidence of completion of English GCSE. According to the files, two of these four applicants had completed an initial literacy assessment; the other two had not. Three applicants had achieved English GCSE at grade E, of whom two had completed an initial literacy assessment. Three others had achieved English GCSE, one at grade C and two at grade B.

79 Ten other applicants among these 25 indicated academic qualifications comprising SSCs and/or high school certificates from India, Bangladesh, Somalia and Pakistan. For seven of these applicants, these were their only formal qualifications. One other applicant stated that they had also completed NVQs, and two others an ESOL Entry level 3 qualification. Thus, none of these applicants, on application, provided evidence of English proficiency higher than entry level 3. All had completed an initial literacy assessment, save one.

80 Five applicants of the 25 had completed UK academic qualifications only, excluding GCSEs; none of the files indicated certified English proficiency beyond entry level 3. All had completed initial literacy assessments, save one.

81 There were 25 students in the sample (55 per cent) whose recorded academic qualifications was at level 2 or below but whose files held some indication of work experience. In none of these cases was there any evidence that the College had explored with applicants the nature and scope of their experience, sought or received references or other external independent verification, or taken any other steps to establish that the work experience was related to the HND course. The team concludes that these 25 applicants were not demonstrably qualified, in accordance with the College's published policy, to enter the HND course at Cardiff. With respect to only three of these 25 applicants was there any indication in the files of proficiency in English at level 2 or equivalent. One other file among these held no record of the applicant's proficiency in English.

82 The remaining nine files in the sample indicated that the applicants had level 3 qualifications, of which seven were overseas degrees. These applicants therefore met the academic entry requirement for a level 3 qualification, though there was no record of any consideration of how, in one case, a Bangladeshi bachelor's degree recorded on file without award title or subject (and, as further indicated below, without an accompanying copy certificate) was 'related to business'. All of the seven graduates of overseas higher education institutions (all of whom, like all the other applicants in the sample, were British citizens or of settled status in the UK) had completed an initial literacy assessment. However, none had

taken GCSEs/A Levels or otherwise provided evidence of English proficiency at level 2. The other two applicants provided evidence of UK level 3 business-related qualifications, but there was no evidence of English proficiency save for, in one case, completion of GCSE English, with no mention of the grade and, in both cases, completion of an initial literacy assessment.

83 The QAA team considered that of these nine applicants whose files recorded the achievement of level 3 academic qualifications, none were demonstrably qualified for admission to the HND at Cardiff, as there was no recorded evidence that they had achieved the required level of English language proficiency.

84 The team also noted that, in addition to the specific entry requirements, Pearson's policy regarding access to qualifications requires centres to review the profile of qualifications and experience held by applicants, consider whether this profile shows an ability to progress to level 4 or level 5 qualifications, and take appropriate steps to assess each applicant's potential.

Recommendation

85 The College should:

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

86 The College Admissions Policy and Procedure states that the College 'adopts 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...recognising that student potential is not always to be seen within formal academic qualifications'. The team heard from senior managers that applicants' personal statements, together with the IAG 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.

87 The QAA team found no evidence that the College met its own expectations in ensuring that all applicants to the HND at Cardiff provided the full range of information, in particular through the IAG and through full personal statements, to assist it in assessing their suitability for the course. Of the 45 sample files examined by the team, two had no record of personal statements. Ten files held no record of any IAG. Twenty-one files provided no indication of the identity of the IAG assessor. Neither the College Admissions Policy and Procedure nor the Cardiff Admissions Procedure specified which individuals were authorised to act as assessors. As to the personal statements within the sample, many comprised a total of only four very brief sentences providing little evidence of potential, experience and aspirations. Some personal statements showed very poor command of written English, with comments such as 'I will be able to help people who wants to make there career', 'I used to studies business in school so I think it's will match', 'I thing this qualification will very helpful...'.

Recommendation

88 The College should:

- ensure that all applicants to the HND at Cardiff provide the full range of information required by the Admissions Policy, Procedure and requirements, in particular through the Information, Advice and Guidance Session and through personal statements, to assist the College to assess their suitability for the course.

89 The team further enquired where authority to take HND admissions decisions at Cardiff rested, and whether the College had followed its own procedures in admitting students at Cardiff, with respect to signing-off admissions decisions; recording the basis of admissions decisions; requirements concerning qualifications certificates; and the verification of qualifications.

90 The College Admissions Policy and Procedure provides that the Vice-Principal takes all decisions regarding admissions to higher education courses. Senior managers stated that, for Cardiff, this authority was delegated to the Cardiff Principal; that in practice the College Principal also performed this function when he attended Cardiff student admission events; and that these two individuals were the only persons with such authority. Senior managers were unable to explain the inconsistency between this position and the Cardiff Admissions Procedure, which allowed admissions decisions to be taken by two administrators. The procedure provides: that 'Strictly only one of the following persons is authorised to accept admissions or give any advice or accept any documents...', and then names the Cardiff Principal and two administrators; that 'the initial decision will be made by one of the authorised persons only'; and that the completed file will be forwarded to the Principal (or other authorised person) for his/her signature to be added, in completion of the decision process.

91 The QAA team considered that there was confusion as to where the authority for signing-off student admissions decisions for the HND at Cardiff rested, and that the Cardiff Admissions Procedure was inconsistent with the College Admissions Policy and Procedure in this respect.

Recommendation

92 The College should:

- clarify, in its Admissions Policy and Procedures, where the authority for signing-off student admissions decisions for the HND at Cardiff rests, and ensure that all College documentation sets out consistent information in this respect.

93 Under the Cardiff procedure, 'all files for the admissions accepted during the day must be strictly signed by two authorised persons by the end of the day.' This requirement was not satisfied in a significant number of cases. With respect to 18 files in the sample there were no authorised or assessor signatures to be found on any documents. The procedure also required the 'authorised person' to 'write brief notes on the basis on which the [admission] judgement has been made...'. However, 29 files in the sample contained no such notes. Where comments were recorded, they comprised a few words that scarcely amounted to (even brief) 'notes'. One file simply recorded 'Hard-working, objective', and another 'Can do very well, very able and careful'.

94 The Cardiff Admission Procedure required applicants to produce original certificates; the authorised person to take photocopies and write 'seen originals' and sign on the copies; and the administrative department to check all UK qualifications online and all 'foreign' [sic] qualifications with the issuing authority, the copy letter being kept in the file. There was no evidence of online checks on UK qualifications, and the requirement as to 'foreign' qualifications was recorded as met in only one case. Seven of the sample student files contained no copy certificates. None of the copy certificates in the other files was signed or marked 'seen originals'. Twenty-two student files in the sample recorded 'foreign' qualifications. Of these, only one contained a letter to the relevant issuing authority asking for verification of the qualification. None of the files contained any record of verification of 'foreign' qualifications by the issuing authority. Senior managers confirmed that the admissions process required checks to be made on all 'foreign' qualifications. They also

stated that, if no response was received, reliance was placed on an applicant's declaration within the application form that 'all the information on this application form is accurate and correct'. However, this practice does not form part of the College's documented processes.

95 The QAA team considered that the College failed to follow its own procedures in admitting students at Cardiff, with respect to signing-off admissions decisions; recording the basis of admissions decisions; requirements concerning qualifications certificates; and the verification of qualifications.

Recommendation

96 The College should:

- ensure that it follows its own procedures in admitting students to the HND at Cardiff, with respect in particular to signing-off admissions decisions, recording the basis of admissions decisions, requirements concerning qualifications certificates, and the verification of qualifications.

Management of student admissions: conclusions

97 The team found no further evidence, beyond that presented in the BBC Week In Week Out programme broadcast on 1 December 2015 (paragraph 6), that faked qualifications were accepted and guidance was given to students on how to make them. However, on the basis of the evidence discussed above, the team drew the following conclusions about additional matters of concern regarding the College's management of student admissions.

98 There was a lack of clarity in College documentation regarding academic qualifications, raising a risk of serious error in the decision-making process leading to the admission of students without the required qualifications (paragraphs 60-62).

99 The College was using an inappropriate 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 (paragraphs 63-67).

100 The College's stated position on the English language entry requirement for the HND, namely proficiency at a minimum of CEFR level B2 or equivalent, was not fully and/or accurately reflected in the Cardiff Admissions Procedure, the College website and Cardiff marketing materials, raising a risk of confusion and error in the admissions process (paragraphs 68-70).

101 Eleven applicants (24 per cent of the sample), whose highest formal academic qualifications was at level 2, provided no evidence of 'related work experience'. Thus, none of these applicants was demonstrably qualified to enter the HND at Cardiff. Only two of these applicants provided evidence of English proficiency at level 2 or equivalent (paragraphs 72-76).

102 Twenty-five applicants (55 per cent of the sample), whose recorded academic qualifications was at level 2 or below, had file records showing some indication of work experience. In none of these cases was there any evidence that the College had explored with applicants the nature and scope of their experience, sought or received references or other external independent verification, or taken any other steps to establish that the work experience was 'related' to the HND course. The team concludes that these 25 applicants were not demonstrably qualified to enter the HND course at Cardiff. Only three of these students' files provided an indication of proficiency in English at level 2 or equivalent.

One file held no record whatsoever of the applicant's proficiency in English (paragraphs 76-81).

103 Nine applicants (20 per cent of the sample), whose records showed achievement of level 3 academic qualifications, provided no evidence that they had reached English language proficiency at a minimum of level 2 or equivalent. These applicants were therefore not demonstrably qualified for admission to the HND at Cardiff (paragraphs 82-83).

104 There was no evidence that the College met its own expectations in ensuring that all applicants to the HND at Cardiff provided the full range of evidence required by the Admissions Policy, Procedure and requirements, in particular through the IAG session and through full personal statements, to assist it to assess their suitability for the course (paragraphs 86-88).

105 There was confusion as to where the authority for signing-off student admissions decisions for the HND at Cardiff rested, and the Cardiff Admissions Procedure was inconsistent with the College Admissions Policy and Procedure in this respect (paragraphs 89-92).

106 The College failed to follow its own procedures in admitting students at Cardiff, with respect to signing-off admissions decisions; recording the basis of admissions decisions; requirements concerning qualifications certificates; and the verification of qualifications (paragraphs 93-96).

107 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

108 In connection with its concerns, discussed above, about the admission of students, the QAA team also considered whether the College provides appropriate information to prospective students.

109 As noted above (paragraphs 60-61) the College Admissions Policy and Procedure, in line with Pearson specifications, sets out the academic qualification requirements for entry to level 4/5, 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, which 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. There were inconsistencies between this document and other College documentation and published information. The College website omits the words 'For learners who have recently been in education' and adds 'or overseas equivalent' with respect to the BTEC level 3 qualification.

110 Cardiff marketing material in use when the current students were recruited, and the contract between the College and the Cardiff recruitment agent, list a BTEC National Diploma, at least one A Level, and other equivalent level 3 qualifications among the range of entry qualifications, but did not specify that these must be in Business (for the BTEC) or demonstrate a strong performance in a relevant subject (for one GCE A Level) or an adequate performance in more than one GCE subject.

111 The College Admissions Policy and Procedure and the Cardiff Admissions Procedure set out inconsistent information about English language entry requirements (paragraphs 68-70). Confusingly, the agent contract, in its only reference to English

language capability, sets out a requirement for '...good literacy skills at Level 1'; the College website provides that for students whose first language is not English, a minimum of CEFR level B2 is required; and Cardiff marketing material stated that UK and EU applicants will be required to attend an interview and take a skill test, and that overseas applicants must have A Levels or equivalent qualification with IELTS 5.0 or equivalent.

112 The team also found that information about plagiarism provided to students was inadequate (paragraphs 136-138, 143, 149).

Management of information for students and prospective students: conclusions

113 The incomplete and inconsistent information found in website information, 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 109-111). Some information provided for current students was also inadequate (paragraph 112). On this basis, the team concludes that the College had paid insufficient attention to its management of information for prospective and current students. It has 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

114 The College should:

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

Student attendance

115 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.

116 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 recruiter whose role is discussed at paragraphs 50-54.

117 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, with an additional attendance sheet being used within the classroom. A headcount of pupils is conducted by College tutors to ensure that only those present have signed the attendance sheet. Students are required by the College to have a minimum 80 per cent attendance record, with each student's attendance being checked monthly. If a pupil falls below this 80 per cent minimum, an attendance warning letter is

issued. If attendance falls below this minimum for three months, then the student is suspended, resulting in their student finance also being suspended.'

Attendance monitoring

118 The College's Student Handbook for its Cardiff-based students supports 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, absence or an attendance record of below 80 per cent may lead to suspension of studies, although the detailed process for monitoring attendance and invoking warnings is not described.

119 In their meeting with senior managers the QAA team learned that student signing-in sheets were generated at the Alperton head office from the College's central student record system. The sheets were then issued and subsequently retained in Cardiff. While the team was unable to meet teaching staff who had been in post prior to the BBC broadcast, students confirmed that attendance signatures were required upon arrival each morning or afternoon, and that they were expected to seek approval and sign out at the College reception if leaving before the end of scheduled classes. Students stated that in-class registers were only introduced following the appointment of a new Principal at the Cardiff site after the BBC allegations were made public, and that thereafter monitoring of attendance was rigorous.

120 Following the 1 December broadcast, the newly appointed teaching staff implemented the monitoring procedure described above; in addition to signing on arrival, staff circulated nominal lists for signature during classes, or called a register during each class. Current staff and students opined that it would not now be possible for students to absent themselves without notification. Signing-in sheets are now scanned daily, and emailed from Cardiff to the Alperton campus, where records are now overseen and managed centrally.

121 Attendance sheets taken during the periods before and after the BBC broadcast appear to confirm what the team has heard; records are now significantly more comprehensive. In its scrutiny of student records, the team has confirmed that formal warning emails are sent to students with a poor attendance record. Initially, these were generated in Cardiff and copies retained in student files, but they now emanate from Alperton, following managerial scrutiny of the central attendance records.

122 The team has thus formed the opinion that while batch 1 students may have initially been able to exploit the lack of in-class registers and depart the College immediately after signing in, the more robust process enforced immediately after the BBC broadcast provides a largely accurate picture of attendance.

123 In its scrutiny of class lists, attendance registers and College student records the team noted that the class signing-in sheets did not always reflect the class lists, and in discussions with students it was evident that students were not all aware of which 'batch' or class they joined with or should be attending (see also paragraphs 29-30). It was noted that significant numbers of students withdrew from their courses soon after entry, but these withdrawal rates varied markedly between batches. According to the College's student records 163 students were admitted between September and November 2015, and 49, or about 30 per cent, were no longer on the roll in January 2016. However, all but two of the students who withdrew were among those who entered in November 2015 in batches 2 and 3. Sixty batch 2 students entered on 9 November, but 19 (nearly 30 per cent) of these were no longer on the roll in January. The withdrawal rate among the batch 3 students who started their courses on 11 November was even higher: 51 entered, but only 23 were still on the roll in January, a loss rate of over 54 per cent.

124 Current students intimated that a number of batch 2 and 3 students had ceased to attend due to the suspension of student support funding following the BBC broadcast. College staff agreed, indicating that uncertainty of continuing study and funding following the programme led to a significant withdrawal rate in the initial four weeks of study, during which students were required to demonstrate commitment to learning and availability of funds before their registration with Pearson would be progressed. The College provided a batch analysis that demonstrated that of the students who successfully progressed through the initial four weeks, 91 per cent are currently still studying.

125 The College has, since the broadcast, 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 while records of its first meeting demonstrate alignment with its terms of reference, it is too early to be able to comment upon the impact it may have.

Management of student attendance: conclusions

126 The team concludes that, while the extent of its inquiries was necessarily limited by the absence of most of the teaching and support staff who had been in post at the time of the broadcast, there was sufficient evidence available from the Cardiff student records, from students and senior staff, to draw conclusions in relation to the allegations raised.

127 The procedure in place for monitoring attendance at the time of the BBC broadcast had not been fit for purpose. It would have enabled students to attend, as alleged, for a short period of time each morning or afternoon session, simply for the purpose of signing in. However, the introduction of class registers, and daily monitoring of attendance by the London office has strengthened the attendance management signing-in process and now provides a mechanism that, if consistently and robustly implemented, would enable the College to identify non-attending students rapidly. However, all of these improvements depend for their effectiveness on the maintenance of complete and accurate student records, which the College has not yet achieved (paragraphs 30-31).

128 When fully operational, the new Attendance Subcommittee (paragraphs 44, 125) should provide more consistent and effective organisation-level oversight of the monitoring of student attendance.

129 The team concludes that the College's management of student attendance at its Cardiff centre does not meet the Expectation of the Quality Code, *Chapter B4: Enabling Student Development and Achievement* because it does not have in place, and has not implemented consistently, policies, practices and systems to monitor attendance and thus facilitate academic progression. However, the team acknowledged that some progress has been made more recently in this area (paragraphs 121-122, 125, 127) and this should provide a basis on which the College may meet the Expectation in future.

Recommendation

130 The College should:

- consistently and robustly maintain its monitoring of attendance class by class, and ensure that its new Attendance Subcommittee provides effective organisation-level oversight of the monitoring of student attendance.

Assessment of students

131 It was alleged in the BBC programme broadcast on 1 December (paragraph 3) that HND students can pay for coursework assignments to be written by others. The agent (recruiter) recruiting students on behalf of the College (paragraphs 50-54) 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'.

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

The College's management of assessment

133 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.

134 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. The College should review and revise its policy and practice in this area to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines.

135 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.

136 The Malpractice and Maladministration Policy details procedures for the investigation of alleged cheating. The Assessment Policy contextualises and defines academic malpractice for students, and the Student Handbook and virtual learning environment give only a very succinct summary of procedural matters relating to assessment and plagiarism.

137 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. They 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 most were aware that submitting others' work as their own was not acceptable academic practice.

138 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 paragraphs 143, 149).

Recommendation

139 The College should:

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

Internal verification

140 The College has established an internal verification process for its Higher National Diploma courses. The course is in its first year of delivery at Cardiff and submission deadlines for the first assessments occurred shortly after the BBC broadcast on 1 December 2015. Thus, assessment outcomes and records have only recently become available, and reflect current processes, not those that might have been in place, but were unused, in the early months of College operation.

141 The majority of teaching and assessment on the Cardiff site is delivered by two new staff (one previously employed on the London campus), and the present Cardiff Principal. Verification is conducted within the small Cardiff team, with the Principal taking a coordinating role. Assessed work and the verification records are transferred to the London campus, where they are retained for scrutiny by the Lead Internal Verifier, a part-time member of staff who is retained to lead on quality assurance matters.

142 A sample of 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 QAA team. However, in the small sample of graded assignment scripts available, only brief and very general feedback was evident.

Assessment misconduct

143 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 the penalties for plagiarism. There is no information about student rights, nor timelines for investigation or what burden of proof is required. It is not clear how staff or students are made aware of the Policy.

144 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 indicated that they were unaware of the alleged practice of buying assignments, and confirmed that they had been briefed on the requirement for original work. 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.

145 The College uses a proprietary plagiarism-detection package to support tutors in their assessment. Of the six samples of work seen by the team, three final submissions produced significant potential plagiarism indices. While earlier formative feedback on the same assignments had in some cases given guidance regarding the use of others' material, the general feedback given at the summative assessment stage did not make any reference to significant sections of work that had clearly originated from other material, and had been, at best, very poorly referenced.

146 Discussions with staff uncovered the use of an unwritten 'plagiarism index threshold' of 25 per cent. Thus, students might copy large sections of material without sanction, and therefore be led to believe that such practice is acceptable. There was no appreciation in the Malpractice and Maladministration Policy of the need to use the plagiarism index to inform assessment intelligently, and to tease out what is appropriate citation or inappropriate copying. No student has yet exceeded the plagiarism threshold, and thus the Policy has yet to be invoked.

147 The QAA team found that the College has a Malpractice and Maladministration Policy and an Assessment Policy and procedures in place that could, but do not yet, make effective contributions to its management of assessment. This point is already acknowledged by the College. The current use of plagiarism-detection software appears to be poorly informed, and both staff and students would benefit from support and training in its use. The team noted examples of individual assignment scripts that contained significant variations of style, grammar and vocabulary, which seemed to call for more detailed and helpful response in assessment feedback given by staff, but this was lacking. The team considered that there remains a risk that similar changes in styles of writing might go unrecognised if purchased material were to be submitted.

Student performance in assessment

148 While the first three intakes to the Cardiff campus have yet to complete their courses, the team found that HND students' assessment performance at the College's Alperton campus 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 sufficient 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. Early results from Cardiff, yet to be externally verified and confirmed by Pearson, demonstrated a similarly skewed profile.

Management of student assessment: conclusions

149 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 134) and should be reviewed. 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. 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. These weaknesses would, in the team's view, limit the College's capacity to address assessment misconduct of the kind alleged in the BBC programme (paragraph 131).

150 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 QAA team considered that some aspects of the management of assessment were satisfactory. However, policy and practice regarding resubmission of assignments to improve pass grades, and 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 expectations of the Quality Code, *Chapter B6: Assessment of Students and the Recognition of Prior Learning*.

Recommendations

151 The College should:

- ensure that all students have access to College policies, in particular its Assessment Policy and Malpractice and Maladministration Policy
- review its policies regarding academic malpractice to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines
- provide training and support for staff to develop skills in order to provide analytically critical feedback that reinforces good assessment practice and addresses any potential misconduct
- provide training and development in the detection of cheating in assessment, including a more informed use of plagiarism-detection software.

Management of staff

152 It was alleged in the BBC programme broadcast on 1 December 2015 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; and 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.

153 The College responded to these allegations by stating that 'The [Cardiff] Principal had only been with the College for a number of weeks, and his appointment was still conditional while the College verified his credentials. A review of his credentials was already under way before the BBC's investigation, and while he presented himself as a highly qualified and reputable individual with an impressive professional record, the College's own review would have found these to be false and his position would have been terminated immediately'.

154 The team asked to see the full appointment documentation for the former Cardiff Principal, and scanned copies of documents were provided. When asked by the team if this set of documents was complete, and contained all that was available, the College confirmed that it was. However, during the discussion that followed, senior managers referred to other documents. The team then requested a full and checked version of the appointment documentation file for the former Cardiff Principal, and a second set of scanned documents was provided. This second set of documents contained items not present in the first set. It included a 'Staff file checklist' which included items such as 'a copy of the employment letter' and a 'statement of employment particulars', which were ticked on the checklist but not present in the file. This checklist was dated '12.08.15' and was signed by the current Cardiff Principal.

155 The team found that the documentary evidence submitted by the College during the course of the investigation was sometimes inconsistent with what the team was told in discussion. In combination, these sources of evidence did not provide a complete and satisfactory record of the appointment process for the former Cardiff Principal.

156 According to the evidence made available by the College, the former Cardiff Principal was recruited initially as a tutor. He applied to the College on 15 July 2015 for a post advertised on the Gumtree website as 'HND Tutor...in Cardiff...immediate start needed'. In his application email he stated that he was looking for a teaching post in Computing rather than Business, and attached a CV. A separate application, on a College application form, for the post of 'Senior Lecturer Cardiff' was made later. The date of this application is open to question. The first version of this form given to QAA was dated '12.10.15' but on the second version provided (paragraph 154) the number '8' had been superimposed on the '10' (see also paragraph 158).

157 In the CV submitted to the College with his email of 15 July 2015, the former Cardiff Principal claimed 52 scholarly and technical publications, and academic qualifications including a Cambridge 'PhD Computer Science (Software Engineering)' from the University of Cambridge. The former Cardiff Principal began work on a full-time basis when the first intake of students began their studies early in September 2015. The team was told that he was not the first choice of a principal, but was promoted to that role when the original appointee was unable to take up the post. It was not possible to determine the date and terms of the initial appointment, nor of the promotion to Cardiff Principal, since no letter of appointment and contract were found in the file of documentation provided. However, the College later advised QAA that the former Cardiff Principal 'was not formally designated as Principal by the College; he chose to use the title himself...Verification of his qualifications was in progress...and he had not yet been issued with any formal contract, which would only have happened if his qualifications had been authenticated'.

158 The team was told that the former Cardiff Principal was interviewed by the College Principal, and found an interview record in the file of documents provided, but the documentary and oral evidence accounts of this interview were contradictory and confused. The interview record, which was dated '12.10.15', mentions that the candidate was asked to teach a class as part of the selection process. However, the team was told that the interview took place in August and that the date on the interview record was 'a mistake'. If that was indeed the case it was not clear how an interview that included an observed teaching session could have taken place before the first course had started in September. The team noted that, in the second version of the documents sent to QAA (paragraph 154), this interview date was altered in the same way as the date on the former Cardiff Principal's application form (paragraph 156). On the basis of this evidence the team concludes that the application and the interview records were unreliable.

159 In his application form (paragraph 156) the former Cardiff Principal gave as a referee the unnamed principal of a college in Cambridge. There was no evidence of a reference from this college. Indeed, QAA has found no reliable evidence that this 'college' existed. No other referee was named on the application form. However, the QAA team was told, in discussion with senior managers at the College, that a reference was given orally at a meeting between the College Principal and a named referee in September 2015. An email from this referee to the College Principal was offered as evidence, but while it confirmed that a meeting (convened for discussion of a joint project) had taken place in September, it made no mention of the former Cardiff Principal, nor the post to which he had by then been appointed by the College. The College told the BBC (on 1 December 2015) that it had 'made checks for references with his previous employers as the norm in the industry, at time of recruitment which came back satisfactory'. The College later told QAA that '[the former Cardiff Principal's] references were supported by a former colleague and by his previous

college before he was engaged by WLVTTC'. However, no further documentary evidence of these or other references was presented. The team thus found no satisfactory evidence to show that any independent external reference had been taken.

160 The team was told that the former Cardiff Principal presented his qualification certificates at his interview in August. He sent copies later, by email (early in October) and these were checked by the College Principal, not against the originals but 'against the CV'. On 23 October 2015 the College emailed a copy of the former Cardiff Principal's University of Cambridge award certificate (paragraph 157) to the University for confirmation. The University replied on 27 November 2015, reporting that the PhD certificate was not genuine and that the University had no record of a student or member of staff matching the name and date of birth.

161 The former Cardiff Principal's teaching and education management experience, according to his CV, was derived from his work as an 'associate professor' at a college whose existence could not be confirmed (paragraph 159). The team concludes that there was no reliable evidence to suggest that he had any teaching or management experience in higher education.

162 The College has asserted that 'any allegation of wrongdoing is taken very seriously by [the College] and acted upon immediately', and that 'in this instance, the College reacted immediately...terminating the appointment of the Cardiff Principal'. However, the team found no evidence to support the claim that the College, on receiving the letter of 27 November 2015 from the University of Cambridge, immediately terminated the former Cardiff Principal's appointment. Rather, evidence suggested that he resigned by email to the College Principal on 1 December 2015, stating that he had been offered another post. The (overall) College Principal explained to the team that he had been on holiday in Spain in the days immediately before the BBC programme was broadcast on 1 December 2015. Following this discussion with the team on 11 March 2016, the College sent to QAA a note dated 18 March 2016 in which the current Cardiff Principal confirms to the (overall) College Principal that, following 'telephonic instructions' from the College Principal on 30 November 2015, while the latter was on holiday, he had dismissed the former Cardiff Principal 'forthwith' by telephone. This later record, however, does not constitute evidence of formal notice of dismissal.

163 The QAA team found that the former Cardiff Principal had been appointed on the basis of unchecked evidence of qualifications and unsupported evidence of teaching experience (paragraphs 159-161). Other aspects of the appointment procedure had been inadequate in this instance. Some details (including the date) of the application and interview process could not be established reliably (paragraphs 157-158). No letter of appointment or contract was among the documents supplied by the College (paragraph 154); indeed, no contract was to have been issued until qualifications had been authenticated, a process that was still in progress in October (paragraphs 157, 160). No references were taken up in writing, although the College claimed that an oral reference had been given, and other references were mentioned but not evidenced (paragraph 159). The College did not seek confirmation of key qualifications claimed by the applicant until some two months after the person concerned started to work as a tutor on a higher education course, in a subject for which the applicant did not even claim qualifications, and was promoted to the post of Principal (paragraph 160). Accounts of the way in which he obtained the title of Principal were contradictory (paragraph 157). When the falsification of a Cambridge award certificate came to light, the evidence suggests that the former Cardiff Principal was not immediately dismissed, as the College claimed, but was allowed to resign a few days later (paragraph 162).

164 The team found other inconsistencies in the College's processes for the appointment of staff. The team was told that appointments of teaching and support staff

at Cardiff, before and since 1 December 2015, were made by the Strategic Committee, the College Principal and the Vice-Principal. However, the team found that, in the period before the BBC programme, the former Cardiff Principal had made at least one appointment outside this appointment process. The suitability of this recruitment-related appointment was questionable: the postholder's CV did not include any evidence of employment experience in educational marketing and recruitment, nor indeed of employment in education at all. The candidate also received and countersigned two letters of appointment on 28 October 2015, each letter specifying a different job title and terms of employment.

165 In addition to the shortcomings of the College's records of staff appointments noted above, other records of staff and their appointments held at the Cardiff centre were not systematically organised and in some cases were unclear and confused. The accuracy of staffing information held by the College was also called into question when a person who teaches at the Cardiff centre, and who was a named post-holder on a College organogram, denied in a meeting with the team that this was their role.

166 The QAA 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 team saw documents recording the very recent appointment of a part-time member of staff at Cardiff. These documents indicated a more transparent and better documented appointment process. 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.

Management of staff: conclusions

167 The QAA investigation 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, were performed in breach of procedure, 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. The team also noted, however, the College's acknowledgment that 'its arrangements for management control and academic leadership at the time were lower than the appropriate level and will be addressing this as part of a comprehensive management review'.

168 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*. This includes an expectation that, as a matter of sound practice, higher education providers assure themselves that 'everyone involved in teaching or supporting student learning is appropriately qualified'. The evidence discussed above indicates that the College had not taken sufficient account of this chapter of the Quality Code. More recent evidence showed some improvement in the process and documentation of staff appointments, albeit with further scope for improvement, notably in the more transparently recorded use of referees (paragraph 166).

Recommendation

169 The College should:

- consistently implement rigorous and reliable procedures for the making of all staff appointments, and for the full documentation of all its staffing arrangements.

Conclusion

170 In its reading of documentary evidence and its meetings with students, staff and senior managers at the College, the team found no further evidence, beyond that presented in the BBC Week In Week Out programme broadcast on 1 December 2015 (paragraph 6), that faked qualifications were accepted and guidance was given to students on how to make them. However, on the basis of the evidence which it found, the team drew the following conclusions about additional matters of concern regarding the College's management of student admissions.

171 The team concludes that:

- the College had in this case used the services of an agent who did not act professionally and competently on its behalf in the recruitment of students at its Cardiff centre; and it had not taken adequate steps to monitor the activities of the agent in question (paragraphs 50-54, 56-57)
- 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 (paragraphs 55-57)
- there was a lack of clarity in College documentation regarding academic entry qualifications, raising a risk of serious error in the decision-making process leading potentially to the admission of students without the required qualifications (paragraphs 60-62)
- the College was using an inappropriate 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 (paragraphs 63-67)
- the College's stated position on the English language entry requirement for the HND, namely proficiency at a minimum of CEFR level B2 or equivalent, was not fully and/or accurately reflected in the Cardiff Admissions Procedure, the College website and Cardiff marketing materials, raising a risk of confusion and error in the admissions process (paragraphs 68-70)
- eleven applicants (24 per cent of the sample used by the team), whose highest formal academic qualifications was at level 2, provided no evidence of 'related work experience' - thus, none of these applicants was demonstrably qualified to enter the HND at Cardiff; only two of these applicants provided evidence of English proficiency at level 2 or equivalent (paragraphs 72-75)
- twenty-five applicants (55 per cent of the sample), whose recorded academic qualifications was at level 2 or below, had file records showing some indication of work experience - in none of these cases was there any evidence that the College had explored with applicants the nature and scope of their experience, sought or received references or other external independent verification, or taken any other steps to establish that the work experience was 'related' to the HND course; the team concludes that these 25 applicants were not demonstrably qualified to enter the HND course at Cardiff - only three of these students' files provided an indication of proficiency in English at level 2 or equivalent; one file held no record of the applicant's proficiency in English (paragraphs 77-81)
- nine applicants (20 per cent of the sample), whose records showed achievement of level 3 academic qualifications, provided no evidence that they had reached English language proficiency at a minimum of level 2 or equivalent - these applicants were therefore not demonstrably qualified for admission to the HND at Cardiff (paragraphs 82-83)
- there was no evidence that the College met its own expectations in ensuring that all applicants to the HND at Cardiff provided the full range of evidence required by the

Admissions Policy, Procedure and requirements, in particular through the Information Advice and Guidance session and through full personal statements, to assist it to assess their suitability for the course (paragraphs 86-88)

- there was confusion as to where the authority for signing-off student admissions decisions for the HND at Cardiff rested, and the Cardiff Admissions Procedure was inconsistent with the College Admissions Policy and Procedure in this respect (paragraphs 89-92)
- the College failed to follow its own procedures in admitting students at Cardiff, with respect to signing-off admissions decisions, recording the basis of admissions decisions, requirements concerning qualifications certificates, and the verification of qualifications (paragraphs 93-96).

172 The team also concludes that low levels of student attendance were accepted at the College in the period before 1 December 2015, apparently because there was no systematic and consistently effective process for monitoring attendance (paragraphs 118-129).

173 The team also concludes that, while there was no specific evidence that students could, or did, pay for assignments to be written by others, 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 131-151).

174 The team also found evidence to corroborate the BBC's allegations 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 (paragraphs 152-169).

175 However, as it addressed these allegations in the context of the College's systems for managing the relevant areas, the QAA investigation team also found other issues that 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.

176 The QAA investigation team found that:

- the College's student records are unreliable and unsatisfactory (paragraphs 29, 31)
- the College did not fully comply with Pearson's requirements for the registration of students (paragraphs 34-35)
- the College has paid insufficient attention to its management of information for prospective and current students (paragraphs 108-114).

177 Taking account all these findings, the team concludes that the College requires improvement to meet the expectations of the Quality Code, notably: *Chapter B2: Recruitment, Selection and Admission to Higher Education; Chapter B3: Learning and Teaching; Chapter B4: Enabling Student Development and Achievement; Chapter B6: Assessment of Students and the Recognition of Prior Learning*; and Part C: Information about Higher Education Provision.

178 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

179 The College should:

- ensure that it has, and consistently maintains, accurate records of all its students (paragraph 32)
- ensure that it complies fully and consistently with Pearson's requirements for the registration of Higher National students (paragraph 37)
- select and monitor the activities of all its recruitment agents so as to ensure that they are competent and that they act in a consistently professional manner (paragraph 57)
- maintain and make use of accurate, complete and effective records of all agents that it uses for the recruitment of students (paragraph 57)
- ensure that all College documentation sets out clearly, unambiguously and consistently the academic entry requirements for the HND course (paragraph 62)
- review its processes for assessing applicants' English language proficiency to ensure that all students admitted to the HND at Cardiff demonstrate that they meet the English language entry requirements (paragraph 67)
- ensure that all the information it publishes internally and externally fully and accurately reflects the College's English language requirements for entry to the HND at Cardiff (paragraph 70)
- ensure that all students admitted to the HND at Cardiff are demonstrably qualified to enter the course, both in terms of academic qualification and English language proficiency (paragraph 85)
- ensure that all applicants to the HND at Cardiff provide the full range of information required by the Admissions Policy, Procedure and requirements, in particular through the Information, Advice and Guidance Session and through personal statements, to assist the College to assess their suitability for the course (paragraph 88)
- clarify, in its Admissions Policy and Procedures, where the authority for signing-off student admissions decisions for the HND at Cardiff rests, and ensure that all College documentation sets out consistent information in this respect (paragraph 92)
- ensure that it follows its own procedures in admitting students to the HND at Cardiff, with respect in particular to signing-off admissions decisions, recording the basis of admissions decisions, requirements concerning qualifications certificates, and the verification of qualifications (paragraph 96)
- ensure that it systematically manages and monitors all information provided for current and prospective students, to ensure its accuracy (paragraph 114)
- consistently and robustly maintain its monitoring of attendance class by class, and ensure that its new Attendance Subcommittee provides effective organisation-level oversight of the monitoring of student attendance (paragraph 130)
- review and revise its policy regarding student reassessment to improve grades, to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines (paragraph 139)
- ensure that all students have access to College policies, in particular its Assessment Policy and Malpractice and Maladministration Policy (paragraph 151)
- review its policies regarding academic malpractice to ensure that standards of assessment are rigorously and consistently maintained in accordance with published guidelines (paragraph 151)

- provide training and support for staff to develop skills in order to provide analytically critical feedback that reinforces good assessment practice and addresses any potential misconduct (paragraph 151)
- provide training and development in the detection of cheating in assessment, including a more informed use of plagiarism-detection software (paragraph 151)
- consistently implement rigorous and reliable procedures for the making of all staff appointments, and for the full documentation of all its staffing arrangements (paragraph 169).

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