

Office for
Students



Quality assessment report

**BSc and BA Business Management
courses at RTC Education Ltd**

November 2022 – May 2023

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Summary

Each year, the Office for Students (OfS) selects a number of higher education providers for investigation based on regulatory intelligence including, but not limited to, student outcome and experience data and relevant notifications. As part of these investigations, the OfS may commission an assessment team, including external academic experts, to undertake an assessment of quality. The quality assessment focuses on areas of potential concern indicated by the data or other regulatory intelligence, or by information obtained by the assessment team as part of the assessment.

The assessment involves a visit to a provider, after which the assessment team produces a report. This report represents the conclusions of the team as a result of its consideration of information gathered during the course of the assessment to May 2023. The report does not take into account matters which may have occurred subsequent to that period.

In line with the risk-based approach of the OfS, the assessment team does not undertake a comprehensive quality assessment in respect of every requirement in each condition of registration, and therefore this report should not be read as the team having undertaken such an assessment.

This report does not represent any decision of the OfS in respect of compliance with conditions of registration.

1. The Office for Students (OfS) requires all registered higher education providers' courses to meet a minimum set of requirements or conditions that relate to quality and standards. The detailed requirements of these conditions can be found in the OfS's regulatory framework.¹ As a result of the OfS's general monitoring, in May 2022 the OfS decided to open an investigation into the quality of business and management courses provided by RTC Education Ltd.
2. RTC Education Ltd, trading as Regent College London, offers business and management courses at both undergraduate and postgraduate levels. Courses are delivered by the School of Business and Enterprise across four main Greater London campus locations: Holborn, Kingsbury, Great Titchfield Street and Wembley.
3. The OfS appointed an assessment team on 3 November 2022 that consisted of three academic expert assessors and an assessment coordinator. The team was asked to give their advice and judgements about the quality of the provider's business and management courses.
4. The team considered a range of information. This included:
 - information already held by the OfS, such as data relating to student outcomes
 - information submitted to the OfS by RTC Education Ltd, including about student achievement and student voice

¹ See www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/.

- specific modules on the provider's virtual learning environment (VLE).
5. The team visited RTC Education Ltd on two occasions in December 2022 and February 2023, and during this time it had a tour of facilities, met with staff and students and observed teaching sessions.
 6. During the assessment process, the team developed lines of enquiry. These focused on areas that potentially warranted further investigation and that were within the scope of ongoing conditions of registration:
 - B1: Academic experience
 - B2: Resources, support and student engagement
 - B4: Assessment and awards.
 7. The lines of enquiry were developed and updated between the two visits and both versions were shared with RTC Education Ltd. This process followed the OfS's risk-based approach.
 8. This risk-based approach also led to a focus on four courses (on which students were either taught, or registered and taught by RTC Education Ltd; i.e. not taught by partner organisations). These were BA Business Management, BA Business Management with foundation year, BSc Business Management, and BSc Business Management with foundation year.
 9. Through its activities, the team identified six areas of concern that may relate to RTC Education Ltd's compliance with the OfS's conditions of registration.
 - **Concern 1:** All students did not receive a high quality academic experience.
 - **Concern 2:** Academic staff resource was often not sufficient or deployed effectively, leading to inadequate resourcing of modules and poor provision of support to students.
 - **Concern 3:** Staff resource in the HubX model did not consistently ensure that students received academic support for a high quality academic experience and success in and beyond higher education.
 - **Concern 4:** Teaching room facilities and study spaces were insufficient to support students successfully participating in their studies.
 - **Concern 5:** A lack of physical and digital library resources, including access to course reading materials.
 - **Concern 6:** Academic practices relating to summative assessment meant that some students were not assessed effectively and some assessments were not valid and/or reliable.

Introduction and background

10. Each year, the OfS selects a number of providers for investigation based on regulatory intelligence including, but not limited to, student outcome and experience data and relevant notifications. As part of these investigations, the OfS may commission an assessment team, including external academic experts, to undertake an assessment of quality. The quality assessment focuses on areas of potential concern indicated by the data or other regulatory intelligence, or by information obtained by the assessment team as part of the assessment.
11. The assessment involves a visit to a provider, after which the assessment team produces a report. In line with the risk-based approach of the OfS, the team does not undertake a comprehensive quality assessment in respect of every requirement in each condition of registration, and therefore this report should not be read as the team having undertaken such an assessment.
12. This report does not represent any decision of the OfS in respect of compliance with conditions of registration.
13. The OfS appointed a team in November 2022 to assess the quality of the business and management courses provided by RTC Education Ltd. The scope of the assessment included those courses delivered by RTC Education Ltd but excluded transnational education, the obligations of awarding bodies for courses delivered by a delivery provider under a partnership arrangement, and the assessment of students' English language proficiency. The quality assessment report discusses the responsibilities of partnership arrangements, however it does not reach conclusions in respect of the partner obligations. The inclusion of information relating to partner providers was necessary in order for the assessment team to assess the concerns and identify which aspects were within RTC Education Ltd's scope of responsibilities. The assessment included matters that fall within the scope of the OfS's conditions of registration that concern quality and standards (specifically, ongoing conditions B1, B2 and B4).² The scope of the assessment, the information considered, and the findings of the assessment team are summarised in this report.
14. This report represents the conclusions of the team as a result of its consideration of information gathered during the course of the assessment to 16 May 2023. The report does not take into account matters which may have occurred subsequent to that period.
15. The OfS decided to open this investigation as part of its approach to general monitoring and in the context of its decision to focus on the quality of business and management courses. In opening the investigation, the OfS had regard to information it held relating to RTC Education Ltd, including student outcomes data, numbers of students, and any notifications received.

Context

16. Business and management courses at RTC Education Ltd are delivered through the School of Business and Enterprise across four main Greater London campus locations: Holborn, Kingsbury, Great Titchfield Street and Wembley. The school delivers undergraduate business

² See www.officeforstudents.org.uk/advice-and-guidance/regulation/registration-with-the-ofs-a-guide/conditions-of-registration/.

management (BA) courses, with top-up year, foundation year and pathway options and a marketing (BA) with a foundation year. It also offers undergraduate business management (BSc) courses with top-up year, foundation year and pathway options and a foundation degree in business management (FdSc). Higher National Diplomas (HND) in business are also offered, with a range of related pathways (for example, accounting and finance, business management, human resource management, marketing).

17. Business and management courses are delivered on a full-time basis only. Classes are timetabled for evenings and weekends as well as on weekdays, allowing students the opportunity to study flexibly. Courses are delivered over three years, or four if students are completing an integrated foundation year. Top-up degrees are delivered full-time over one year. The school also delivers full-time (one year) postgraduate taught degrees in international management (MSc) and business management (MBA). Business and management degrees have up to four entry points throughout the academic year in September, January, April and June.
18. RTC Education Ltd does not have degree awarding powers so works in partnership with awarding bodies to deliver its business and management courses. Buckinghamshire New University awards undergraduate degrees in business management (BA), with top-up year and foundation year options, and the marketing (BA) with a foundation year. This partnership arrangement has been in place since 2018. The University of Bolton awards business management (BSc) degrees with top-up year, foundation year and pathway options; postgraduate taught degrees in international management (MSc) and business management (MBA); and the foundation degree in business management (FdSc). This partnership arrangement has been in place since 2019 and RTC Education Ltd is recognised and marketed by the University of Bolton as the University of Bolton's London Academic Centre. This arrangement falls under the University of Bolton Off Campus Division, which was established in October 2011 to manage all University of Bolton partnership activity.
19. The foundation degree in business management is designed and delivered by RTC Education Ltd and validated by the University of Bolton. This means that RTC Education Ltd has designed and delivered the course, which the University of Bolton has approved to lead to one of its awards. All other business and management undergraduate and postgraduate courses offered by RTC Education Ltd are subcontracted (sometimes described as 'franchised') to RTC Education Ltd by either the University of Bolton or Buckinghamshire New University (the awarding body). This means that RTC Education Ltd delivers courses that are designed and subcontracted from the awarding body.
20. The number of students studying in the School of Business and Enterprise has increased significantly over the past six academic years. Based on student headcount, provided by RTC Education Ltd, student numbers over this period are:
 - 2017-18: 964
 - 2018-19: 996 (+3 per cent year-on-year)
 - 2019-20: 2,086 (+109 per cent year-on-year)
 - 2020-21: 3,929 (+88 per cent year-on-year)

- 2021-22: 3,776 (-4 per cent year-on-year)
- 2022-23: 4,055 (+7 per cent year-on-year).³

21. Alongside changes in student numbers, the number of academic staff delivering business and management courses has increased year-on-year since 2017-18. These staff numbers, provided by RTC Education Ltd and based on total academic staff count by full-time equivalent (FTE), are:

- 2017-18: 28
- 2018-19: 57 (+104 per cent year-on-year)
- 2019-20: 53 (-7 per cent year-on-year)
- 2020-21: 82 (+55 per cent year-on-year)
- 2021-22: 88 (+7 per cent year-on-year).⁴

Across this period, academic staff have been split across four different contract types: fixed-term, permanent, self-employed (hourly paid) and module unit. As set out in Table 1 below, staff on a module unit contract comprised the highest proportion of academic staff since the introduction of this contract type in the 2020-21 academic year.

Table 1: Headcount of business and management academic staff per academic year by contract type

Contract type	2017-18	2018-19	2019-20	2020-21	2021-22
Fixed-term	5	5	26	5	13
Module unit	0	0	0	54	72
Permanent	21	30	30	36	34
Self-employed	6	40	0	0	0

22. The provider contracts academic staff employed on a module unit contract to deliver teaching on a specific module. It introduced this contract type to replace self-employed (hourly paid) contracts with the stated aim of providing greater consistency of academic delivery. Module unit contracts are discussed further under concern 2 (condition B2) below. Total remuneration for the module unit contract includes a 20 per cent retainer payment. Staff receive this payment after they complete the module and once they have successfully met the key performance indicators set out below:

- successful completion of all assessment related tasks
- formally signed off module evaluation report

³ Percentage numbers are rounded to the nearest whole number.

⁴ Percentage numbers are rounded to the nearest whole number.

- an expected assessment submission rate of 90 per cent
- an expected assessment achievement rate of 85 per cent
- learning and teaching delivered in line with the agreed Scheme of Work
- applicable Guided Learning Hours delivered to the students as a combination of digital lessons, coaching and formative assessment sessions.

23. For context, OfS internal analysis shows that for students studying business and management courses at RTC Education Ltd in the 2020-21 academic year, around 45 per cent were from more economically deprived areas - Index of Multiple Deprivation (IMD) quintiles 1 and 2.⁵ Mature students made up 95 per cent of the total student population studying business and management courses, with 41 per cent of these aged 21 to 30 on entry to their course, around 55 per cent aged 31 to 50 and a small proportion aged 51 and over.⁶

24. Students studying business and management courses at RTC Education Ltd generally fell into one of three entry qualification groupings. OfS internal analysis shows that for a four-year aggregate covering 2017-18 to 2020-21 the percentage splits across these three groups were:

- 54.8 per cent: access course, foundation course, or other Level 3 courses at 65 tariff points or higher
- 28.1 per cent: none, unknown or other entry qualification
- 11.1 per cent: higher education-level qualification.⁷

Based on student FTE, as supplied by RTC Education Ltd, in the 2022-23 academic year 64.8 per cent of students were studying on a business and management course with an integrated foundation year.

25. All applicants, regardless of entry qualification, undertake an 'intention to study' meeting. The purpose of which is to:

- assess the applicant's academic and/or professional background
- assess the applicant's understanding of and suitability for the course

⁵ Index of multiple deprivation (IMD), as calculated in England only. IMD is calculated from a basket of measures which classifies areas in England by level of deprivation. It is presented as five quintiles, where quintile 1 contains the most deprived 20 per cent of the English population, and quintile 5 the least deprived 20 per cent.

⁶ Source: OfS internal analysis of the student data used to construct the published 'Size and shape of provision' dashboard from September 2022, subset to students taught at RTC Education Ltd within the business and management CAH2 subject area, using the 'all students' population for academic year 2020-21.

⁷ Source: OfS internal analysis of the student data used to construct the published 'Size and shape of provision' dashboard from September 2022, subset to students taught at RTC Education Ltd within the business and management CAH2 subject area, using the 'all students' population for academic years 2017-18 to 2020-21.

- assess the applicant's understanding of the subject area, related industry and relevant careers
- review and comment on the applicant's English language ability; and
- make a decision (with reference to the course entry criteria) on the suitability of the student to undertake the course.

26. Students applying to study who meet the published entry requirements of the relevant courses were processed via a standard route and have their 'intention to study' meeting with an admissions coordinator. Students who did not meet the published entry requirements of the relevant courses, but had non-traditional entry qualifications or relevant work experience, were processed via the non-standard entry route and had their 'intention to study' meeting with a member of academic staff from the School of Business and Enterprise. Non-standard entry route students were also required to provide evidence of a minimum of two years' relevant work experience as part of their application to study, including a work reference letter, relevant work evidence and a CV. For business and management courses, the provider recognised the following examples from students applying to study via the non-standard entry route as evidence of relevant work experience for admission onto a course:

- leadership experience
- working to a schedule
- time management
- meeting deadlines
- self-management
- organisational skills
- communications skills
- teamwork
- problem solving
- analytical skills.

27. The primary mechanism for student support at RTC Education Ltd was a system called HubX. Students were allocated to a HubX group when they began their studies. Each group had a designated academic support officer (ASO), customer services officer (CSO), student finance officer (SFO), registry officer and attendance officer. For international students, the provider aimed to have a maximum of 180 students in one hub. For domestic students the maximum is 250 students. This is discussed under concern 3 (condition B2).

28. Within the HubX structure, CSOs were the first point of contact for student queries. They worked from home (with the majority located in India) and could be contacted by students via Microsoft Teams and email. Supporting the HubX structure were campus liaison officers (CLOs). They worked alongside CSOs as a first point of contact for students. They were based

on each campus at the main reception desk, and their specific duties and responsibilities included 'working effectively with the allocated HubX team to support students, individually and collectively'.

29. The monitoring and tracking of student attendance and assessment submission rates carried out by CSOs as part of their HubX duties fed into a wider internal data tool used by the provider. This Retention, Engagement, Submissions, Marking and Achievement (RESMA) report tracked academic progress of individual students. It also monitored and evaluated the wider academic performance of the provider. The RESMA report was used by academic staff, course boards and programme committees, HubX, the student wellbeing team and the academic council.
30. Outside of the HubX structure, students also had access to the SCOPE (Success, Character, Opportunity, Progress and Enhancement) programme. RTC Education Ltd described this as a student development programme designed with the intention of helping students to maximise their academic, personal and professional development. It includes access to a head of academic skills and one academic skills tutor who provide academic skills support sessions, including library support. Through SCOPE students could also access RTC Education Ltd Thinking into Character (TiC) workshops, a series of 12 online workshops that, as stated by the provider, accelerate personal growth and professional success. Careers support was provided to students through CareerX and included a hub for advice and support as well as networking and careers events. Additional central services support staff included a wellbeing coordinator, a wellbeing officer and an inclusion coordinator.
31. Across each campus location students had access to teaching rooms and a central communal area. Academic resources such as journals and books were provided digitally via an online library. Students also had access to both the VLE platform of their degree awarding partner as well as the RTC Education Ltd VLE. If required, students were also able to borrow a laptop for the duration of their studies.
32. As previously set out (see paragraphs 18 and 19) with the exception of the foundation degree in Business Management, which is designed and delivered by RTC Education Ltd and validated by the University of Bolton, all other business and management undergraduate and postgraduate courses offered by RTC Education Ltd are delivered via a subcontractual relationship with the two awarding bodies. While the awarding bodies design and approve each course, RTC Education Ltd also has responsibility for specific elements within each partnership arrangement.
33. There is a separate operations manual for each of the subcontracted partnerships that sets out the responsibilities for either RTC Education Ltd or the partner provider to support the successful delivery of the relevant courses. The content included in each manual is different, however broadly they set out responsibilities as follows:
 - In RTC Education Ltd's subcontractual partnership with the University of Bolton, which covers the BSc and MSc suite of business and management courses, the operations manual states that while courses have been devised by the university, they will evolve collaboratively with input from both RTC Education Ltd staff and the university. Specifically, the operations manual sets out that setting assessment and moderation of assessment is the responsibility of both providers, while first marking and feedback to students is the

responsibility of RTC Education Ltd. Teaching, the preparation of teaching materials, developing and uploading materials to the VLE and teaching quality is the responsibility of RTC Education Ltd. Both RTC Education Ltd and the University of Bolton have responsibility for aspects of annual course monitoring, oversight and development.

- In RTC Education Ltd's subcontractual partnership with Buckinghamshire New University, which covers the BA suite of business and management courses, the operations manual sets out that students must be formally enrolled with both providers and inducted by RTC Education Ltd. RTC Education Ltd is responsible for providing academic, administrative and pastoral support that gives students studying with RTC Education Ltd a comparable experience with those who study at the university. The university provides some online resources for business and management students, including access to the university's VLE. RTC Education Ltd is responsible for marking all assessments, including examinations, using an agreed marking scheme. It is also responsible for providing feedback to students using an agreed format. Once marking is completed and moderated internally, all student work (and internal moderation) is then shared with the university for moderation.

34. Across both partnerships, RTC Education Ltd has primary responsibility for academic delivery and, as part of this, introduced a content review process in 2021 to review the content for all courses and liaise with the relevant partner institution, with a specific focus on areas that are within the bounds of the OfS's B conditions of registration. This process had not been in place for a sufficient period of time to have had an impact on the concerns identified by the assessment team.

Assessment process

Information gathering

35. The assessment team gathered a range of information to determine whether there were possible concerns relating to the requirements as set out in conditions of registration B1, B2 and/or B4. The team gathered information through an initial request for data from RTC Education Ltd (9 November 2022) and two site visits on 8 December 2022 and 20 to 21 February 2023.
36. During these visits it undertook:
- a range of staff interviews (with academic and central college professional service staff)
 - a range of student panel interviews (including students studying at Levels 3, 4, 5 and 6)
 - a physical and digital facilities tour and review of records and documents.
37. The team reviewed material on the VLE from 22 December 2022 to 16 May 2023 and on specific teams on Microsoft Teams used by staff and students for teaching delivery and communication between staff and students. It made further requests for information and data based on discussions with staff and students during both the initial site visit and subsequent two-day site visit, as well as requests arising from its analysis of information already provided. The college fulfilled all requests in a timely fashion and provided the additional information and data on 5 December 2022, 22 December 2022, 20 January 2023, 14 February 2023, 17 March 2023 and 12 April 2023.
38. The assessment team first reviewed general monitoring intelligence, including student outcomes data held by the OfS, and initial data provided by RTC Education Ltd. From this it decided to focus on undergraduate provision. This was because larger cohort sizes in undergraduate provision meant that this was, in the assessment team's view, in line with a risk-based approach.
39. Similarly, following a risk-based approach, the assessment team then focused on the four specific undergraduate courses below as they represented a significant majority of undergraduate students in the School of Business and Enterprise:
- BA (Hons) Business Management and BA (Hons) Business Management with foundation year, both awarded by Buckinghamshire New University (the "BA Business Management courses").
 - BSc (Hons) Business Management and BSc (Hons) Business Management with foundation year, both awarded by the University of Bolton (the "BSc Business Management courses").

Assessment of matters relating to quality under ongoing conditions of registration B1, B2 and B4

Condition B1: Academic experience

40. The assessment team reviewed a range of evidence relevant to condition B1 (see Annex A for the full text of the condition), which is detailed through the discussion below.

41. In the assessment team's view, there are concerns that may relate to compliance with some of the requirements set out in condition B1.2, as follows:

B1.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B1.1, the provider must ensure that the students registered on each higher education course receive a high quality academic experience.

B1.3 For the purposes of this condition, a high quality academic experience includes but is not limited to ensuring all of the following:

- a. each higher education course is up-to-date;
- b. each higher education course provides educational challenge;
- c. each higher education course is coherent;
- d. each higher education course is effectively delivered;
- e. each higher education course, as appropriate to the subject matter of the course, requires students to develop relevant skills.

42. The assessment team also particularly noted the following definitions listed under B1.5:

'b. "coherent" means a higher education course which ensures:

- i. there is an appropriate balance between breadth and depth of content;
- ii. subjects and skills are taught in an appropriate order and, where necessary, build on each other throughout the course; and
- iii. key concepts are introduced at the appropriate point in the course content; and

c. "educational challenge" means a challenge that is no less than the minimum level of rigour and difficulty reasonably expected of the higher education course, in the context of the subject matter and level of the course; and

d. "effectively delivered", in relation to a higher education course, means the manner in which it is taught, supervised and assessed (both in person and remotely) including, but not limited to, ensuring:

- i. an appropriate balance between delivery methods, for example lectures, seminars, group work or practical study, as relevant to the content of the course; and
 - ii. an appropriate balance between directed and independent study or research, as relevant to the level of the course.
- f. “relevant skills” means:
- i. knowledge and understanding relevant to the subject matter and level of the higher education course; and
 - ii. other skills relevant to the subject matter and level of the higher education course including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences, and;
- g. “up-to-date” means representative of current thinking and practices in the subject matter to which the higher education course relates, including being appropriately informed by recent:
- i. subject matter developments;
 - ii. research, industrial and professional developments; and
 - iii. developments in teaching and learning, including learning resources.’

Concern 1 (condition B1.2): All students did not receive a high quality academic experience

Role and responsibilities of RTC Education Ltd relevant to Concern 1

43. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that RTC Education Ltd was responsible for teaching modules, preparing teaching materials, and preparing and uploading e-materials to the VLE. Specifically, the operations manual sets out that it is the responsibility of the head of school and module leaders at RTC Education Ltd to ensure that:

- the approved teaching, learning and assessment strategy is adhered to.
- teaching material is relevant, current, localised and interesting.
- as a minimum, the VLE pages include core module documents (module specification, approved module guide, moderated assignment briefs), teaching materials to support workshop sessions and additional background reading and activities.

44. The division of responsibilities is similar for the partnership with Buckinghamshire New University. In this case, the partnership operations manual sets out that key individuals at RTC Education Ltd were responsible for ensuring that courses were delivered in line with Buckinghamshire New University procedures and regulations. The Buckinghamshire New University partner monitoring and review procedure document sets out that the maintenance of

academic quality is the collective responsibility of all Buckinghamshire New University employees, as well as all staff of RTC Education Ltd delivering and monitoring Buckinghamshire New University courses under a subcontractual relationship.

Organisation and delivery of taught sessions

45. The assessment team reviewed 21 modules across Levels 3, 4, 5 and 6 (approximately 40 per cent of all modules across the four courses set out in paragraph 39) to understand how taught sessions were organised and delivered. Of these modules, ten covered courses delivered on BA Business Management courses. The remaining 11 were delivered on BSc Business Management courses.

46. For these modules, the team examined:

- module handbooks
- lecture slides and other learning materials available on the VLE
- Microsoft Teams channels used by staff and students for teaching delivery and communication between staff and students.

47. For the BSc Business Management courses, the team also watched recordings of teaching sessions hosted on Microsoft Teams. The provider did not record teaching sessions for the BA Business Management courses.

48. This review raised concerns that the relevant courses (see paragraph 39) were often not up-to-date, not consistently effectively delivered, often lacked educational challenge and coherence, and often did not teach relevant skills.

Insufficient teaching time dedicated to cover new module subject content

49. The assessment team found that 15 modules of the 21 reviewed dedicated between a quarter to half of the module teaching time to revision and assessment support, rather than new module subject content. This finding is based on the assessment team's review of the delivery in practice of modules.

50. Where modules involved a summative examination, the assessment team found that modules often used multiple taught sessions to prepare students for the examination. This was apparent at all levels of study (this is also discussed under concern 6, condition B4, but is considered here in relation to students receiving a 'high quality academic experience'). An example of this was seen on a Level 6 BSc Business Management module (2022-23), where the weekly teaching schedule consisted of one three-hour teaching session per week, for 15 weeks. The module's summative assessment entailed one exam. Four of the weekly teaching sessions were dedicated to revision and examination preparation. One week of teaching was also dedicated to module evaluation. Therefore, new substantive module content was not being covered in approximately one third of the module teaching time.

51. The assessment team observed that modules also often used multiple taught sessions for the purposes of revision and assessment support, where modules had coursework-based assessment (this is also discussed under concern 6, condition B4, but is considered here in relation to students receiving a 'high quality academic experience'). This occurred across all

levels and raised concerns as to whether the relevant courses were effectively delivered. A selection of examples is set out below:

- One Level 3 BSc Business Management module (September 2022) ran over 15 weeks with two three-hour taught sessions each week and was assessed by a single piece of coursework. It dedicated five weeks (one third) of teaching time to revision and assessment support. For four of the weeks where new content was delivered, lecture slides on the VLE site duplicated content from previous weeks' lectures. In several other non-revision sessions, the assessment team found that a notable amount of the lecture content was repeated between sessions. This meant that the module spent less than one third of teaching time delivering new module content. The assessment team recognised that foundation year students are likely to need higher levels of academic support, considering the academic needs of the specific cohort, and that the amount of subject content covered may be less at Level 3 compared with Levels 4 to 6. However, in the assessment team's judgement, teaching time on this module was not used effectively to meet module learning outcomes and ensure that students were enabled to develop knowledge and understanding relevant and appropriate to the subject matter and level. This was due to the low proportion of subject content delivered relative to the expectations set in the module specifications regarding what students should gain from this module, and therefore an inappropriate balance between directed and independent study for a higher education course.
- At Level 5, a BA Business Management module (2021-22) was taught over 15 weeks with one three-hour weekly teaching session and two assessments involving a piece of coursework and an in-class presentation. Eight of the 15 weeks did not cover new substantive content. While one to two of these eight weeks were justifiably used for presentation delivery, the remaining weeks involved assessment support (for example, providing opportunities for students to obtain feedback). This included three weeks to support any students submitting late. Based on the team's review of the module VLE lecture materials, of the seven weeks that were used to deliver subject matter content, one session had a focus on the assessment and two sessions included time for students to work on their assessment. Given this observed use of teaching time, the assessment team's view is that the module was under-delivering subject content by, in the academic judgement of the assessment team, not being taught to sufficient depth or breadth having used less than half the teaching time to deliver subject matter.
- At Level 6, the provider offered a BSc Business Management module (April 2022 cohort) involving two three-hour sessions delivered weekly over 15 weeks, where summative assessments were a piece of written coursework and a narrated presentation. Four teaching weeks were dedicated to revision and assessment support while a fifth teaching week consisted of assessment formative feedback and 'module evaluation' . This represented one third of teaching contact time. Part of the weekly teaching time over nine weeks was also used to explain assessment requirements and give students time to work on their assessments. This meant that less than one third of teaching time covered new substantive content. The assessment team was concerned about the effective use of teaching time to develop students' knowledge and understanding of relevant subject matter, particularly given this was a Level 6 module for those students in their final year of undergraduate study.

52. In considering the examples above, the assessment team was concerned that:

- Students' learning could be negatively impacted by the lack of time in taught sessions focused on the delivery of subject content. The view of the assessment team was that this had led to a lack of appropriate balance between the breadth and depth of content taught to students, and a lack of opportunity for students to develop relevant skills, knowledge and understanding as required for the level of the higher education course they were registered on.
- The team was also concerned that the module sessions reviewed that were dedicated to revision and assessment support, were not only excessive in number but were often focused on priming students to complete and pass assessments, rather than on requiring students to develop knowledge and understanding of the subject matter. This is discussed further under concern 6, condition B4. This led the team to be concerned that relevant courses were not effectively delivered because based on the manner in which it was assessed, there was not an appropriate balance between directed and independent study opportunities for students, with learning often being overly directed. Additionally, the team was concerned that the excessive support provided to pass assessments meant that the level of educational challenge of the course was less than the minimum level of rigour and difficulty that, in the team's academic judgement, it would reasonably expect of an undergraduate degree in business and management.

53. In addition to high proportions of module teaching contact time being dedicated to revision and assessment support, in a meeting with teaching staff, the assessment team was told that modules 'usually had a session dedicated for students to understand the module evaluation'. The team's review of 21 modules' handbooks and VLEs found that four modules stipulated a session for module evaluation either on its own or apparently in combination with other session titles, typically assessment feedback or career workshop. For these four modules, the team could not identify any subject-specific learning material on the VLEs. While the assessment team clearly recognised that seeking student feedback on modules is a crucial activity for continuous improvement and hearing the student voice, the team were concerned that seemingly dedicating a three-hour session to this purpose in its view did not represent an effective use of taught contact time.

54. The assessment team was also concerned to find that in a number of the teaching sessions (in the sample reviewed) the time it took to record attendance, as well as delayed starts and early finishes, could have reduced the time available for delivering new substantive module content. For example, a Level 3 BSc Business Management teaching session (June 2022) used approximately 30 minutes to take note of the attendance of 13 students. Similarly, in a Level 6 BSc Business Management module (February 2023) the first approximately 30 minutes of a session were dedicated to this as well as addressing issues of access to module materials.

55. In the assessment team's view, the insufficient teaching time dedicated to cover new module subject content meant that relevant courses were not consistently providing an appropriate level of educational challenge, effectively delivered or ensuring students develop relevant skills. This is because when the evidence is looked at as a totality, there was often a lack of time in teaching sessions dedicated to subject content and this led to a lack of substantive learning opportunities across all levels. This is concerning at all levels of the courses under

consideration, but particularly at Levels 5 and 6 where students would be expected to be developing advanced skills and knowledge.

Subject content was not effectively delivered

56. The assessment team viewed 22 recordings of taught sessions across 12 modules from the BSc Business Management courses, both hybrid and online-only delivery. The team was concerned that the majority of these sessions, in its view, involved substantive module content not being delivered effectively.
57. Across these observed sessions, in the assessment team's academic judgement, teaching staff often did not explain concepts and issues relevant to the subject matter with an appropriate level of depth. For example:
- on a Level 4 module (March 2023), the team viewed recordings of four taught sessions delivered online. Throughout these sessions, the tutor limited themselves to reading bullet points from PowerPoint slides and playing videos for the class to watch, without seeming to provide any explanation of the ideas and concepts addressed. The videos played occupied most of the observed teaching time. In one class that ran for 45 minutes, videos were played for approximately 35 minutes, with the tutor reading from the slides for most of the remaining time.
 - in a Level 5 module (April 2023), the assessment team noted that for most of an observed session the tutor only read from slides, while providing little to no further explanation of the content.
 - in a Level 6 module online class (April 2023), the tutor read verbatim a significant number of slides without providing explanations of what were, in the assessment team's view, often advanced concepts and issues. Although one student asked that more time be spent on less familiar topics, and less time on topics that had been covered extensively in previous years, the tutor did not provide fuller explanation of these in the teaching session.
 - in a Level 6 module online class (April 2023) focused on assessment support, a majority of the class consisted of the tutor reading verbatim from slides or signposting to learning resources without elaborating on how these could be used. At times, students asked for fuller explanation of specific topics but sufficient academic explanation was not provided by the tutor. In the assessment team's view this lack of sufficient explanation was in part due to the tutor being a 'cover tutor' (as the tutor noted to the class, 'I am only taking this class now'). This relates to issues raised below in concern 2 under condition B2 regarding 'frequency of module tutor changes' (paragraphs 97 to 103).
58. The view of the assessment team is that subject content was often not effectively delivered. The observed sessions within the sample reviewed indicated that modules were not consistently taught by RTC Education Ltd in a manner that ensured an appropriate balance within the delivery method. This is because the team frequently observed an apparent overreliance on PowerPoint slides or videos and a lack of explanation of concepts and issues relevant to the subject matter. The team were concerned that this would limit the ability of students to develop relevant skills, knowledge and understanding in the subject as appropriate to the level of the module.

Consistency of timeframe for providing summative assessment grades and feedback

59. The assessment team identified that the timeframe for providing summative assessment grades and feedback could vary between modules and could often be outside the expectations set in University of Bolton and Buckinghamshire New University policies. This could have impacted on the academic experiences of students and the consistency of support available to them through summative assessment. The assessment team considered that this suggested assessment was not always effectively delivered.
60. The timeframe for returning marks and feedback to students was specified in the assessment and feedback policies of the partner providers. For BA Business Management and BA Business Management (with a foundation year), this was specified in the 'Buckinghamshire New University Assessment and Feedback Policy':
- 'Marks and feedback will be returned to students within 15 working days. Feedback should not be withheld while internal and external moderation takes place if this would delay the return of feedback to students beyond this timeframe.'
61. Similarly, for BSc Business Management and BSc Business Management (with a foundation year), this timeframe was specified in the 'University of Bolton Assessment and Moderation Procedures':
- 'Tutors should make available marked any internally moderated work (including examinations and dissertations) to students with feedback and provisional grades within 15 working days.'
62. Both of these policy documents were publicly available on the policies section of the RTC Education website. Module handbooks provided similar guidance to students as standard. For example, from a Level 6 BSc Business Management module (2022-23):
- 'We recognise the value of prompt feedback on work submitted. Other than in exceptional circumstances (such as might be caused by staff illness), you can expect your assignment and examination work to be marked and feedback provided not more than 15 working days from the deadline date. However, please note that such feedback will be provisional and unconfirmed until the Assessment Board has met and may, therefore, be subject to change. Please take the time you [sic] read or listen to your assessment feedback. This can be very useful in determining your strengths and key areas for development, and can, therefore, help you improve on future grades.'
63. The focus here was on summative, rather than formative assessment feedback. Formal marks and feedback from summative assessments are an important source of support for students. They helped students to understand and reflect on their achieved attainment for specific assessments and how they could develop in future assessments within the same module or across modules. As such, timely provision of summative assessment marks and feedback is important in helping students to gauge their progress, adapt where relevant, and ensure that students' expectations for their academic experience were met.
64. The assessment team noted that the student council minutes from March 2022 recorded related concerns from student representatives:

'Assessment and Feedback – marks released at different points for different students (ad hoc): some students not received their results or feedback whilst others in class did. Full class did not receive vital information regarding results and feedback. No explanation was given regarding this.'

65. The assessment team identified continuing issues with marks and feedback not being returned to students consistently in accordance with partners' policies. The assessment team sampled a range of modules across Levels 5 and 6 of the BSc Business Management courses. Nine modules were selected due to the larger cohort size and at levels that contributed to the calculation of students' overall degree classification, which made timely feedback to support future assessment preparation particularly impactful and particularly important that students receive feedback in a timely way. Of these, eight modules were identified as not meeting the timeframe for returning summative assessment marks and feedback. For example:

- A Level 5 module assessment with a student submission deadline of 13 November 2022 did not provide marks and feedback to students until 29 January 2023. The second assessment for this module was then due on the same day as the feedback for the prior assessment was made available (29 January 2023). This left no time for students to receive and reflect on their grades and feedback to prepare for the subsequent assessment.
- A Level 5 module assessment with a student submission deadline of 13 November 2022 released marks and feedback to students 20 working days later (i.e. more than 15 working days as expected under the policy). However, 41 submissions had still not been marked when reviewed by the assessment team on 16 January 2023 (12 per cent of 330 submissions from 361 students on the module). These students would not then have received their marks and feedback until after 16 January 2023, despite feedback having been 'released' to the module cohort, and marks and feedback being available to other students.
- A Level 5 module assessment, with a student submission deadline of 20 November 2022, had 140 submissions unmarked when reviewed by the assessment team on 16 January 2023 (42 per cent of 333 submissions from 361 students on the module). Those students whose assessments had received marks and feedback were able to view theirs, but the 140 students did not have marks and feedback, creating a disparity within the cohort.
- A Level 6 module assessment with a student submission deadline of 20 November 2022 had a 'post date' (when marks and feedback become visible to students) of 11 December 2022, within 15 working days. However, 96 submissions had been graded after the 'post date' (68 per cent of 141 submissions from 164 students on the module). This suggests that a proportion of students in the module cohort had access to their marks and feedback on time, but most received them later (for example, assessment data suggests that 20 per cent of submissions were marked on 18 January 2023).

66. In most of these cases the head of school could be seen to have access to marking progress. This suggests that the seemingly common issues in returning marks and feedback to students in a consistent and equitable manner, and in line with student and institutional expectations, should have been known to the school.

67. The view of the assessment team based on the sample reviewed was that students on courses delivered by RTC Education Ltd often did not receive timely feedback that would support their learning and therefore considered that assessment was not consistently effectively delivered.
68. Potential contributing factors to this concern are considered further under concern 2 (condition B2), in paragraphs 118 to 121 below.

Reading material not sufficiently up-to-date

69. The assessment team found that appropriate module reading material was often not embedded in module teaching. The team evaluated both guidance about recommended reading and reading lists for 21 modules (40 per cent of all modules on the courses under review) across Levels 3, 4, 5 and 6. Ten of these modules were delivered on BA Business Management courses, with the remaining 11 being delivered on BSc Business Management courses. The information reviewed included module handbooks, online reading lists and reading material via module VLEs and lecture slides. Overall the assessment team was concerned that, in a significant number of the modules reviewed, there was a lack of appropriate up-to-date reading lists.
70. Eight of the 11 modules delivered on the BSc Business Management courses that were reviewed lacked comprehensive reading lists available to students. While module handbooks provided what was referred to as an 'indicative readings' list, this primarily constituted a list of textbook titles, names of academic journals (rather than journal articles) and non-academic sources. This was in keeping with their 'indicative' nature, but would not guide students to particular readings that would, for example, support specific teaching sessions. Information about reading material was also provided on the modules' VLE sites via online 'resource lists', but these generally did not provide guidance on specific weekly reading either. Only one module reviewed provided a weekly reading list via the online resource list. This suggested to the assessment team that reading material was not consistently linked with teaching sessions and it would be difficult for students to understand how to independently engage with academic resources on these modules to support their learning in taught sessions. Although it was noted by the assessment team that some modules organised textbooks in order of priority (namely 'essential' and 'further' readings), which would be helpful to guide students this would not address concerns about embedding specific readings. The team also reviewed lecture slides to identify if they included weekly reading lists. In most modules they did not or, where they did, this was not consistent across the module teaching weeks.
71. Overall, the inclusion of reading lists was more frequently observed in the modules delivered on the BA Business Management courses. This was part of the format of module handbooks on these courses. For seven of the ten modules reviewed, weekly reading guidance was provided. The extent and detail of readings listed varied. Information about readings could also be seen on the VLE, presented in online reading lists and also in lecture slides. However, as noted below, across some modules the information on reading lists via the VLE did not align with those in the module handbook.
72. In the academic judgement of the assessment team, of the 21 modules reviewed, over half (13) included readings that were outdated. This suggests that learning resources were not updated frequently, raising questions as to how up-to-date course materials were. For example:

- the weekly reading list for a Level 4 BSc Business Management module (June 2022) included a substantial number of media sources that were dated 2018 and earlier. Given that the module subject matter was focused on the business environment, which is fast-evolving, the assessment team recognised the need to include contemporary sources.
- in a Level 6 BA Business Management module (2021-2022), the core textbook listed in the module handbook was dated 2010 for an electronically available edition and 2013 for a physical copy. Additional readings posted on the VLE, which primarily constituted consultancy papers and practitioner-oriented journals, were almost all outdated in the context of the fast-moving nature of the subject.

73. The view of the assessment team was that at times, students were not directed to reading material reflective of the fast-evolving nature of the relevant subjects and therefore, reading lists were not considered to consistently have been up-to-date.

Inconsistencies in published module schedules undermined the coherence of courses

74. The assessment team also found inconsistencies between the week-by-week taught content schedule of modules as detailed in module handbooks and the week-by-week content structure found on the module VLE sites. The VLE sites for modules delivered on both the BA and BSc Business Management courses contained module handbooks, which followed a prescribed standardised format set by each partner university, and provided key information about modules. These handbooks included details of the weekly schedule of modules, specifying teaching week number, date and title indicating content to be covered in each week's taught sessions. The assessment team expected module handbooks shared with students at the start of a module to match the weekly content structure, as set out on VLE sites. However, when comparing the weekly schedules for 21 modules across the BA and BSc Business Management courses, as laid out in their module handbooks against the weekly content schedule as set out on the module VLE sites, the team observed numerous discrepancies for eight out of the 21 modules. The assessment team noted that all eight modules were delivered on the BSc Business Management courses and amounted to 70 per cent of the sample of the BSc Business Management modules reviewed. In all eight modules, the nature of the inconsistencies was that topics due to be covered in certain weeks actually were covered in different weeks.

75. The assessment team found that information could be confusing. In some cases, it was unclear whether certain topics announced in the module handbook schedule were delivered at all based on the VLE's weekly structure. The assessment team was concerned that these inconsistencies undermined the coherence of courses. Providing two different versions of the order of module content to students, across a high proportion of modules on BSc Business Management courses, gave contradictory information to students as to how particular subjects built on each other and where key concepts were introduced. This lack of clarity and coherence regarding the order of module content would also, in the assessment team's view, present a barrier for students in preparing for teaching sessions and their ability to engage effectively with learning.

B1 conclusions

76. In summary, the concerns found under condition B1 were:

- Relevant courses did not consistently provide appropriate educational challenge. This was evident across all levels. This was due to insufficient time dedicated to cover module subject content and an excessive amount of time spent on supporting students to complete and pass assessments (as discussed in paragraphs 49 to 55). In the assessment team's view, this led to the courses providing a level of rigour and difficulty that, in the team's academic judgement, was less than the minimum it would reasonably expect of an undergraduate degree in business and management.
- Relevant courses were not consistently effectively delivered. This was due to insufficient time dedicated to cover module subject content and an excessive amount of time spent supporting students to complete and pass assessments (as discussed in paragraphs 49 to 55). This excessive assessment support led to a lack of appropriate balance between directed and independent study opportunities for students. The apparent overreliance on PowerPoint slides or videos and a lack of explanation of concepts and issues relevant to the subject matter (as discussed in paragraphs 56 to 58) led the team to conclude that the manner in which courses were taught had often not ensured courses were effectively delivered. And finally, the assessment team identified that the timeframe for providing summative assessment grades and feedback could vary between modules and could often be outside the expectations set in RTC Education Ltd's policies (as discussed in paragraphs 59 to 68). The view of the assessment team was that students often did not receive timely feedback that would support their learning and therefore considered that assessment was not consistently effectively delivered.
- Relevant courses were not consistently coherent. This was due to inconsistent information provided to students regarding which topic they were due to be taught in which week (as discussed in paragraphs 74 to 75). The team observed that in many modules contradictory information was provided to students as to how particular subjects built on each other and where key concepts were introduced.
- Reading material was not consistently up-to-date. This was due to learning resources not being updated to reflect subject matter developments (as discussed in paragraphs 69 to 73). In the academic judgement of the assessment team, the relevant subject matter was fast-evolving and required contemporary sources that were not always suggested to students.
- Relevant courses did not consistently require students to develop relevant skills. This was due to insufficient time dedicated to covering module subject content and an excessive amount of time spent supporting students to complete and pass assessments (as discussed in paragraphs 49 to 55). The view of the assessment team was that this created a lack of opportunity for students to develop relevant knowledge, understanding and skills as required for the level of the higher education course they were registered on. Additionally, the assessment team were concerned that an overreliance on PowerPoint slides or videos and a lack of explanation of concepts and issues relevant to the subject matter (as discussed in paragraphs 56 to 58) often meant that the ability of students to develop their knowledge and understanding in the subject as appropriate to the level of the module was limited.

77. In the assessment team's view, the concerns set out under condition B1 mean that a high quality academic experience had not been consistently ensured for students on the courses delivered by RTC Education Ltd considered as part of this assessment.

Condition B2: Resources, support and student engagement

78. The assessment team reviewed a range of information relevant to condition B2 (see Annex A for the full text), which is detailed through the discussion below.

79. In the assessment team's view there are concerns that may relate to compliance with some of the requirements set out in condition B2.2, as follows:

'B2.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B2.1, the Provider must take all reasonable steps to ensure:

- a. each cohort of students registered on each higher education course receives resources and support which are sufficient for the purpose of ensuring:
 - i. a high quality academic experience for those students; and
 - ii. those students succeed in and beyond higher education'

80. The assessment team also particularly noted the clarification articulated within requirement B2.3:

'B2.3 For the purposes of this condition [B2.2], "all reasonable steps" is to be interpreted in a manner which (without prejudice to the other relevant conditions):

- a. Focuses and place significant weight on:
 - i. The particular academic needs of each cohort of students based on prior academic attainment and capability; and
 - ii. The principle that the greater the academic needs of the cohort of students, the number and nature of the steps needed to be taken are likely to be more significant;
- b. Places less weight, as compared to the factor described in B2.3a., on the Provider's financial constraints'

81. The assessment team considered arrangements for student engagement relevant to condition B2.2.b. This included methods such as the student representatives scheme used by RTC Education Ltd, the establishment of the Student Open Forum between students and staff, and the use of module evaluation surveys. The assessment team did not have concerns regarding engagement with each cohort of students as defined under condition B2.2.b.

Concern 2 (condition B2.2.a): Academic staff resource was often not sufficient or not deployed effectively, leading to inadequate resourcing of modules and poor provision of support to students

82. The assessment team identified concerns regarding the deployment of academic staff in the School of Business and Enterprise. This included, in line with condition B2, whether academic

staff were sufficient in number and deployed effectively to deliver in practice. The assessment team was then concerned that insufficient numbers and ineffective deployment of academic staff (for example, by failing to ensure that there were roles with appropriate oversight responsibilities) often led to poor organisation and management of modules (as observed by the assessment team). Evidence of academic staff resource impacting on module organisation and management could be seen through, for example, frequent changes in module tutor, a lack of clarity in information and guidance to students, and summative assessment grades and feedback being provided to students inconsistently. The assessment team heard that such issues could lead to uncertainty and confusion for students, impacting on their ability to engage with learning and assessments as effectively as possible, and disrupting their academic experience.

Role and responsibilities of RTC Education Ltd relevant to Concern 2

83. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:

- the recruitment, training and development of all module leaders and tutors. This includes a compulsory one and a half day induction programme, covering areas such as University of Bolton and RTC Education Ltd processes, procedures and regulations; online resource demonstrations; introduction to tutoring and dissertation supervision; and quality assurance processes. Following the general induction, new staff should complete module specific training.
- the provision of academic support to ensure the provision of a rewarding academic experience. This includes allocating a personal tutor to each student.
- the provision of module guides to students (including an outline of assessments for the module) at least two weeks prior to the planned delivery.
- the timely provision of assessment information to students.
- the provision of assessment feedback and provisional grades to students within 15 working days of the due date.

84. The RTC Education Ltd and Buckinghamshire New University operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:

- the provision of teaching staff of an appropriate standard for the courses being delivered.
- training and development of academic staff that ensures, amongst other things, that all RTC Education Ltd staff teaching on BA Business Management courses have a thorough understanding of the UK higher education sector, including requirements relating to quality of provision.
- the provision of academic student support so that students have an experience comparable with students studying at Buckinghamshire New University.

- the provision of marks and written feedback to all students within 15 working days of the due date. If there is a delay, this should be clearly communicated to students alongside a revised date of when marks and feedback will be available.

Academic staffing context

85. As we have described above, student numbers have grown rapidly in the School of Business and Enterprise at RTC Education Ltd. The assessment team was keen to understand the arrangements for academic staffing to support modules in this context being effectively delivered. Table 2 below shows the student to academic staff ratio (SSR) for the School of Business and Enterprise over a five-year period, drawn from data provided by RTC Education Ltd.

Table 2: School of Business and Enterprise student to academic staff ratio (SSR), 2017-18 to 2021-22

Measure	2017-18	2018-19	2019-20	2020-21	2021-22
Student FTE	964	996	2,086	3,929	3,776
Academic staff FTE	28	57	53	82	88
SSR	34.43	17.47	39.36	47.91	42.91

86. According to data provided by RTC Education Ltd, the number of students (FTE) in the School of Business and Enterprise has increased further in 2022-23 to 4,055. Over the most recent three years, the SSR has averaged 43.91 (FTE students per FTE academic staff member). Given the characteristics of the student cohort recruited, as described under the 'Context' section above, (i.e. significant numbers of students from low IMD quintiles, mature students, students joining through a foundation year, and/or admitted via the non-standard entry route), the assessment team considered that students were likely to have high academic support needs. This was acknowledged in RTC Education Ltd's most recent Teaching Excellence Framework (TEF) submission (2023) which was submitted to the assessment team by the provider and stated: 'RCL's [RTC Education Ltd trading as Regent College London] student profile means that many of our students, especially the mature 21+ HE returns, have specific academic skills development needs, particularly in relation to analytical reasoning, academic writing, research and referencing'.⁸ The view of the assessment team is that, taking these factors into consideration, the larger the cohort size of students, the greater the number of academic staff should be available to those students to provide sufficient levels of support. In its judgement, the assessment team therefore regarded the SSR to be high, and this was particularly concerning given the academic support needs of the student cohort.

87. The assessment team noted from the data provided by RTC Education Ltd that the average SSR over the most recent three years was also higher than the institutional SSR identified by senior staff members, who informed the assessment team in a meeting that the ratio was 12 students per staff member (12 to 1). This is also quoted in RTC Education Ltd's TEF submission (2023) which was submitted to the assessment team by the provider: 'At the time of the submission RCL has 227.5 academic and 226.5 professional services staff, an overall 12:1

⁸ [Open-Ancillary-Docs \(officeforstudents.org.uk\)](https://www.officeforstudents.org.uk/Open-Ancillary-Docs)

student: staff ratio.’ As the provider makes clear in the TEF submission, the identified SSR of 12 to 1 does not reflect academic staff per student. The SSR numbers that were communicated to the assessment team, and cited in the TEF submission, are not in keeping with the HESA definition of student to staff ratios (i.e. ‘the student: staff ratio (SSR) is designed to show the total number of students per member of academic teaching staff⁹). The assessment team was concerned that a focus on a broader measure of SSR within RTC Education Ltd (i.e. including staff that are not responsible for teaching) has had the effect of masking the issue of insufficient academic staff numbers internally and externally and has hidden the need for action on this issue.

88. The data suggests that academic staff resource in the School of Business and Enterprise had not kept pace with student growth, and the broader definition of SSR used within RTC Education Ltd did not sufficiently measure numbers of academic staff in relation to the size of the student cohort. The assessment team’s view was that academic staff resource was therefore not sufficient in number and that this had the capacity to impact the quality of the academic experience and the ability of students to succeed in their course. This is particularly so when considered alongside the other concerns set out in this report.

89. Alongside the SSR, the assessment team also sought to understand how teaching staff were recruited and teaching allocated. The assessment team looked at this area because it was noted in early meetings with senior staff that a number of academic staff were appointed to short-term contracts. The assessment team was interested in the recruitment, training and onboarding of teaching staff in relation to the student cohort, to help the team determine the sufficiency of the academic staff resource. As detailed under the ‘Context’ section above, most of the teaching staff by headcount (61 per cent) in the School of Business and Enterprise (2021-22) were employed on Module Unit Contracts (MUCs). The table below provides an overview of academic staff by contract type.

Table 3: School of Business and Enterprise academic staff by contract type, 2017-18 to 2021-22¹⁰

Contract type (headcount)	2017-18	2018-19	2019-20	2020-21	2021-22
Permanent	21	30	30	36	34
Fixed-term	5	5	26	5	13
Module Unit Contracts	0	0	0	54	72
Self-employed	40	6	0	0	0

⁹ [Technical definitions | HESA](#)

¹⁰ Source: RTC Education Ltd internal data

Overtime¹¹	0	0	15	18	0
Total	32	75	71	113	119

90. The assessment team noted from this information the high (and increasing) proportion of staff who were on MUCs. It also noted that the proportion of staff employed on permanent contracts remained relatively consistent between 2018-19 and 2021-22, despite significant growth in student numbers over this four-year period. The assessment team considered that this high proportion of academic staff on fixed and/or short-term contracts was likely to contribute to the lack of consistent and effective organisation of modules detailed below (and as noted by RTC Education Ltd staff in paragraph 116).
91. The assessment team met with a number of academic staff employed on MUCs. These staff members, who had generally been employed by RTC Education Ltd for a number of years, gave positive views regarding their inductions. However, the assessment team also noted that the timeframe between recruitment and delivering modules for some new staff was, in its view, too short. This ranged from three weeks between recruitment and beginning to teach modules for some staff, to a period of just two weeks between submitting an application and commencing module teaching for others. The assessment team considered that this timeframe reduced time available for staff to be inducted, trained and familiarised with module content and delivery, which, in its view, in turn would be likely to negatively impact the effective organisation and delivery of modules.
92. Given that the student cohort included a large proportion of mature students returning to education and students from diverse educational backgrounds, the assessment team was concerned that this rapid recruitment and onboarding process for MUCs meant that staff were less likely to have available the knowledge and information related to the specific provider and courses required to deliver modules effectively and to support students in their learning. In the view of the assessment team, this contributed to the ineffective deployment of academic support which had the capacity to impact the quality of the academic experience and the ability of students to succeed in their course.
93. The assessment team viewed issues with the delivery of teaching and learning, identified in concern 1 (condition B1), as evidence that these staff recruitment processes (from the sample of staff members on MUCs that the assessment team met with) put pressure on the capacity to ensure staff members were fully inducted, trained and familiarised with modules so they are able to give students appropriate information, guidance and support.
94. The assessment team heard from senior RTC Education Ltd leadership that they were developing a module leader role. At that time, there was no designated module leader role (21 February 2023) and the provider had yet to agree an allocation of time for it. The assessment team viewed this as contributing to concerns about module oversight and management outlined below. This is because the lack of a defined role meant that responsibility for module organisation was often unclear to teaching staff and students. RTC Education Ltd later provided a copy of a module leader role description to the assessment team (17 March 2023), which included a 'notional 30-50 workload hours per module'. The recent establishment of this

¹¹ Existing academic staff members who took on additional overtime during the Covid-19 pandemic.

role and its specific time allocation explains why it did not appear on the School of Business and Enterprise workload allocation model (provided to the assessment team on 22 December 2022).

95. The assessment team regarded the introduction of a module leader role description as a positive development that could address some of the issues regarding provision of consistent support for students, as well as module oversight and management highlighted under this concern and concern 1 (condition B1), if it were successfully implemented. However, this is likely to depend on adequate academic staffing and effective deployment of staffing, as well as clarity of responsibilities within academic roles. The assessment team noted, for example, that in the new role description the module leader has 'responsibility for accurate and accessible information and learning materials on the VLE module website', but associate lecturers (on MUCs) have a responsibility to 'ensure that the VLE is regularly updated'. This example suggested to the assessment team that there remained a risk of roles and responsibilities not being clear.
96. This context provided the assessment team with a broader understanding of academic staffing resources within the School of Business and Enterprise, and how their deployment had contributed to the concerns identified below regarding the organisation and management of modules.

Frequency of module tutor changes

97. The assessment team heard from a range of students across all levels that their module tutor often changed unexpectedly during the course of a module, and that this negatively affected their learning and assessments. In a meeting with Level 5 students, some students described how their tutor had changed often on particular modules; for example having 'different tutors over five weeks' in one module and 'three or four tutors' on another Level 5 module, both in autumn 2022. Another student described how two seminar groups were unexpectedly merged, and they felt that this disruption had affected their assessment mark. Students felt that these changes of tutor had negatively affected their module marks and that they 'would have got better marks if the tutor had not changed so frequently'. This experience of tutors changing was also reflected in a subsequent meeting with Level 3 students.
98. Similarly, in meeting with student representatives (across levels of study 3 to 6) the students in this meeting described how 'the tutor frequently changes' on modules, and 'they change the tutors all the time, which is annoying'. One student described three changes of tutor on a module in one month, and another that they had had 'six or seven lecturer changes'. Students explained that such changes meant that 'each tutor then spends a lot of the lecture time giving an introduction' and the 'international students struggled with the change of tutor'.
99. Business and management students in a weekly open meeting between student course representatives and senior RTC Education Ltd leadership also raised this issue. The assessment team viewed recordings of the meetings and observed:
- in one meeting, another student described that their class's tutor for an online teaching session on 6 March 2023 was unable to attend and replaced by a cover tutor. However, the cover tutor 'arrived almost half an hour late' and 'was clearly travelling or in a public place'. During the session 'they didn't cover anything that was related to our module'. When students challenged this the cover tutor seemed to leave the teaching session and the

students 'haven't heard anything from them since'. The student reported that this incident had been raised with management.

- in another meeting, another student detailed that their class had not had a consistent tutor over the previous five or six weeks in two Level 4 modules. The student reported that the 'teacher wasn't ever present in the first session, we didn't have anyone. The second then the third were covered by somebody else, and going on we every week had somebody different.' The student expressed concern that this had meant that their class did not have clarity on expectations for their assignment: 'the assignment is coming, I think it's just somewhere in March, and we don't have a clear line on what is required except the brief.' However, the student noted that the brief that their class had been given was different from other students, 'so I'm a little bit confused and concerned to be honest', and having such frequent changes in tutor was 'a little bit challenging'. A senior staff member responded by committing to look into this with the teaching team, noting that this 'happens in some cases, happily not very many cases, but sometimes there is a problem with getting staff into place in some units.'

100. The assessment team did not review the weekly meetings that occurred before 17 February 2023. It was concerned, however, to find two separate examples raised in this forum of disruption to learning over these two months, each affecting different student classes, due to unexpected changes (or the absence) of tutors.

101. Finally, the team accessed recordings or transcripts of teaching sessions for the BSc Business Management courses through RTC Education Ltd's VLE or Teams platform. The assessment team identified disruption to four out of 14 modules sampled from across the two courses in these teaching sessions because of changes to, or the absence of, the class tutor. It should be noted that for most of these modules (11), the team reviewed a sample of between one and four teaching sessions for a single class (each module ran multiple classes).

- In a Level 6 module, the class had a replacement tutor for multiple weeks (for example, 'I've been asked to cover your group for today and next week', January 2023). This seemed to have been arranged at short notice ('I was only called this morning to say that the link is open for me to have a session with you', as 'I wasn't going to teach your group any more').
- Tutor changes occurred in a second Level 6 module (April 2023, one of two teaching sessions reviewed for this module) and a Level 5 module (March 2023) in which students reminded the tutor that 'you weren't here last week'.
- In a Level 3 module (February 2023) the assessment team noted a discussion about why the session had not started between students in a hybrid teaching session (some students were attending online and some in the classroom). Students in the classroom clarified that this was because 'we still don't have [a] teacher in the classroom'; over half an hour into the teaching session students were reporting that they had no tutor. The following week students were again reporting that they had no tutor after the scheduled start of the session.

102. The assessment team was concerned by the repeated instances of tutors being changed or absent within just this sample of teaching sessions and considered this to be evidence that staff resource was insufficient in number and not effectively deployed. The view of the assessment team was that the examples provided above demonstrated considerable impact on the students' ability to engage with their learning, the overall quality of their academic experience and their ability to succeed on their course. Additionally, in the team's view, this factor contributed to the concerns about module oversight and management outlined below.
103. Senior RTC Education Ltd staff told the assessment team that they had experienced 'timetabling issues at times' that meant tutors needed to be changed. However, they claimed that this 'isn't a systemic issue'. There were particular challenges noted by senior staff regarding the move from entirely online provision to a blended learning approach. However, the assessment team considered it unlikely that this move would have explained ad hoc changes to tutors during a term. In particular, many of the examples above took place in spring 2023, by which time the return to in-person teaching would have been well-established.

Clarity and consistency of information provided to students in relation to the organisation of assessment, modules and courses

104. The assessment team found that the clarity and consistency of information provided to students, including by tutors, about modules and courses could vary. This suggests the provider found it challenging to organise and manage its modules and courses. In some cases, this seemed to be because tutors did not have timely or accurate information about the modules and courses they were delivering. The impact of this could be a lack of clarity for students regarding their assessments or teaching, and disruption to their preparation for assessments or ability to engage with their learning as effectively as possible.
105. The assessment team identified examples of unclear or inconsistent information and guidance, relating to the delivery of teaching or assessments in nine out of 14 modules sampled from across the two BSc Business Management courses for which the team accessed recordings or transcripts of teaching sessions, through RTC Education Ltd's Teams platform.

Clarity and consistency of information and guidance to support students in undertaking assessments:

106. Examples of unclear or inconsistent information relating to clarity and consistency of information and guidance to support students in undertaking assessments included:
- Resources for assessment support in a Level 6 BSc Business Management module lacked clarity: in a teaching session (March 2023, recordings viewed by the assessment team), students asked the tutor why they had not been provided with sample proposals, to support them in writing their own proposals as part of their assessment. The weekly teaching slides on the VLE had specified that by this point in term 'some sample proposals from [the] previous year are uploaded to Moodle'. Students noted to the tutor that the week five seminar (from the weekly structure on the VLE) should have focused on 'Looking at Sample Proposals'. It was, by that point, week six and they had not been provided with sample proposals, so had not done this. The tutor confirmed that they had not been sent sample proposals to share. Students agreed that another tutor had also

said the same, and expressed concern that the weekly structure on the VLE did not seem to be supported with the correct resources. This, they said, could have an impact on their preparation for assessment. The tutor stated that they would raise it with the institution. The following week (week seven) the tutor reported that after contacting the module leader, they had been sent a sample proposal that they could show to the class (as many times as they like), but that they were not permitted to distribute it to the students. This information was counter to guidance in the week five module slides and therefore the expectations of the students, which stated that this resource would be uploaded to the VLE.

- A second Level 6 BSc Business Management module session (April 2023) involved preparing students for an exam. The tutor was unclear whether the exam paper under discussion could be shared with the class as an exemplar (due to a lack of guidance for the tutor). The tutor committed to check this with the head of department before doing so. The assessment team would have expected this to be part of the planned guidance for the teaching session. For the same module, in a session (January 2023) with a different intake, the tutor was unclear whether the take-home exam was available for 24 or 48 hours, expressing a view that it should be 48 hours. However, it was confirmed with the course leader during the class that it would only be available for 24 hours.
- On a third Level 6 BSc Business Management module the tutor was, again, unclear what resources could be provided to students to support their assessments. The tutor noted in a teaching session (April 2023) that they were waiting for a response from the course leadership as to whether they were permitted to share an example assessment with the class (this was also noted in the previous week's teaching session). Students expressed concern that the tutor seemed not to have received this confirmation for over a week. Students pointed out that it was only one week before the assessment deadline and they were unclear about the correct structure for the assessment.
- Access to resources was a concern raised by students on another Level 6 BSc Business Management module (October 2022). Some students identified that they had not been added to the Moodle VLE site for the module even though it was the third week of teaching. The students claimed to have raised this with the institution, and expressed concern about the impact that the delay in access to learning resources relating to assessments may have had on their assignment.
- On a Level 5 BSc Business Management module (October 2022), students asked their tutor to clarify whether their summative presentation assessment should include slides with or without a voiceover. This, they said, was not a requirement for another Level 5 BSc Business Management module. The tutor identified that it was a requirement for this module. Students claimed that they were not marked down for having no voiceover in the other module, but would be for the current one. The tutor stated that guidance could vary between modules and that students should follow the advice of their tutor for the module. However, the assessment team were concerned that this was not consistent with the guidance in the assessment briefs, which for both of these Level 5 modules stated that a voiceover should be provided. The students expressed significant frustration with the lack of consistency in guidance between modules or with the module assessment brief. They stated that they would contact the management for the School of Business and Enterprise as something was being changed related to assignments or

preparation for assignments 'every week'. This meant that students did not know what they needed to do.

- Other students reported issues over information and guidance concerning assessments. For example, a Level 5 student representative in a recorded meeting with staff and students described incorrect information on a submission deadline being given by their class tutor and concerns within their class about the reliability of marking (for example, all students in the class had received the same mark on an assessment). The student claimed to have reported these issues to the provider, but that they had not been addressed 'for weeks', with a lack of response from the relevant ASO. Other students in the same meeting described how their class had not received assessment information or deadlines, and had been given access to material on Moodle 'late'. Different student groups also received information at different times. They noted that this had been the case each year for the past three years, suggesting more persistent and systemic issues with organisation.

Clarity and consistency of information from staff relating to the organisation of modules:

107. Examples of unclear or inconsistent information from staff relating to the organisation of modules included:

- For some modules there were concerns regarding how much information tutors have in order to prepare their teaching. On a Level 6 BSc Business Management module (February 2023), for example, the tutor had to ask the class what level they were at the beginning of the teaching session and seemed unsure what the assessment methods were for the module. The class then helped the tutor to access the VLE for the module.
- This was similarly the case in a Level 3 BSc Business Management module, in which the tutor began one teaching session (June 2022) by checking with the students whether the class should be online or in-person and what level the module was. The tutor was unclear what module they were teaching, asking initially whether it was 'International HRM [Human Resource Management]', which was incorrect. The students clarified that it was a foundation year module and which module it was. The tutor stated that they had 'no information about this course', and that 'maybe it's a new course that was given to me'. The following week (July 2022) there remained a lack of clarity, with the tutor again asking 'can we get this right – is this class meant to be face-to-face or online?', and that 'I spoke to our head of department and we were all confused'.
- The same Level 3 session also included a student asking for information on how to report that they will not be able to attend a future class. The tutor was unclear on the process for this, and initially advised the student that they will make a note but also to approach 'management'. The student queried how to contact 'management' or 'someone that is responsible for attendance'. The tutor then advised that they contact 'student services' or 'welfare', but was unable to signpost a contact route instead suggesting that the student search for it on Google. From RTC Education Ltd's student engagement policy, the process should have been for the student to request approval for an absence from an attendance officer. The CSO or other HubX roles were not mentioned in this exchange although these were the primary means of academic support and monitoring. The lack of clarity on these points raises concerns as to level-appropriate preparation for

the class, potential confusion for the students in how to attend and engage, and clarity of signposting to pastoral support.

- In a Level 6 BSc Business Management module (October 2022) teaching session both tutor and students expressed uncertainty about how and where teaching was to take place, with this session seeming to be unexpectedly online. This was queried by students who asked the tutor why they were working from home rather than on campus. The tutor described how 'I was at the campus the previous week. No one informed me that I had to be at Holborn, so I went to Wembley... they said no, you're not supposed to be here'. 'Last week I went to Holborn... they said they've not made any provision for me to be there and I'm not supposed to be there, it's to be run from home.' The tutor stated that they had asked for clarification but 'no one has gotten back to me.'
- On a Level 4 BSc Business Management module (March 2023), a tutor incorrectly advised students that the teaching term had finished. This was corrected by a CSO who advised students that they had to attend the following week or be marked absent. The tutor then informed the students that 'management has decided to continue the classes till next week', and that they should log in to the class 'for attendance'. As well as potential confusion for students, this raised questions for the assessment team as to the value of this teaching week for students when framed in this way (the suggestion was that the content to be covered was not important).

Clarity and consistency of information from staff relating to courses:

108. Inconsistency in the information provided to students was also raised in relation to the award that students would receive from their course of study. A student in a recorded meeting with staff and students noted that they had recently completed their course with RTC Education Ltd and had expected to receive a Level 5 Chartered Management Institute (CMI) award in Leadership and Management as well as their degree. The student highlighted that this was offered via the online prospectus when they applied for their course at RTC Education Ltd and was still advertised on the RTC Education Ltd website at the time of the forum meeting. However, they stated that they had not received this award and when they contacted RTC Education Ltd about it, the provider told them that it did not provide a Level 5 CMI diploma.
109. RTC Education Ltd staff reported that, following investigation with senior School of Business and Enterprise leaders and relevant partner leads, they were also not aware of offering this qualification. However, the assessment team noted that the online prospectus did offer the award under business and management undergraduate courses: 'on completion of the course you'll receive the CMI Level 5 Diploma in Leadership and Management (subject to approval), giving you an impressive dual-award.' While RTC Education Ltd staff said that they would raise this with the partner university, the assessment team was concerned by the lack of clarity among senior staff about the award being offered and advertised. This suggested that students completing relevant business and management courses may not have received the dual-award that was advertised when they applied (where they were eligible).
110. The assessment team was concerned to identify this range of examples of unclear and inconsistent information from staff on the organisation of assessment, modules and courses within just the timeframe of the sample it reviewed. In the view of the assessment team, these examples suggested that academic staff did not consistently display the required

knowledge to provide students with the academic support they needed to succeed on their course. It further suggested that the impact on students of the high student to academic staff ratios (in the view of the assessment team), increasing numbers of staff on MUCs and frequent changes in tutor was considerable. The assessment team considered that these factors had often led to a negative academic experience for students due to a lack of clear, consistent and accurate information and guidance regarding assessments and teaching. This may have then impacted students' ability to prepare for assessments and access to learning resources for assessments. Additionally, it could present challenges for engaging with their learning as effectively as possible, and ultimately impact their ability to succeed on their course. It could have also led to confusion regarding policies and processes that students should follow (for example, in accessing pastoral support).

Delayed access to learning resources

111. The assessment team heard similar issues raised by student representatives via recordings it viewed of meetings with staff and students. For instance, Level 5 BSc Business Management students reported that they had not been added to their module VLE sites via Moodle, which would have allowed them to access module content, even though teaching was due to start the following week. Staff at RTC Education Ltd advised that students would be enrolled on the module VLE 'as soon as you start attending classes', and that they should raise it again if they had not been 'three or four days' after teaching had started. Following this, another student representative noted that the provider had taken more than four weeks to add their class to the module VLE sites after teaching started. In that time, tutors had to post module content on Teams. Staff noted that this was being looked into and agreed that it was a problem for students not to be given access to VLEs before teaching started.
112. Students who met with the assessment team echoed concerns about timely and consistent provision of module information and resources relating to their academic course. They suggested that there were further steps RTC Education Ltd could have taken to ensure sufficient support for students or a high quality academic experience. For example, in a meeting with student representatives, some identified that late access to a timetable was a major issue. In some cases they did not have this access before teaching starting; for others it was received three or four days before teaching. This was not consistent with the commitment on RTC Education Ltd's external website FAQs that stated, 'You will receive your individual timetable well in advance of the new academic year.'
113. Similarly, some students wanted access to module materials before teaching started to support their participation and allow them to prepare in advance. It was noted by a student that this lack of access hampered students academic progress. Other student representatives agreed, noting that when course material was provided late it could cause additional stress. Some reflected that it meant early parts of modules could feel 'too empty' because there was not sufficient content or access to learning resources to enable students to have a high quality academic experience. The assessment team regarded it as a reasonable expectation that this information and access should be provided for the commencement of teaching and was an important aspect of student support.
114. This factor contributed to the concerns of the assessment team around module oversight and management. Further, in the view of the assessment team, student to academic staff ratios that the assessment team considered to be high, increasing numbers of staff on MUCs and frequent changes in tutor could have exacerbated this issue.

Timeframe for providing summative assessment grades and feedback

115. The view of the assessment team was that students often did not receive timely feedback that would support their learning (this matter is explored further under concern 1 (condition B1) paragraphs 59 to 68).
116. Some of the RTC Education Ltd academic staff who met with the assessment team suggested that employing staff on MUCs could explain issues with meeting marking turnaround times. They noted that staff on these contracts were often new, not permanent and worked with other institutions, which could make it difficult for staff on these contracts to control their overall workload. Staff explained that where there were issues, these would be referred to the head of school. They also explained that coaching could be offered to staff on MUCs, and that if performance were not satisfactory, contracts might not be renewed. The assessment team reflected that non-renewal of contracts may, however, exacerbate the issues of teaching staff turnover and proportions of new staff.
117. The suggestion from some academic staff that employing staff on MUCs was contributing to delays in students receiving timely assessment feedback therefore reinforced the concerns the assessment team had about the sufficiency of staffing levels and the effectiveness of deployment. As such, in the assessment team's view, this further demonstrated that academic staff resources were not sufficient to consistently ensure a high quality academic experience and to ensure that students were sufficiently supported to succeed in their course. It further contributed to the assessment team's concerns regarding the effective organisation and management of modules.

Conclusion

118. In the assessment team's view, high student to academic staff ratios combined with frequent module tutor changes and a high proportion of staff on casualised contracts (MUCs) recruited through what appeared to be a rapid process, led to challenges in ensuring students received a high quality academic experience and were enabled to have the best chance at success on their course.
119. In particular, the assessment team viewed frequent changes to tutors and high student to academic staff ratios as having led to:
- a lack of clear, consistent information being made available to support students in undertaking assessments, their understanding of modules and their understanding of their course.
 - delayed access to important learning resources.
 - variation between modules and student groups regarding the timely provision of summative assessment grades and feedback.
120. Ensuring accurate and timely information and guidance relating to assessment, modules and courses is a key aspect of academic support. Oversight of modules through appropriate academic leadership roles (for example, a module leader) was inadequate to prevent such issues. The effects of this, as seen by the assessment team, led to an uneven and disrupted academic experience for students. The widespread nature of these organisational issues

over time, as seen through the evidence above, suggest to the assessment team that they were significant and systemic to the school.

121. Finally, both insufficient academic staff resource and changes in tutor have put pressure on the capacity to return summative assessment marks and feedback on time consistently. This is explored further under concern 1 (condition B1), paragraphs 59 to 70. The assessment team's view is that insufficient academic staff resource has also led to insufficient academic support for some students.

Concern 3 (condition B2.2.a): Staff resource in the HubX model did not consistently ensure that students received academic support for a high quality academic experience and success in and beyond higher education

Role and responsibilities of RTC Education Ltd relevant to Concern 3

122. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that RTC Education Ltd is responsible for the following aspects relevant to this concern:
- the recruitment, training and development of all module leaders and tutors. This includes a compulsory one and a half day induction programme covering areas such as University of Bolton and RTC Education Ltd processes, procedures and regulations; online resource demonstrations; introduction to tutoring and dissertation supervision; and quality assurance processes. Following the general induction, new staff should complete module specific training.
 - the provision of academic support to ensure the provision of a rewarding academic experience. This includes allocating a personal tutor to each student.
123. The RTC Education Ltd and Buckinghamshire New University operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:
- the provision of teaching staff of an appropriate standard for the courses being delivered.
 - training and development of academic staff that ensure, amongst other things, that all RTC Education Ltd staff teaching on BA Business Management courses have a thorough understanding of the UK higher education sector including requirements relating to quality of provision.
 - the provision of academic student support so that students have a comparable experience with students studying at Buckinghamshire New University.
124. The assessment team considered whether student withdrawal rates might signal matters for consideration relevant to the scope of its investigation.

125. The table below shows the number and percentage of student withdrawals on the BSc Business Management and BSc Business Management with foundation year courses as of 21 February 2023.

Table 4: Student withdrawal data, 2019-20 to 2022-23, BSc Business Management courses ¹²

	2019-20 entrants		2020-21 entrants		2021-22 entrants		2022-23 entrants	
	Number	% of total	Number	% of total	Number	% of total	Number	% of total
Total number of student entrants in the cohort	247		1,784		555		684 ¹³	
Withdrawn within 12 months	85	34	395	22	96	17	11	2
Withdrawn after 12 months	28	11	132	7	3	1	n/a	n/a
Withdrawn after 24 months	6	2	3	0	n/a	n/a	n/a	n/a
Withdrawn after 36 months	1	0	n/a	n/a	n/a	n/a	n/a	n/a
Total number of students withdrawn as of February 2023	120	48.5	530	29.7	99	17.8	11	2

126. RTC Education Ltd submitted additional context for these withdrawal figures. It noted ‘there was a 25 per cent dropout rate recorded in academic year 2019-20’ for students withdrawn within 12 months in the School of Business and Enterprise on the BSc Business Management courses. The assessment team note this figure (based on RTC Education Ltd’s data in Table 4 above) was actually 34 per cent for these courses. Provision at this time also included one year top-up degrees at Level 6 which had lower withdrawal rates. RTC Education Ltd identified that the 2019-20 dropout rate ‘was mainly due to the initial pandemic impact and also SLC funding issues which contributed to the larger proportion for this 25 per cent dropout.’ This rationale did, however, seem to be at odds with the low withdrawal rate within 12 months seen in the BA Business Management courses, detailed below, where withdrawals were more common after 24 months (i.e. 2021-22 or later). RTC Education Ltd went on to explain that:

‘RCL acted immediately to put in place measures to remedy the situation and provide extra support to students and prevent further dropouts, all under the gravity of the global pandemic... RCL’s actions resulted in a reduction in dropouts for AY 2020/21 down to 19% which included the ability to consume the teaching in the new methodology.’

¹² Source: RTC Education Ltd internal data.

¹³ As of February 2023, student numbers for later intakes in the academic year not available.

127. However, as noted in Table 4, withdrawals for the 2019-20 cohorts continued at a high rate after measures were put in place in 2019-20. At least an additional 14 per cent of the total student population withdrew between 12 and 36 months.
128. For the 2020-21 cohorts, RTC Education Ltd noted in its Annual Monitoring Return to the University of Bolton that 130 students on the BSc Business Management courses had withdrawn by 15 November 2021, meaning that a significant majority of students who withdrew did so after this date. The withdrawal rate for the 2020-21 cohorts is cumulatively 29.7 per cent. While (at the time of completing the assessment) this was an improvement on the 2019-20 cumulative withdrawal rate of 48.5 per cent, the assessment team considered that it remained high. Furthermore, RTC Education Ltd's decision to expand recruitment significantly on these courses in 2020-21 means that the absolute number of students who have withdrawn after 24 months (between 2020-21 and February 2023) was 530 students up to February 2023.
129. RTC Education Ltd has suggested that the numbers of students withdrawing within 12 months for the academic year 2021-22 for the BSc Business Management courses have fallen further within the School of Business and Enterprise overall, from 19 per cent to 18 per cent. However, the assessment team noted that it was too early to determine this for the two courses under consideration, and particularly too early to compare a cumulative withdrawal rate with 2020-21.

BA Business Management courses

130. The table below shows the number and percentage of student withdrawals on the BA Business Management and BA Business Management with foundation year courses, subcontracted by the Buckinghamshire New University, as of 21 February 2023.

Table 5: Student withdrawal data, 2018-19 to 2021-22, BA Business Management courses¹⁴

	2018-19 entrants		2019-20 entrants		2020-21 entrants		2021-22 entrants	
	Number	% of total	Number	% of total	Number	% of total	Number	% of total
Total number of student entrants in the cohort	209		294		6		217	
Withdrawn within 12 months	17	8	1	0	1	17	80	37
Withdrawn after 12 months	43	21	10	3	n/a	n/a	2	1
Withdrawn after 24 months	2	1	28	10	n/a	n/a	n/a	n/a
Withdrawn after 36 months	2	1	24	8	n/a	n/a	n/a	n/a
Total number of students withdrawn as of February 2023	64	30.6	63	21.4	1	17	82	37.7

131. The BA Business Management courses began one year earlier than the BSc Business Management courses. The 2018-19 cohorts had a cumulative withdrawal rate of 30.6 per cent, with the majority (22.4 per cent) withdrawing after 12 months.

132. RTC Education Ltd did not open the BA Business Management courses to new recruitment in 2020-21. For the 2021-22 cohorts, however, 37 per cent of students withdrew within 12 months. RTC Education Ltd identified the reason for this high withdrawal rate as being 'due to BNU's [Buckinghamshire New University] inability to allow students to study on a hybrid basis so many students moved across to UoB [University of Bolton] programmes due to the flexibility of the RCL mode of study, and elsewhere.'

Withdrawal rate reasons

133. The assessment team was concerned to see high levels of student withdrawals, particularly on the larger BSc Business Management courses where high numbers of students were affected. RTC Education Ltd staff, in meeting with the assessment team, stated that the most common reasons for student withdrawal were financial changes and health issues. In data provided to the assessment team by RTC Education Ltd, for the two BSc Business Management courses under consideration, the most common reasons for student withdrawal between 2019-20 and 2022-23 were:

- absence (26 per cent)
- academic (27 per cent)

¹⁴ Source: RTC Education Ltd. Internal data

- self-withdrawal (22 per cent)
- finance (11 per cent).

134. For the BA Business Management courses these were:

- self-withdrawal (55 per cent)
- absence (20 per cent).

135. To help understand what factors might be contributing to the high withdrawal rates, the assessment team sought to understand the context of the undergraduate student cohort admitted to the School of Business and Enterprise. The assessment team then had particular regard to the expectation in condition B2 that ‘significant weight’ should be placed on ‘(i.) the particular academic needs of each cohort of students based on prior academic attainment and capability; and (ii.) the principle that the greater the academic needs of the cohort of students, the number and nature of the steps needed to be taken are likely to be more significant’ (condition B2.3, see Annex A).

Academic support through the HubX model

136. In considering the cohort of students recruited, the assessment team noted from an internal analysis by the OfS¹⁵ that over a quarter of students (28.1 per cent) joined with ‘none, unknown or other entry qualification’ and approximately half (54.8 per cent) joined having completed an access course, foundation course, or other Level 3 qualification at 65 tariff points or higher. Additionally, around 45 per cent of students studying business and management degrees at RTC Education Ltd in 2020-21 were from IMD quintiles one and two with 95 per cent mature students (as detailed under ‘Context’, above).

137. In the context of the cohort of students recruited, the provider’s reflections on the needs of the student cohort (as discussed in paragraph 86), significant growth in student numbers and high levels of student withdrawals, the assessment team was keen to understand the arrangements for academic support. This was primarily delivered through the HubX system, noted under ‘Context’ above. As detailed by RTC Education Ltd in an annual monitoring report:

‘The college introduced the HubX student support system in January 2021 to support student needs. Each student registered at Regent College is assigned a Customer Service Officer (CSO), a Student Finance Officer (SFO) and an Academic Support Officer (ASO). CSO is the first point of contact for any concerns. Student Finance Officer (SFO) is responsible to respond to any finance issues and Academic Support Officer (ASO) assists students with course related issues, or any academic concerns that a student may have. Our model of support not only includes academic support but also pastoral and wellbeing delivered through our ‘HubX’ teams. The HubX teams are typically centred around a maximum 250 student per ‘Hub’ to ensure they receive an individualised service.’

¹⁵ Source: OfS internal Analysis of the student data used to construct the published size and shape of provision dashboard from September 2022, subset to students taught at RTC Education Ltd within the business and management CAH2 subject area, using the ‘all students’ population for academic year 2020-21.

138. Senior RTC Education Ltd staff, in meeting with the assessment team, described the HubX model as the main way that RTC Education Ltd had responded to growth in student numbers. The reasons for introducing this model in January 2021, following an already significant expansion in student numbers in 2020-21, were unclear. The model had not then been in place to support earlier student intakes. The HubX model was not mentioned as a strategic development in RTC Education Ltd's 2019-20 access and participation plan. This suggested to the assessment team that the model was not designed to accommodate planned student number growth in advance.
139. In 2021 there were 16 'hubs' within the School of Business and Enterprise, with an average student number per hub of 246. Of these, eight hubs had student numbers above 250 (range of 251 to 280), seven hubs had student numbers between 210 to 245, and one hub had 176 students. In 2022, RTC Education Ltd added four additional hubs to give a total of 20 (however hub 20 had a student number of only 11). The average student number per hub (excluding hub 20 as this was an outlier in assessing capacity for student support) was 213. Of these 19 hubs, four had student numbers above 250 (range of 256 to 272), eight had student numbers of between 200 to 249, and seven had student numbers below 200 (range of 144 to 198). This suggests that in 2021 individual hubs could often be above RTC Education's own targets for capacity, but that positive improvements had been made to increase the capacity in 2022.
140. The assessment team also heard that having consistent contacts within the hub for students was an aim. As described in RTC Education Ltd's TEF submission (2023) which was submitted to the assessment team by the provider: 'the student remains with the same HubX team for the duration of the studies with RCL'.
141. This was confirmed in a meeting with the assessment team by senior RTC Education staff, who explained that it is the intention for students to stay in the same HubX with the same staff throughout the duration of the student's time with RTC Education Ltd, but that in practical terms this is difficult to maintain. Staff clarified that a student's HubX team is their first point of contact for any queries, requests or concerns and that each HubX team should have no more than 250 students.
142. While the assessment team had significant concerns about each hub's capacity to offer effective academic support, for the reasons set out below, the assessment team agreed that the aim of providing consistent contacts was beneficial to help students develop relational connections with their support network and a sense of belonging.

Customer Service Officer (CSO) role

143. The CSO role was described by RTC Education Ltd in guidance to students as 'your first point of contact for any questions, concerns, or help you need.' This description was also given to the assessment team in detailing the CSO role. The CSO team worked remotely from RTC Education Ltd campuses and was based in India. The role itself required CSOs to:
- monitor students' attendance at taught sessions and contact students who did not attend
 - contact students before all assessment submission deadlines, and track assessment submission rates daily

- receive and resolve queries from students, providing advice and guidance in accordance with relevant RTC Education Ltd policies
- liaise with other colleagues, such as those within the HubX model, to determine the appropriate advice and support for students. This included ASOs for all academic-related issues and campus liaison officers for all campus-based issues relating to student study
- identify and refer students in need of specialist support to the relevant support service, including Student Wellbeing and academic skills support
- attend weekly hub meetings, using the RESMA report to track the progress of individual students, identifying where interventions need to be made and daily meetings of all CSOs.

144. The assessment team regarded the use of student data as notably positive, particularly the development of the RESMA system to monitor engagement, identify where there may have been potential challenges for students, and then pre-emptively contact them. This approach, in the assessment team's view, represented a beneficial model of support for students and students who met with the assessment team expressed positive views about CSOs.
145. However, the assessment team was concerned to see significant staff turnover of CSOs across School of Business and Enterprise Hubs, with 81 per cent of CSOs (13 out of 16) changing between 2021 and 2022. This level of turnover presented challenges to consistency of service for students. Given the CSO was students' primary point of contact for support, in the view of the assessment team, this high turnover of staff was likely to adversely impact students by, for example, making it less clear who to contact, with less opportunity to develop supportive connections with their CSO. CSOs would also have been less familiar with the circumstances of students in their hub.
146. Additionally, in 2021, there were two instances of a single CSO being assigned to cover two hubs. In one case this meant that the CSO was responsible for 491 students, and in the second case for 511 students. The assessment team considered this a concern due to the high number of students allocated to each CSO, which was above the already high number of students planned (as set out in paragraph 139). Because of these high allocations, and the lack of consistency in allocation of CSO, the assessment team viewed these as issues relating to staff resource not being sufficient and that this would have negative impacts on their capacity to deliver sufficient academic support.
147. The assessment team heard from some students that their CSO could, at times, provide academic support that the assessment team considered inappropriate. Some students described that they could ask for support from CSOs if their lecturer was not available (which may further relate to challenges in academic staff resource identified in concern 2 above and under the ASO role below. For example, the assessment team was told that in one instance a CSO had provided support with referencing during an online exam assessment. The assessment team viewed this as problematic in relation to ensuring the integrity of the assessment.
148. In line with the expectations of the role as set out paragraph 143, CSOs should also signpost students to other more specialised support, which helps them to navigate available services. However, this gave rise to two concerns for the assessment team. First, it demonstrated a

model of academic support that generally lacked oversight of students' academic progress. The CSO role is not designed to provide this academic oversight, and such a role does not feature in the HubX model. This is considered further in relation to the ASO role below. Second, the assessment team was concerned that any of the services that CSOs could signpost students to for academic (or pastoral) support were not themselves sufficiently resourced. This is considered in relation to central academic support services capacity below.

149. The view of the assessment team is that the impact of high allocations of students per CSO, the lack of consistency in allocations of CSO support for students, and insufficiently resourced academic and pastoral support for CSOs to signpost students to (described below), meant that there were further steps RTC Education Ltd could have taken to ensure a high quality academic experience or that students succeed in and beyond their course.

Academic support officer (ASO) role

150. Senior lecturers undertook the ASO role in the School of Business and Enterprise. It involved being 'the first senior point of academic contact for a group of assigned students', although students were expected to contact their CSO initially who would then signpost students to ASOs or liaise with ASOs themselves as relevant. This was confirmed by RTC Education Ltd staff who described how students generally go through CSOs, and the CSO will then direct queries to the ASO. As noted above, the ASO role was meant to support students within their allocated hub with 'any academic concerns'. The numbers of students within each hub, and so allocated to each ASO, suggested to the assessment team that this role only had the capacity to react to academic issues that were self-identified by students or by CSOs.
151. The assessment team noted that the current HubX model did not seem therefore to involve academic oversight of all students' progress during their course. If students initiating contact or data monitoring did not identify academic challenges experienced by students, the assessment team questioned how the provider would have supported them to continuously improve academically and achieve their full potential. Senior RTC Education Ltd staff gave the view that many students did not need an intervention; they just needed to 'experience what [the provider] had to offer'. However, in considering the context of the student cohort recruited and particularly the likely academic support needs of the cohort (outlined in paragraph 86 above), the assessment team was concerned that this reactive approach would not have addressed the needs of all students in the cohort, specifically where data monitoring or self-reporting had not identified the need for an 'intervention'. It was unclear, for instance, how the provider would have supported such students to identify knowledge or skills gaps, and then develop plans to address them, or how it would have guided them to make decisions about future study choices.
152. The assessment team was concerned that the approach was at odds with the messaging included in promotional material to prospective students. This suggested that academic support was more personal and built around a relationship with the student than the HubX model allowed in practice. For example, in a promotional video to international students RTC Education Ltd describes that:

'we have an academic support officer for each student. Each academic support officer will have a small group of students that they will be assigned to look after, and the academic support officer will support you in the class'.

153. The assessment team would question whether ASOs had 'small groups of students', based on the number of students per hub detailed above in paragraph 146. Similarly, an open day video for prospective students suggested that 'one-to-one support' would provide students with:
- 'that personal touch, and you will develop even more of a relationship with your academics, and they will know you better when you come next time'.
154. This was later reinforced by the claim that 'it's probably rare to find another college or university where you have such a close relationship with your tutors when it comes to your studies', and that 'this is our main attraction for the students, having that great support hub'. This emphasis on personal connection and a continuous relationship with academics for all students was, in the assessment team's view, not in keeping with the reactive approach and resourcing actually available for academic support.
155. Within the model the accessibility and visibility of ASOs seemed to vary. Students who met with the assessment team described how they would only work with their CSO, and not deal with their ASO. Some students were not aware who their ASO was. Where some students had contacted their ASO, the experience that they reported could vary. One student representative described raising an issue with their ASO but not receiving a response from them 'in weeks', despite having had positive experiences with a previous ASO who had since changed.
156. While not at the same high rate as the CSO role, staff turnover in the ASO role was also significant with 37 per cent (6 out of 16) changing between 2021 and 2022. As with the CSO role, noted above, this high level of change was likely to make it less clear for students who they should contact for academic support, and to affect the sharing of knowledge between students and staff within a hub. This was, again, not the intended means of implementation as identified by RTC Education Ltd. Taken together, 31 per cent (5 out of 16) of hubs had a new staff team entirely (i.e. CSO, ASO and Student Finance Officer) between 2021 and 2022. Students also confirmed this experience, describing how CSOs and ASOs change. Their perception was that this was particularly due to the pandemic, but the data above suggests that this high turnover occurred in the subsequent years. The assessment team considered this lack of consistency to have contributed to the variability in experience that some students reported in relation to their ASO.
157. The assessment team's view, in this case, was that the academic support available through the HubX model would not be sufficient for the academic support needs of the cohort. This was exacerbated by insufficient staff resource allocated to the HubX model and, in the view of the assessment team, was further evidence of ineffective deployment of academic support. The assessment team considered that there were therefore further steps RTC Education Ltd could have taken to ensure a high quality academic experience and that students succeed in and beyond their course.

Capacity of central academic skills support and English language support services

158. Where students would benefit from more specialised central support, HubX staff were expected to signpost students to these services. Such services included, academic skills and English language support (referred to as ASK@Regent), wellbeing and inclusion, and careers. However, the assessment team was concerned that the staff resource for academic

support in these central services (i.e. academic skills and English language) was not sufficient, particularly given the 'specific academic skills development needs, particularly in relation to analytical reasoning, academic writing, research and referencing' identified by the provider (outlined in paragraph 86 above).

159. This was further echoed in meetings with professional services staff who reflected that, as many RTC Education Ltd students had been away from education for some time, support with academic skills was imperative in helping them learn how to be students again.
160. For academic skills and English language support the assessment team heard that staffing comprised two staff members, although the team was informed that there were plans to expand this number. These staff members provided academic skills support outside of the curriculum and support for students with English as an additional language. Students could book one-to-one support using the service, which may be or may not have been recommended by a tutor or member of HubX. Members of teaching staff could request sessions from the academic skills team that could be delivered as part of their module. The service also offered a programme of online resources, webinars and workshops.
161. However, the assessment team was concerned at the level of staff resource available for academic skills support given an institutional student population of 5,603 in 2022-23 (of which 4,223 were in the School of Business and Enterprise based on data provided by the RTC Education Ltd).
162. The view of the assessment team was that the level of staff resource allocated to academic skills support was insufficient given the specific academic skills development needs of the cohort identified by the provider. Therefore, the team considered that there were additional steps to ensure a high quality academic experience or that students succeed in and beyond their course that RTC Education Ltd should have been taking.
163. In relation to English language support, the assessment team was again concerned by the level of staff resource allocated to this. This was particularly the case given, as described in RTC Education's most recent TEF submission, 'approximately 80%' of students' first language is not English'. It was noted in this submission that 'since 2021, RCL have employed an academic skills tutor to provide English for academic purposes support across the institution.' Academic skills tutors offered one-to-one support in English for academic purposes, as well as running extracurricular workshops, an English speaking club, and academic writing bootcamps. However, these activities were optional extras for students, and subject to the staff resource constraints noted above.
164. It was not only the quantity of students who may have required English language support, in relation to the staff resource available, that concerned the assessment team here, but also the level of support some students would require given the English language requirements for admission. For the BSc Business Management with foundation year and BA Business Management with foundation year courses, the English language requirement for entry was advertised as at least an overall grade of 5.0 in the International English Language Testing System (IELTS) with no less than 4.5 in any band (or equivalent). This was lower than the English language requirements for the equivalent courses at each of the partner institutions (University of Bolton and Buckinghamshire New University respectively), which both required a score of 6.0 in IELTS with no less than 5.5 in any band (or equivalent). Senior admissions

staff told the assessment team that lowering English language requirements below the requirements for equivalent courses at partner institutions had been a subject of 'debate' with the subcontracting institutions. This was evident in the Annual Monitoring Return (2020-21) for Buckinghamshire New University, where RTC Education Ltd stated that:

'As recently discussed with the partnerships team, we believe the maintenance of the 5.0 IELTS entry requirement for foundation year is vital for this access route. This is supported by the fact that the majority of the students who enter with an overall band score of 5.0 have provided evidence of now being at 6.0 before they progress to Level 4 or have demonstrated sufficient academic performance and progress.'

165. However, the assessment team saw no evidence to support this statement either in the Annual Monitoring Return or other sources of information. The provider also did not require foundation year students to undertake an English language assessment to demonstrate a higher level of English language proficiency (i.e. 6.0 in IELTS or equivalent) before progressing into year 1 (where relevant) and 'sufficient academic performance' was not defined.
166. Furthermore, the programme specification (2022-23 onwards) for the BSc Business Management with foundation year, agreed with the partner awarding institution (University of Bolton) and delivered by RTC Education Ltd, included option modules focused on supporting English language. It stated that:

'If English is your second language and you feel you need extra help with your language skills, you have the option of studying specialist language modules during the foundation year of the programme which are shown as EFP3003 and EFP3004 in the Module List.'

167. EFP3003 referred to the module 'Academic Language and Skills 1' and EFP3004 referred to 'Academic Language and Skills 2'. RTC Education Ltd's online prospectus also listed these modules for this course. However, the assessment team did not find evidence that the provider had delivered these modules focused on supporting English language. These modules:

- were not listed in the programme handbook (September 2022) for students on this course (for example, in the module table that lists 'core/option modules')
- did not appear in the teaching timetable (covering Levels 3 to 7 for BSc Business Management courses, 2022-23)
- were not included in module attainment data (September 2019 to August 2022) provided to the assessment team
- did not appear on relevant VLEs available to the assessment team.

168. The assessment team was concerned, therefore, that these optional modules would not be available to students. The assessment team did not identify any other substantive provision of English language support.

169. In the academic judgement of the assessment team, the level of support available for academic skills and English language was insufficient for the number of students, the likely

academic support needs of the cohort as identified by the provider, and the level of English language proficiency required of students upon entry (i.e. the required level of English language qualifications). As such, the assessment team considered that there were additional steps that had not been taken to ensure a high quality student experience or to enable students to success in and beyond higher education.

Pressure of managing full-time employment and full-time study

170. The assessment team noted RTC Education Ltd's approach to students undertaking full-time employment while in full-time studies. In meeting with Level 6 students, for instance, the assessment team found that most students were in full-time employment. None of the courses delivered within the School of Business and Enterprise were available on a part-time basis.
171. Senior RTC Education Ltd staff advised that they did not give students guidance about how many hours they should work alongside full-time studies. This, they said, was a matter of student choice. However, senior staff also said that all prospective students had an 'intention to study meeting' with a member of RTC Education Ltd staff, in which they discussed the need to balance full-time employment and full-time studies (where relevant), including any adjustments that may be needed. Staff conducting intention to study meetings asked students a set question: 'What changes do you need to make to your current circumstances to accommodate studying and ensure your success?' Given the lack of guidance, however, it was unclear how students or staff could gauge what would be reasonable to 'ensure success'. Training materials for staff conducting intention to study meetings, provided to the assessment team, did not refer to holding discussions on balancing employment with full-time studies.
172. The assessment team spoke with academic and professional services staff, who referred to the potential impact of students working and studying full-time. For instance, some academic staff identified that health and finance were reasons for students withdrawing, but also that many were mature students who work, 'wear many different hats' and 'struggle with work.' Other academic staff described how some students on both BSc Business Management and BA Business Management courses faced challenges when teaching returned to in-person (rather than only online) because they were in full-time work, so were not able to commit to attending classes. This raised questions for the assessment team as to why this would not be a continuing challenge for some students. Professional service staff who delivered academic support to students highlighted that students could find it difficult to 'juggle' their competing priorities. They explained that the admissions office managed advice and decided whether to accept students. Academic services tried to support students once they were enrolled.
173. The assessment team was, then, concerned to see prospective students being advised, as a selling point on the RTC Education Ltd website:

'Whether it's a full-time job or childcare responsibilities, we know that sometimes factors outside our control can get in the way of pursuing your education. But a busy lifestyle shouldn't get in the way of your dream job! Here at RCL, we welcome and encourage mature students to pursue higher education.'

174. This was echoed in a promotional video for RTC Education Ltd by a member of admissions staff. It claimed that flexibility in course delivery:

‘allows a lot of our students to study, have their full-time employment commitment, and to have a social life all in one. This is one of the key factors why a lot of mature students especially decide to come to Regent College London to pursue their education.’

175. However, these statements did not seem to account for, or make clear to prospective students, the levels of independent study required on a full-time higher education course. For example, Level 4 modules (20 credit modules) on the BSc Business Management courses require 132.5 independent study hours out of 200 total study hours (equating to 26.5 hours per week of independent study over a 15 week term where three 20 credit modules are studied). It also did not help students to understand whether they could expect to ‘accommodate studying and ensure your success’ while balancing high levels of employment.

176. The assessment team concluded that the pressure of managing full-time employment and full-time study was likely to be one factor behind high withdrawal rates, particularly given the likely academic needs of the cohort recruited. The assessment team was concerned that some students may have been admitted to full-time study in the School of Business and Enterprise without sufficient academic advice and guidance regarding the academic expectations of a full-time course. This meant that they may have been unprepared for the demands of the course, which may have contributed to them being unable to sufficiently engage with their studies to ensure success. In the view of the assessment team, this suggested that academic support was often not effectively deployed for students managing the pressures of full-time employment and full-time study.

Conclusion

177. Noting that HubX was the primary mechanism for student support at RTC Education Ltd, overall the assessment team was concerned that the model (including the system of ASOs and CSOs) did not provide sufficient academic support for all students. In the evidence viewed by the assessment team, it did not enable personalised engagement over students’ academic progress, despite it being suggested to students in promotional material that this was the case.

178. In the view of the assessment team, staff resource was too stretched and therefore was insufficient in number (this was relevant to CSOs, academic skills support, English language support and especially ASOs). Additionally, staff turnover in CSO and ASO roles was too high to provide the levels of support the cohort of students was likely to require. The assessment team considered that this was likely to have a negative impact on students given the likely academic support needs of the cohort recruited as identified by the provider, and, in turn, be contributing to withdrawal rates discussed above.

179. The assessment team was also concerned about how the provider had planned its resources to meet the expected level of student recruitment. The HubX model was the primary means that RTC Education Ltd had adopted to support higher numbers of students, but was in operation only after a substantial and rapid increase in student recruitment. Launching in January 2021, it was not in place in advance of the most significant increases in student

numbers in 2019-20 and 2020-21, as a way of enabling a significantly larger cohort to be effectively supported. This suggested that it was not designed to accommodate planned student number growth in advance. The team had similar concerns about the level of resource available to support students in the more specialised services signposted students to by the HubX team. The prominent, or exclusive, role that some teams played in providing support within students' academic experience, and the high number of students who were likely to require support, exacerbated this concern. For example, support for students with English as an additional language was focused specifically on a small academic skills team that provided optional support for a large proportion of RTC Education Ltd's student population.

180. The assessment team was highly concerned by rates of student withdrawals in the relevant courses, described above. This concern was exacerbated by guidance from RTC Education Ltd about the feasibility of students balancing full-time paid employment with full-time studies, and that this set unrealistic expectations for students that the academic support provided could not meet. Academic support provision is clearly an essential aspect of enabling students to continue with their studies.
181. Given the concerns it identified, the team regarded staff resource to be insufficient in number and not effectively deployed to enable a high quality academic experience or to ensure students succeed in and beyond their course. In the view of the assessment team, the impact of this was that not all students consistently received sufficient academic support and therefore was further evidence of ineffective deployment of academic support.

Concern 4 (condition B2.2.a): Teaching room facilities and study spaces were insufficient to support students successfully participating in their studies

182. The assessment team found that there were limited physical resources and study spaces provided for students in two specific areas:

- Facilities available in classrooms for digital in-person teaching.
- Spaces for individual study or in-person group work.

Role and responsibilities of RTC Education Ltd relevant to Concern 4

183. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:

- Providing students with access to all RTC Education Ltd learning resources and student support facilities as well as purpose-designed teaching and seminar rooms and a learning resource centre.
- Providing students access to EBSCO Business Source Complete e-journals database, EBSCO FE/HE eBook collection and Cite Them Right MacMillan Publishing.

184. The RTC Education Ltd and Buckinghamshire New University operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:

- Providing teaching facilities including classrooms and lecture theatres that meet minimum Buckinghamshire New University standards.

Classroom facilities for digital in-person teaching

185. As described in the Digital Learning Policy (November 2022), teaching at RTC Education Ltd was delivered through four modes of delivery:

- digital in-person
- digital online
- digital in-person and digital online
- on-demand.

186. RTC Education Ltd shared its 2023 TEF submission with the assessment team. The TEF submission noted that:

‘In line with our Regent Digital strategy our HND programmes, FdSc programmes and all UoB [University of Bolton]... programmes are rapidly moving to being delivered in 3 modes, digital in-person, digital online and digital on-demand with over 50% of delivery as digital in-person, meaning there are comprehensive online T&L [Teaching and Learning] materials available to students to draw on during and after the in-person teaching sessions. In line with BNU’s [Buckinghamshire New University’s] requirements BNU partner programmes are currently only delivered digitally in-person. All international students are 100% digital in-person as per the UKVI [UK Visas and Immigration] regulations of study visa’.

187. These documents demonstrated RTC Education Ltd’s expectations for in-person teaching to be delivered digitally in-person, and for digitally in-person teaching to make-up a significant proportion of its teaching delivered overall. Digital in-person teaching, as defined above, included a requirement for students to be able to access digital resources during in-person teaching sessions. The ‘laptop loan scheme’, through which ‘domestic students based on campus are eligible to loan a laptop for the duration of their studies’, supported the expectation for students to be engaging with digital resources during in-person teaching sessions.

188. The assessment team heard from a range of students in meetings that desks in teaching rooms were often not adequate for using a laptop during in-person teaching. Some student representatives, across a range of study levels, described how ‘small tables’ could make it difficult for them to take notes. Some Level 4 students, in discussing teaching rooms in the Wembley campus, identified that they were ‘not happy with seats in the classroom’ as they ‘only have seats with small tables’ and that the ‘chairs often break’. This experience was echoed at the student council (30 January 2023), which included the following paragraph under ‘Key Points Raised’:

'Tables and chairs – flip desks no good too flimsy – new ones at Wembley – same style – why? Holborn repeating the pattern. Blinds, heaters, air conditioning no good'.

189. These concerns were also identified by the assessment team in observing Level 5 teaching at the Holborn campus (February 2023). The team noted that the teaching room was 'cramped', with seats for students being very close together, and that while some students had a chair and separate desk, others had a chair with only a small surface attachment fixed to it. From observation by the assessment team these latter students often struggled to use laptops effectively due to the small size of the surface and proximity to other students.
190. A student in a recorded meeting with staff and students also raised the issue of adequate facilities for using laptops during teaching sessions at the Wembley campus. The student identified that the class did not have actual desks, but chairs with a 'small' attached surface. This was described as 'not stable', that because of it 'you can't even take proper notes' and 'you can't pay attention because you are always fighting with the table for your laptop to be able to keep still while the lecturer is also giving important information, so it's like we're fighting to stay focused in class'. A senior member of staff responded to agree with the student that this was 'not satisfactory', identifying that 'I'm sad to say it is not the first time we've heard this. We've heard this many, many times and I have raised it many, many times, and still we carry on with the same problem. So, I will raise it again'. The staff member stated that:
- 'the fact that repeatedly students come onto this call and tell me about this issue, and we've had it from every single campus, we've had it from many, many different groups of students. So it really does need to be taken seriously and addressed, rather than simply excuses offered as to why nothing can be done.'
191. The assessment team was concerned that teaching room facilities presented challenges for students trying to engage with in-person teaching. This issue was raised by students, recognised by staff, and observed by the assessor team. This suggested to the assessment team that it was an issue that had been raised repeatedly over a prolonged period. Inadequate resources in this area presented particular challenges for implementing the 'digital in-person' teaching approach which included a requirement for students to be able to access digital resources during in-person teaching sessions, and demonstrated that RTC Education Ltd had not taken all steps to ensure that all students received sufficient physical resources for a high quality academic experience.

Spaces for quiet individual study and/or group work

192. The assessment team heard from a number of students that there were very limited spaces available on RTC Education Ltd campuses for individual or quiet study, or for in-person group work. The team considered this in the context of the high proportion of students in the cohort who commuted to in-person teaching.
193. In a meeting with student representatives, across all undergraduate levels of study, some claimed that students were not coming to campus because they did not have a space where they felt comfortable. Other Level 4 students described that the Wembley campus needed more facilities, that it had no spaces for group work or individual study, in part as it had no physical library, and that it had 'lots of students there'. Students described that they might go to Wembley public library for a quiet space. Some Level 5 students stated that they had

expected social spaces where they could work together, and that for group assessments or other group work they needed to work on these online due to the lack of these spaces.

194. In a recorded meeting with staff and students, students in attendance were advised by senior RTC Education Ltd staff that 'if you want to study and you need a quiet space' then they could speak with the reception team for their campus and 'there's always space reserved so the students can go and do some work' or there were 'coffee shops and lunch venues' or 'the British Museum around the corner'.
195. The assessment team was concerned that this lack of study space meant that some students could not engage with independent learning effectively when based on campus (for example, when students had multiple in-person teaching sessions with periods of time between them). This could have affected, in particular students who need to work in groups to prepare group-based assessments and may have expected to have physical spaces in which to do this.
196. The assessment team heard that these two issues (classroom facilities for digital in-person teaching and spaces for individual and/or group work) formed part of a wider context of problems with campus facilities. For example, some student representatives said that facilities were sub-standard, particularly in the Wembley and Kingsbury campuses. Some Level 5 students noted that they expected a 'proper campus', although others suggested that they 'got what they expected'.
197. In the view of the assessment team, overall these physical resources did not support all students in engaging with their learning and at times presented barriers. This suggested to the assessment team that there were additional steps that the provider could have taken to ensure all students had the physical resources for a high quality academic experience.

Concern 5 (condition B2.2.a): A lack of physical and digital library resources, including access to course reading materials

Role and responsibilities of RTC Education Limited relevant to concern 5

198. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:
 - Providing students with access to all RTC Education Ltd learning resources and student support facilities as well as purpose-designed teaching and seminar rooms and a learning resource centre.
 - Providing students access to EBSCO Business Source Complete e-journals database, EBSCO FE/HE eBook collection and Cite Them Right MacMillan Publishing.
199. The RTC Education Ltd and Buckinghamshire New University operations manual sets out that RTC Education Ltd is responsible for the following aspects that are relevant to this concern:

- Providing teaching facilities including classrooms and lecture theatres that meet minimum Buckinghamshire New University standards.

200. RTC Education Ltd did not provide a physical library service or facilities. Instead, it offered digital library resources to students. As described on its public website:

‘Students at Regent have access to an extensive range of e-books, journals, and academic resources to help them with their studies. We provide our students with information, advice, and training on how to access and fully utilise these resources, as well as develop their information literacy and research skills.’

201. Specifically, students were given access to the digital library of the relevant partner institution (University of Bolton or Buckinghamshire New University) as well as RTC Education Ltd’s digital library platform (‘Heritage’). They were also given access to the EBSCO academic resource service (which is an organisation whose most relevant services here include access to collections of research databases, e-journals and e-books).

202. However, the assessment team heard from a range of students in meetings that they found a lack of access to reading material a challenge. Some students reported that they could not access course reading material as it was not available digitally so, against their expectations when enrolling for their course, they had to purchase books themselves. Some reflected that they were already paying for the course, and would rather not have had to pay for books too.

203. Staff also told the assessment team that for some modules students could not access assigned reading via the digital library and had to go to a public library. The assessment team was concerned, therefore, that the library provision available meant that not all students could access course material adequately and equally, and that it did not support independent study. In the view of the assessment team, this may be particularly the case given the high number of mature students with additional caring responsibilities and/or high levels of students in paid work.

204. The team observed that for a number of modules, texts were included on module reading lists for students that were not accessible to students digitally. The team reviewed a selection of modules on the courses under consideration and, from these, identified 11 modules (across courses and levels) that included reading unavailable to students digitally via the relevant partner library catalogues. This included seven modules from Levels 3, 4 and 6 on BSc Business Management and BSc Business Management (with a foundation year) and four modules on BA Business Management and BA Business Management (with a foundation year), noting that courses with a foundation year and non-foundation years courses in each case were the same apart from the foundation year (Level 3) itself. Each module included multiple instances of recommended or optional reading that appeared on module reading lists and/or were recommended on lecture slides that were not available via digital library resources available to students through RTC Education Ltd or the relevant partner library catalogues. In many cases, physical editions of these texts were available at the University of Bolton library. On the BA Business Management courses, this included modules at Levels 5 and 6. Texts listed as core (essential) reading on all of these modules were not available to students digitally (on a Level 6 module (2022-23), with 98 students, one of two core textbooks was only available physically via the Buckinghamshire New University library).

205. Given the digital focus emphasised to students and the distance of RTC Education Ltd from the University of Bolton or Buckinghamshire New University, the assessment team considered that it was unreasonable to expect students to visit either of these libraries in-person. Without doing so, however, it meant that students could not access via their provider a range of module reading materials (including examples listed above as 'core') that did not seem to be available digitally. The assessment team was also concerned that, given the range of modules on which issues were identified, this was a widespread issue and demonstrated that resources were not sufficient to ensure a high quality academic experience or student success in and beyond the course.
206. RTC Education Ltd provided guidance to students about joining local libraries and the British Library, as supplementary to digital resources (as described, for example, in a recording of a meeting with staff and students). Guidance for students about registration with the British Library explained that students 'cannot take books or any other resources home but you can reserve them to use in the reading rooms.' The British Library is clearly an excellent resource, however in the view of the assessment team, the need to attend it in-person and undertake all reading on site would not have suited large numbers of students accessing the same texts at the same time where not available digitally (potentially within a short span of time, where reading for the content of a module takes place in a specific week). It would have also presented a barrier to students engaging with module texts regularly (particular core texts). Given this, the assessment team did not regard this guidance as sufficient to ensure availability of required learning resources for all students.
207. Guidance for students about joining local libraries focused specifically on Wembley Library and other libraries in Brent. Students may have been able to borrow books from these libraries, but the assessment team had similar concerns. In its view, it would not have suited large numbers of students looking to access a single recommended (or core) text. It may have involved students travelling significant distances (particularly depending on which campus their teaching was based in) and incurring additional cost. All of which were potential barriers to students' engagement with their studies.
208. Similarly, RTC Education Ltd's Annual Monitoring Return 2021-22 to Buckinghamshire New University identifies that some students, in their National Student Survey (NSS) comments: 'would have liked to be able to access the library books from the recommended reading list but were unable to do so. It seems that the books listed as recommended reading are not available in the library. Students were worried that this may affect the outcome of their assignments. In response, the school is committed to purchasing any missing books from the recommended reading lists for the RCL Heritage Library.'
209. While this commitment is positive, and if implemented could help students to access the course reading material digitally, at the time of the investigation there were significant and urgent gaps (as noted above) suggesting that sufficient action had not yet been taken by RTC Education Ltd.
210. Support from RTC Education Ltd for students in accessing, navigating and successfully engaging with academic library resources was provided by the academic skills team. As described above in paragraphs 158 to 169, the assessment team has concerns about whether this team had enough resource to manage the number of students in the cohort and

the likely academic support needs as identified by the provider. Where students had questions about access to specific partner libraries, they were directed by RTC Education Ltd online information to contact the library teams at the partner institutions. Referring them to another provider added complexity to the available support.

211. The assessment team was concerned, therefore, that the library provision did not enable students to access all course reading material in either physical or digital form. As such not all students had been able to access module content, affecting their ability to successfully engage with their studies. Some students may have needed to unexpectedly purchase texts themselves with consequences for their access to learning. The absence of dedicated support for library provision and academic resources may have also presented a barrier to students engaging in independent study. It is also the team's view that there may have been a disproportionate impact on those students who were managing significant additional commitments and who made up a high proportion of RTC Education Ltd's student cohort.
212. The assessment team considered physical and digital library resources to often be inadequate. In the view of the assessment team, RTC Education Ltd was aware of the difficulties students were experiencing in accessing physical and digital library resources, but had not taken all steps to ensure students received sufficient learning resources to ensure success on their course of study. It was in particular concerned to see that students were informed the institution had a 'digital focus', however staff then told the assessment team that for some modules students could not access assigned reading via the digital library and the assessment team observed that texts were included on module reading lists that were not accessible to students digitally.

B2 conclusions

213. In summary the assessment team identified a range of issues that raised concerns in relation to condition B2.
214. The assessment team concluded that there were additional steps that RTC Education Ltd could have taken to ensure that each cohort of students registered on the relevant courses received staff resources and support sufficient for the purpose of ensuring a high quality academic experience for those students, and for ensuring that those students succeeded in their course. In particular, the assessment team viewed staff resource as insufficient in number, due to:
- student to academic staff ratios on courses delivered by RTC Education Ltd that were high in the view of the assessment team and increasing numbers of academic staff employed on MUCs (as discussed in concern 2, paragraphs 85 to 96) in addition to frequent changes in module tutors (as discussed in concern 2, paragraphs 97 to 103). In the view of the assessment team, the impact of these factors on students was considerable and was evident in the lack of clear, consistent information provided to support students in undertaking assessments, their understanding of modules, their understanding of their course and delayed access to important learning resources.
 - variation regarding the timely provision of assessment grades and feedback on courses delivered by RTC Education Ltd (discussed in concern 2, paragraphs 115 to 117 and concern 1 paragraph 59 to 68). In the view of the assessment team, staff resource not

being sufficient in number contributed to this factor and demonstrated evidence of insufficient resource for academic support.

- insufficient staff resource allocated to the HubX model, and in particular to CSO, ASO and academic skills support roles, in addition to high staff turn over in the CSO and ASO roles (as discussed in concern 3, paragraphs 136 to 157). In the view of the assessment team, the impact of this was that not all students consistently received sufficient academic support and therefore was further evidence of ineffective deployment of academic support on courses delivered by RTC Education Ltd.
- staff resource allocated to academic skills support and English language support (as discussed in concern 3, paragraph 158 to 169) on courses delivered by RTC Education Ltd was considered by the assessment team to be insufficient in number given the number of students, the likely academic support needs of the cohort as identified by the provider, and the level of English language proficiency required of students upon entry (i.e. the required level of English language qualifications).

215. In the view of the assessment team, staff were not being effectively deployed to meet the needs of the student cohort. This is because:

- due to rapid recruitment timelines and increasing numbers of staff employed by RTC Education Ltd on MUCs, the assessment team found that staff did not consistently have available the knowledge and information required to deliver modules effectively (as discussed under concern 2, paragraphs 104 to 107). The impact of this was evident in the lack of clear, consistent information provided to students to support them in undertaking assessments, their understanding of modules and their understanding of their course. In the view of the assessment team, this contributed to the ineffective deployment of academic support.
- the evidence reviewed by the assessment team suggested that academic support was often not sufficient for students managing the pressures of full-time employment and full-time study on courses delivered by RTC Education Ltd (as discussed under concern 3, paragraphs 170 to 176). Academic and professional staff identified that many students were mature students that 'struggle with work' and find it difficult to juggle their competing priorities. Despite this, prospective students were not provided with clear information on the levels of independent study required and the challenges of balancing full-time work and study.

216. The assessment team also concluded that there were additional steps that RTC Education Ltd could have taken to ensure that each cohort of students registered on the relevant courses received physical and digital resources sufficient for the purpose of ensuring a high quality academic experience and for ensuring that those students succeeded in their course. The assessment team viewed physical and digital resource as often being inadequate because:

- Physical and digital library resources were not considered satisfactory by the assessment team (as discussed in concern 5, paragraphs 198 to 212). This was because, despite students being informed that the institution had a digital focus, the assessment team noted that for a number of modules, texts included as core reading

were not available digitally to students. Additionally, staff informed the assessment team that for some modules students were unable to access assigned reading via the digital library. While guidance was provided to students on using local public libraries, this was not considered satisfactory by the assessment team because it was unlikely that sufficient resources would have been available to large numbers of students and may have involved students being required to travel a significant distance. The view of the assessment team was that both physical and digital library resources were therefore insufficient, creating additional barriers to students engaging with their studies.

- Desks provided in classrooms were not considered satisfactory with concerns raised by students via a number of different forums (as discussed in concern 4, paragraphs 182 to 191). This presented particular challenges for implementing the 'digital in-person' teaching approach which included a requirement for students to be able to access digital resources during in-person teaching sessions. The understanding of the assessment team was that the issues were well known to staff. Additionally, spaces for quiet individual study and/or group work were insufficient in number (as discussed in concern 4, paragraphs 192 to 197). Overall these facilities did not support all students in engaging with their learning and at times presented barriers.

217. In the assessment team's view, the issues identified above, both individually and taken as a whole, provide evidence that there were further steps that RTC Education Ltd could have taken to ensure that all students on the courses reviewed received resources and support sufficient for ensuring a high quality academic experience for those students or that those students succeed in and beyond higher education. The assessment team was concerned that the insufficiency of such resources and academic support meant that some students were not able to access appropriate support to engage with their learning, despite the cohort recruited being one with likely higher academic support needs.

Condition B4: Assessment and awards

218. The assessment team reviewed a range of evidence relevant to condition B4 (see Annex A for the full text of the condition), which is detailed through the discussion below.

219. In the assessment team's view, there are concerns that may relate to compliance with some of the requirements set out in condition as follows:

B4.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B4.1, the provider must ensure that:

a. students are assessed effectively

b. each assessment is valid and reliable; and

e. relevant awards granted to students are credible at the point of being granted and when compared to those granted previously.

220. The assessment team also particularly noted the following definitions listed under B1.4:

'a. "academic misconduct" means any action or attempted action that may result in a student obtaining an unfair academic advantage in relation to an assessment, including but not limited to plagiarism, unauthorised collaboration and the possession of unauthorised materials during an assessment.

b. "academic regulations" means regulations adopted by the provider, which govern its higher education courses, including but not limited to:

i. the assessment of students' work;

ii. student discipline relating to academic matters;

iii. the requirements for relevant awards; and

iv. the method used to determine classifications, including but not limited to:

A. the requirement for an award; and

B. the algorithms used to calculate the classification of awards.

c. "assessed effectively" means assessed in a challenging and appropriately comprehensive way, by reference to the subject matter of the higher education course, and includes but is not limited to:

i. providing stretch and rigour consistent with the level of the course;

ii. testing relevant skills; and

iii. assessments being designed in a way that minimises the opportunities for academic misconduct and facilitates the detection of such misconduct where it does occur.

e. "credible" means in the reasonable opinion of the OfS, relevant awards reflect students' knowledge and skills, and for this purpose the OfS may take into account factors which include, but are not limited to:

i. the number of relevant awards granted, and the classifications attached to them, and the way in which this number and/or the classifications change over time and compare with other providers;

ii. whether students are assessed effectively and whether assessments are valid and reliable;

iii. any actions the provider has taken that would result in an increased number of relevant awards, and/or changes in the classifications attached to them, whether or not the achievement of students has increased, for example, changes to assessment practices or academic regulations; and

iv. the provider's explanation and evidence in support of the reasons for any changes in the classifications over time or differences with other providers.

g. "relevant award" means:

- i. a research award;
- ii. a taught award; and/or
- iii. any other type of award or qualification in respect of a higher education course, including an award of credit granted in respect of a module that may form part of a larger higher education course, whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.
- h. “relevant skills” means:
 - i. knowledge and understanding relevant to the subject matter and level of the higher education course; and
 - ii. other skills relevant to the subject matter and level of the higher education course including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences.
- i. “reliable” means that an assessment, in practice, requires students to demonstrate knowledge and skills in a manner which is consistent as between the students registered on a higher education course and over time, as appropriate in the context of developments in the content and delivery of the higher education course.
- j. “research award” and “taught award” have the meanings given in section 42(3) of the Higher Education and Research Act 2017.
- k. “valid” means that an assessment in fact takes place in a way that results in students demonstrating knowledge and skills in the way intended by design of the assessment.’

Concern 6 (condition B4.2): Academic practices relating to summative assessment meant that some students were not assessed effectively and some assessments were not valid and/or reliable

Role and responsibilities of RTC Education Ltd relevant to Concern 6

221. RTC Education Ltd is responsible for delivering courses in partnership with the University of Bolton and Buckinghamshire New University (see paragraph 33 for an outline of the roles and responsibilities in relation to teaching and assessment). The University of Bolton and RTC Education Ltd 2022-23 operations manual sets out that in respect of assessment both partners have responsibility for setting assessments and for assessment moderation. RTC Education Ltd has full responsibility for:

- The provision of assessments to students, including setting deadlines for submission.
- The management and invigilation of exams.
- First marking of coursework and exams.
- Provision of assessment feedback to students.

222. The Buckinghamshire New University and RTC Education Ltd partnership operations manual sets out that key individuals at RTC Education Ltd are responsible for ensuring that courses are delivered in line with Buckinghamshire New University procedures and regulations. RTC Education Ltd staff are responsible for marking all assessments, including exams, in accordance with the agreed marking scheme. They are also responsible for providing feedback to students.
223. In both partnerships RTC Education Ltd is required to undertake assessment processes in line with the relevant assessment policies.
224. During the course of its investigation the assessment team found information suggesting that the level of support and guidance given to students when completing summative assessments was often excessive. This raised concerns about the effectiveness, validity and reliability of assessments across some modules, including whether individual students had the opportunity to demonstrate that they had met course and module learning outcomes with sufficient independence.
225. The assessment team identified a range of common practices that raised concerns about the manner in which assessments are conducted, especially when taken as a totality. These included:
- The practice of students submitting drafts of summative assessments to tutors for substantive feedback before submission.
 - Excessive teaching hours dedicated to assessment support.
 - Inconsistent guidance to students on avoiding academic misconduct.
 - Over-generosity in awarding grades.
 - Examples of coaching students explicitly and providing them with exam papers before an unseen exam.
226. Each of these issues individually raised concerns for the assessment team, and collectively may lead to an environment that undermines the rigour of summative assessments.

Provision of feedback on drafts of summative coursework assessments

227. The assessment team heard in several meetings with academic staff at a range of levels that students could submit drafts (including full drafts) of their summative coursework assessments ahead of their formal submission deadlines for module tutors to review and provide feedback on. This included a full draft of dissertations, as described by one member of academic staff. The assessment team was concerned that this amounted to 'first marking' of summative assessments, and that this was a standard practice in the courses reviewed. 'First marking', which involves providing students with marks and/or feedback on full or extensive final drafts of summative assessments prior to submission, was prohibited in guidance from both partner institutions as it can give some students an unfair advantage and undermine the integrity of assessments (i.e. to demonstrate that the student has independently met learning outcomes).

228. In assessment and feedback guidelines provided to RTC Education by both the University of Bolton and Buckinghamshire New University, offering feedback to students on full drafts of summative assessments prior to submission (i.e. 'first marking') was not permitted. Both the University of Bolton and Buckinghamshire New University guidelines specify that they are to be used by RTC Education Ltd teaching staff in conjunction with assessment and feedback policy and regulations. As such, the following statement is included in the University of Bolton's assessment and feedback policy:
- 'The level of formative or developmental support must not extend to reading a full draft of the student's summative work in order to give feedback on the standard of performance, as this would be tantamount to first marking and place the student at an unfair advantage over other students.'
229. Buckinghamshire New University's assessment and feedback policy (2021-22) mirrored the University of Bolton requirements, was also designed for use by RTC Education Ltd staff and specifies that:
- 'The purpose of the assessment is to test the student's achievement of the learning outcomes. Therefore, the level of support must not extend to reading a full draft of the student's summative work in order to give feedback on the standard of performance, as this would be tantamount to first marking and place the student at an unfair advantage over other students.'
230. Staff members informed the assessment team in a meeting that students were encouraged to make submissions of draft summative assessments via the online assessment platform embedded in their relevant VLE (i.e. Turnitin) so that they could receive feedback. Staff described that online assessment submission points generally opened two weeks before submission deadlines to enable this. Students then received feedback on their submission from staff via Turnitin, verbally in class, via written notes, or in one-to-one tutorials with the module tutor. Academic staff thought that most students submitted draft assessments for feedback, though the proportion of students varied, but all students in a class were encouraged to submit.
231. Some tutors advised that feedback on full drafts of each piece of coursework was a one-time opportunity for students. However, other academic staff in oversight roles for courses identified that there were 'no limitations' on the number of times that students could receive feedback on the same piece of coursework and that drafts could be submitted repeatedly. This suggested to the assessment team that not only was feedback provided inappropriately on full drafts of summative assessments, but that in some cases there was a repeated cycle of feedback. This exacerbated the assessment team's concerns regarding the effectiveness of assessment, as well as the impact of this practice on the validity and reliability of assessments.
232. Academic staff said that the nature of such feedback encouraged students to see their Turnitin (a similarity detection service that deters academic misconduct) similarity score before submission but also covered the content of the assessment. Feedback was described as providing students with a 'steer' to make them aware of any changes that they should make to their assignment before the final submission. Some academic staff described giving 'general feedback' about whether students had met learning outcomes and covered all

aspects of the assessment. Other staff said that feedback on summative assessment drafts could relate to both the 'similarity index' (i.e. Turnitin similarity score) and 'the assignment feedback in general'. This demonstrated to the assessment team that feedback on drafts of summative assessments before submission could be wide-ranging and linked to student performance in the assessment. Given the submissions were used to both check Turnitin similarity scores and provide tutor feedback, before a final submission, the assessment team concluded that these submissions would be full drafts of summative assessments and that this was then standard practice (incomplete drafts would not be useful for checking similarity scores).

233. This was also echoed in a number of meetings with students. In a meeting with Level 5 students, the assessment team heard that students could 'submit anytime to get feedback', and that most students did submit work to their tutor for feedback on drafts of summative assessments (almost all in the meeting had done so). The students said that the type of feedback covered presentation, spelling and grammar, referencing, as well as substantive content, such as suggesting content that the student could add to their assessment. It was described that at times this feedback led students to 'change direction' in their assessment. In the view of the assessment team, this practice could therefore act as a barrier for students to independently demonstrate their knowledge, skills and understanding of the subject matter.
234. Students in this group identified that feedback on drafts was the primary means of receiving feedback in their modules generally. Similarly, Level 3 students who met with the assessment team described how their assignments were checked through Turnitin, with feedback on how to improve 'weaknesses'. Level 6 students on the BA Business Management also agreed that they could send their 'whole coursework' to tutors for feedback before they submitted, and that there were no restrictions on how many times they could do this. They confirmed that this was their experience on every module. The range of students who consistently described feedback on drafts of assessments being provided prior to submission suggested to the assessment team that this was a normalised practice. This suggested to the assessment team that summative assessments, across all levels of study, were subject to 'first marking' as standard in the courses reviewed, which raised concerns regarding effectiveness of assessments, as well as the validity and reliability of assessments.
235. The assessment team identified further evidence of feedback being provided on full draft summative assessments through module VLEs, module resources and/or module Microsoft Teams sites at all levels on the BSc Business Management courses:
- For example, a tutor on a Level 3 module (September 2022) repeatedly reminded students to 'upload your draft assessment 1 on Canvas by the 12 January, which is the cut off date. That gives us two weeks for formative feedback and will give you time to work on making amendments'. Similar messages from staff to students requesting that students submitted draft assessments for feedback were identified on three other Level 3 modules reviewed (four out of five Level 3 modules reviewed). This included a message from a CSO reminding students that 'Assessment 2 is fast approaching on 22/02/2023. Kindly upload your drafts assessments at the earliest to attain formative feedbacks and to check your similarities rate [sic]'.

- In Level 4 modules, four out of four modules reviewed had evidence of feedback being offered on draft summative assessments. This included messages from tutors requesting drafts be submitted and weeks in module handbooks dedicated to 'Formative Feedback on Draft Assessment' (September 2022).
- At Level 5, four out of five modules reviewed showed evidence of feedback being offered on assessment drafts, with tutors on one module noting that they could suggest 'some improvements to your work' (November 2022) and a module announcement to all students on another module that 'Students are encouraged to submit a draft report of their submission for formative feedback. No other formative feedback point.'
- In Level 6 modules, seven out of seven modules reviewed contained evidence of feedback being offered on draft summative assessments. This included, for example, a tutor on one module requesting for students to 'mail me your work for formative review' (January 2023), module handbook guidance that 'verbal and written feedback will be offered on in-class activities and assessment drafts' (April 2022) and a message to all students on two modules advising students that 'you can still improve your drafts based on the feedback you receive from your tutors before the deadline, if needed. New uploads will overwrite the old ones' (September 2022). For modules on courses validated by the University Bolton this practice, then, seemed to be customary.

236. For modules on the BA Business Management courses, this practice seemed to be significantly less common. However students on these courses who met with the assessment team said that it was still occurring. Students were often asked to submit assessment drafts before the formal submission deadline, albeit for the purposes of checking Turnitin similarity scores. It should be noted that the assessment team only reviewed the VLE (Blackboard) for these modules. Regardless, the assessment team identified four modules from the 25 reviewed in total (16 per cent) that included evidence of students being able to submit drafts of assessment for feedback before submission. With these modules communicating to students that, for example, 'if you wish to send your draft work, please send to me so that I can provide feedback on it' (included in PowerPoint slides for Level 6 students) and 'get your drafts ready for formative feedback before the final submission' (Level 4 (September 2021)).

237. The assessment team also noted minutes of the School of Business and Enterprise's Student Voice Committee (3 June 2022), which included feedback from one course representative that 'Despite the advice given to make few adjustments, I did not receive the grade I was told I would receive after making those changes.' The assessment team was concerned that this demonstrated that 'first marking' of an assessment, relating to students' standard of performance and with advice on how to improve performance prior to formal submission, was provided to and expected by students. That this was recorded in a formal committee of the school further evidences that this was a known practice.

238. The assessment team was concerned by the evidence of feedback being provided on full drafts of summative assessments, which was against the guidelines and policies of partner institutions. This was because, in the assessment team's view, this practice does not provide confidence that students are being assessed effectively. Additionally, the assessment team consider that this practice:

- Can undermine the validity and reliability of the assessment by questioning whether students have demonstrated they have independently met learning outcomes
- Introduces a lack of parity between students who receive or do not receive such feedback.

239. The assessment team raised this issue when it met with members of academic senior staff for RTC Education Ltd. They informed the team that formative feedback should have been limited, that submissions to Turnitin should not have been used for formative feedback (only for similarity checking), and that staff should not have provided formative feedback on the content of summative assessments before submission. However, in meeting with members of professional senior leadership for RTC Education Ltd, the assessment team was informed that tutors employed a range of strategies for feedback and did encourage students to submit assessments via Turnitin for feedback before formal submission. They said that this was not a policy, but a practice that had evolved internally and was 'Regents led' (i.e. developed internally within RTC Education Ltd). In a cover note provided to the assessment team by RTC Education Ltd (17 March 2023), it was then confirmed as 'additional context' that 'formative, developmental feedback is provided to students prior to the submission of the summative assessment through Turnitin. Summative feedback is also provided through Turnitin'. This suggested to the assessment team that the practice of providing feedback on full drafts of summative assessments, i.e. 'first marking', was accepted standard practice at RTC Education Ltd, even if it was not formal policy.
240. The assessment team was concerned by this difference in awareness of practice between the two senior leadership groups. The confirmation in the 17 March 2023 cover note to the assessment team that feedback on summative assessment submissions was commonly provided before formal submission supports the evidence identified by the assessment team. However, this was then seemingly at odds with the guidelines and policies of the partner providers and this practice raised concerns for the assessment team.
241. The assessment team regarded the practice as undermining the requirement for students to demonstrate their knowledge and skills, and to meet relevant learning outcomes with sufficient independence through summative assessment. As such, it raised concerns for the assessment team that students were not being assessed effectively, that is in a challenging and appropriately comprehensive way, with stretch and rigour consistent with the level of the course. This, similarly, indicated an issue regarding the validity of assessments, that is that assessments in fact take place in a way that results in students demonstrating knowledge and skills in the way intended by the design of the assessment. The feedback practices evidenced here are not part of the design of assessments and, in the assessment team's view, function to undermine the assessments' validity. It also raised concerns about parity between students undertaking the same assessment (i.e. receiving different levels of support through feedback on assessment drafts) and so the reliability of assessment, that is requiring students to demonstrate knowledge and skills in a manner which is consistent between students on a course. Finally, in the view of the assessment team, because students were not consistently assessed effectively, and assessment could not be considered to be consistently valid and reliable, it considered that relevant awards granted to students may not consistently be credible.

Teaching contact hours dedicated to assessment support

242. Following a review of delivery in practice of modules considered by the assessment team, the proportion of taught contact hours within and across modules dedicated to assessment support (for example, preparation and revision) as well as taught contact time allocated to the independent preparation of assessments is discussed under concern 1 (condition B1), paragraphs 49 to 55. In the context of support and guidance for summative assessments, the assessment team was concerned that this proportion of time spent in modules on discussing, advising and preparing assessments was excessive. Sufficient support for students in this area is crucial. However the proportion of teaching time allocated, in the cases observed by the assessment team, led to a narrow focus on completing and passing the assessment itself. The team was concerned that this focus was essentially priming students to complete and pass assessments, rather than on requiring students to reflect on their learning and demonstrate their gained knowledge, skills and understanding of the subject matter.
243. In the view of the assessment team, the excessive contact hours dedicated to assessment support meant that assessments did not provide appropriate stretch and rigour consistent with the level of the course, and did not test relevant skills, knowledge and understanding in a challenging and appropriately comprehensive way. The assessment team were therefore concerned that students were not assessed effectively. Similarly, because students were not always required to independently demonstrate skills, knowledge and understanding of the subject matter in the way intended by design of the assessment, in the view of the assessment team, assessment could not be considered consistently valid. The assessment team considered that, because students were not consistently assessed effectively, and assessment could not be considered consistently valid, relevant awards granted to students may not consistently be credible.

Assessments do not consistently ensure that academic integrity is protected

244. The assessment team identified that tutors advised students inconsistently, and often incorrectly, about how to avoid potential academic misconduct. This could lead to academic misconduct in fact being facilitated by tutors' instructions or guidance. At times students were guided to use resources that would undermine the academic integrity of assessments (such as, in one case, including a resource from an 'essay mill' website). This led to some students' assessments not meeting academic integrity requirements (as identified in RTC Education Ltd and partner institution policies, as relevant). For instance, the assessment team noted concerns regarding some tutors' advice to students regarding the paraphrasing of sources as a way to avoid plagiarism.
245. RTC Education Ltd's Academic Misconduct Procedure (December 2022) made it clear that academic integrity meant:

'Properly referencing the sources of the arguments and ideas in an assignment using a recognised referencing system (as specified in programme and unit guidelines). It is not only quotations that must be referenced but also paraphrasing of the arguments of others and the use of their ideas, even if explained in the student's own words.'

'Plagiarism', as a form of academic misconduct, is defined in this document as: 'the unacknowledged incorporation in a student's work of material derived from the work (published or unpublished) of another.' Examples of plagiarism given here include: 'the

summarising of another person's work by simply changing a few words or altering the order of presentation, without acknowledgement' and 'the use of the ideas of another person without acknowledgement of the source'.

246. Similarly, in the University of Bolton's Academic Misconduct Regulations and Procedures (governing the students on the BSc Business Management courses reviewed at RTC Education Ltd), examples of plagiarism included: 'the summarising of another person's work by simply changing a few words or altering the order of presentation, without acknowledgement' and 'the use of ideas or intellectual data of another person without acknowledgement of the source, or the submission or presentation of work as if it were the student's own, which are substantially the ideas or intellectual data of another person.' Buckinghamshire New University's Academic Integrity Policy (governing students on the BA Business Management courses reviewed at RTC Education Ltd) identifies plagiarism as being 'Where a learner intentionally or unintentionally presents in part or completely, someone else's work as their own'. There is, then, consistency between all policies that paraphrasing other sources, and replicating ideas contained within them without proper citation, is a form of academic misconduct.
247. Students were provided with access to the RTC Education Ltd Academic Misconduct Procedure through the provider's website, and this document signposted students to the relevant University of Bolton or Buckinghamshire New University policies depending upon their course of study. Staff were governed by these policies when providing students with assessment feedback and guidance.
248. However, the assessment team identified variable practices in the advice offered to students within modules. On three out of the six Level 5 modules reviewed on BSc Business Management courses, the assessment team found feedback on summative assessments that directed students to improve their paraphrasing as a way of reducing similarity scores on Turnitin (i.e. that Turnitin software had identified a high level of similarity with another source), rather than guiding students to ensure sources are cited appropriately and that ideas from sources are used appropriately to protect academic integrity.
249. For example, a tutor gave repeated feedback on one Level 5 BSc Business Management module to 'paraphrase them [sources] accordingly as there is a higher level of similarity index'. While assessment feedback sometimes included guidance to 'paraphrase and provide citations to reduce similarity index' (another Level 5 BSc in Business Management module), the need to include citations when paraphrasing was not always noted. Guidance in a Level 5 BSc Business Management module given by one tutor to their class concerning the use of a quotation was to 'do the correct things with that so that it's not flagged as you know, against you or something like that and perhaps paraphrase your work' (September 2022) and 'don't forget paraphrasing high similarities' (October 2022).
250. The assessment team saw similar advice at Level 6 of the BSc Business Management. A tutor gave assessment feedback on a submission with a 70 per cent similarity score that received a passing grade of 40. They did not mention potential academic misconduct other than in a note that said 'more paraphrasing in places needed'. Similarly, at Level 4 on a BSc Business Management module, the assessment team found comments to students on summative assessments such as 'High level similarities due to failure to paraphrase arguments properly' (63 per cent similarity score, with a passing grade of 45 awarded). In

this case, in fact, only the bibliography for the assessment had a similarity match, so the feedback was also incorrect. The assessment team was concerned that tutors often framed guidance to students that they should paraphrase more around the aim of reducing students' Turnitin similarity scores, seemingly, as an end in itself. This was a common feature in the sample of assessment submissions that the assessment team reviewed.

251. The assessment team was concerned that such feedback and guidance may have suggested to some students that ensuring a low similarity score on Turnitin, to avoid potential detection and allegations of plagiarism, was the priority rather than ensuring good academic practice. This concern was echoed by comments from an external examiner (May 2021) who reflected on the lack of appropriate guidance on avoiding plagiarism, and assignments receiving passing grades where it was present: 'students are also being allowed to pass (40% marks obtained... with a clearly visible cut and paste sections)'. The formal response from the School of Business and Enterprise to the external examiner's comments did not address this issue specifically. It advised that the actions would be to 'share the comments from the EE [external examiner] with our study skills coordinator to formulate actions'.
252. The assessment team's discussion with students reinforced this concern. They said that they knew they had to explain information in their own words to avoid plagiarism. However, this alone would not have avoided plagiarism such as the 'unacknowledged incorporation in a student's work of material derived from the work (published or unpublished) of another', as detailed by RTC Education Ltd policies, suggesting that guidance in this area may not have been sufficient.
253. This information suggested to the assessment team that RTC Education Ltd's procedures on academic misconduct were not always being followed, with the effect that some students may not have received appropriate guidance from their tutors. Challenges around monitoring this, as well as providing clarity for staff and students, were reflected in the minutes of RTC Education Ltd's academic council (9 June 2022), which 'highlighted that the college's approach to recording information about academic misconduct was inconsistent, which made it difficult both to analyse the issue (e.g. by type of misconduct, level and other variables) among different courses, and to confirm that the college's procedure was being implemented properly.' From the information observed by the assessment team, difficulties in ensuring implementation of the procedure seemed to be continuing at the time of investigation.
254. The assessment team also identified examples of guidance that worked to undermine academic integrity in other aspects of module delivery. A tutor on a Level 6 BSc Business Management module (September 2022) advised their seminar group (with seven students in attendance) to use generative artificial intelligence (AI) software (ChatGPT) in the preparation of aspects of a summative assessment.
255. However, this was not permitted in the assessment brief and all students on the module did not receive such guidance. In this case the tutor demonstrated how to use ChatGPT in relation to an aspect of a summative assessment for the module. While the tutor reminded students repeatedly that they should not forget to engage in their learning themselves, they also advised students that they 'can use it [ChatGPT], this is just not for this particular task that you have to do, but in general.' In the view of the assessment team, it was not made clear to students that they should not use ChatGPT to complete assessments generally.

256. This guidance was not in keeping with the University of Bolton Academic Misconduct Regulations and Procedures 2022-23, which defined 'commissioning' or 'contract cheating' as 'requesting another person or using AI to complete an assessment, or contribute to an assessment, such that the output of that commissioning in whole or part is then submitted as the student's own work'. RTC Education Ltd's Academic Misconduct Procedure (July 2023) defined this as an example of 'ghosting', whereby 'a student submits as their own, the output of a generative Artificial Intelligence tool such as ChatGPT'. This example then raised concerns for the assessment team as to the effectiveness of the assessment, as opportunities for academic misconduct were not minimised in the assessment for these students, but enabled. This example also raised concerns regarding the reliability of the assessment due to a lack of parity between students undertaking the same module and assessment, who either were, or were not, in attendance at the seminar group.
257. A particularly serious example of students not receiving appropriate guidance about academic integrity was identified (February 2023) on a Level 4 BA Business Management module that signposted students to resources provided by a website offering essay writing services for a fee (an 'essay mill'). On the module VLE, under 'module materials' to support students in preparing their first summative assessment for the module, links were included to an exemplar essay hosted by an 'essay mill' website. Students accessing this link were then also offered the paid-for services of the company in question. The task set for students enabled them to use the exemplar essay in producing their summative assessment (i.e. in the assessment brief the subject of the exemplar essay was explicitly included as an option that students could write about). As such, there was also evidence of some students copying content from the exemplar essay from the 'essay mill' website in their summative assessments. This raised significant concerns for the assessment team, not only as it encouraged academic misconduct in this module's assessment, but it also seemed to promote a website to students that offered paid-for essay writing services. In the assessment team's view this example demonstrated that students were not being assessed effectively, given the facilitation of academic misconduct identified, and that the requirements for reliability and validity of assessment as set out in Condition B4 were not met. This also reflected a particular failing in module oversight and academic governance, as the inclusion of this resource in the module was not identified through quality assurance processes (such as a module leader or the course leader).
258. Compounding this issue was the fact that a similar issue was raised in relation to a Level 4 BSc Business Management module by external examiners and included in exam board minutes (20 May 2022). The response from RTC Education Ltd at this time identified that 'Regents have an action task force as they noticed the same issue and have conducted investigation into the cheating websites.' However, this suggests to the assessment team that this response does not seem to have ensured such instances were addressed systematically.
259. The assessment team was concerned by seemingly widespread inconsistency in academic practices that, in the issues and examples identified above, often undermined academic integrity in assessments and at times actively facilitated academic misconduct. Issues ranged from seemingly widespread inconsistency in advice about paraphrasing in relation to avoiding academic misconduct, to more specific examples of particularly serious academic integrity failings that demonstrate a lack of awareness of relevant policies and of module oversight to prevent such failings. These issues would have ultimately reduced the stretch

and rigour of the assessment. The assessment team considered these issues, when taken as a totality, to suggest clear and systemic risks to students being assessed effectively.

260. Similarly, the assessment team considered that the issues identified in paragraph 259 above meant that assessments were not always requiring students to demonstrate knowledge and skills in the way intended by design of the assessment. In the view of the assessment team, assessment could not be considered consistently valid. Finally, the assessment team considered that, because students were not consistently assessed effectively, and assessment could not be considered consistently valid, relevant awards granted to students may not consistently be credible.

Validity of summative assessments compromised by the facilitation of academic misconduct

261. The assessment team identified a small number of instances in which tutors provided students with access to questions that were to be used in summative examination assessments, prior to the assessment itself. These tutors were, therefore, allowing their students to commit academic misconduct in their examinations. These examples centred on two separate intakes of a Level 5 BSc Business Management module, with separate tutors.

262. In one seminar group (January 2021 intake) delivered simultaneously online and in-person, on multiple occasions (March to May 2023), the tutor advised their class that 'this is a question that is 100 per cent going to come [in their summative exam]. I'll show you the question.' Later, in discussing an exemplar exam question answer, the tutor advised the class that they could use 'Yahoo' in answering exam questions and a book that they referred the class to.

263. In a later class (April 2023) that took place approximately one week before the assessment (6 May 2023), the tutor showed the class an Excel document titled '[module code] – AS2 Take-Home Exam Paper Solution for Paper 1, Resit-1 and Resit-2'. This seemed to show calculations and answers for exam questions and the class time was spent going through each question and the solution in detail. The tutor encouraged students to use the class as practice. However, students asked the tutor to send the file to them. The tutor noted that they could not do this as it would be 'checked', but that students should instead look at the solutions document that was shown on screen in the recording of the class.

264. This suggests to the assessment team that the document in question should not have been shared with students, and doing so undermined the integrity of the assessment. In the last class before the assessment, the tutor asked the class if they had the Excel document previously referred to. The class responded that they had not, and the tutor then sent it to them via the Teams channel. The tutor then advised the class to keep this document in front of them when taking the exam, and that 'almost the same question is coming'. Throughout these sessions, significant time was spent working through the Excel document. The tutor encouraged the students to use the answers or calculations contained in it during their examination, as the questions in the examination would be either very similar or the same.

265. The assessment team was highly concerned that the practice in this example undermined the integrity of the assessment. The tutor provided and encouraged students to use a resource that included answers to exam questions, or the means to answer very similar

questions. This meant students did not need to independently demonstrate the relevant skills, knowledge and understanding expected in the module learning outcomes.

266. A second, similar example identified by the assessment team occurred in the same Level 5 module but with a different intake (September 2020) and different tutor. In one class (December 2022) taught online, the tutor showed the class an exam question, which they introduced as 'a question which you will have to answer in your second assessment'. This question shown then did feature in the exam assessment that this class took as a summative assessment.
267. A significant majority of the time in this class was spent discussing this question and how to answer it. The tutor had prepared a solution to the question and went through it with the class ('This is my answer. I have prepared it for you.'). Later in the teaching session the tutor asked the class 'Should I share the solution with you? Do you want me to share the solution or you can do it yourself?' The class responded that they wanted the solution to be shared. The tutor noted 'But that's not a perfect thing to do' and 'that's the solution to the exact question'. The class noted that they would have been able to watch the recording of the teaching session to view the solution anyway; the tutor responded that 'if you check the recording that's not a problem'. However, at the end of the teaching session the tutor shared the document with the worked solution to the question via the class Teams channel, with the verbal request that they 'do not misuse this'. This was the solution to the question that appeared on the module summative examination (February 2023).
268. In subsequent weeks, the tutor provided the class with the questions used in other parts of the summative exam and worked solutions. A significant proportion of class time was spent discussing them. The assessment team was seriously concerned to see this second example of a tutor directly providing their class with the means to commit academic misconduct in a summative assessment.
269. While these are two specific examples, which in themselves raise significant concerns, the assessment team consider that it is important to note that these were identified from a limited sample of classes. The seriousness of the issues found within only a sample of modules, and only a proportion of classes within those modules, exacerbated the team's concerns. The team's view was that the evidence of assessment practices, taken as a whole, may suggest a culture in which pass rates are prioritised without due regard for academic integrity.
270. In the examples provided, the stretch and rigour of the assessment would have been reduced, and assessment cannot be said to effectively assess students' relevant skills, knowledge and understanding. As such, the assessment team's view is that students are not always assessed effectively. In the view of the assessment team, this practice also meant that assessments were not always requiring students to demonstrate knowledge and skills in the way intended by design of the assessment. This meant that assessment could not be considered consistently valid. In the view of the assessment team, because students were not consistently assessed effectively, and assessment could not be considered consistently valid, relevant awards granted to students may not consistently be credible.

Excessively high grading of summative assessments

271. The assessment team identified a range of evidence indicating that over-grading had taken place, particularly in awarding students passing grades on summative assessments where this may not have been appropriate.
272. When reviewing module pass rates provided by RTC Education Ltd, the assessment team noted that pass rates for modules on the BA Business Management courses reviewed (across Levels 3 to 6 over a three-year period, 2019-20 to 2021-22) averaged 98 per cent (not including students who failed due to non-submissions, but including resit opportunities). For a proportion of modules the pass rate was 100 per cent, even for modules with large student numbers (for example, five Level 4 modules, with 232 students each, had 100 per cent pass rates in 2020-21). For BSc Business Management courses reviewed, on the same basis, the average module pass rate was similarly high at 95 per cent. The assessment team was keen to explore this high pass rate further.
273. In reviewing samples of marked assessments on module VLE sites, including moderated assessments, the assessment team identified a range of examples across modules and levels that suggested over-marking for some students, particularly at the passing threshold (a pass mark being 40). These examples sometimes included feedback to the student that suggested a passing mark may not have been warranted, given the critical nature of the feedback in relation to assessment requirements, or the mark and feedback had not taken sufficient account of potential academic misconduct issues.
274. External examiner reports such as the one noted above (May 2021) reinforced these examples. This report described that some students were 'being allowed to pass' despite seemingly copied material. In minutes from the BSc Business Management exam board (17 March 2022) another external examiner noted that 'there was not a great deal of low marked papers within the sample.' This range of information, including pass mark data, observed assessment marking and feedback, and indications from external examiners, suggested to the assessment team that marking at the pass threshold (in particular) may have been excessive.
275. This concern was exacerbated by statements from some tutors to students during teaching sessions that suggested an inappropriate approach to marking. For example, a tutor advised a Level 5 BSc Business Management class (September 2022) that 'I try to make everybody pass. Some had high similarities that I could have raised' and, when encouraging students to send draft work for feedback, that 'we are working together, that's all. Let's work together', 'you win, I win. You lose, I lose. I'm telling you.'
276. Similarly, a tutor for another Level 5 BSc Business Management module (March 2023), when discussing summative assessment grading, advised their class that they 'tried to pass everyone at least 40' and that they 'usually don't give less than 60, that is my marking'. As such, 'my students always want me to teach because they know they will get good marks'. The tutor also described marking papers for another module, in covering for a colleague: 'I gave good grades, and [the original tutor] said you are too gracious, but that is what I do, and nobody can say no, not even the university'. This line of discussion was later reinforced (May 2023) with the same class: 'I will give you between 60 and 80 whatever you do. But if you do really badly then I have got no choice, I have to give you F. You have failed. I can't do anything else. But if you do [a] little bit of those questions, you get a lot of marks... I'm going

to give you very good marks.’ These examples raised significant concerns for the assessment team. They suggested a deliberate intention on the part of some staff to award excessive marks, and particularly to ensure passing marks that may not have been justified by students’ performance. They also reveal an understanding from some staff that the provider’s existing quality assurance processes or oversight would not prevent this.

277. The totality of the evidence within this section, in the assessment team’s view, indicated the likelihood of excessively high marking and raised concerns that students were not being assessed effectively. This is because assessment had not provided the stretch and rigour consistent with the level of the course, required the testing of relevant skills, and undermined the academic standards of the assessment. Similarly, because these assessments were not requiring students to demonstrate knowledge and skills in the way intended by design of the assessment, in the view of the assessment team, assessment could not be considered consistently valid. Finally, the assessment team considered that, because students were not consistently assessed effectively, and assessment could not be considered consistently valid, relevant awards granted to students may not consistently be credible.

278. The assessment team identified another concern in relation to this issue regarding the terms of the MUC by which most teaching staff at RTC Education Ltd were employed (the contract was introduced at the start of 2021). Staff employed on this contract were required to meet a number of key performance indicators (KPIs) in order to be fully paid. As confirmed by senior RTC Education staff in meeting with the assessment team, a ‘retainer payment’ amounting to 20 per cent of the contract total was withheld unless these KPIs were met. As the contract specified:

‘The retainer payment as outlined in Schedule 2 is payable after the module/modules have been completed and is subject to successful completion of the KPIs contained in Schedule 1. For the avoidance of doubt, if the module/modules are not completed, or the KPIs are not met, the retainer payment will not be made.’

279. The six KPIs detailed in ‘Schedule 1’ of the contract included one that specified: ‘Achievement expectation rate is 85%.’ The ‘achievement rate’ was defined by RTC Education Ltd as: ‘the percentage of students who pass a module.’ The assessment team understands that the intention of this KPI may have been to encourage high quality teaching. However, on the basis of the concerns set out under concern 6, the team was concerned that including this numeric requirement in the MUC contract developed by RTC Education Ltd, and explicitly making full payment of a teaching contract dependent upon meeting it, introduced the risk of creating a systemic and perverse incentive for excessively high marking from tutors (i.e. in awarding passing grades). In the assessment team’s view, this requirement had the capacity to create conflicts of interest for markers and was incompatible with the aim of an impartial marking and quality assurance process, undermining the reliability of summative assessments. This was exacerbated by the high proportion of teaching staff on MUCs (61 per cent of teaching headcount in 2021-22, see ‘Context’) and the assessment team regarded it as a factor that may have contributed to the excessively high marking and module pass rates identified above.

B4 conclusions

280. The assessment team identified that each of the concerns above were serious issues in themselves, but particularly so when considered in totality. The conclusions of the assessment team are set out in summary below.

281. Students on the relevant courses were not consistently assessed effectively. This was because:

- students often received feedback on full drafts of summative assessments before submission ('first marking') (as discussed in paragraphs 227 to 241) which meant that they had not been consistently required to independently demonstrate their knowledge, skills and understanding of the subject matter. Providing feedback on full drafts of summative assessment also meant that students were not consistently assessed in an appropriately challenging and comprehensive way.
- an excessive proportion of teaching contact hours dedicated to assessment support (as discussed in paragraphs 242 to 243) meant that assessments did not consistently ensure that students' knowledge and understanding was tested in an appropriately challenging and comprehensive way. In the view of the assessment team, assessments had therefore not always ensured the testing of relevant skills.
- some staff encouraged students to paraphrase content to reduce Turnitin similarity scores instead of encouraging students to improve their academic practice through signposting to appropriate resources (as discussed in paragraphs 244 to 260). Additionally, the assessment team saw seriously concerning examples of tutors pointing students towards the use of artificial intelligence and essay mills. In the view of the assessment team, these factors encouraged students to engage in academic misconduct which would have reduced the stretch and rigour of the assessment and undermined the academic integrity of the assessment.
- some staff provided students with advance access to questions that were to be used for summative examination assessments, despite the evidence viewed by the team suggesting that this was not appropriate (as discussed in paragraphs 261 to 270). In the view of the assessment team, this practice also encouraged students to engage in academic misconduct which would also have reduced the stretch and rigour of the assessment and undermined the academic integrity of the assessment.
- some staff implied to students that the effort made in assessment was not necessarily connected to the grades awarded to students (as discussed in paragraphs 271 to 279). The assessment team saw evidence that suggested a deliberate intention on the part of some staff to award excessive marks, and that pass marks may not have been justified by students' performance. In the view of the assessment team, this undermined the assessment providing stretch and rigour consistent with the level of the course, the testing of relevant skills, and the academic integrity of the assessment.

282. The evidence viewed by the assessment team therefore led it to conclude that students were not consistently assessed effectively. This is because there were further steps RTC Education Ltd could have taken to ensure assessment was providing stretch and rigour

consistent with the level of the course and to ensure that assessment was appropriately testing relevant skills.

283. Assessments for students on the relevant courses were not consistently valid and/or reliable. This was because:

- some students who had received feedback on full drafts of summative assessment before submission (as discussed in paragraphs 227 to 243) may not have been adequately required to demonstrate their knowledge, skills and understanding of the subject matter. This meant that assessments could not be considered consistently valid. It also raised concerns about parity between students undertaking the same assessment. This was because there was not a consistent policy underlying this practice which meant students could receive different levels of support through feedback on assessment drafts. Therefore, the practice of providing feedback on full drafts meant that assessment also could not be considered reliable.
- an excessive proportion of teaching contact hours dedicated to assessment support (as discussed in paragraphs 242 to 243) meant that students were not always required to independently demonstrate knowledge, skills and understanding of the subject matter in the way intended by design of the assessment, and therefore assessment could not be considered consistently valid.
- some staff encouraged students to paraphrase content to reduce Turnitin similarity scores instead of encouraging students to improve their academic practice (as discussed in paragraphs 244 to 260). Additionally, the assessment team saw seriously concerning examples of tutors pointing students towards the use of artificial intelligence and essay mills. In the view of the assessment team, this meant that assessments were not always requiring students to demonstrate knowledge and skills in the way intended by design of the assessment and therefore could not be considered consistently valid.
- providing advance access to questions that were to be used for summative examination assessment (as discussed in paragraphs 261 to 270) meant that assessments were not always requiring students to demonstrate knowledge and skills in the way intended by design of the assessment. This meant that assessment could not be considered consistently valid.
- the awarding of at times excessive marks that may not have been justified by students' performance (as discussed in paragraphs 271 to 279) meant that assessment was not always requiring students to demonstrate knowledge and skills in the way intended by design of the assessment. Therefore, assessment could not be considered consistently valid.

284. The assessment team's view is that these issues, relating to summative assessment practices in the courses reviewed delivered by RTC Education Ltd, each raise concerns when seen in isolation. However, when seen in the round, the assessment team regarded them as demonstrating multiple and systemic failings in assessment practice. When taken individually and in totality these issues raised significant concerns for the assessment team about the extent to which summative assessment required students to demonstrate that they

had sufficiently met learning outcomes and sufficiently assessed students' knowledge and skills.

285. In the assessment team's view, relevant awards granted to students were therefore not always credible. This is because in the findings of the assessment team as set out under paragraphs 280 to 284 above, students were not assessed effectively and assessments were not always valid and reliable.

Annex A: Ongoing conditions of registration

Condition B1: Academic experience

Scope

B1.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a provider (including, but not limited to, circumstances where a provider is responsible only for granting awards for students registered with another provider).

Requirement

B1.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B1.1, the provider must ensure that the students registered on each **higher education course** receive a high quality academic experience.

B1.3 For the purposes of this condition, a high quality academic experience includes but is not limited to ensuring all of the following:

- a. each **higher education course** is **up-to-date**;
- b. each **higher education course** provides **educational challenge**;
- c. each **higher education course** is **coherent**;
- d. each **higher education course** is **effectively delivered**; and
- e. each **higher education course**, as appropriate to the subject matter of the course, requires students to develop **relevant skills**.

B1.4 Insofar as **relevant skills** includes technical proficiency in the English language, the provider is not required to comply with B1.3.e to the extent that it is able to demonstrate to the OfS, on the balance of probabilities, that its English language proficiency requirements, or failure to have English language proficiency requirements, for one or more students, are strictly necessary as a matter of law because compliance with B1.3.e in respect of that student, or those students:

- i. would amount to a form of discrimination for the purposes of the Equality Act 2010;
and
- ii. cannot be objectively justified for the purposes of relevant provisions of that Act; and
- iii. does not fall within an exception or exclusion provided for under or by virtue of that Act, including but not limited to provisions of the Act that relate to competence standards.

Definitions

B1.5 For the purposes of this condition B1:

- a. “**appropriately informed**” will be assessed by reference to:
 - i. the time period within which any of the developments described in the definition of **up-to-date** have been in existence;
 - ii. the importance of any of the developments described in the definition of **up-to-date** to the subject matter of the **higher education course**; and
 - iii. the time period by which it is planned that such developments described in the definition of **up-to-date** will be brought into the **higher education course** content.

- b. “**coherent**” means a **higher education course** which ensures:
 - i. there is an appropriate balance between breadth and depth of content;
 - ii. subjects and skills are taught in an appropriate order and, where necessary, build on each other throughout the course; and
 - iii. key concepts are introduced at the appropriate point in the course content.

- c. “**educational challenge**” means a challenge that is no less than the minimum level of rigour and difficulty reasonably expected of the **higher education course**, in the context of the subject matter and level of the course.

- d. “**effectively delivered**”, in relation to a **higher education course**, means the manner in which it is taught, supervised and assessed (both in person and remotely) including, but not limited to, ensuring:

- i. an appropriate balance between delivery methods, for example lectures, seminars,
group work or practical study, as relevant to the content of the course; and
- ii. an appropriate balance between directed and independent study or research, as relevant to the level of the course.

e. **“higher education course”** is to be interpreted:

- i. in accordance with the Higher Education and Research Act 2017; and
- ii. so as to include, for the avoidance of doubt:
 - A. a course of study;
 - B. a programme of research;
 - C. any further education course that forms an integrated part of a higher education course; and
 - D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.

f. **“relevant skills”** means:

- i. knowledge and understanding relevant to the subject matter and level of the **higher education course**; and
- ii. other skills relevant to the subject matter and level of the **higher education course** including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences.

g. **“up-to-date”** means representative of current thinking and practices in the subject matter to which the **higher education course** relates, including being **appropriately informed** by recent:

- i. subject matter developments;
- ii. research, industrial and professional developments; and
- iii. developments in teaching and learning, including learning resources

Condition B2: Resources, support and student engagement

Scope

B2.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a provider (including, but not limited to, circumstances where a provider is responsible only for granting awards for students registered with another provider).

Requirement

B2.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B2.1, the provider must take all reasonable steps to ensure:

- a. each **cohort of students** registered on each **higher education course** receives **resources** and **support** which are sufficient for the purpose of ensuring:
 - i. a high quality academic experience for those students; and
 - ii. those students succeed in and beyond higher education; and

- b. effective **engagement** with each **cohort of students** which is sufficient for the purpose of ensuring:
 - i. a high quality academic experience for those students; and
 - ii. those students succeed in and beyond higher education.

B2.3 For the purposes of this condition, “all reasonable steps” is to be interpreted in a manner which (without prejudice to other relevant considerations):

- a. focuses and places significant weight on:
 - i. the particular academic needs of each **cohort of students** based on prior academic attainment and capability; and
 - ii. the principle that the greater the academic needs of the **cohort of students**, the number and nature of the steps needed to be taken are likely to be more

significant;

b. places less weight, as compared to the factor described in B2.3a., on the provider's financial constraints; and

c. disregards case law relating to the interpretation of contractual obligations.

Definitions

B2.4 For the purposes of this condition B2:

a. "**academic misconduct**" means any action or attempted action that may result in a student obtaining an unfair academic advantage in relation to an **assessment**, including but not limited to plagiarism, unauthorised collaboration and the possession of unauthorised materials during an **assessment**.

b. "**appropriately qualified**" means staff have and maintain:

i. expert knowledge of the subject they design and/or deliver;

ii. teaching qualifications or training, and teaching experience, appropriate for the content and level of the relevant **higher education course**; and

iii. the required knowledge and skills as to the effective delivery of their **higher education course**.

c. "**assessment**" means any component of a course used to assess student achievement towards a **relevant award**, including an examination and a test.

d. "**cohort of students**" means the group of students registered on to the **higher education course** in question and is to be interpreted by reference to the particular academic needs of those students based on prior academic attainment and capability.

e. “**engagement**” means routine provision of opportunities for students to contribute to the development of their academic experience and their **higher education course**, in a way that maintains the academic rigour of that course, including, but not limited to, through membership of the provider’s committees, opportunities to provide survey responses, and participation in activities to develop the course and the way it is delivered.

f. “**higher education course**” is to be interpreted:

i. in accordance with the Higher Education and Research Act 2017; and

ii. so as to include, for the avoidance of doubt:

A. a course of study;

B. a programme of research;

C. any further education course that forms an integrated part of a higher education course; and

D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.

g. “**physical and digital learning resources**” includes, as appropriate to the content and delivery of the **higher education course**, but is not limited to:

i. physical locations, for example teaching rooms, libraries, studios and laboratories;

ii. physical and digital learning resources, for example books, computers and software;

iii. the resources needed for digital learning and teaching, for example, hardware and

software, and technical infrastructure; and

iv. other specialist resources, for example specialist equipment, software and research tools.

h. “**relevant award**” means:

i. a **research award**;

ii. a **taught award**; and/or

iii. any other type of award or qualification in respect of a **higher education course**, including an award of credit granted in respect of a module that may form part of a larger **higher education course**, whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.

i. “**research award**” and “**taught award**” have the meanings given in section 42(3) of the Higher Education and Research Act 2017.

j. “**resources**” includes but is not limited to:

i. the staff team that designs and delivers a **higher education course** being collectively **sufficient in number, appropriately qualified** and deployed effectively to deliver in practice; and

ii. **physical and digital learning resources** that are adequate and deployed effectively to meet the needs of the **cohort of students**.

k. “**sufficient in number**” will be assessed by reference to the principle that the larger the cohort size of students, the greater the number of staff and amount of staff time should be available to students, and means, in the context of the staff team:

i. there is sufficient financial resource to recruit and retain sufficient staff;

ii. the provider allocates appropriate financial resource to ensuring staff are equipped to teach courses;

iii. **higher education courses** have an adequate number of staff, and amount of staff

time; and

iv. the impact on students of changes in staffing is minimal.

l. “**support**” means the effective deployment of assistance, as appropriate to the content of the **higher education course** and the **cohort of students**, including but not limited to:

i. academic support relating to the content of the **higher education course**;

ii. support needed to underpin successful physical and digital learning and teaching;

iii. support relating to understanding, avoiding and reporting **academic misconduct**;

and

iv. careers support,

but for the avoidance of doubt, does not include other categories of non-academic support.

Condition B4: Assessment and awards

Scope

B4.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a provider (including, but not limited to, circumstances where a provider is responsible only for granting awards for students registered with another provider).

Requirement

B4.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B4.1, the provider must ensure that:

- a. students are **assessed effectively**;
- b. each **assessment** is **valid** and **reliable**;
- c. **academic regulations** are designed to ensure that **relevant awards** are **credible**;
- d. subject to paragraph B4.3, in respect of each **higher education course**, **academic regulations** are designed to ensure the effective assessment of technical proficiency in the English language in a manner which appropriately reflects the level and content of the applicable **higher education course**; and
- e. **relevant awards** granted to students are **credible** at the point of being granted and when compared to those granted previously.

B4.3 The provider is not required to comply with B4.2d to the extent that:

- a. a **higher education course** is assessing a language that is not English; or
- b. the provider is able to demonstrate to the OfS, on the balance of probabilities, that its **academic regulations**, or failure to have any **academic regulations**, for assessing technical proficiency in the English language for one or more students are strictly necessary as a matter of law because compliance with B4.2d in respect of that student, or those students:

- i. would amount to a form of discrimination for the purposes of the Equality Act 2010; and
- ii. cannot be objectively justified for the purposes of relevant provisions of that Act; and
- iii. does not fall within an exception or exclusion provided for under or by virtue of that Act, including but not limited to provisions of the Act that relate to competence standards.

Definitions

B4.4 For the purposes of this condition B4:

- a. “**academic misconduct**” means any action or attempted action that may result in a student obtaining an unfair academic advantage in relation to an **assessment**, including but not limited to plagiarism, unauthorised collaboration and the possession of unauthorised materials during an **assessment**.
- b. “**academic regulations**” means regulations adopted by the provider, which govern its **higher education courses**, including but not limited to:
 - i. the assessment of students’ work;
 - ii. student discipline relating to academic matters;
 - iii. the requirements for **relevant awards**; and
 - iv. the method used to determine classifications, including but not limited to:
 - A. the requirements for an award; and
 - B. the algorithms used to calculate the classification of awards.
- c. “**assessed effectively**” means assessed in a challenging and appropriately comprehensive way, by reference to the subject matter of the **higher education course**, and includes but is not limited to:
 - i. providing stretch and rigour consistent with the level of the course;
 - ii. testing **relevant skills**; and
 - iii. **assessments** being designed in a way that minimises the opportunities for **academic misconduct** and facilitates the detection of such misconduct where it

does occur.

d. “**assessment**” means any component of a course used to assess student achievement towards a **relevant award**, including an examination and a test.

e. “**credible**” means that, in the reasonable opinion of the OfS, **relevant awards** reflect students’ knowledge and skills, and for this purpose the OfS may take into account factors which include, but are not limited to:

i. the number of **relevant awards** granted, and the classifications attached to them, and the way in which this number and/or the classifications change over time and compare with other providers;

ii. whether students are **assessed effectively** and whether **assessments** are **valid** and **reliable**;

iii. any actions the provider has taken that would result in an increased number of **relevant awards**, and/or changes in the classifications attached to them, whether or not the achievement of students has increased, for example, changes to assessment practices or **academic regulations**; and

iv. the provider’s explanation and evidence in support of the reasons for any changes in the classifications over time or differences with other providers.

f. “**higher education course**” is to be interpreted:

i. in accordance with the Higher Education and Research Act 2017; and

ii. so as to include, for the avoidance of doubt:

A. a course of study;

B. a programme of research;

C. any further education course that forms an integrated part of a higher education course; and

D. any module that forms part of a higher education course, whether or not that

module is delivered as an integrated part of the course.

g. “**relevant award**” means:

i. a **research award**;

ii. a **taught award**; and/or

iii. any other type of award or qualification in respect of a **higher education course**,

including an award of credit granted in respect of a module that may form part of a

larger **higher education course**, whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.

h. “**relevant skills**” means:

i. knowledge and understanding relevant to the subject matter and level of the **higher education course**; and

ii. other skills relevant to the subject matter and level of the **higher education course** including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences.

i. “**reliable**” means that an **assessment**, in practice, requires students to demonstrate knowledge and skills in a manner which is consistent as between the students registered on a **higher education course** and over time, as appropriate in the context of developments in the content and delivery of the **higher education course**.

j. “**research award**” and “**taught award**” have the meanings given in section 42(3) of the Higher Education and Research Act 2017.

k. “**valid**” means that an **assessment** in fact takes place in a way that results in students demonstrating knowledge and skills in the way intended by design of the assessment.



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