

Regulatory case report for London College of Business Studies – Specific Ongoing Condition B2A

Summary

This case report explains why we have decided to impose a specific condition of registration on London College of Business Studies (the “Provider”) in relation to ongoing condition B2.

London College of Business Studies has satisfied the initial conditions of registration with the OfS.

However, a Quality and Standards Review (“QSR”) by the Quality Assurance Agency (QAA) has identified the following concerns, which could pose risks to quality for students:

1. No robust and credible plans in place for recruiting additional support staff
2. Some aspects of student support are as yet untested.

The OfS has imposed a specific ongoing condition of registration which requires London College of Business Studies to notify the OfS if its forecast or actual student numbers reach or exceed 300 full-time equivalent. If this happens, the Provider is required to submit to the OfS a Student Support Plan, setting out the actions it will take/is undertaking to ensure that all students receive a high-quality academic experience and are adequately supported to succeed in and benefit from higher education.

Reasons for the specific ongoing condition of registration

In October 2019, the Provider underwent a QSR conducted by the QAA for Higher Education acting as the Designated Quality Body (“DQB”) which assessed the college against 12 core practices of the UK Quality Code for Higher Education. The QAA concluded that all 12 of the core practices were ‘met’; however the following two core practices were met to a ‘moderate’ level of confidence:

- Q3: The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience
- Q9: The provider supports all students to achieve successful academic and professional outcomes.

The reason the QAA concluded that it has a ‘moderate’ level of confidence related to the following concerns:

Under core practice Q3, the QAA was concerned that:

‘...many of the support staff functions are currently being covered by two senior staff who have multiple and varied roles, and although the College acknowledged the need to recruit more staff to support its development, the team was not provided with robust or credible plans or timescales for this.’ (paragraph 180 of the QSR report)

‘Although conversations with staff [M4-5] indicated an awareness of the need to recruit additional support staff, the College does not have a definitive strategy in place for this. It was evident from meetings with senior staff [M1] that growth in student numbers, and therefore income, is key to the recruitment and retention of additional staff, and for ensuring that a broader range of skills, for example for support functions such as welfare, learning support and careers support, are available.’ (paragraph 181 of the QSR report)

Under core practice Q9, the QAA was concerned that:

‘Some aspects of student support are as yet untested and plans for future staffing of student support mechanisms are not definitive, robust or credible, being dependent on how the College develops in terms of its student numbers and its ability to recruit appropriate support staff.’ (paragraph 291 of the QSR report)

‘The Learning and Teaching Policy includes aims relating to student skills development, focusing on encouraging independent learning, development of communication skills, development of skills and reflective practice and development of employability skills. [033] The College has policies addressing particular needs, such as learning difficulties and mental health, [154] disability [117] and reasonable adjustments. [153] The team found that the staff structure does not identify staff to support these policies [052, 111] and the policies lack detail on responsibilities for implementation.’ (paragraph 281 of the QSR report)

The QSR report also highlighted the following concerns despite concluding that the core practice was met to a ‘high’ level of confidence:

- Q4: The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience:
‘Some roles are, however, wide-ranging, which is also evident from the current organisational structure, [052, 111] which indicates a number of posts being covered by staff who are often taking on multiple roles, and this was further evidenced by the overlap of staff between meetings at the visit, particularly between the senior staff and support staff meeting. [M1, M4] This is a stretching model but manageable within the current student numbers, although the student support capacity has not been tested by students with additional support needs. Staff demonstrated an understanding of their roles and responsibilities in providing support services for students, [M1, M4], while also acknowledging that some staff are stretched across several roles and there is a need to appoint additional support staff particularly if student numbers increase.’ (paragraph 199 of the QSR report)

Relevant OfS condition of registration

It is the OfS’s view that, should the Provider significantly increase its student numbers, the issues raised by the QAA indicate a risk to ensuring the delivery of a high-quality academic experience for all students and ensuring students succeed in and beyond higher education. The condition of registration relevant to these concerns is condition B2 (quality and standards).

Requirement B2.2.a of condition B2 requires a provider to take all reasonable steps to ensure 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.

The QAA's concerns in relation to core practices Q3 and Q9 are as follows:

1. No robust and credible plans in place for recruiting additional support staff
2. Some aspects of student support are as yet untested.

This could undermine the support the Provider provides to students should its student numbers increase. It could also have an impact on students' academic experience, their ability to complete the course, and the outcomes they achieve from their course.

Decision

We require London College of Business Studies to notify the OfS if its forecast or actual student numbers reach or exceed 300 full-time equivalent (FTE). If this happens, the Provider is required to submit to the OfS a Student Support Plan, setting out the actions it will take/is undertaking to ensure that all students receive a high-quality academic experience and are adequately supported to succeed in and benefit from higher education. The OfS will review the credibility and impact of the actions set out in the Student Support Plan.

Our requirements are triggered by growth because many of the concerns raised in the October 2019 QSR relate to growth, and more specifically there being a lack of definitive, credible and robust planning for growth. The OfS is therefore seeking to reduce the risk to students, in the event that the Provider significantly increases its student numbers after it is registered, by ensuring that the Provider has suitably planned for growth, so that it can be managed effectively and does not lead to quality risks for students, or to a potential breach of condition B2.

The text set out below constitutes the specific ongoing condition imposed on London College of Business Studies, pursuant to section 6(1) of the Higher Education and Research Act 2017, and is referred to as 'Specific Ongoing Condition B2A (London College of Business Studies)'.

Specific Ongoing Condition B2A (London College of Business Studies)

B2A.1 Where the Provider identifies that the number of Students it is providing higher education to reaches or exceeds 300 Students, or is forecast to reach or exceed 300 Students, the Provider must:

- a. notify the OfS of the actual and forecast Student numbers at the Specified Time and in the Specified Manner; and
- b. develop a Student Support Plan and submit that plan to the OfS at the Specified Time and in the Specified Manner.

Definitions

“Forecast Student Numbers” means forecasts showing predicted Student numbers over the next 12 months.

“Governing Body” means persons responsible for the management of the provider, as defined in section 85 of the Higher Education and Research Act 2017.

“OfS” means Office for Students.

“Provider” means London College of Business Studies.

“Specified Manner” means:

- a. in relation to the requirement in paragraph B2A.1(a) above, submitted by email to regulation@officeforstudents.org.uk; and
- b. in relation to the requirement in paragraph B2A.1(b) above, submitted via the 'OfS Regulation – Submissions' section of the OfS portal.

“Specified Time” means:

- a. in relation to the requirement in paragraph B2A.1(a) above, within 10 working days after the Provider becomes aware that its actual Student numbers have reached or exceeded 300 FTE or its Forecast Student Numbers will reach or exceed 300 FTE.
- b. in relation to the requirement in paragraph B2A.1(b) above, within 25 working days after the Provider becomes aware that its actual Student numbers have reached or exceeded 300 FTE or its Forecast Student Numbers will reach or exceed 300 FTE.

“Student” means a full-time equivalent student who is either registered on a higher education course at the Provider or is on a higher education course that is being delivered by the Provider.

“Student Support Plan” means a document that sets out:

- a. the steps that the Provider will undertake, is undertaking or has undertaken, to ensure that, if its Student numbers reach or exceed 300 Students:
 - i. Student support functions will be maintained and developed; and
 - ii. all Students will be adequately supported and have access to a high-quality academic experience; and
 - iii. Students are adequately supported to succeed in and beyond higher education.
- b. how the Governing Body will monitor its Student support functions to ensure that all Students receive a high-quality academic experience and are adequately supported to succeed in and benefit from higher education.