

## Regulatory case report for London Churchill College Ltd – specific ongoing condition BA

### Summary

This case report explains why we have decided to impose a specific condition of registration on London Churchill College Ltd.

London Churchill College Ltd has satisfied the initial conditions of registration with the OfS.

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

1. The college does not routinely provide sufficient support to students on work experience elements of their courses, particularly the Higher National Diploma (HND) in Social Care. It is also not consistently assessing these work experience elements.
2. The college does not routinely take sufficient action to monitor and address attendance rates on some courses including Business courses and the HND in Social Care. It does not always produce definitive data on student attendance or plans to ensure that students are suitably supported.
3. The college does not have a robust approach to securing academic standards delivered in partnership with work placement providers for the HND in Social Care course. The college does not manage its relationships with placement providers effectively to ensure that students, college staff, and the placement providers understand their respective roles and responsibilities.

London Churchill College Ltd has stated that it has already taken a number of actions to address these concerns. We have imposed a specific ongoing condition of registration which requires the college to have a future assessment of quality and standards to test the credibility and impact of these actions.

### Reasons for the specific condition of registration

In a September 2019 Quality and Standards Review (QSR), the Quality Assurance Agency for Higher Education (QAA), in its role as the Designated Quality Body (DQB) assessed the college against twelve core practices of the UK Quality Code for Higher Education. The QAA concluded that nine of these core practices were 'met' and that the following three core practices were 'not met':

- Core practice Q8: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the academic experience is high-quality irrespective of where or how courses are delivered and who delivers them.

- Core practice Q9: The provider supports all students to achieve successful academic and professional outcomes.
- Core practice S3: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

The QAA's concerns included the following:

Under core practice Q8, the QAA was concerned that:

'...although the external examiner reports indicate that the academic experience for students is of a high quality, the College does not have effective and comprehensive arrangements in place to ensure a high-quality work experience for those students for which this is a mandatory requirement of their programme (the [Higher National Diploma ("HND")] in Health and Social Care), which therefore presents a risk to quality. Students do not always provide employers' details when they obtain work experience and some students are known to be undertaking work experience without appropriate contact with College supervisors to conduct the suitability checks, risk assessments and provide support, as outlined in the College's own policies. In addition, it is not clear how the College processes assessment results for Unit 4 – Personal and Professional Development on the HND in Health and Social Care, in order to record the assessment as not being completed.'

Under core practice Q9, the QAA was concerned that:

'...while it has appropriate mechanisms to support students who are engaged and fully committed to their programme and offers many opportunities for support, including the role of the personal tutor which is vital to this, enabling these students to achieve their academic and professional outcomes, there is a lack of concrete and timely action on attendance rates and timely completion of programmes, especially in relation to the HND in Health and Social Care, where failure to complete appropriate work experience means that students are not able to meet all of the requirements for their award. Coupled with this finding is that of the College's inability to produce definitive student data and evidence-based plans for ensuring that all students are supported to achieve successful academic and professional outcomes. The team questioned the ability of the data the College collects to effectively monitor student retention and achievement with a view to supporting all students to achieve successful academic and professional outcomes and to put in place robust plans to mitigate risks to students being unable to complete.'

Under core practice S3, the QAA was concerned that, with regard to the college's Higher National Diploma in Health and Social Care, it does not:

'...follow the requirements set out in its own documentation to manage its relationships with placement providers to effectively discharge its responsibilities for enabling students to have appropriate opportunities to achieve required learning outcomes; ensure that staff, students and providers of work experience understand their respective roles and responsibilities in relation to work experience and learning outcomes expected; or have a robust approach to securing standards delivered in

partnership with providers of work experience for those students on the HND in Health and Social Care.'

## **Relevant OfS conditions of registration**

Our view is that the concerns raised by the QAA pose quality and standards risks which are relevant to conditions B1, B2 and B4, including as follows:

### **Condition B1**

This condition requires a provider to 'deliver well-designed courses that provide a high quality academic experience for all students and enable a student's achievement to be reliably assessed'.

The QAA's concerns in relation to core practice Q8 indicate that the college is failing to:

- provide sufficient support to students on work experience elements of their courses
- consistently assess these work experience elements.

This could undermine the quality of students' learning experience and the outcomes they achieve from their course.

### **Condition B2**

This condition requires a provider to 'provide all students, from admission through to completion, with the support that they need to succeed in and benefit from higher education'.

The QAA's concerns in relation to core practice Q9 indicate that the college is failing to:

- take concrete and timely action on attendance rates and timely completion of courses
- produce definitive student data and plans for ensuring that students are sufficiently supported.

This could undermine the support the college provides to students. It could also have an impact on students' learning experience, their ability to complete the course, and the outcomes they achieve from their course.

### **Condition B4**

This condition requires a provider to ensure that 'qualifications awarded to students hold their value at the point of qualification and over time, in line with sector recognised standards.'

The QAA's concerns in relation to core practice S3 indicate that the college is failing to:

- effectively manage relationships with placement providers
- ensure that staff, students, and providers of work experience understand their respective roles and responsibilities
- ensure a robust approach to securing standards for work experience delivered in partnership with other providers.

This could undermine the value of qualifications awarded to students where these qualifications have a work-experience component.

## Decision

We require London Churchill College Ltd to undergo a future assessment of quality and standards by the DQB. The DQB will assess the college in relation to the concerns identified in the September 2019 QSR. We note that the college has stated that it has taken a number of actions following the September 2019 QSR to address the concerns raised by the DQB. The credibility and impact of these actions will be tested by the DQB as part of its assessment.

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

## Specific Ongoing Condition BA (London Churchill College Ltd)

### Requirement to co-operate with assessment of quality and standards by the Designated Quality Body

BA.1 The Provider must comply with any written directions issued by the OfS (from time to time) in connection with its co-operation with an assessment of quality and standards undertaken by the Designated Quality Body in respect of the concerns raised by the Designated Quality Body in its assessment of the Provider dated September 2019 (hereafter 'Concerns').

BA.2 For the purposes of paragraph BA.1, directions issued by the OfS may cover (but are not limited to) the following subject matter in connection with the Concerns:

- (a) the timing and scope of the quality and standards assessment;
- (b) descriptions of information and documents that must be made available to the Designated Quality Body and/or the OfS; and
- (c) any other specified actions the Provider must take or refrain from taking which the OfS reasonably considers are necessary or appropriate for ensuring that the assessment can be conducted effectively.

BA.3 This condition will cease to have effect on 31 December 2023.

BA.4 Where this condition ceases to have effect, that cessation does not in any way affect the ability of the OfS to investigate and/or take any form of regulatory or enforcement action in respect of any non-compliance (whether or not it remains ongoing in nature) which took place during the period that this condition was in effect.

BA.5 For the purposes of this condition:

"Designated Quality Body" means the body designated under Schedule 4 of the Higher Education and Research Act 2017 to perform the assessment functions under section 23 of that Act;

"OfS" means Office for Students; and

"Provider" means London Churchill College Ltd.