

**Office for
Students**



Quality assessment report

**Business and management courses
at BPP University Ltd**

November 2022 – January 2023

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Summary

Each year, the Office for Students (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.

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 6 January 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 BPP University Ltd.
2. BPP University Ltd (the university) offers a range of degree courses in business and management, delivered through BPP University Business School.
3. The OfS appointed an assessment team on 4 November 2022 that consisted of three academic expert assessors and a member of OfS staff. The team was asked to give their advice and judgements about the quality of the university'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 BPP University Ltd, including about student attendance and achievement

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

- specific modules on the university's virtual learning environment.
5. It visited BPP University Ltd on two occasions in December 2022 and January 2023 during which time it had a tour of facilities and met with staff and students.
 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 the university. This process followed the OfS's risk-based approach.
 8. This risk-based approach also led to a focus on the university's undergraduate courses.
 9. The risk-based approach led the assessment team to consider in detail the following areas:
 - the course design of BSc Accounting and Finance
 - student support arrangements
 - resources provided during in-centre exams.
 10. The assessment team did not identify any concerns from its review of this information relating to conditions B1: Academic experience, B2: Resources, support and student engagement, or B4: Assessment and awards.

Introduction and background

11. 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.
12. 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 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.
13. This report does not represent any decision of the OfS in respect of compliance with conditions of registration.
14. The Office for Students (OfS) appointed an assessment team in November 2022 to assess the quality of the business and management courses provided by BPP University Limited (i.e. those courses delivered by BPP University Ltd, excluding courses delivered by partner organisations and transnational education). The assessment included matters that fall within the scope of ongoing conditions B1, B2 and B4. The scope of the assessment, the evidence considered, and the findings of the assessment team are summarised in this report.
15. This report represents the conclusions of the team as a result of its consideration of information gathered during the course of the assessment to 26 January 2023. The report does not take into account matters which may have occurred subsequent to that period.
16. 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 BPP University Ltd, including student outcomes data, numbers of students and any notifications received.

Context

17. BPP University Ltd is part of the BPP Education Group. However, it is a distinct legal entity and was awarded its own degree awarding powers in 2007. Business and management courses at the university are delivered through the BPP University Business School, which offers a range of degree courses. At undergraduate level, the university offers two courses, BSc Accounting and Finance and BSc Accounting and Finance with Digital Business. Both courses are full-time with three start dates in the year: September, January and May. At postgraduate level the university offers MSc Management, MSc Management with Data Analytics, MSc Management with Digital Marketing and MSc Management with Project Management. All courses are offered full-time and are designed with rolling start dates throughout the year.
18. BPP University Ltd has a number of study locations throughout the UK. The business and management undergraduate courses are offered in London and concentrated in the Shepherds

Bush study centre. The postgraduate courses are offered in London and Manchester, with the London courses taught from both Shepherds Bush and the newly refurbished Portsoken Street centre.

19. Overall, based on the latest available 'Size and shape of provision data dashboard', BPP University Ltd had a student population in 2021-22 of 15,740 (taught or registered headcount, excluding offshore TNE).² This included 3,790 undergraduate students, of which 410 were part-time and 910 were apprenticeship students, and 11,900 postgraduate students, of which 1,780 were part-time and 160 were apprenticeship students.
20. Based on information supplied by the university, for the academic year 2022-23 the university had 10,246 students (FTE) on its business and management courses, of which 8,680 were on postgraduate courses and 1,567 were on undergraduate courses.
21. There are no partnership arrangements relevant to courses in business and management at the university.
22. Based on information supplied by the university, the two undergraduate courses offered are targeted at international students, who make up over 93 per cent of the cohort. Of these, the vast majority come from India and Pakistan to study, and the university has well established links with recruitment agents in key regional areas. Because of this, the university reported that the coronavirus pandemic had a disproportionately negative impact on its undergraduate cohort, as many students travelled back to their home countries and were faced with extremely difficult personal circumstances.
23. The initiatives for change that are underway or had been planned by the university before the OfS investigation was opened, which will be referred to in more detail in the report where relevant, are:
 - A re-design from 2020 of an online platform or 'virtual campus' called the Hub for student access to academic technical and practical support, as well as all course-specific online learning materials, activities and resources (including videos of lectures and lecture notes, and timetabling). The Hub is also used to monitor engagement and need for additional support.
 - The iterative development since 2020 of a specific role called engagement officer dedicated entirely to support and engagement. These engagement officers support and engage Level 4 students from pre-arrival to the UK and through their first term.
 - The strategy 'Connect first, educate second' was launched in 2021. This strategy placed a greater emphasis on the university building connection and relationships with students as the foundation for academic success.
 - A dedicated space on the Shepherd's Bush campus, trialled in 2021-22 and since 2022-23, open daily for drop-in in-person support on academic, practical and technical needs that may impact on the academic experience.

² Source: [OfS size and shape of provision data dashboard](#), as published on 12 April 2023.

- Monitoring of engagement and support needs via the Daily Pulse survey, in which students are asked to rate the tutor and session from 1-5.
- In-programme activities in the first term to develop academic skills and engagement, launched in 2022-23.
- Access to university laptops for in-person assessments, which use the online platform Inspira.

24. Most support and engagement arrangements and roles were initiated in 2020 and rolled out in 2021-22 and 2022-23, and the university described them as a response to issues highlighted by the coronavirus pandemic.

Assessment process

Evidence gathering

25. The assessment team gathered a range of information to determine whether there were possible concerns relating to requirements as set out in conditions of registration B1, B2 and B4. The assessment team gathered information through an initial request for data from the university (3 November 2022) and two site visits on 5 December 2022 and 25-26 January 2023.

26. During the visits it undertook:

- a range of staff interviews (with academic and professional service staff)
- a range of student interviews (including students studying at Levels 4, 5, 6 and 7)
- a physical and digital facilities tour and review of records and documents.

27. The assessment team was also granted access to the virtual learning environment (VLE) from 5 December 2022 to 26 January 2023. 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 arising from its analysis of information already published. The university fulfilled all requests in a timely fashion and provided the additional information and data on 1 December 2023 and 18 January 2023.

28. The assessment team first reviewed general monitoring intelligence, including student outcomes data held by the OfS, and initial data provided by the university. Following on from the first visit the team determined to focus on the undergraduate provision (BSc Accounting and Finance and BSc Accounting and Finance with Digital Business). Although the postgraduate provision is larger than the undergraduate, the team viewed this to be in line with a risk-based approach, based on differential student completion data.³ The completion rate for the BSc Accounting and Finance has consistently been below the B3 numerical threshold of 75 per cent for full-time first degree students in each of the four years for which data was available. In comparison, the cohort of MSc students, with significantly more entry points in the year, had a completion rate above the B3 numerical threshold of 80 per cent for full-time postgraduate taught masters' students. In addition, the postgraduate courses have been running longer at the university, and are more established, whereas the undergraduate courses are a more recent addition to the portfolio.

³ Source: OfS internal analysis of the student data used to construct the published completion measures within the student outcomes dashboard from September 2022, subset to students taught at BPP University Ltd within the business and management CAH2 subject area. It covered entrants in academic years 2013-14 to 2016-17 inclusive.

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

Condition B1: Academic experience

29. The assessment team reviewed a range of evidence relevant to condition B1 (see Annex A for the full text of the condition) in seeking to understand whether students on the BSc Accounting and Finance and BSc Accounting and Finance with Digital Business have received a 'high quality academic experience', including that the relevant courses are 'up-to-date' (B1.3.a), provide 'educational challenge' (B1.3.b), are 'coherent' (B1.3.c), are 'effectively delivered' (B1.3.d) and require 'students to develop relevant skills' (B1.3.e).

30. The initial information provided by the university, and reviewed by the assessment team, included:

- course and module specifications for the relevant courses across Levels 4 to 6
- programme handbooks for the relevant courses across Levels 4 to 6
- module attainment data for Level 4 modules on the relevant courses (for academic year 2021-22)
- any student complaints and their outcomes (during the academic year 2021-22)
- all the documents from the latest periodic review process when the BSc Accounting and Finance programme was revalidated in 2022.

31. Alongside the initial information provided by the university, the assessment team reviewed National Student Survey (NSS) data for 2019-20, 2020-21, and 2021-22, both quantitative and qualitative, and student outcomes data including measures on completion, continuation and progression.

32. This initial information is potentially relevant to the courses under consideration being 'up-to-date', providing 'educational challenge', being 'coherent' and requiring 'students to develop relevant skills'.

33. During on-site visits, the assessment team met with students studying the courses under consideration across Levels 4 to 6, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to courses being 'up-to-date', providing 'educational challenge', being 'coherent', being 'effectively delivered' and requiring 'students to develop relevant skills'.

34. The assessment team requested additional information from the university as detailed under 'Information gathering' above. (All data noted below was sourced from the university.) This included:

- summaries of outcomes from course-level student feedback surveys (for all levels in 2020-21)

- module and course leader reports or evaluations (for all levels in 2020-21)
- minutes of programme committees (for all levels in 2020-21)
- external examining reports for the relevant courses (for all levels in 2020-21).

35. This information is relevant to all aspects of condition B1.3, that students receive a 'high quality academic experience'.

36. The assessment team reviewed the VLE site. This information is particularly relevant to courses being 'up-do-date' (B1.3a), 'coherent' (B1.3.c) and 'effectively delivered' (B1.3.d).

37. The assessment team's investigation drew on multiple sources of information, as identified above, that are relevant to condition B1. Following a risk-based approach, the assessment team considered the area set out below.

Course design of BSc Accounting and Finance

38. The assessment team reviewed and compared continuation and completion rates for cohorts on the 2015, 2019 and 2020 versions of the BSc Accounting and Finance, which correspond to Level 6, 5 and 4 of the 2022-23 student cohorts. They reviewed the relevant programme and module handbooks and validation documents and held discussions with award (programme) leaders, past and present, and a range of current module leaders.

39. The assessment team was supplied with data on the completion rates of students for the BSc Accounting and Finance, covering the cohorts entering higher education from the academic years 2013-14 to 2016-17, inclusive. The evidence provided showed completion rates consistently below the B3 numerical threshold of 75 per cent for full-time first degree students.⁴ This contrasted with continuation rates for the undergraduate students that were above the OfS B3 numerical threshold. A below-threshold completion rate suggests that a proportion of students may have difficulty meeting learning outcomes for the more specialised units at higher levels, rather than the more basic Level 4 units.

40. The assessment team considered the delivery of the undergraduate courses in the context of this data. The key features of delivery for students identified by the assessor team were:

- curriculum delivery centred on a standard set of teaching materials for each module, drawing on the university's experience as a publisher of study guides for professional qualifications
- development and provision of the materials as the responsibility of the module leader, who had teaching experience on the relevant module and was directly responsible for briefing and supporting all the tutors teaching the material
- a team of tutors using the materials to provide a standard learning experience across all runs of the module, with the module leader performing coordination and guidance

⁴ Source: OfS internal analysis of the student data used to construct the published completion measures within the student outcomes dashboard from September 2022, subset to students taught at BPP University Ltd within the business and management CAH2 subject area. It covered entrants in academic years 2013-14 to 2016-17 inclusive.

- module leaders who usually taught review classes for any students who were required to resit an assessment
 - module provision that fits the way the academic year is organised on the undergraduate courses with three entry points in every calendar year requiring each module to be run several times in that period
 - all students on a module grouped in classes of around 40.
41. The provision of standard materials and plans meant that tutors were supported to provide an effective learning experience for students regardless of their point of entry. The model was used more extensively on the university's MSc programmes, with up to eight entry points within an academic year.
42. The original design of the BSc Accounting and Finance course in 2017, as set out in Handbook v1.2, was for a course that would attract and retain students by providing a clear set of exemptions from professional examinations in accounting, as well as an honours degree in the discipline. The result is that the course offered no variation from the path to the exemptions. This meant a lack of alternatives for students who turned out to be weak in some aspects of higher-level accounting, or were not motivated to continue the course because they realised it was a poor match to their needs.
43. The senior managers of the university volunteered to the assessment team that the lack of options within the course design may have contributed to the low completion rates (as set out in paragraph 39).
44. In addition, the requirements of professional bodies include a heavy emphasis on assessment through closed-book examinations. The opinion of the assessment team is that this could have also contributed to low completion rates if students were not well enough prepared for this type of assessment, not sufficiently motivated or alternatives were not available for those with special needs. Time-based, closed-book exams may also be harder for students where English is their second language. This may have been a factor for the undergraduate cohort at this university, where 93 per cent are international.
45. Staff at the university also explained to the team that some students had begun the BSc Accounting and Finance course because other family members had done so or because it was seen as the expected route into accounting and finance, rather than by considering whether the course was a good match for their individual needs and motivations.
46. Staff reported that students and recruiting agents had fed back to the university that some students wanted a more 'generalist' business qualification because they intended to go into family businesses or become entrepreneurs. The university also talked to employers, who highlighted that they require graduates with strong digital skills, alongside financial and accounting knowledge.
47. It is logical for a programme geared towards exemptions to have a large core curriculum because of the requirements of the professional bodies. While some higher education providers address this by providing options within a course to allow students to pursue different paths from specialist accounting such as finance, economics or general management, the university chose to develop an alternative course to run alongside the accounting and finance course, resulting in the development of BSc Accounting and Finance with Digital Business.

48. The alternative course, and the options it introduced, was therefore driven by student demand and current student feedback, recruiting agent and employer feedback. Staff were clear that the programme change had been devised and developed as a strategic step for the university's portfolio. BSc Accounting and Finance with Digital Business was launched in 2022 and therefore at the time of the assessment the course only had Level 4 students.
49. The BSc Accounting and Finance with Digital Business is, effectively, an alternative, less specialised, route that is not as constrained in its assessment methods by professional body requirements for closed-book examinations. A course seeking to maximise ACCA (the Association of Chartered Certified Accountants) exemptions needs to have an assessment strategy based on examinations. The BSc Accounting and Finance with Digital Business course can have a more coursework-based assessment strategy. More variety in methods of assessment may be expected to be to the benefit of students with an interest in more general management topics, including international students intending to return to the family business to work.
50. BSc Accounting and Finance with Digital Business is a distinct programme, but it shares all of the Level 4 units with BSc Accounting and Finance. Staff explained that students on the BSc Accounting and Finance programme could switch to BSc Accounting and Finance with Digital Business during the first year without any interruption of academic progress and that they monitored and supported students who wanted to make this change. Staff also said that there were mechanisms to catch whether students had made the right choice, including feedback from engagement officers.
51. The introduction of BSc Accounting and Finance with Digital Business, was in the view of the assessment team, a positive step. The evidence suggests that the university had responded well to the needs of their current and future students by providing an alternative course. The assessment team notes that the Level 4 students were the first to benefit from this change, and that the lack of an alternative route before 2022 would have adversely affected completion rates for all prior and existing Level 5 and 6 students.
52. Additional steps that could be taken include, but are not limited to, monitoring for individual module pass rates across all modules on both courses as it moves into the first cohorts at Levels 5 and 6. This will be an important indicator that the completion rates are improving.
53. Overall, the assessment team was satisfied that the university's actions were an appropriate response to the course design of BSc Accounting and Finance impacting on completion rates.

B1 Conclusions

54. The assessment team's investigation drew on multiple sources of information, as identified above, that are relevant to condition B1. Following a risk-based approach, it did not identify any concerns relating to condition B1 from reviewing this information.

Condition B2: Resources, support and student engagement

55. The assessment team reviewed a range of evidence relevant to condition B2 (see Annex A for the full text of the condition). It reviewed information relevant to the issue of whether the university has taken all reasonable steps to ensure that each cohort of students registered on the university's business and management courses is receiving 'resources and support'

(B2.2.a) that are sufficient for the purpose of ensuring a high quality academic experience, and that those students succeed in and beyond higher education. As set out in paragraph 39, the evidence provided showed completion rates consistently below the B3 numerical threshold of 75 per cent for full-time first-degree students. This indicated that a proportion of students may have had difficulty meeting learning outcomes for the more specialised units at higher levels, rather than the more basic Level 4 units.

56. In addition, the assessment team sought to understand whether the university has taken all reasonable steps to ensure 'effective engagement' (B2:2b) with each cohort of students registered on the business and management courses, sufficient for the purpose of ensuring a high-quality academic experience for those students, and that they succeed in and beyond higher education.
57. 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. The initial information provided by the university, and reviewed by the assessment team, included:
- a. Course and module specifications for the relevant courses across Levels 4 to 6.
 - b. Programme and student handbooks for the relevant courses across Levels 4 to 6.
 - c. Module attainment data for Level 4 modules on the relevant courses (for academic year 2021-22).
 - d. Any student complaints and their outcomes (during the academic year 2021-22).
 - e. All the documents from the latest periodic review process when the BSc Accounting and Finance programme was revalidated in 2022.
58. Alongside the initial information provided by the university, the assessment team reviewed National Student Survey (NSS) data for 2019-20, 2020-21, and 2021-22, both quantitative and qualitative, and student outcomes data, including measures on completion, continuation and progression. This initial information is relevant to the courses under consideration being 'up-to-date', providing sufficient 'resources and support' and 'effective engagement'.
59. During on-site visits, the assessment team met with students studying the courses under consideration across Levels 4 to 6, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to courses being 'up-to-date', providing 'educational challenge', being 'coherent', being 'effectively delivered' and requiring 'students to develop relevant skills'.
60. The assessment team requested additional information from the university as detailed under 'Information gathering' above. (All data noted below was sourced from the university.) This included:
- a. Summaries of outcomes from course-level student feedback surveys (for all levels in 2020-21).
 - b. Module and course leader reports or evaluations (for all levels in 2020-21).

- c. Minutes of programme committees (for all levels in 2020-21).
- d. Minutes of student-staff committee meetings.
- e. Connect First Educate Second materials.
- f. Student Support Business School Mission Statement.
- g. Support staff job descriptions.
- h. External examining reports for the relevant courses (for all levels in 2020-21).

61. This information is relevant to all aspects of condition B2.2, that the university provides sufficient 'resources, support and student engagement'.

62. The assessment team reviewed the VLE site. This information is particularly relevant to the provision of 'resources and support' (B2:2a) and 'effective engagement' (B2:2b). The assessment team's investigation drew on multiple sources of information, as identified above, that are relevant to condition B2. Following a risk-based approach, it considered the areas set out below.

63. Having considered the data relating to completion as discussed above in paragraph 39, the team held discussions with staff to help understand the university's approach to the student support journey. The assessment team noted that the completion rate data was only available for BSc Accounting and Finance, as BSc Accounting and Finance with Digital Business had not been running long enough for there to be any completion data.

64. The assessment team sought to understand the context of the undergraduate student cohort admitted to the undergraduate courses. The team were mindful that the student cohort was made up of 93 per cent international students, predominantly from South Asia (as set out in paragraph 22). Staff commented that many students on arrival are not used to the forms of support available and the ways of working that are expected of them at the university.

65. The key features of the delivery of the undergraduate courses identified by the assessment team are outlined above in paragraph 40. The dedicated support and engagement teams at the university comprised:

- Engagement officers within an engagement team for the business school, dedicated primarily to supporting Level 4 international students from pre-arrival in the UK, through their first term. The engagement team also supported the UK Visas and Immigration compliance team at the university by monitoring and driving progression through the course, attendance and engagement over the first term. Attendance, online engagement and resits assessments data were passed on to the retention manager, a role created in 2022.
- After term one, and for the remainder of the student's time on the programme, support was handed over to programme support officers and personal tutors (both dedicated roles rather than roles teaching staff take on). Personal tutors focused on pastoral care. The programme support officer was the first formal point of contact for academic queries, particularly those relating directly to the content of the programme the student is studying

on. Students can reach programme support officers both in-centre at the daily drop-in support centre and online.

- Students in the role of student ambassadors, rather than staff programme support officers, were intended to deal with simple queries such as Hub access. They were given basic training with training needs monitored, and a daily list of duties. Ambassadors escalated more significant support needs to the personal tutors and programme support officers.
- Academic tutors who taught the programme gave limited academic support, provided mostly during or immediately after a teaching session and often involving signposting to dedicated support and engagement staff.
- Professional services staff provided specialised support on technology, visas and finance, and other issues influencing the academic experience such as access to programme materials and timely arrival in the UK for international students.
- There was also a range of specialist student support based on the main university campus and accessible online, including the library, careers service, and safeguarding, mental health and wellbeing services, and disability services.

66. The university reported that the coronavirus pandemic had a disproportionately negative impact on its undergraduate cohort, as many students travelled back to their home countries and were faced with extremely difficult personal circumstances (as set out in paragraph 22). Due to the challenges faced by its students during the pandemic, the university introduced a number of initiatives to improve its student support offering. The university also ran a wide range of activities to help reengage those students who left the UK during the pandemic to provide advice and support to enable them to complete their course.

Student support arrangements

67. Beginning with the current Level 4 cohort who started in September 2022, the first four weeks of term for new undergraduate students were spent on a business game called 'Pitch Perfect' where students were put into teams from across the whole year group. This required development of a business idea, with accountancy and cash flow considerations. Staff explained that this game increases student confidence, helps them mix with other students, and begins to introduce them to academic skills and teaching material. Thirty staff and 100 students took part in September 2022. Level 4 students and academic and engagement staff who met with the team were all enthusiastic about Pitch Perfect. While introducing key academic concepts, a main function of Pitch Perfect was to encourage engagement with the course and with other students. As an introduction to the course and the university, this activity was suitably focused on term one, Level 4 students only.

68. The engagement team in the business school, including the engagement officers, were introduced in 2020, as a result of issues perceived to arise during the coronavirus pandemic for Level 4 students. Engagement officers, a major investment for the university were dedicated to supporting and engaging Level 4 students in order to help with their transition into university. The team has had a beneficial impact in term one of Level 4.

69. Engagement officers were kept fully updated about changes in teaching and services so they could be alert to potential issues and provide relevant advice. They made regular proactive

contact with students to check they were all right, prioritising those with low attendance and engagement with online systems, and provided reminders for assessment submission, and general support and guidance. Where needed, they signposted students to other sources of support. They tried to meet students in person as well as remotely, and also encouraged them to attend focus groups to inform future improvements. Engagement officers formed an enthusiastic team that gave the assessment team examples of how they had developed an in-depth understanding of the international student body through learning on the job. A member of the engagement team, stated that learning was shared in 'Business Conference Meetings' (i.e. away days) and multiple 'spotlight' meetings when topics of special interest arose and needed discussion.

70. The groups of Level 4 and 5 students the assessment team spoke with endorsed the engagement team support as working well, and one student in the Level 4 group said the support made them more engaged with the university and more excited to start the course, even before term started. According to the 'Draft minutes of the School of Business Education and Standards Board meeting of 25th May 2022', the engagement officers reduced first-term assignment non-submission rates from 14 per cent to 4 per cent in term one. There was, at the time of the assessment, no formal measure of continued impact beyond term one, for example whether submission rates were also higher in term two and beyond.
71. The assessment team asked the university in what other ways the impact of the engagement officers and the other new support and engagement initiatives would be measured. Staff replied that this would be through the key metrics of engagement, the use of online resources as well as class attendance with RAG ratings, continuation and completion. Following a decision ratified by the School of Business Education and Standards Board of 11 October 2021, the dashboards used by the university to monitor student data were in the process of being updated to better enable this. This is an iterative process that was begun in 2021.
72. Engagement officers provided most of their support in term one (with informal support thereafter if contacted by the student). After term one they handed over to the programme support officers, who told the assessment team that this was not a formal process. Staff said that where there were ongoing issues or potential red flags, the engagement officers would pass the information onto programme support officers, and they would also keep a light touch check on such students. Programme support officers from term two of Level 4, and in Levels 5 and 6, were the first point of contact for student queries relating to academic support.
73. The Level 4, 5 and 6 students that the team met with all said they took part in, and all volunteered the usefulness of, support focus groups, begun in 2022 which they described as happening monthly. They said that sometimes these were used to support students with services such as the library and at other times they were used for inductive development of new academic and pastoral support initiatives. The assessment team queried with staff how this worked with multiple entry points and were told that sessions on, for example, library support, were repeated as needed throughout the year. These sessions were intended to always be live sessions so that they responded to emerging issues, though the Hub also contained videos and other materials that support students. These focus groups appear to be a useful addition to the student support services offered by the university across all levels of the student body, although some, such as those directed at library support, were particularly appropriate for new Level 4 students.

74. Measures to support resit students across all levels in 2020-21 specifically were revision boot camps and workshops, one-to-one revision plans and auto-marked exam practice in the form of multiple-choice questions (MCQ).
75. The evidence suggests that support to help Level 5 and 6 students to completion had been limited as a temporary reactive response to the coronavirus pandemic. It had not been formalised into a sustained response.
76. The university told the assessment team that they were considering implementing a similar support model in the future for students at other milestones, but nothing firm had been decided. It is the assessment team's view that this might be a helpful addition for this specific cohort of students, should completion rates remain below the threshold in future years.
77. It is the view of the assessment team that changes in the support for Level 4 students, which had been put into effect, should have a positive impact in future years, despite their having been tailored to the pandemic. Not enough time has passed so far to demonstrate this using annual monitoring data, since they were instigated in 2021 and 2022. However, the engagement team suggested that an improved rate of assignment submission was an early indication that the objectives were being met.
78. It is the assessment team's view that these initiatives, combined with the change in degree options, should help address the problems leading to low undergraduate completion rates, that was evident in previous years. While not directly targeting Levels 5 and 6, the support provided in Level 4 term one should help to establish strong connections between students and the university and set students up for success.
79. Additional steps that could be taken include, but are not limited to, ensuring that new initiatives are monitored and evaluated for positive, negative or unexpected outcomes, at initiative as well as whole programme level, so that resource input can be focused on where there is real benefit. It is commendable that several initiatives were begun in parallel in a comprehensive attempt to address existing issues, but the combination means it will be difficult to understand the impact of specific initiatives. This will make it unclear where to focus future student support and engagement work to ensure it meets the needs of students in the future.
80. Overall, the assessment team was satisfied that the university's present actions are an appropriate response to the student support and engagement needs across the different levels of the BSc Accounting and Finance and the BSc Accounting and Finance with Digital Business.

Resources provided during in-centre exams

81. The student experience of academic assessment at the university went through substantial changes during and after the pandemic. Examination assessments were converted from in-person to online. There is no indication in the evidence considered that the design of assessment activities was a problem, hence this concern is outside the scope of ongoing condition of registration B4.
82. In common with a number of UK institutions, the university employed the Inspira platform to administer online examinations during the coronavirus pandemic. Also in common with most UK institutions using online examinations, there was no attempt to impose any method of

intrusive virtual proctoring on students sitting remote assessments. With the resumption of in-person teaching, the university considered how to continue to use Inspera while requiring students to take the examinations in invigilated settings, i.e. under controlled conditions as documented in the 'Draft minutes of the School of Business Education and Standards Board (SESB) of 25th May 2022'.

83. In-centre exams using Inspera were introduced from September 2022 across the programme, both to help students who have difficulties with their own laptop to sit exams and to discourage any academic misconduct as described in the Annual Programme Monitoring (Teach Out) Report 2020/21. Students interviewed in the Level 5 student panel meeting told the assessment team there was an issue with student Macbooks connecting to the Wi-Fi during in-centre exams and that, because of this, there had been campaigns by the Student Association to get a larger supply of university laptops for the exams. Although more were purchased as a result, there was still not enough for every student taking an exam. The assessment team asked the professional support team about disruption to other students taking exams if a student needed technical support but the support team said that since students could start the exam up to 20 minutes late this was not outside the normal. By contrast, student reps and ambassadors said this problem caused disruption in exams. The evidence suggested this was a support issue under B2 relating to hardware supply and compatibility.
84. It is the view of the assessment team that the university had begun to implement a plan for the provision of more university laptops to mitigate the hardware issues students had in exam time in accessing the internet on their personal laptops. The purchase of further laptops might be considered as an additional step should future evidence suggest the need. The university has also provided information, during induction and on an ongoing basis, to students about laptop compatibility, setting out clear steps students need to take before sitting exams.
85. Overall, the assessment team was satisfied that the university's actions were an appropriate response to the student resource needs in exams for the BSc Accounting and Finance and the BSc Accounting and Finance with Digital Business.

B2 Conclusions

86. The assessment team's investigation drew on multiple sources of information, as identified above, that are relevant to condition B2. Following a risk-based approach, it did not identify any concerns relating to condition B2 from reviewing this information.

Condition B4: Assessment and awards

87. In the course of its investigation the assessment team reviewed a range of evidence relevant to condition B4 (see the full text in Annex A) in seeking to understand whether students on the higher education courses above (paragraph 30) are 'assessed effectively' (B4.2.a), that each assessment is 'valid and reliable' (B4.2.b), that academic regulations 'are designed to ensure that relevant awards are credible' (B4.2.c) and that 'relevant awards granted to students are credible' (B4.2.e).
88. In reviewing initial information provided by the university the assessment team did not identify any concerns that would relate to condition B4. This included reviewing assessment methods as detailed in course and module specifications for all levels, module attainment data for Level 4 and any student complaints (during the academic year 2021-22). This information is relevant

to students on the courses under consideration being 'assessed effectively' (B4.2.a) and assessments being 'reliable' (B4.2.b). The assessment team reviewed university regulations related to assessment and understood that approaches to assessment detailed in course and module specifications were in line with these (B4.2.c). The assessment team also reviewed National Student Survey (NSS) information for 2020-21 and 2021-22, both quantitative and qualitative, and did not identify concerns relating to condition B4.

89. During on-site visits, the assessment team met with students currently studying the courses under consideration, across Levels 4 to 6, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to assessments being 'effective' (B4.2.a) and 'valid' (B4.2.b) (i.e. 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 assessment team did not identify any concerns relating to condition B4 during the course of its on-site visits.

B4 Conclusions

90. As the assessment team's investigation progressed, it drew on multiple sources of information, as identified above, that are relevant to condition B4. Following a risk-based approach the assessment team did not, then, identify any concerns relating to condition B4 from reviewing this information.

Annex 1: 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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