

**Office for
Students**



Quality assessment report

**BSc/BA Business and Management
courses at the University of Bolton**

October 2022 – January 2023

Reference OfS 2023.45

Enquiries to regulation@officeforstudents.org.uk

Publication date 12 September 2023

Contents

Summary	2
Introduction and background	5
Context	5
Assessment process	8
Information gathering	8
Assessment of matters relating to quality under ongoing conditions of registration B1, B2 and B4	10
Condition B1: Academic experience	10
Condition B2: Resources, support and student engagement	12
Concern 1 (condition B2.2.a): Academic staff resource and sufficient academic support for the undergraduate student cohort.....	13
Concern 2 (condition B2.2.a): Consistency of support for avoiding potential academic misconduct in assessment feedback at Level 4	24
Concern 3 (condition B2.2.a): Formative feedback being provided consistently in formats that support all students.....	28
Concern 4 (condition B2.2.a): Academic support for foundation year students following their foundation year	30
B2 Conclusions	34
Condition B4: Assessment and awards	36
Annex A: Ongoing conditions of registration	39
Condition B1: Academic experience	39
Scope.....	39
Requirement	39
Definitions	40
Condition B2: Resources, support and student engagement	42
Scope.....	42
Requirement	42
Definitions	43
Condition B4: Assessment and awards	47
Scope.....	47
Requirement	47
Definitions	48

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 the University of Bolton.
2. The University of Bolton offers business and management courses at both undergraduate and postgraduate level at the Institute of Management Greater Manchester in central Bolton.
3. The OfS appointed an assessment team on 19 October 2022 that consisted of three academic expert assessors and a member of OfS staff. The team were 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 the University of Bolton, including about student attendance and achievement,
 - specific modules on the university's virtual learning environment.

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

5. It visited the University of Bolton on two occasions in November and December 2022 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 four courses (on which students were registered and taught by the university, i.e. not taught by partner organisations). These were BSc Business Management (and associated pathways), BA Accountancy, BSc Business Management (with foundation year) and BA Accountancy (with foundation year).
9. The assessment team considered multiple sources of information that were relevant to condition B1: Academic experience and B4: Assessment and awards. The assessment team did not identify any concerns relating to these conditions from reviewing this information.
10. Through its activities, the team identified four areas of concern that may relate to the University of Bolton's compliance with the OfS's conditions of registration:
 - **Concern 1.** The assessment team found that academic staff resource could be overly stretched, which had an impact on some aspects of academic support, meaning that academic support was in some cases not sufficient for the cohort of students. However, it was acknowledged that academic support is multifaceted and that existing plans and initiatives have the potential to address the issues identified. This concern is considered under condition of registration B2 because this condition relates to students receiving sufficient academic resources and support.

The assessment team particularly considered the context of the student cohort recruited by the University of Bolton. It found that a high proportion joined through a 'non-standard' route and were then likely to require higher levels of academic support for onward success. The team found that existing staff were often seen to go above and beyond expectations in providing support to students. There was evidence to suggest that academic staff resources in relation to the university's methods for providing academic support could, however, be overly 'stretched', which has had an impact on aspects of academic support for some students. The assessment team saw examples of this through:

- a. The implementation of the personal academic tutoring system.
- b. The time for some students to receive marks and feedback on assessed work in relation to the university's policy and guidance to students.

- c. Academic staff capacity for providing academic support to students through individual assessment tutorials, which are a key means of providing feedback in the model used by the university.

While existing plans and initiatives the university is currently implementing are likely, in the assessment team's view, to positively address the issues identified under concern 1, this will depend on successful implementation and require continued monitoring.

- **Concern 2.** The assessment team found that support for avoiding potential academic misconduct was not consistently provided in assessment feedback via the online assessment platform at Level 4, although it was more consistently evident at Levels 5 and 6. This was one part of wider support available for avoiding potential academic misconduct, although an important one. This concern relates to condition of registration B2 because the assessment team considered that providing this support consistently is a step that the University of Bolton could have taken to ensure students had sufficient support to succeed.
- **Concern 3.** The assessment team found that the format for providing formative feedback on assessments may not have been sufficient for some students across a number of modules reviewed. This concern also relates to condition of registration B2 because the assessment team considered that ensuring consistent access to formative feedback is a step that could have been taken to ensure students have sufficient academic support to succeed.
- **Concern 4.** The assessment team found that students taking a foundation year received positive support to progress, reflected in good rates of progression into year one of their course. However, student success in subsequent years of study was lower. The assessment team saw a link between this and academic support for the onward success, that is completion rates and/or attainment, of progressing foundation year students. As such, the assessment team's view is that academic support for these students was not sufficient. This relates to condition of registration B2.

Introduction and background

11. 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.
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 OfS appointed a team (October 2022) to assess the quality of the business and management courses provided by the University of Bolton (i.e. those courses delivered by the University of Bolton, excluding courses delivered by partner organisations and transnational education). 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 B4²). The scope of the assessment, the information 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 6 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 the University of Bolton, including student outcomes data, numbers of students, and any notifications received.

Context

17. Business and management courses at the University of Bolton are delivered through the Institute of Management Greater Manchester (the 'Institute of Management'), part of the university's faculty of professional studies, based in a dedicated building in central Bolton, approximately 10 to 15 minutes' walk from the main university campus. The institute delivers undergraduate degrees in Business Management (BSc), with a range of related pathway degrees (e.g. in enterprise, finance, marketing, people management, retail, supply chain), Accountancy (BA) and Digital Management and Marketing (BSc).

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

18. Business management and accountancy degrees are offered on a full-time (3 years) or part-time (4.5 years) basis. The institute offers foundation year routes into both business management and accountancy, and top-up years in business management. It delivers full-time and part-time postgraduate taught degrees in Accountancy and Financial Management (MSc), Entrepreneurship and Innovation (MSc), International Management (MSc), and Logistics and Supply Chain Management (MSc). It also offers a range of master of business administration (MBA) courses, as well as degree apprenticeships and continuing professional development courses accredited by the Association of Chartered Certified Accountants.
19. There are a range of central student support services based on the main university campus, including a library (with a dedicated academic librarian for the institute), careers service, and student services (including its 'Life Lounge' for mental health and wellbeing services, and a disability service). These central teams hold a Customer Service Excellence Standard award³.
20. The university has adopted a model of services 'on tour'. Under this arrangement, staff from different services are based at the Institute of Management on specific days. The university organises much of its 'academic and personal development' support work under a blended (academic and professional) service called LEAP (Learning Excellence Achievement Pathway), which is discussed under Condition B2: Resources, support, and student engagement, below.
21. Alongside the services described above, the Institute of Management has recently (2021) established a Student Success Zone (SSZ). This is based in the institute's building and supports students both in-person and virtually with academic and study skills. The SSZ was a response to student feedback and has grown over the past two years. This is discussed further in paragraph 52 below.
22. In 2012 the university established its Graduate Attributes Matrix for Employability (GAME) to support curriculum design and development. GAME is a framework that describes a set of ten graduate attributes that 'a student should acquire during their time at this university'. Courses are then required to identify and embed attributes from the matrix to support student employability. The Institute of Management's Industry Advisory Board (IAB) recently reviewed GAME as part of a new university 'student success strategy'. The board has representation from businesses within the local area, including the Bolton Greater Manchester Chamber of Commerce, and is designed to provide advice and consultation to the institute.
23. For overall context, based on the latest available OfS 'Size and shape of provision data dashboard',⁴ the University of Bolton had a student population in 2021-22 of 10,900 (taught or registered headcount, not including offshore, transnational education or students mainly abroad). This included 7,040 undergraduate students, of which 430 were part-time. Of these students, 5,240 were registered and taught by the University of Bolton (300 part-time) and 1,810 were only registered with the university and taught by another organisation. The total student population then also included 730 undergraduate apprentices and 130 postgraduate apprentices (860 total), as well as 2,850 postgraduate students (2,120 full-time and 730 part-time). Of these postgraduate students, 230 were only registered by the University of Bolton.

³ See <https://www.customerserviceexcellence.uk.com/about-the-standard/>.

⁴ See www.officeforstudents.org.uk/data-and-analysis/size-and-shape-of-provision-data-dashboard/data-dashboard/.

This gives a total population of students that are both registered and taught by the university, by headcount, of 8,720 in 2021-22.

24. Of the students taught by the University of Bolton on business and management degrees, i.e. in the Institute of Management, there have been some changes in student numbers over the past three years. Based on student full-time equivalents (FTE), as provided by the university, totalling both accountancy and business management students, these have been as follows:

- 2020-21: 915.7
- 2021-22: 989.7 (+8.1 per cent year-on-year)
- 2022-23: 938.6 (-5.2 per cent year-on-year).

25. A number of ongoing change initiatives at the university will affect courses at the institute, including:

- The institute has recently undergone an organisational restructure, including the appointment (January 2023) of a new dean and chief executive officer who reports directly to the president and vice-chancellor.
- The university has recently (February 2022) approved a new student success strategy (2022 to 2027) focusing on three areas: 'supporting the transition to Higher Education', 'supporting the student journey' and 'supporting the transition to Graduate Employment'.
- In 2022 business management undergraduate courses underwent a periodic review and re-approval (PRR) process. This is a standard internal process for higher education providers by which courses can be updated, revised where appropriate, and quality assured at regular intervals in a holistic way to ensure cohesiveness. It involved staff within the institute and central university teams. A number of changes have been made to business management courses and modules through this process, particularly in relation to assessments. Some of these changes (for Levels 3 and 4) were in effect during the assessment team's investigation (courses that began in the 2022-23 academic year). Changes to courses at Levels 5 and 6 will come into effect in 2023-24 and 2024-25 respectively.

Assessment process

Information gathering

26. The assessment team gathered a range of information to determine whether there are possible concerns relating to requirements as set out in conditions of registration B1, B2 and/or B4. The team gathered information through an initial request for data from the university (19 October 2022) and two site visits on 22 November 2022 and 12 to 13 December 2022.

27. During these visits it undertook:

- a range of staff interviews (with academic and central university 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.

28. The team was also granted access to the virtual learning environment (VLE) from 22 November 2022 to 3 March 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 provided. The university fulfilled all requests in a timely fashion and provided the additional information and data on 20 November 2022, 9 December 2022, 15 December 2022, 16 December 2022 and 6 January 2023. The university also chose to submit additional information on 9 December 2022.

29. The assessment team first reviewed general monitoring intelligence, including student outcomes data held by the OfS, and initial data provided by the university. From this it decided to focus on undergraduate provision. Differential student outcomes data and cohort sizes between undergraduate and postgraduate taught students meant that this was, in the assessment team's view, in line with a risk-based approach. For example, the completion rate for full-time first degree students in business and management over four years was 65.2 per cent, which is below the B3 numerical threshold⁵ of 75 per cent. This compares with a completion rate of 92.6 per cent for full-time postgraduate taught masters students over the same period and same subject area, which is above the threshold of 80 per cent.⁶

30. Similarly, following a risk-based approach, the assessment team then focused on the specific undergraduate courses below as they represent a significant majority of undergraduate students in the Institute of Management:

- BSc (Hons) Business Management (and associated pathway degrees)
- BSc (Hons) Business Management with foundation year
- BA (Hons) Accountancy

⁵ See <https://www.officeforstudents.org.uk/publications/setting-numerical-thresholds-for-condition-b3/>.

⁶ Source: OfS published completions measures within the student outcomes dashboard from September 2022 using the 'Taught' view of a provider's student population, available at <https://www.officeforstudents.org.uk/data-and-analysis/student-outcomes-data-dashboard/get-the-data/>. The subject area is defined by the Common Aggregation Hierarchy Level 2 (CAH2), including accounting. The four years were 2013-14 to 2016-17 inclusive.

- BA (Hons) Accountancy with foundation year.

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

Condition B1: Academic experience

31. 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 four higher education courses considered (paragraph 30) 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).
32. In reviewing initial information provided by the university, the assessment team did not identify any concerns that would relate to condition B1. The review of this initial information included:
- course and module specifications for the relevant courses across Levels 3 to 6
 - programme handbooks for the relevant courses across Levels 3 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).
33. This information is relevant to the courses under consideration being 'up-to-date', providing 'educational challenge', being 'coherent' and requiring 'students to develop relevant skills'. 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 B1.
34. During on-site visits, the assessment team met with students currently studying the courses under consideration, across Levels 3 to 6, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to courses providing 'educational challenge', being 'coherent', being 'effectively delivered' and requiring 'students to develop relevant skills'. The assessment team did not identify any concerns relating to condition B1 during the course of its on-site visits. The assessment team also met with a representative from the Industry Advisory Board for the Institute of Management, which included discussion of topics relevant to the requirement for 'students to develop relevant skills'; this also did not lead to any concerns relating to condition B1 being identified.
35. The assessment team requested additional information from the university regarding the courses being considered, as detailed under 'Information gathering' above (all data noted below was sourced from the university). This included:
- external examiner reports and responses, and exam board minutes for the relevant courses (for all levels in 2019-20, 2020-21 and 2021-22)
 - assessment maps at course level for the relevant courses under consideration

- student attendance and withdrawal data on the relevant courses (for 2021-22)
- module evaluation reports for all modules included within the four courses under consideration (for academic years 2020-21 and 2021-22)
- degree outcomes for each course under consideration (awarded in academic years 2019-20, 2020-21 and 2021-22)

36. This information is relevant to all aspects of condition B1.3, that students receive a 'high quality academic experience'. The assessment team also reviewed a range of documentation provided by the university, including details of the University's Graduate Attributes Matrix for Employability (GAME), which was discussed with students, staff and Industry Advisory Board member during on-site visits. This was particularly relevant to understanding how courses require 'students to develop relevant skills'. The assessment team did not identify any concerns relating to condition B1 from this information.

37. The assessment team reviewed module VLE sites (for 15 modules, including Levels 3, 4, 5 and 6), including samples of teaching resources, guidance to students, and organisation of the sites themselves. This information is particularly relevant to courses being 'coherent' (B1.3.c) and 'effectively delivered' (B1.3.d). The assessment team did not identify any concerns relating to condition B1 from these reviews.

38. The assessment team reviewed documentation relating to the recent periodic review and re-approval (PRR) process undertaken for business management courses (2022), including assessment maps prior to the PRR, following the PRR and a separate rationale for changes made as a result of the PRR. The assessment team found that the PRR had made positive changes that would be likely to further help 'students to develop relevant skills' through increased use of assessment methods designed to support students' employability skills. The PRR process itself also provides a means for ensuring courses are 'up-to-date'.

39. 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

40. 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.

41. In the assessment team's view there were 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'

42. 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'

43. The assessment team considered arrangements for student engagement relevant to condition B2.2.b, including student involvement in relevant committees, appropriate student voice mechanisms (such as module evaluations), and opportunities for students to contribute to course design through their feedback. This activity is encapsulated effectively within the University's Student Engagement Framework 2022-23. The NSS 2022 result⁷ for the student voice theme in business and management was 81.61 per cent (this was above the university overall result for this theme of 75 per cent, which was significantly above the institutional benchmark of 69 per cent). Based on the evidence reviewed, within the scope of this quality assessment, the assessment team regarded student engagement processes and practice to be appropriate and therefore did not identify any concerns in relation to condition B2.2.b.

⁷ See www.officeforstudents.org.uk/advice-and-guidance/student-information-and-data/national-student-survey-nss/nss-data/.

Concern 1 (condition B2.2.a): Academic staff resource and sufficient academic support for the undergraduate student cohort

44. Academic support is multifaceted at the University of Bolton, with a blend of academic and professional service resources. These are primarily organised under the umbrella of LEAP (Learning Excellence Achievement Pathway).
45. 'LEAP Online' is a digital resource that aims to support students' 'academic and personal development'. Students can access it proactively themselves and they can be signposted to it by staff. Content is developed by teams based in the Library and Information Services and Technology, in collaboration with academic colleagues, and has a dedicated quality review cycle.
46. Students can complete sections of LEAP Online and undertake assessments linked to each section (for example, a student may complete a LEAP Online tutorial on 'editing and proofreading' and take an assessment to show their understanding of this topic). By completing assessments students are able to achieve digital badges as they progress, which they can add to their profile on the university's VLE. This incentivises use of the resource and creates a portfolio of students' academic skills development.
47. This resource won a LILAC Digital Award for Information Literacy in 2018.⁸ Most students that the assessment team spoke with knew of these online resources when asked, and since the launch of LEAP Online in 2018 to December 2022 a total of 111,676 digital badges have been awarded across the university. The assessment team regarded these resources as positive additions for the students that make use of them, with a clear, regularly updated structure that encourages students to map their progression and incentivises engagement.
48. The assessment team heard that university central student support services had received additional resources over the past 18 months, including the recent creation of 'LEAP Live' (September 2022). This is a wide-ranging programme of in-person and online sessions covering academic and study skills as well as wellbeing topics. Staff reported that student demand for these is high, and 139 events had been delivered by the time of the assessment team's second visit. Additionally, 'LEAP Together' is the university's peer support programme, which students can sign up to and be connected with a trained student mentor.
49. The final aspect of LEAP is 'LEAP Forward', which is the university's personal academic tutoring (PAT) system that has been in operation since 2015. The PAT system is set out in an institutional policy and process document: 'Best Practice Framework for Personal Academic Tutoring 2022-23'. PATs are members of academic faculty within the students' subject area. All students are automatically allocated a PAT before 'induction week', who is 'your first point of call for any academic issues you may experience'. The PAT role, as it is described to students, 'will provide you with high quality academic support based on your individual needs, with the aim of enhancing your success and achievement as one of our students at Bolton'.
50. For LEAP Online, LEAP Live and LEAP Together students choose to access or sign-up to voluntarily (and may have been advised to do so by staff). Students are, however, automatically included in LEAP Forward (PATs) when they start their course, which involves tutors monitoring student engagement, reaching out to students where appropriate and scheduling

⁸ See <https://www.lilacconference.com/awards>.

set meetings that students are expected to attend. Alongside the formal PAT role, students may also engage with their module tutors to seek support and guidance related to specific modules.

51. The university uses a system for monitoring student interactions and engagement called 'PULSE', which has been in place for approximately 10 years. This system provides a single space for recording contacts that a student has had with their PAT and module tutors alongside attendance data and contextual information about the student. This supports the PAT in monitoring and engaging with their tutees. It also enables module tutors to monitor attendance and interactions for students that they teach on their modules, including details of who each student's PAT is. This is intended to facilitate more effective communication between module tutors and PATs about students' progress. The assessment team saw this as a very positive system that offers the capacity for more effective academic support for students and more efficient working for academic staff by connecting student engagement data, teaching staff and personal academic tutors in a contextualised way.
52. The recently created Student Success Zone (SSZ) is specific to the Institute of Management and was established in January 2021 in response to student feedback. Students access this service either proactively or may be signposted to it by tutors. Students may, for example, seek support with digital literacy, academic systems, or academic writing. They can undertake a 'diagnostic' test to identify current academic skills and where developmental work may be beneficial, the results of which are also provided to their PAT. Feedback from students and staff that the assessment team spoke with was positive, and the service has seen a significant increase in demand from students over 18 months (from an initial 12 students registered to currently 417). The assessment team heard that staffing had increased appropriately to match this demand.
53. The assessment team's view is that the university-wide LEAP Online and LEAP Live initiatives are too recent to be able to clearly assess their impact on student success (as relevant to condition B2.2). This is also the case for the Student Success Zone, which is specific to the Institute of Management, particularly given its growth over the past 18 months. The university is developing a framework to evaluate these initiatives.
54. In the assessment team's view LEAP Online and LEAP Live are likely to have a positive impact on the academic experience of students and their success, which will support the university's strategy in this area. The assessment team also considers the Student Success Zone to be a positive, complementary addition to students' academic support in the Institute of Management, and likely to have a positive impact on student outcomes as it develops. Similarly, the PULSE system is a resource that, in the assessment team's view, has a positive impact on the delivery of student academic support as a part of LEAP Forward (the university's PAT system) and in relation to condition B2.2.a.
55. Following from these positive initiatives, the assessment team focused on the academic staff resource available for delivering academic support through students' courses. Students speaking with the assessment team consistently identified academic staff as their principal source of academic support.
56. To reach a view on the sufficiency of academic staff resource and academic support (B2.2.a), the assessment team sought to understand the context of the undergraduate student cohort

admitted to the Institute of Management. The assessment team had 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).

57. In considering the cohort of students recruited, the assessment team noted that the University of Bolton operates ‘a range of traditional and alternative routes onto our programmes’. This includes a ‘Non-Standard Entry’ route by which:

‘Applications from students without formal academic qualifications may also be considered by the University. Students may have obtained the ability and knowledge to succeed on a course from professional, work or personal contexts. In such cases, the Programme Leader is able to use academic discretion to recommend an offer to study on their programme and is required to complete a Non-Standard Entry Form available from the Admissions Team.’ (Student Admissions Policy 2022-23).

58. Senior members of the recruitment and admissions teams told the assessment team that the proportion of students joining through this route (or otherwise not having UCAS point tariffs) is ‘a significant number’.

59. The university provided the team with data that showed the proportion of undergraduate students joining the Institute of Management with a ‘Zero Tariff’ entry profile⁹ has, in four of the last six years, been a majority of the student intake:

Entry year	Proportion of undergraduate students in the Institute of Management entering with Zero Tariff points (%)
2016-17	55
2017-18	65
2018-19	44
2019-20	49
2020-21	54
2021-22	74

60. In addition, data held by the OfS¹⁰ shows the proportion of students entering business and management undergraduate degrees at the University of Bolton aggregated over a four-year period (2017-18 to 2020-21) with A-levels at grade CDD or higher was 1.5 per cent and those with BTECs at grade DDM or higher, or one A-level and two BTECs, was 2 per cent.

61. University of Bolton’s access and participation plan 2021-22 to 2025-26 asserts that, nationally there is ‘a strong relationship between a student’s Attainment and their entry qualifications. Internal University analysis, taking account of the smaller dataset (producing greater

⁹ This includes the ‘non-standard entry’ route, as well as students that have other entry qualifications that do not carry UCAS points, such as apprenticeships and foundation years at other providers.

¹⁰ Source: OfS internal analysis of the student data used to construct the published size and shape dashboard from September 2022, subset to students taught at the University of Bolton within the business and management CAH2 subject area.

variability), demonstrated a similar trend.’ This analysis found that institutionally there is a ‘uniform 5.4% [lower] difference between University and national averages of good degree outcomes over all entry qualifications’, and that ‘two major structural factors are affecting UoB: 1. qualifications on entry being significantly different to the aggregated [national] data – UoB data shows only 14% of students with any form of A-level qualification and 2. the significantly larger Mature student population [than national average]. This compounds the above point, with Mature students having, in general, lower entry level qualifications’.

62. This university analysis illustrates that students are more likely to need higher levels of academic support where their entry qualifications are lower to enable success. Compared with the university as a whole, this need is then likely exacerbated within the business and management subject area given the entry qualification data above and that up to 5.1 per cent of the subject’s undergraduate students have an A-level qualification (aggregated over a four-year period (2017-18 to 2020-21)¹¹). This context regarding ‘prior attainment and capability’ was then a factor for the assessment team in considering whether there was a ‘sufficient’ level of academic staff resource and academic support.
63. The ‘non-standard entry route’ also includes recognition that students admitted through this route are likely to need higher levels of academic support. For example, when completing a ‘Non-Standard Entry Form’, as part of the admission process, the academic programme leader is asked to agree to ‘provide additional support to this student where necessary’. The assessment team understand this to refer to ‘additional’ academic support above the cohort in general.
64. The undergraduate student cohort for business and management degrees at the University of Bolton has had a high and progressively increasing year-on-year proportion of students from quintile 1 (‘most deprived’) of the Index of Multiple Deprivation (IMD2019¹²):

IMD Quintile	2018-19		2019-20		2020-21	
	Number	%	Number	%	Number	%
1 (most deprived)	230	66	310	67	390	71
2	70	20	80	17	90	16
3	30	9	30	7	40	7
4	10	3	20	4	20	4
5 (least deprived)	10	3	20	4	10	2

65. Students from contexts of high deprivation may be more likely to require greater levels of academic support to ensure positive outcomes. This is recognised, for example, in the University of Bolton’s Degree Outcomes Statement (2021), which identifies that ‘there was a direct correlation between IMD and attainment of ‘good honours’ degrees and first-class

¹¹ Source: OfS internal analysis of the student data used to construct the published size and shape dashboard from September 2022, subset to students taught at the University of Bolton within the business and management CAH2 subject area.

¹² Data is focused on students from the UK. Source: OfS internal analysis of the student data used to construct the published size and shape dashboard from September 2022, subset to students taught at the University of Bolton within the business and management CAH2 subject area.

degrees during the five-year period, 2015-16 to 2019-20, and in the most recent year, 2019-20. During the five years and in the latest year, students from 'households in an area of most deprivation' attained the fewest 'good-honours' or first-class degrees.'

66. It is notable that the business and management subject area has had a consistently higher proportion of students from IMD Q1 than the university overall (e.g. 2020-21: IMD Q1 is 65 per cent for business and management and 39.1 per cent for the university overall). This suggests that a higher proportion of the business and management cohort may be more likely to require greater levels of academic support than students at the university generally.
67. The assessment team was informed by university staff that a high proportion of students in the Institute of Management balance their studies with significant levels of paid work and/or caring responsibilities (e.g. 'not many students don't have full-time employment'), with some staff noting that 'the main challenges in [students] completing' are 'family commitments' or trying to balance 'full-time hours of employment and studying'). The assessment team was assured, though, that academic staff do provide clear advice to students when they join the university regarding the workload expectations of full-time study and give appropriate guidance on balancing studies with employment hours. Student attendance data (2021-22) did not suggest particular concerns in this area, with attendance monitoring and intervention processes also appearing robust and to be implemented effectively.
68. Alongside this context of the undergraduate student cohort, the assessment team also sought to understand the level of academic staff resource available to support students in the Institute of Management. For each subject area the academic staff-student ratio is given below as supplied by the university, for the current year and the previous two years:

Year	Subject centre	Student FTE	Staff FTE	Calculated SSR
2020-21	Accountancy	166.9	5.6	29.8
2021-22	Accountancy	171.6	5.1	33.7
2022-23	Accountancy	204.9	8.9	23.0
2020-21	Business and management	748.8	21.1	35.5
2021-22	Business and management	818.1	27.1	30.2
2022-23	Business and management	733.7	26.95	27.2

69. Senior staff indicated to the assessment team that academic staff resource had not been, and was not, at the target level. Senior leaders stated that there had been 'challenges in recruitment', but that the university was 'investing in staff' meaning that the 'staff-student ratio has peaked' and was expected to fall (in keeping with the above trajectory). It was reported that the university executive supported new posts in the Institute of Management and the assessment team was advised that seven new (additional) academic posts had been approved and advertised, but not filled (as of 14 December 2022). In subsequent meetings, when asked

whether academic staff resource was sufficient to student numbers, senior staff commented that this was 'getting there', that 'if you have more resource you can do more, but we only have what we have', and that 'it takes time to have an impact, the same is true for additional resource'.

70. The assessment team also noted that a high proportion of academic staff in the Institute of Management were studying for postgraduate (primarily doctoral) qualifications. Of the 36 staff members within the Institute of Management Academic Group (2022), 16 were in progress with a doctorate (44 per cent) and a further two were studying another postgraduate qualification (6 per cent), meaning 50 per cent of academic staff were undertaking postgraduate study alongside their academic role. The assessment team identified this support for professional development and enhancing research expertise as significant positives for staff and students, increasing the capacity for research-informed teaching and curriculum design. The high proportion of staff with study commitments may, however, also present additional challenges to levels of academic staff resource available for student support.
71. Considering the likely academic support needs of the undergraduate student cohort recruited and levels of academic staff resource that were available, the assessment team identified areas of academic support that seemed to have been affected by 'stretched' academic staff resource (as noted, this view is reinforced by senior leadership's stated aims to reduce SSRs in the Institute of Management). This led the assessment team to a view that, in this context, academic staff resource (B2.4.j) for academic support (B2.4.l) was not sufficient in these areas, which included:
72. **Impact of academic staff resource on marking times:** The University of Bolton's Assessment and Moderation Procedures (2022-23), published in the 'Student Policy Zone' in the 'Student Area' of the university website, specifies that:
- 'Tutors should make available marked any internally moderated work (including examinations and dissertations) to students with feedback and provisional grades within 15 working days. Assessments submitted via Turnitin and marked using Grademark should therefore have a Post Date which is no longer than 15 working days after the Due Date.'
73. This expectation was consistent in 2021-22 and 2023-24. Students receiving feedback on assessments in a timely manner is an important component of academic support. Quality feedback enables students to address areas for improvement and strengths to build on in good time to prepare for their next assessment/s (within a module or across modules). It also enables students to effectively reflect on their experience of the assessment and learning from it.
74. The assessment team reviewed 19 summative assessment submission points, via the VLE, across 13 modules from Levels 3 to 6 with a mix of 2021-22 (Semester 2) and 2022-23 (Semester 1) academic years. Of these, nine assessments (47 per cent) appeared to have returned marks and feedback to the module cohort more than 15 working days after the assessment due date (with ranges varying between 17 to 30 working days). Assignment 1 marks and feedback for one 2022-23 Level 6 module seemed to have been released after Assignment 2 took place.

75. This mixed picture was echoed by comments from business and management students. There were six qualitative comments in total in NSS 2022 and NSS 2021 for the business and management subject area that mentioned the keywords 'feedback', 'marking' or 'timely': four negative and two positive. Level 6 business management students reported (through meeting with the assessment team) that feedback time (and usefulness) was mixed. Some was 'very quick', 'some takes a month with just a grade'. Another group of students (identified as 'having used central and/or Faculty-based academic support', across levels) similarly reported mixed experiences. Some described not always having feedback in advance of their next assessment on a module, with one claiming to have done an initial assignment that they were at that time waiting for feedback on, but that they would not receive this feedback until after their second assignment was due.
76. The NSS quantitative results for business and management at the University of Bolton were largely positive, and the statement 'Feedback on my work has been timely' (question 10) had an agreement rate of 72.8 per cent in NSS 2022.¹³ This was above the sector average for business and management (69.4 per cent) across all providers in 2022 (not benchmarked by provider). However, this represented a decline for business and management at the university (-3.6pp). The NSS 2021 agreement rate was 76.4 per cent, despite increases between 2021 and 2022 in the sector average for the subject (+2.3pp, to 69.4 per cent) and the university overall (+4.0pp).
77. For business and management, agreement with question 10 also declined between 2020 and 2021 (-10.0pp) more than the subject sector average (-6.5pp) and for the university overall (-6.2pp). While NSS results on this question for business and management at the University of Bolton remained above the sector average for the subject, its more significant recent decline and atypical trajectory were notable. The assessment team recognises that there may have been a number of factors that influenced NSS data, and that the results for this period may partly have been impacted by the coronavirus pandemic.
78. However, the recent differences noted for business and management at the university, from the subject at sector level and from the university more widely, support the assessment team's view, formed through other information described above, that there have been pressures on timeframes for returning assessment feedback that were specific to business and management at the university.
79. The assessment team viewed the challenges in consistently meeting institutional and student expectations for on-time feedback, then, to be evidence of 'stretched' academic staff resource. This was further supported by the minutes of the Institute of Management Awards Board (15 June 2022), which recorded that 'Staff raised their concerns that marking deadlines remain the same even with the large increase in numbers. Staff are finding it increasingly hard to meet the deadlines.'
80. **Impact of academic staff resource on personal academic tutoring:** PATs are identified to students, for example in the University's Personal Academic Tutoring Programme Handbook, as a 'keystone' in students' teaching and learning experience. Senior academic staff also described them to the assessment team as the 'backbone' of academic support available to

¹³ See www.officeforstudents.org.uk/advice-and-guidance/student-information-and-data/national-student-survey-nss/nss-data/.

students. In the team's view there was a robust set of policies and procedures issued by the University of Bolton centrally to implement its blended PAT system ('Best Practice Framework for Personal Academic Tutoring 2022-23' (the 'Framework')). This Framework sets out that 'regular and ongoing contact is key to the student's engagement with the institution' and that 'this is particularly important for those students who are deemed to require additional support'. It specifies that 'the allocated Personal Academic Tutor will be a student's first port of call for advice or direction to further support on academic and pastoral matters'. The Framework was introduced in September 2021 with the aim of supporting 'ALL our students' academic, personal, and professional development through an ongoing personalised point of contact with the University'.

81. The Framework specifies that the PAT should schedule tutoring sessions regularly throughout the year; it recommends a 'minimum of 3 one-to-one sessions per student per semester' to 'guarantee continued effectiveness', and that a further meeting may be required with particular students (i.e. 'both parties [PAT and student] may also request a further meeting in addition to the minimum requirements outlined above').
82. In meetings with students, few reported having met with their PAT formally to discuss their progress (in accordance with the Framework). Students often mentioned that they would be more likely to approach module tutors, or in some cases the programme leader, to discuss academic issues. For example, in a meeting with Level 4 students (11 students total) most said that they had not tried contacting their PAT, with a small number stating that they had tried but not received a response and had not had formal meetings. Other students similarly identified that for academic support they would 'first speak to the module tutor' and 'when this wasn't an option, then the Personal Tutor [PAT] helped'. They said that they had been told who their personal tutor was 'and their name is on your action plan'.
83. Students often saw their PAT as someone they would only contact if there were a significant issue. Some described their understanding that the 'Personal Tutor is there when needed' (Level 4 business and management) and that there was no contact with the personal tutor 'unless there's a problem' (foundation year business management). A minority of students were unaware of who their PAT was. The exception to this was a meeting with foundation year accounting students who identified that they had all met their PATs, having been told who this was in their first week, and they all felt that 'you can go to them for help'.
84. This suggested that some students may not have met regularly, and thus developed a relationship, with their PAT given there was relatively little evidence of regular one-to-one meetings with PATs from the Level 3 Business Management and Level 4 students that the assessment team met, unless the PAT was one of their module tutors. As a consequence, some students seemed not to have been accessing consistent, formalised academic support that should have been available through PATs. It was notable that for foundation year students, where they reported that they had met with their PAT, it was common for the PAT to be a tutor on foundation year modules as well. This was part of a strategy to try to increase the level of contact and support via PATs.
85. Academic staff in the Institute of Management were allocated two hours per student per year in their workload allocation to fulfil the PAT role (calculated on the basis of one hour for each student per semester), but assessors were told that 'staff often go above and beyond' in

fulfilling this role. Depending on their wider workload, PATs were usually allocated between 40 to 60 tutees.

86. When staff were asked whether this was sufficient academic staff time, the assessment team were referred to the 'blended' model of academic and university professional services and told that 'this is why we have other student support services [centrally]... Other areas in the University can support'. It was highlighted that wider student support services were available to students which they could access.
87. Some staff suggested that relationships mainly developed between tutees and their PATs through engagement in class sessions (where the PAT is the student's class tutor) rather than specific PAT meetings. This was often supported by an 'open-door policy' (which some students positively reflected on, e.g. 'I feel I can speak with anyone'). While these clearly represented positive opportunities for students to gain academic support, 'open-door policies' can also cause additional pressure and workload for some academics leading to additional stretch in academic resource. The module tutor acting as students' first point of contact for academic support, as identified by some students, may also lead to pressure on academic staff time where the module tutor is not the PAT, as module tutors are allocated less time than PATs for academic support (45 hours per year), adding to 'stretch' in academic staff resource particularly where some tutors are contacted by students more frequently.
88. The University of Bolton's 'Framework for Personal Academic Tutoring' included 22 specific activities under the role of the PAT, for example:
- providing 'guidance and advice to students on University processes, e.g. academic procedures, mitigating circumstances, change of programme'
 - providing 'structured support for students' personal development planning and charting of students' progress'
 - working 'with students, module tutors, R&Rs [Recruitment & Retention], programme leaders and other sources of support to ensure that tutees have every opportunity to access and catch up on work post absence'.

This structure was designed with regular, tutor-initiated, one-to-one meetings between students and their PAT as the expectation.

89. The assessment team received numerous pieces of evidence demonstrating that many staff do actively support the academic achievement of their students by providing advice and guidance when asked and monitoring their tutees' engagement with their course. Many students that assessors spoke with reflected positively on the support that they had received from specific tutors. For example, 'Staff mostly are great supporting student learning and find time even with other work' and 'The staff are very helpful anytime that I needed help from them' [NSS 2022]. However, there was a view from some students that support was there if 'asked for' and that 'if you want help, tutors will help you'. This aspect of support clearly worked well for some students, although students who may have been less confident in requesting additional support could also have been disadvantaged in such situations, and perhaps particularly in a cohort that was more likely to have higher academic support needs.

90. Following the above information, the assessment team were concerned that the expectations of the PAT role did not currently match the level of staff resource available to it. The Framework included expectations of at least six one-to-one meetings per student per year, as well as the duties noted under the 'Role of the Personal Academic Tutor'. Given the workload allocation of two hours per student per year, balanced with the likely academic support needs of the cohort, the assessment team felt that this was likely to have resulted in the PAT system becoming more reactive to students requesting support than the regularised and proactive structure within the University's 'Best Practice Framework'.
91. With the high proportion of students that were likely to benefit from 'additional support' (given the context of the cohort on admission), the number of tutees assigned to each PAT, and the pivotal coordinating role that PATs are designed to play in supporting all students academically, the assessment team's view was that PATs were likely to need to go 'beyond' the workload allocation often in the current system in attempting to provide sufficient levels of academic support. This 'stretch' in resource was then likely to lead to inconsistency for students and require them to actively seek support, as reflected in student meetings held with the assessment team. This differed from the expectations for a regularised and developmental structure outlined in the university's Framework and what was likely to be necessary to deliver sufficient support for the whole student cohort.
92. **Impact of academic staff resource on academic support via assessment tutorials:** one-to-one feedback tutorial sessions, in which students meet with module tutors, were often used on modules to discuss assessment preparation or feedback with students. Where tutorials were offered the assessment team identified that these sometimes indicated stretched academic staff resource, which could then affect academic support provided to students.
93. Students were often required to book one-to-one meetings with their module tutor, during dedicated tutorial weeks, via the VLE. These tutorial weeks usually took the place of scheduled teaching hours, with teaching weeks then allocated as tutorial weeks (which may, in itself, have reflected limitations in academic staff resource). From reviewing VLE bookings, where available, it was likely that there would be insufficient academic staff time available if all students booked tutorials (although a minority of students seemed to). For example:
- One 2022-23 Level 4 module had 145 students registered. The two tutors both made tutorial slots available for their respective teaching groups during a tutorial week (three groups each, with two hours per group), making 12 hours available for bookable tutorials in total. Each student was offered a 10 minute tutorial. If all students booked and attended tutorials this would have required over 24 hours of academic staff time in the week, making the time allocated insufficient. As it was, 52 students (36 per cent) seemed to have booked a tutorial via the VLE.
 - Another 2021-22 Level 4 module had 176 students registered. The two tutors both made tutorial slots available for their respective teaching groups and students were offered 10 minute tutorials. If all students booked tutorials this would have required over 29 hours of academic staff time in the week. As it was, 24 students (c.14 per cent) seemed to have booked a tutorial via the VLE.
 - The lack of capacity for feedback tutorials was also exemplified by a VLE notice to students on a 2021-22 Level 5 module (190 students) regarding tutorials, which stated:

'Week 6 Tutorial Week – No Formal Online or Seminar Classes. Tutorials - APPOINTMENT ONLY – Book a slot through the scheduler within this week's Moodle section. There is not enough availability to have 121 sessions so please book in small groups. Each individual attending must book a slot alongside who they have arranged to attend with. For those not attending with their peers they should just book an available time that has not been fully filled' (original emphasis retained).

The assessment team noted that this guidance on delivery of academic support in groups rather than one-to-one sessions seemed to have been given due to resource capacity rather than pedagogical choice. The role that tutorials are intended to play in academic support is described in the module handbook: 'In weeks 6 & 12 tutorials will take place which will provide you with the opportunity to discuss your progress on the module and receive feedback on assessments.'

94. In the assessment team's view these examples illustrated stretched academic resource in providing feedback to students via tutorials and, given the significant role that tutorials often played in providing formative feedback in the current structure, were evidence of insufficient academic support. Overall, the assessment team was concerned that academic staff resource was 'stretched' and, in the context of the academic needs of the undergraduate student cohort recruited, that this has had an impact on academic support for students.
95. Students were often very positive about the academic support they received from individual tutors, although it could be inconsistent; a broadly common view heard by the assessment team and articulated by one student was that there was a 'group of tutors who are always available'. This echoed comments that the assessment team heard often from staff and students that many staff 'go above and beyond'. The team had no doubt of this and staff commitment to supporting students was clearly evident throughout meetings with the assessment team.
96. The assessment team's view is that this 'stretch' in academic staff resource meant that it was not sufficient to ensure a consistent delivery of academic support, through the examples discussed, including as outlined by university policies.

Plans relevant to academic staff resource and academic support

97. The university provided the assessment team with information relating to a number of plans that were underway, but at a stage that the assessment team considered too early to have had a material impact on concern 1 at the time of the visits in November and December 2022. It is important to note, however, that in the assessment team's view these plans were credible, given evidence that they were already being rolled out with resources allocated, and may address issues identified above if they are successfully implemented. Determining whether these plans are successful in their implementation will require further monitoring by the university in relation to student outcomes. Such plans include:
 - **Additional academic staff recruitment.** The assessment team was advised that the Institute of Management had approval and was advertising for seven additional academic posts, as of 14 December 2022. This included three at professorial level, one at reader level and three at senior lecturer or lecturer level, and will include at least one post in accountancy. The assessment team heard that one post had been recruited (14 December 2022) and noted that other posts had live advertisements (12 December 2022)

to 8 January 2023). The assessment team welcomed this information as it felt that increasing the academic staffing level is a key part of addressing the concerns identified above, provided this is allocated in ways that improve staff-student ratios and improve capacity for academic support.

- **Developing PULSE.** The continued development and use of the existing PULSE student interactions system, deployed effectively, has the potential to further support academic staff capacity through simplifying record-keeping, monitoring of student engagement, and liaison with central support services.
- **The continued development of the existing Student Success Zone.** While not increasing academic staff resource, the assessment team agreed that this initiative would be likely to support improved student success, and so is a very positive addition in complementing academic support.
- **The university's student success strategy.** The University of Bolton's recent Student Success Strategy 2022-27 addresses a number of the concerns identified by the assessment team, including a positive commitment that 'opportunities and support are tailored and personalised to meet the individual needs of students' particular circumstances, concerns and aspirations'. The example of 'academic mentoring / coaching / tutoring to support a structured approach to managing feedback and the diverse range of learning environments' is given, within the Learning, Teaching and Assessment Sub-Strategy, for instance. This aim seems to prioritise changes that would align with the assessment team's concern that academic staff resource was not always sufficient to tailor academic support for students (as in the examples above) and could often require students to take the lead in tailoring support to their needs. The explicit inclusion of a commitment to 'supporting students through effective and impactful personal academic tutoring' is also a positive example.

The Student Success Strategy does, then, give confidence that concerns raised by the assessment team above are existing strategic priorities.

Concern 2 (condition B2.2.a): Consistency of support for avoiding potential academic misconduct in assessment feedback at Level 4

98. From reviewing business management modules at Level 4 (six modules across 2021-22 and 2022-23) the assessment team identified a high number of initial student submissions with Turnitin similarity scores of 30 per cent or higher. This means 30 per cent or more of a submitted piece of work had been detected by Turnitin software¹⁴ as being similar to another source.

99. A high Turnitin similarity score should not, in itself, be treated as evidence of academic misconduct. Different assessment tasks may, for instance, produce high scores by their design or sources may be correctly referenced by the student. A high score may, however, indicate a

¹⁴ Turnitin is a technology product that is used by many HE institutions, primarily to support academic integrity in assessments. It includes the facility to identify similarities between text submitted by a student and content on Turnitin databases. As such, a high similarity score may warrant additional investigation in case plagiarism has occurred.

higher likelihood of academic misconduct and the need for further investigation and, potentially, academic support.

100. Across eight assessments reviewed over six modules (with 16 to 137 student submissions each, a total of 748 submissions) between 12 to 23 per cent of submissions for each assessment had a similarity score of 30 per cent or higher (an average of 16 per cent). The assessment team was, then, interested to explore how potential cases of academic misconduct were addressed in assessment feedback.
101. The University of Bolton's Academic Misconduct policy (2022-23) includes provision to issue an 'informal warning' in cases where 'there was no intent to deceive and/or that the academic misconduct occurred on a formative assessment'. However, 'informal warnings should not be issued where an offence that would normally be classed as serious has occurred or where prior informal warnings and/or academic misconduct has been recorded.' This provision focuses on academic support for the student as informal warnings 'should be reported to the relevant Programme Leader who should record the fact that an informal warning has been issued. The Module Leader should arrange for the student to receive appropriate training and/or advice on how to avoid committing academic misconduct.'
102. Where the 'informal warning' route is not appropriate, suspected offences may be classified as 'minor' or 'serious'. For suspected minor offences a 'programme hearing' is held. This comprises the programme leader and one other academic. The marking tutor and module leader will compile an 'Academic Misconduct Report' that includes 'evidence for the alleged offence and whether any prior offence(s) have been recorded'. For suspected serious offences a 'school hearing' is held. This additionally includes 'the Head of the academic area or nominee of sufficient seniority'.
103. On the Level 4 business management modules reviewed, markers' feedback often noted potential academic misconduct on submissions with high similarity scores and would generally take this into account in assigning a grade to the assessment. However, assessment feedback often did not include signposting to academic support for students or seem to initiate a formal or 'informal' process that would require such support to be accessed. This suggested that students may not have been consistently directed to support on understanding and avoiding academic misconduct in the future. There was then a risk that if students were not consistently guided and/or required to access such support, they may have repeated academic misconduct in later work or at later levels of study (potentially then having negative impacts on, for example, student continuation rates or degree outcomes).
104. In some cases, assessments that had academic misconduct concerns noted in feedback retained a passing grade or higher. For example,
 - On one module assessment, with 23 per cent of submissions at or above a 30 per cent Turnitin similarity score (21 out of 93 submissions), 20 of these 21 submissions received feedback that directly referenced potential plagiarism and high similarity scores. This included comments such as: 'only 35% of the work is yours' (assessment grade: 35), 'what really detracts from an otherwise reasonable report is the lack of citations and the over use of other's work, not indicated by you - a similarity of 35% is to high' (similarity score was actually 45 per cent, assessment grade: 45).

On 13 of these 20 submissions (65 per cent) the assessment feedback did not seem to signpost academic support. On six submissions (30 per cent) the student was signposted to the University's LEAP academic support resources, and in one submission the student was advised to contact the Student Success Zone in the Institute of Management. Eight of the 20 submissions (40 per cent) received passing grades, potentially disincentivising the students from changing their practice.

- Following a different method of investigation, the assessment team traced an exemplar student's assessment feedback across a sample of their Level 4 modules. The team randomly selected the student from a group with high similarity scores on an assessment submission. The student submitted an assessment on 10 March 2022 that had a Turnitin similarity score of 52 per cent (assessment grade: 5). They were issued with a 'verbal warning' on this module after the tutor met with them to 'discuss academic misconduct'. The assessment team understood this to be an 'informal warning' within the university's Academic Misconduct policy.

A subsequent submission for another module (8 April 2022) had a similarity score of 72 per cent (assessment grade: 35), with feedback identifying the potential misconduct: 'You have at best provided generic response to the assessment brief with over 70 per cent similarity copied from other sources and therefore not your own' and 'Future Considerations: Do not simply copy text and pass it off as your own'. The student was signposted to LEAP Online academic support resources and advised to access these (as well as attend taught sessions for the module). No formal or informal misconduct process was noted in assessment feedback.

On a third Level 4 module the same student submitted Assignment 1 (7 December 2022) with a 34 per cent similarity score (assessment grade: 35). Suspected misconduct was noted, but without signposting to academic support or seeming to initiate a formal process (which would have been in line with the university's Academic Misconduct policy following an informal warning): 'Feedback; this has too much similarity from another students work... Moving forward you must be prepared to paraphrase work from authors and use quotes direct source appropriately.' Subsequently, the student's submission for Assignment 2 of this module (5 January 2023) had a 67 per cent similarity score (assessment grade: 10), with the following feedback:

'Comment – this is 67 per cent another students work according to similarity and cannot be marked as a piece of work submitted by yourself. It is important to understand that while it is useful to use others ideas it is important to not use their work directly. I suggest that you arrange to take a workshop on paraphrasing authors work from elsewhere and avoid using previously submitted paper.'

No formal academic misconduct process was noted in this assessment feedback and the signposting included was not to specific academic support. The assessment team were concerned that, while a formal academic misconduct process may have been initiated by other means, this example did not include evidence of a formal process being implemented and so a requirement for the student to engage with academic support. Instead the student was guided to independently seek support, where signposted. On the evidence above, this approach did not seem to have led to changes in this student's practice over the two academic years.

105. The assessment team noted that a formal process for addressing potential academic misconduct seemed to have been more common at Level 5 but the number of submissions with high Turnitin similarity scores seemed to remain high. For example, one Level 5 module had 56 submissions (from 156, 36 per cent) that had similarity scores above 30 per cent. This included 19 submissions (12 per cent) for which concerns were flagged in feedback regarding the copying of unattributed text. Signposting students to support was common here, often including requests to meet with the module convenor. Of these, three submissions were clearly referred for potential serious misconduct. However, six of the 19 submissions with concerns identified by the marker also had passing grades.
106. Formal processes for addressing potential academic misconduct seemed significantly more common at Level 6. For example, the assessment for one Level 6 module (due 3 December 2022) had 76 initial student submissions (from 89 students registered). Of these 76, 10 (13 per cent) were flagged in feedback by the marker to contain potential academic misconduct. All were 'referred for consideration under the Academic Misconduct Policy of the University of Bolton' and nine received failing marks.
107. Signposting students to general academic support was also common in feedback on all submissions on the module, where relevant. This suggested to the assessment team that more consistent implementation of formal academic misconduct processes at Level 4, in line with the university policy, would have been likely to reduce the number of identified academic misconduct cases at later levels and reinforce student engagement with academic support at an earlier stage.
108. It should be noted that assessment feedback provided via the online assessment platform (i.e Moodle and Turnitin) was one means by which support for avoiding potential academic misconduct was made available to students. As described above, there were wider academic support services that students could access, such as the Student Success Zone, and modules focused on academic skills at Level 4. These modules included 'Academic Language and Skills', which was a 0-credit module taken by international students and delivered alongside core modules. This module included a week specifically on avoiding plagiarism and was assessed through students achieving satisfactory levels of attendance and engagement, and completing all formative tasks.
109. While this module was a positive initiative, the assessment team were also concerned to note the pass rate provided by University of Bolton for business and management students on this module was 27 per cent (2020-21 to 2021-22). All Level 4 business management students also took a core 20-credit module, 'Professional and Academic Skills Development', which included a week focused on academic writing and referencing. This provided a consistent element of support as part of the business and management curriculum. However, in the assessment team's view, formal assessment feedback via the assessment platform and across all modules represents an important part of the academic support structure on these courses by enabling individual guidance for all students on their own practice, linked to assessment grades, and underpinned by academic misconduct processes that can encourage student engagement with necessary support.
110. The assessment team's view is, then, that more consistent implementation of the processes outlined in the university's Academic Misconduct Policy and more consistent signposting to specific academic support at Level 4 would help students to avoid academic misconduct at

later stages. Inconsistencies in this raised a concern for the assessment team as to the sufficiency of academic support to guide students in avoiding academic misconduct.

Concern 3 (condition B2.2.a): Formative feedback being provided consistently in formats that support all students

111. Based on the information reviewed, the assessment team found that opportunities for formal formative assessment and feedback could vary across modules and levels. Formative assessment and feedback are key elements of academic support. They enable students to receive constructive guidance on how to develop their skills, knowledge and understanding, and how to demonstrate these through assessed work. They often prepare students for undertaking summative (contributory) assessments.
112. Current practice is described, in a largely standardised way, within Institute of Management module handbooks:

‘Formative assessment is employed to support your learning on the module, allowing you to reflect on feedback on your progress from your tutors and peers. It takes a variety of forms including online activities, practice group presentations, quizzes, surveys and contributions to published forums. It does not contribute to the final module mark.’
113. The assessment team regarded such formative activities as clearly positive practice, supporting students’ learning and enabling tutors to check students’ understanding. However, this also meant that some modules introduced a formal formative assessment as part of their approach and others did not, with implications for how formative feedback was then provided.
114. In meetings with students, experiences of formative assessment were mixed with variation in whether and how formative assessments were provided. Some were not clear on the meaning or role of formative assessment. Some students commented that they had done in-class presentations or small in-class tasks for which they could receive feedback. As noted above, these practices are in line with Institute of Management guidance and, in the assessment team’s view, represent positive opportunities for feedback to students.
115. However, there is variation in whether modules offer more formal formative assessments. This variation is evident across module VLE sites for a range of levels and academic years (2021-22 and 2022-23). For example, while four out of six foundation year modules reviewed seemed to have formal formative assessment opportunities (including two modules that use weekly tasks for this), only one out of six Level 4 modules reviewed seemed to have a formative assessment submission. Out of two Level 6 modules reviewed that had examination assessments, one included a mock exam as a formative assessment and the other seemed not to. Where these modules did not offer formal formative assessments, formative feedback (which may still be provided in the module) was likely to be through, for example, in-class discussions and activities or on a more ad hoc basis.
116. Where there were more formal formative assessment opportunities the primary way of providing formative feedback, across the modules reviewed, involved students booking tutorials for verbal feedback. This required students to access and organise the support proactively. There was some evidence of students facing challenges engaging with this approach, with a tutor, for example, noting to students during a lecture that ‘when we issued

the feedback for the first assignment a lot of you didn't come to the actual tutorial sessions [and] would have benefitted from a visit'. Students also identified that they often needed to be proactive in seeking feedback. For example, some Level 4 students commented that 'if I want a review on it [assessed work], I can book a one-to-one session to go through it', 'if you seek feedback it's generally given' and that 'there is some written feedback, but mostly it's verbal'. Other students (Level 6) similarly commented that there was 'not enough feedback on assignments'.

117. The model clearly worked well for some students, with positive comments regarding 'open-door policies' (although this was only one aspect of support) and the approachability of many tutors. However, given variation in whether formal formative assessments were provided, in levels of engagement with tutorials, and a more ad hoc approach to formative feedback where there was no formal assessment submission, the assessment team were concerned about the range of students who regularly accessed formative feedback. As noted above, the assessment team repeatedly heard from staff that many students faced additional challenges, including high levels of paid work and/or caring responsibilities alongside their studies, and academic support was likely to be particularly important due to the entry context of the cohort. Given these academic support needs and challenges that many students faced in managing competing demands on their time, in the assessment team's view, more consistent feedback methods that students could access flexibly and that they could refer back to were likely to be beneficial for academic support (in relation to condition B2.2.a). In discussion with the assessment team, for example, some academic staff commented that 'written feedback would have been better on Turnitin', but they were not able to do this 'due to time.'
118. The use of tutorials for feedback can be positive and benefit those students that engage with them. In the assessment team's view, however, given the context of likely academic support needs of the student cohort, availability and accessibility of academic support via formative feedback was not currently sufficient for all students. Consistently providing formative feedback that could be accessed flexibly by students and referred back to would have enabled a baseline expectation for students in how academic support is provided through formative feedback. This may then have also further encouraged uptake of formative assessment tasks from students by setting clear expectations for feedback.
119. The assessment team also noted, however, that the business management undergraduate courses had undergone periodic review and re-approval (PRR) in 2022, with a number of changes being made that may in due course help to address this concern. For example, the introduction of portfolio assessments for a number of modules may enable more continuous formative feedback in a structured way and encourage engagement with assessment tutorials. The document 'Changes to the Undergraduate Business and Management Assessment Strategy' (2022), summarising changes made during the PRR, goes some way to addressing the concerns of the assessment team by noting that 'a number of small, early summative assessment were introduced in some modules, specifically at Levels 3 and HE4, to provide opportunities for early feedback and to build student confidence. This feedback is combined with continuous feedback on summative assessments in the case of 100% Portfolio assessments and formative feedback where there are later summative assessments in a module.' Whether modules are providing low-stakes summative assessments or providing formal formative assessment opportunities, the consistent provision of formative

feedback that can be accessed flexibly by students is, in the assessment team’s view, a key aspect of academic support in this context.

Concern 4 (condition B2.2.a): Academic support for foundation year students following their foundation year

120. The assessment team heard from the university that students entering a foundation year in the Institute of Management often enter through a ‘non-standard route’, and so are more likely than the undergraduate cohort overall to have no Level 3 qualifications. The assessment team was informed by university staff that:

- the characteristics of the foundation year student intake had not significantly changed over the past five years
- 98.6 per cent of students are from an ‘underrepresented’ group
- students are very likely to have additional caring responsibilities and/or be undertaking high levels of paid employment alongside full-time studies.

121. This student group is, therefore, likely to have higher academic support needs relative to the undergraduate cohort overall in the Institute of Management.

122. The first-time submission rates for foundation year module assessments as provided by the university indicated these support needs and the associated challenges. Lower proportions of students submitting at the first opportunity (whether on-time, during a permitted late period or with approved extensions) was likely to suggest that they faced challenges in an academic and/or personal context and that these challenges were affecting their ability to engage with their course as expected. From the eight summative assessments reviewed (across six foundation year modules, 2021-22 and 2022-23 academic years) the proportion of students on each module who submitted their assessment at the initial opportunity (including late submissions or extensions, but not resit attempts) was:

No. of first-time submissions	Students on module	Proportion of first-time submissions (%)
18	27	67
13	19	68
10	19	53
16	38	42
20	38	53
15	44	34
16	52	31
24	46	52

123. Students not submitting their assessments first-time (including late submissions or extensions) may have been more likely not to pass the module initially and require additional attempts (at individual assessments as resits or by repeating modules or years). However, pass rates for foundation year modules were better than might have been expected from the

first-time submission rates: business management foundation year modules had a pass rate range of 68 to 76 per cent and accounting foundation year modules had a pass rate range of 71 to 85 per cent (based on aggregated data over three years, 2019-20 to 2021-22).

124. Pass rates included additional and resit attempts at an assessment and the application of exam board powers where relevant, such as compensation (i.e. a module recorded as a pass where the aggregate mark was normally at least 35 per cent rather than the usual minimum pass mark of 40 per cent and the student's overall stage performance was satisfactory). This suggests that some students may have experienced challenges during their foundation year but were positively supported to pass the year (including through support to pass potential additional and resit attempts at assessments).
125. This trajectory was then also reflected in the continuation rates for both foundation year courses, which were broadly positive (this also includes students undertaking repeat years). In 2021-22 (i.e. students who started their course in 2020-21) information supplied by the university showed that the business management foundation year's continuation rate was 81.2 per cent (95 from 117 students) and the accounting foundation year's continuation rate was 85.0 per cent (17 from 20 students). This broadly aligns with OfS data over a longer period, with a continuation rate aggregated over four years of 81.1 per cent (full-time students on foundation years within the business and management CAH2 subject area, entry cohorts 2016-17 to 2019-20).¹⁵
126. The assessment team read this data, showing initial challenges for students followed by higher pass rates and positive continuation rates, as corroborating the additional academic support that, from speaking with students, seemed to have been common to the Institute of Management's foundation year courses. That is, a focus on supporting students to continue their studies and progress into Year 1 (Level 4) of their course despite often higher academic support needs.
127. Current accounting foundation year students, who the assessment team met with, reflected very positively on the support available to them. Students described this course as an 'opportunity for anyone to come in, anyone who wants to learn, [it] helps you climb up the levels'. Students who had progressed from a foundation year (both accounting and business management), in discussion with the assessment team, reflected that 'overall foundation was great'. Comparing their foundation year with Level 4, they described how 'expectations are lowered so that you are allowed to make mistakes without being penalised', and that it 'can be a bit informal' which helped to 'build relationships with tutors'.
128. The assessment team understood from students that they often felt 'held' and supported in their foundation year. Similarly, staff teaching on foundation years reflected that there was 'lots of one-to-one support', 'Personal Tutors are often class tutors' which helped to 'head off issues' and 'informally pick-up issues'. The assessment team heard that there was a 'higher percentage of scheduled hours for foundation compared to Level 4'. The curriculum design of

¹⁵ Source: OfS internal analysis of the student data used to construct the published continuation measures within the student outcomes dashboard from September 2022, subset to students taught at the University of Bolton within the business and management CAH2 subject area on courses with an integrated foundation year.

foundation years was also described to the assessment team by academic staff as ‘scaffolding support for students to reach the next stage’.

129. Following continuation into Year 1, however, student outcomes seemed to be less positive. Completion rates for students who had undertaken a foundation year course (student cohort that started in the academic year 2017-18) provided by the university were as follows¹⁶:

Course title	Population	Completing	Completion %
BA (Hons) Accountancy with Foundation	14	6	42.9
BSc (Hons) Business Management with Foundation	43	11	25.6

130. This pattern was largely reflected over a longer time series from OfS data.¹⁷ Looking at full-time students on foundation years within the business and management CAH2 subject area for the University of Bolton, the completion rate, aggregated over four years (entry cohorts 2013-14 to 2016-17), was 48.1 per cent.

131. Attainment rates for those students who completed a foundation year as part of their course, measured through ‘good’ degree outcomes (first and upper second class honours), as provided by the university, were then as follows:

Course title	Degree classification	2019-20		2020-21		2021-22	
		%	No.	%	No.	%	No.
BA (Hons) Accountancy with Foundation	First class honours	33	2	0	0	17	1
	Upper second class honours	50	3	75	3	33	2
	Lower second class honours	17	1	25	1	50	3
	Third class honours/Pass	0	0	0	0	0	0
	Unclassified	0	0	0	0	0	0
	FE level qualification	0	0	0	0	0	0
‘Good’ degree outcomes		83	5	75	3	50	3
	First class honours	0	0	6	1	10	2

¹⁶ Completion measures report the proportion of students that were observed to have gained a higher education qualification (or were continuing in the study of a qualification) four years and 15 days after they started their course.

¹⁷ 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 the University of Bolton within the business and management CAH2 subject area on courses with an integrated foundation year.

BSc (Hons) Business Management with Foundation	Upper second class honours	50	5	6	1	15	3
	Lower second class honours	40	4	44	7	25	5
	Third class honours/Pass	10	1	0	0	0	0
	Unclassified	0	0	25	4	5	1
	FE level qualification	0	0	19	3	45	9
'Good' degree outcomes		50	5	12	2	25	5

132. Completion and attainment outcomes were higher for students on the BA (Hons) Accountancy with foundation course, where student numbers were smaller, although completion rates identified above remained low. For the BSc (Hons) Business Management with foundation course, however, completion and attainment rates seemed particularly low, with 44 per cent and 50 per cent of those students who did complete receiving an Unclassified or FE level qualification in 2020-21 and 2021-22 respectively.
133. In comparing the 'good' degree outcomes shown in the table above, information provided by the university showed that non-foundation year students on BSc (Hons) Business Management graduating in the same years had 'good' degree outcome rates of 62 per cent (2019-20), 71 per cent (2020-21), 49 per cent (2021-22). Therefore, overall attainment for completing students who progressed from the business management foundation year seemed low relative to other students in the same subject. There were examples of individual student success given by staff, including among the students who had progressed from a Foundation Year that the assessment team met with. However, this data suggested to the assessment team that students were well-supported during their foundation year to continue into subsequent years of study, but then often experienced challenges in the later stages of their course.
134. Students who the assessment team met reflected on the change in the level of academic support they received as they progressed from their foundation year into subsequent years. In relation to the business management foundation year there was a view that 'guidance is very high', you feel 'very looked after in foundation, but then it went down'; that it 'feels like they think I should know the answers' and 'in Foundation Year we were made to feel looked after'. However, this view was not shared by students who had progressed from the accountancy foundation year, who remarked positively on support in later years too. For example: 'they go over everything again even if one person doesn't understand' and it was felt that the foundation year had 'prepared us well' for later years.
135. The assessment team identified a range of common aspects to the delivery of foundation year modules that illustrated a high level of academic support, particularly for assessments. For example, reviewing VLE sites and module handbooks for a sample of foundation year modules, the assessment team noted that there was a high proportion of teaching weeks dedicated to assessment support in Level 3: for one Level 3 business management module (2022-23, semester 1) tutorials (on-campus 2.5 hour teaching sessions) in seven out of the 15 teaching weeks listed were dedicated to 'Portfolio Reviews' (4), 'Drop-in Sessions' (1), 'Feedback Tutorials' (1) and 'Portfolio Submission' (1). While the first-time submission rate of

the assessment was 52 per cent (24 out of 46 students), just one student had not passed following initial marking of the assessment. This suggested that these high levels of support and scaffolding through contact hours were enabling those students who submitted their assessment to pass.

136. Similarly, another module (2021-22, semester 2) allocated tutorials in six out of 13 teaching weeks to 'Assignment Tutorials' (4), Assignment Submission (1) and Examination Week (1); note this was out of 13 weeks as two weeks were 'Easter'. This compared with, for example, a Level 4 module (2022-23, semester 1) that had three out of 15 teaching weeks dedicated to 'Tutorials' and 'Exam Week'. Assessment support at Level 3 was also provided on some business management foundation year modules through templates for summative assessments.
137. This high level of scaffolding and academic support was likely to benefit the academic needs of the cohort joining through the foundation year route and progressing into Level 4. However, the assessment team noted a concern that with current academic support, particularly for business management, a significant proportion of foundation year students appeared not to be successful in their onward study. The level of academic support provided at Level 3 seemed to have been reduced at Level 4 onwards. This may be expected given different academic needs of students joining a foundation year and those joining at Year 1, but the assessment team had concerns that some progressing foundation year students may not have been sufficiently prepared for this change.
138. As such, the team's view is that levels of academic support to meet the needs of this cohort of students, i.e. progressed foundation year students, were not sufficient. It is important to note that the assessment team's concern regarding academic support for foundation year students, to enable success following progression, does not presume that this is an issue related to academic staff resource. As such, it is distinct from concern 1. This is also suggested by outcomes for students who progressed from a foundation year specifically being lower than non-foundation year students on average. While ensuring appropriate academic support in this case may relate to academic staff resource, equally there may be other relevant aspects of academic support and ways of addressing this issue; the assessment team is not forming a view on this.
139. More consistent onward success for foundation year students may involve, for example, maintaining similarly high levels of academic support beyond the foundation year. This would need to be balanced with ensuring educational challenge, as described under ongoing condition B1.3.b, and breadth of subject coverage. Or it may involve embedding support in the foundation year that focuses on further developing students' skills for success in a more independent learning environment (i.e. transitions between Level 3 and later levels).

B2 Conclusions

140. The assessment team's view is that on balance the University of Bolton has not currently taken all steps to ensure that each cohort of students registered on the business and management courses identified in paragraph 30 receives sufficient resources and support for ensuring that those students succeed in and beyond higher education, as required under ongoing condition B2.a.ii. The assessment team considered recent student support initiatives, including the Institute's Student Success Zone and the University's LEAP Live and LEAP Online, to be positive contributions in this context that are likely to have beneficial

impacts on students going forward. The team would also highlight the positive support for students that individual academic staff often provide, which was clearly evident during the course of this assessment.

141. In relation to concern 1, existing plans and initiatives that the university is currently implementing have the potential, in the assessment team's view, to address the issues identified. These include additional academic staff recruitment, continued development and use of the PULSE student contact management system, further development of the Student Success Zone, and the delivery of a new strategy for student success. However, based on the existing position at the time of the assessment, the team found that academic staff resource was currently not sufficient for the intended levels of academic support in a range of activities, including:
- a. **Assessment feedback timeframes** (discussed in paragraphs 72-79). The assessment team's view is that the level of academic staff resource it observed means that the university marking and feedback time policy was not consistently being met with current academic staff resource levels. This sometimes delayed feedback on assessments (and the academic support provided by such feedback) for some students beyond stated expectations.
 - b. **Personal academic tutoring** (discussed in paragraphs 80-91). The assessment team's view is that, given the role that PATs have in academic support, the resource allocated to this system was not sufficient for the number of tutees, the range of duties PATs have, and the academic support needs of the student cohort.
 - c. **Academic support via assessment tutorials** (discussed in paragraphs 92-96). The assessment team's view is that academic staff time to accommodate individual tutorials for all students was over-stretched. This raised a concern as, although a number of students may not engage with tutorials, this often seemed to have been the primary means of providing formative feedback.
142. The assessment team also identified concerns regarding sufficient support for students (condition B2.2.a) in relation to:
- **Concern 2: consistent guidance for students regarding potential academic misconduct through assessment feedback on the online assessment platform, and consistency in relation to the relevant university policy** (discussed in paragraphs 98-110). The assessment team's view is that suspected academic misconduct was not being consistently addressed in assessment feedback so as to require and/or signpost students to access specific academic support at Level 4. As such, some students seemed not to be receiving sufficient guidance on accessing academic support to avoid academic misconduct. Balancing this, the assessment team saw evidence that potential academic misconduct was being consistently addressed in assessment feedback at Levels 5 and 6 in modules reviewed by the team.
 - **Concern 3: consistently providing formative feedback that is available flexibly to all students** (discussed in paragraphs 111-119). The assessment team's view is that formative feedback was not being consistently provided in a format that supported all students, across modules reviewed. In the assessment team's view, current variability

in how formative feedback was provided and whether this could be accessed flexibly by students, and referred back to by them, means that this aspect of academic support may not have been sufficient given the context of the student cohort recruited. This should, however, be considered in the context of changes being made to assessments on business management modules through the periodic review and re-approval (PRR) process noted above, which the assessment team viewed as positive and potentially helping to address the concern.

- **Concern 4: academic support for progressing foundation year students** (discussed in paragraphs 120-139). The assessment team's view is that some foundation year students (particularly in the business management course) seemed to encounter challenges following progression from their foundation year. This could lead to low levels of completion and/or attainment (i.e. 'good' degree outcomes) for these students. As such, the assessment team's view is that academic support for these students was not sufficient. This does not, however, take away from the evidence of positive academic support during the foundation years themselves.

143. Considering the information above, the assessment team's view is that the University of Bolton could have taken further steps to ensure that the students on the courses in question received the resources and support that are sufficient for those students to succeed in and beyond higher education.

144. This is, however, balanced by planned or recent actions that are likely to positively address identified issues relating to concern 1, in particular. Additional steps that could have been taken include, but are not limited to:

- a. Actions to address the completion and attainment rates of students who progress from foundation years.
- b. Ensuring that academic support is clearly signposted more consistently in assessment feedback where students are suspected of potential academic misconduct, including through formal academic misconduct processes where relevant, at Level 4.

145. The assessment team also observed that the university includes specific targets in its new strategy for student success for student experience, enrolment, Graduate Outcomes, retention, and attainment in relation to the university's access and participation plan. All these targets are positive. However, the strategy has no specific target for completion rates, which could have been included to reinforce academic support initiatives relating to these.

Condition B4: Assessment and awards

146. 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) were 'assessed effectively' (B4.2.a), that each assessment was '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).

147. 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 (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 approaches to assessment detail in course and module specifications to have been 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.

148. During on-site visits, the assessment team met with students currently studying the courses under consideration, across Levels 3 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.
149. The assessment team also met with a representative from the Industry Advisory Board for the Institute of Management, which included discussion of topics relevant to the requirement for students to be 'assessed effectively' (B4.2.a) (i.e. 'testing relevant skills'); this also did not lead to any concerns relating to condition B4 being identified.
150. The assessment team also requested additional information from the university regarding the courses being considered, as detailed under 'information gathering' above. This included external examiner reports (all levels), assessment maps at course level, module evaluation reports (all levels), and degree outcomes for each course. This information is relevant to all aspects of condition B4.2. The assessment team also reviewed a range of documentation provided by the university, including details of the University's Graduate Attributes Matrix for Employability (GAME), which was also discussed with students, staff and Industry Advisory Board member during on-site visits and is particularly relevant to students being 'assessed effectively'. The assessment team did not identify any concerns relating to condition B4 from this information.
151. The assessment team reviewed assessment briefs and samples of exam papers, as well as assessment tasks, student submissions and tutor marking and feedback via module VLE sites (samples from 22 summative assessments across 15 modules, including Levels 3, 4, 5 and 6). This information is particularly relevant to students being 'assessed effectively' (B4.2.a) and that assessments are 'valid and reliable' (B4.2.b). The assessment team did not identify any concerns relating to B4 from these reviews (regarding concern 2, identified above, as being related to academic support under condition B2).
152. The assessment team reviewed documentation relating to the recent periodic review and re-approval (PRR) process undertaken with business management courses (2022), including assessment maps prior to the PRR, following the PRR and a separate rationale for changes made as a result of the PRR. The assessment team found the PRR to have made positive changes that would be likely to support students being 'assessed effectively' through increased use of assessment methods designed to test students' 'relevant skills'.

153. 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 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.



© The Office for Students copyright 2023

This publication is available under the Open Government Licence 3.0 except where it indicates that the copyright for images or text is owned elsewhere.

www.nationalarchives.gov.uk/doc/open-government-licence/version/3/