Quality assessment report

BSc and BA Business and Management courses at the University of Bedfordshire

October 2022 – April 2023

Contents

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 25 April 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 Bedfordshire.

2. The University of Bedfordshire ('the university') offers business and management courses at both undergraduate and postgraduate level through the University of Bedfordshire Business School ('the Business School'). The Business School is based at the Luton campus, although business courses are also available to study at the Bedford and Milton Keynes campuses.

3. The OfS appointed an assessment team on 21 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 Bedfordshire, including about student achievement

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[1] See Securing student success: Regulatory framework for higher education in England - Office for Students.

- specific modules on the university's virtual learning environment (VLE).

5. The team visited the University of Bedfordshire on two occasions in November 2022 and February 2023, during which time it had a tour of facilities and met with staff and students.

6. During the assessment process, the team developed lines of enquiry. These focused on areas that potentially warranted further investigation and that were within the scope of ongoing conditions of registration:

    - B1: Academic experience

    - B2: Resources, support and student engagement

    - B4: Assessment and awards.

7. The lines of enquiry were developed and updated between the two visits and both versions were shared with the university. This process followed the OfS's risk-based approach and meant that the assessment could focus on areas that were most likely to give rise to more significant regulatory concerns.

8. The assessment team considered multiple sources of information that were relevant to condition B4: Assessment and awards. The assessment team did not identify any concerns relating to this condition from reviewing this information.

9. Through its activities the team identified three concerns that may relate to the University of Bedfordshire's compliance with the OfS's conditions of registration:

    - **Concern 1:** The assessment team found that undergraduate courses were delivered mainly through a traditional full-time student model that operated during standard teaching hours with limited flexibility for students. With student cohorts that the university acknowledged were non-traditional in nature, with many students who were working full-time while studying, this presented challenges for students and limited their ability to engage with their course. This concern relates to condition B1, because this condition requires that the higher education provider must ensure that the students registered on each higher education course receive a high quality academic experience, including that courses should be effectively delivered.

    - **Concern 2:** There was limited central monitoring of student engagement with their course and overreliance on individual academic staff to proactively monitor and take action where students may have been struggling to keep up with their course. Limited proactive action from central support services meant that students who were struggling to engage may or may not have received the support they needed depending on the actions of individual academic staff. Without effective monitoring of students who were at risk of dropping out, the university could not provide additional academic support for students who needed it. This concern relates to condition B2, because this condition requires that the higher education provider take all reasonable steps to ensure students receive sufficient academic resources and support. The assessment team considered that effective monitoring of student engagement, over and above the personal academic tutoring system, was a step that could have been taken to ensure students had sufficient academic support to succeed.

- **Concern 3:** The assessment team considered that in order to ensure that students have sufficient academic support to succeed, the provider could have taken more steps to develop a better understanding of non-continuation rates and to embed appropriate management processes. There had been sustained high failure and low continuation rates despite continuation-focused initiatives and changes in processes. High rates of student attrition in the first year had been ongoing for a sustained period despite a number of continuation-focused initiatives and changes in process having been made in recent years. This was coupled with limited understanding of the reasons for low continuation rates. High fail rates suggest there was an issue with the support that students received, and monitoring of module failures was not sufficient to allow the university to proactively intervene and offer additional support to students where this might have been needed. While university-level strategies existed and changes had been made to the planning framework, the assessment team found limited evidence of their effective implementation. The result was an inability to take effective action to address low continuation.

Introduction and background

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

11. The assessment involves a visit to a provider, after which the assessment team produces a report. In line with the risk-based approach of the OfS, the 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.

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

13. The OfS appointed a team in October 2022 to assess the quality of the business and management courses provided by the University of Bedfordshire (i.e. those courses delivered by the university, excluding courses delivered by partner organisations and transnational education (TNE)). The assessment included matters that fall within the scope of ongoing conditions B1, B2 and B4. The scope of the assessment, the information considered, and the findings of the assessment team are summarised in this report.

14. This report represents the conclusions of the team as a result of its consideration of information gathered during the course of the assessment to 25 April 2023. The report does not take into account matters which may have occurred subsequent to that period.

15. The OfS decided to open this investigation as part of its approach to general monitoring and in the context of its decision to focus on the quality of business and management courses. In opening the investigation the OfS had regard to information it held relating to the University of Bedfordshire, including student outcomes data, numbers of students and any notifications received.

Context

16. Business and management courses at the University of Bedfordshire are delivered through the University of Bedfordshire Business School (the Business School). The Business School is based at the Luton campus, although business courses are also available to study at the Bedford and Milton Keynes campuses. The Business School offers a wide range of undergraduate courses, including business management, business administration and international business, all with various pathways. At postgraduate level the Business School offers an MBA, again with various pathways, as well as a wide range of other courses.

17. Overall, based on the latest OfS 'Size and shape of provision data dashboard', the University of Bedfordshire had a student population in 2021-22 of 16,920 (taught or registered headcount,

excluding offshore TNE).[2] This included 11,120 undergraduate students, of which 390 were part-time. Of these students, 10,850 were registered and taught by the University of Bedfordshire (310 part-time), with 270 only registered with the university (and taught by another organisation). The total student population also included 220 undergraduate apprentices and 30 postgraduate apprentices (250 total), as well as 5,370 postgraduate students (4,730 full-time and 640 part-time). Of these postgraduate students, 190 were only registered by the university and taught by another organisation. This gives a total population of students who are both registered and taught by the university, by headcount, of 16,280. Among the students taught by the university on business and management degrees, there have been some significant changes in student numbers over the past five years, as shown in Table 1.

Table 1: Changes in student numbers, 2018-19 to 2021-22

Mode and level of study	2018-19	2019-20	2020-21	2021-22
Full-time undergraduates	3,080	4,440	4,920	3,870
Part-time undergraduates	10	0	0	0
Apprenticeship undergraduates	10	10	0	10
Full-time postgraduates	880	1,510	2,140	2,500
Part-time postgraduates	40	40	60	40
Apprenticeship postgraduates	0	10	0	10
Total	4,020	6,010	7,120	6,430

18. As set out in Tables 2 to 5, compared with the total population of students at OfS-registered providers, students at the University of Bedfordshire are more likely to:[3]

- be mature (over 21 years old at entry)

- enter from access courses or foundation degrees or hold no qualifications on entry

- be local

- be from Index of Multiple Deprivation (IMD) quintiles 1 or 2.

In addition, the team heard at the visits from both students and staff that a high proportion of students are in full-time employment alongside their studies, and many also have caring responsibilities.

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

[3] Source: Data from the four-year aggregate (academic years 2018-19 to 2021-22) from the OfS size and shape of provision data dashboard, as published on 12 April 2023.

Table 2: Age of students on entry (four-year aggregate 2018-19 to 2021-22)

Age on entry	All OfS-registered providers (%)	University of Bedfordshire (%)
Under 21 years	77.2	34.4
21 to 30 years	14.9	30.8
31 years and over	7.9	34.8

Table 3: Entry qualifications (four-year aggregate 2018-19 to 2021-22)

Entry qualifications	All OfS-registered providers (%)	University of Bedfordshire (%)
A-levels (CDD or higher) or international baccalaureate	41.9	7.7
A-levels (DDD or lower), other L3 (105 tariff points or higher) or two A-levels	9.3	4.8
Higher education level qualifications on entry	8.7	11.3
BTECS (at least DDM), or one A-level or two BTECs	7.4	4.9
BTECS (lower than DDM)	8.2	10.8
Other qualifications held by non-UK-domiciled students	1.0	2.0
Access courses, foundation courses or other Level 3, or 65 tariff points or higher	17.0	30.2
None, unknown or other entry qualifications	6.5	28.6

Table 4: Study location (four-year aggregate 2018-19 to 2021-22)

Study location	All OfS-registered providers (%)	University of Bedfordshire (%)
Local to address prior to entry	23.3	35.6
Not local to address prior to entry	76.4	64.1

Table 5: Deprivation quintile (four-year aggregate 2018-19 to 2021-22)

Deprivation quintile (IMD)	All OfS-registered providers (%)	University of Bedfordshire (%)
Quintile 1 or 2	40.1	61.0
Quintile 3, 4 or 5	59.9	39.0

Note: IMD only available for UK-domiciled students.

19. The Business School has a number of TNE partnership arrangements, which the OfS viewed as being out of scope for this investigation. The university has a relationship with London School of Commerce (LSC), registered on Companies House as St Piran's School GB Limited

and trading as London School of Commerce and Health Sciences. LSC is not registered with the OfS. LSC works in partnership with the University of Bedfordshire to deliver BA (Hons) Business Management with Foundation Year at study hubs in London and Birmingham and on the university campus in Milton Keynes.

20. Large numbers of students are taught through the partnership with LSC. According to data submitted by the university for 2022-23, the two courses with the largest number of students within the Business School are Business Management (with Foundation Year) LSC Birmingham (569 students) and Business Management (with Foundation Year) LSC London (398 students). For data purposes, students studying University of Bedfordshire courses through LSC are registered and taught by University of Bedfordshire based on how the student data is submitted to the designated data body.

21. In the agreement between the two organisations LSC is described as an 'associate college'. The responsibilities of LSC are set out in the agreement and include:

    'conduct teaching and learning […] using approved LSC teaching staff, student marketing, recruitment and admission processes in conjunction with the University of Bedfordshire, student registration support for enrolment, examination administration, support for student attendance monitoring, student support in conjunction with the University of Bedfordshire, educational facilities.'

22. The team's understanding is that Levels 3 and 4 are taught by LSC staff and Levels 5 and 6 by University of Bedfordshire staff. From the information available, the LSC provision is completely embedded into the overall business and management provision at the University of Bedfordshire, and is not a separate entity. This being the case, the team included the LSC courses as part of its assessment.

23. On 25 November 2022 the University of Bedfordshire submitted a reportable event to the OfS, stating that the partnership with LSC had now been terminated by mutual agreement, asserting that the business model was no longer viable because of a fall in EU student recruitment following the UK's withdrawal from the EU. The university stated that recruitment of new students had been halted and that both parties were committed to teaching out current students.

Student support arrangements

24. The key features of the student support mechanisms in place at the university are as follows:

    a. All students are allocated a Personal Academic Tutor (PAT).

    b. The way in which this process works is governed by a PAT policy, with accompanying handbook for staff and guidance for students, introduced for the 2021-22 academic year.

    c. Module tutors monitor class engagement by manually taking a register at the start of each class via the VLE, BREO.

    d. A variety of central services exists to provide student support, including the student information desk (SID) with physical and virtual locations for students to access, a student wellbeing service, and academic skills development resources available via the library.

e. Academic staff may refer students to the central support services, or students may refer themselves.

Strategic overview

25. The university is currently undergoing a significant change programme. In September 2021 the university's board of governors approved a new strategy, 'Transforming Bedfordshire'. Underpinning this overall strategy are a number of delivery strategies:

- Education and Student Experience

- Research and Innovation

- International Strategy

- People and Culture

- Infrastructure

- Partnerships and Community.

The University of Bedfordshire states that 'the delivery of our Education and Student Experience Strategy is absolutely vital to the improvement in student outcomes'. It has developed a range of strategic action plans, which provide the detail around delivery:

- Teaching and Curriculum

- Retention

- Student Experience and Student Voice

- EDI (equality, diversity and inclusion) Student Success Action Plan

- Employability.

Assessment process

Information gathering

26. The assessment team gathered a range of information to determine possible concerns about requirements set out in conditions of registration B1, B2 and B4. The team gathered information through an initial request for data from the university (19 October 2022) and two site visits on 28 November 2022 and 13 to 14 February 2023.

27. During these visits it undertook:

    - a range of staff interviews (with academic and central professional service staff)

    - student interviews (including a range of students studying at Levels 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 VLE, BREO, on 28 November 2022. It made further requests for information and data based on discussions with staff and students during both the initial site visit and the 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 24 January 2023, 2 February 2023 and 25 April 2023.

29. The team first reviewed general monitoring intelligence, including student outcomes data held by the OfS, and initial data provided by the university. From this information 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 continuation rate (the proportion of students that were observed to be continuing in the study of a higher education qualification, or to have gained a qualification, one year and 15 days after they started their course) for full-time first degree students in business and management over four years is 59.3 per cent, which is below the condition B3 numerical threshold of 80 per cent.[4] This compares with a continuation rate of 91.8 per cent for full-time postgraduate taught masters' students over the same period and subject area, which is above the threshold of 80 per cent.[5] All undergraduate programmes were included in the assessment.

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[4] See OfS, 'Setting numerical thresholds for condition B3'.

[5] Source: OfS published continuation measures within the student outcomes dashboard from September 2022 using the 'Taught' view of a provider's student population, available at 'Student outcomes data dashboard'. The subject area 'business and management' is defined by the Common Aggregation Hierarchy Level 2 (CAH2). The four years were 2016-17 to 2019-20 inclusive.

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

Condition B1: Academic experience

30. The assessment team reviewed a range of information relevant to condition B1 (see Annex A for the full text), which is detailed through the discussion in paragraphs 31 to 52.

31. In the assessment team's view there were concerns that may relate to compliance with condition B1.2, taking account of the explanation of a 'high quality academic experience' provided in condition B1.3d:

> '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:
>
> […] d. each higher education course is effectively delivered; '

32. The assessment team also particularly noted definition B1.5.d:

> '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.'

33. The assessment team considered a range of information related to the delivery of courses at the University of Bedfordshire in seeking to understand whether students were receiving a high quality academic experience, including whether courses were 'up-to-date' (B1.3.a), provided 'educational challenge' (B1.3.b), were 'coherent' (B1.3.c), and required 'students to develop relevant skills' (B1.3.e).

34. Based on the initial information reviewed in the scope of this quality assessment, the assessment team did not find any concerns that would relate to condition B1.3 a, b, c or e. The review of 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.

35. 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'.

36. During on-site visits, the assessment team met with students currently studying relevant courses, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to courses providing 'educational challenge', being 'coherent', and requiring 'students to develop relevant skills'. The assessment team did not identify any concerns relating to condition B1.3 a, b, c or e during the course of its on-site visits.

37. The assessment team also considered a range of information related to the delivery of courses at the university, including a review of VLE content, teaching materials, timetables, course and module structures, along with discussions with students and academic teaching staff, in seeking to understand whether students were receiving a high quality academic experience and whether courses were effectively delivered.

38. The assessment team also noted a recent restructure of the foundation year syllabus, introduced in the 2022-23 academic year, and a pending restructure of the first year syllabus to include more explicit support for academic skills development, due to be introduced in the 2023-24 academic year.

39. The assessment team sought to understand the way in which courses were delivered at the university, staff views of the way in which students engaged with their courses and, critically, students' views on the ease with which they were able to engage with their course. The assessment team referred in particular to the use of the word 'appropriate' in definition B1.5.d with reference to the non-traditional nature of the university's students.

Concern 1 (condition B1.2): A traditional delivery model that is not effective for a 'non-traditional' cohort

40. The assessment team focused on the delivery of undergraduate courses in business and management at the university, the key features of which were as follows:

- a standardised VLE template based on the most up-to-date Blackboard software, referred to as a 'BREO Shell', for each module

- face-to-face teaching delivered on the relevant campus in a variety of lecture, seminar and workshop formats depending on module topic and level

- courses delivered full-time over three academic years (or four academic years where students undertake a foundation year at Level 3).

41. The assessment team considered matters relating to the way in which courses were delivered at the university and the nature of the cohort the university recruits onto its undergraduate courses. The nature of the cohort of students at the University of Bedfordshire as set out in paragraph 18 is that the students are more likely than the population of students at other OfS registered providers to be: mature; enter from access courses or foundation degrees or hold no qualifications; and come from IMD quintiles 1 or 2. In addition, the team heard at the visits from both students and staff that a high proportion of students were in full-time employment alongside their studies, and also had caring responsibilities. This meant that course delivery should have been structured in a way that took account of these factors to ensure that students could effectively engage around other responsibilities such as caring or work. However, the

team found mainly standard delivery methods in place and limited practices that would support flexibility, for example, blended learning. There were many references from staff during the visit to the effect that students at the university had 'complex lives', and indeed the university noted the following in a document providing a narrative overview of continuation data:

> '...characteristics of our students not represented in sector metrics but which impact student success include the large proportion of our students that work to support their studies or provide care for dependants. […] Taken together, our student data indicates that a significant proportion of our business and management students have to deal with multiple factors of disadvantage. This context provides challenges for learning, teaching and progression.'

42. Despite this acknowledgement of the significant challenges the university's cohort faced, the delivery model employed by the university was similar to those used at providers where the cohort is a 'traditional' one. The university's policy on attendance was under development and it did not collect attendance data centrally, and therefore it was difficult to ascertain an accurate picture of student engagement with their course. However, the delivery model emerged as a significant barrier to engagement in meetings with students. The university's timetabling policy set out the conditions under which a student may request a change of class allocation. While caring responsibilities were included here as a valid reason, the policy highlighted that only part-time students could request a change for reasons other than caring responsibilities, disability or medical needs. The policy outlined the use of random allocation of students to teaching groups and stated that if a student requests a change they are then randomly re-allocated to another group. Therefore, limited flexibility was allowed for students in shaping their own timetable. This is explored further in paragraphs 46 and 47.

43. In reviewing the way in which courses were delivered at the university, the assessment team noted some features aligned to the non-traditional nature of the student cohort, such as multiple intakes per academic year. One relatively strong element across all modules was the university's VLE, which had undergone significant investment in recent years. In a meeting, the VLE team discussed how the university had invested significant effort here in standardising the layout of each module and having standard sections that each module was required to provide, benefiting students by making modules easier to navigate and learning resources easier to find. Another recent change was the move to try to condense the timetable for all students to two days per week, as discussed with operational staff from central services. The intent of this change was to make teaching easier for students to engage with alongside their other commitments. The Education and Student Experience Strategy also noted that the university intends to provide a 'personalised and flexible approach to enable our students to thrive'.

44. In most aspects of course delivery, however, the university's approach was similar to what might be expected for a more traditional cohort of students. The assessment team reviewed a timetable report for 2022-23, and found all teaching to be scheduled between 0900 on Monday and 1800 on Friday. This is surprising when the university works with students who often have multiple sets of other competing responsibilities such as childcare, employment and caring. From the information reviewed by the assessment team, there was no indication that other approaches (such as evening or weekend teaching) had been considered, other than one brief mention of evening teaching being a possibility in a meeting with staff. During a meeting in which Level 4 module leaders were asked whether recording of lecture content was standard, it emerged that recordings were not in place for all modules and some staff viewed such practices as pandemic-related rather than standard. The university's policy on audio-visual

recording was 'opt-in' rather than 'opt-out' – again this was surprising given the context in which the university is operating.

45. In recent years the university had explored various approaches to blended learning and the team reviewed university level guidance for the 2022-23 academic year that allowed individual units to deliver up to 25 per cent of their teaching online. From the timetable report, however, it seems that this approach was not adopted in the Business School. A Framework for Blended Learning was approved by the university in March 2023 to cover future academic years. The definition of 'on-campus' provision in this more recent update, however, appears more restrictive than prior guidance and states that only supporting material may be provided online and all teaching must take place face-to-face.

46. In meetings with students, last-minute changes to the timetable were noted as being challenging for students who were working full-time, although students acknowledged the current academic year had been more stable than the previous year. In a meeting with Level 4 students, the timetable was noted as a particular challenge, with changes from semester to semester being difficult to accommodate when working full-time on a set shift pattern. Another group of Level 4 students suggested that most students work and are often unable to attend. The same group also noted inconsistencies in online resources available and variable approaches to recording teaching sessions.

47. A group of Level 5 students noted timetabling to be an issue in terms of being assigned to seminar groups, some of which occurred when the students were working. The students noted that there was no flexibility in the system around joining alternative seminar groups that fitted with their work schedule. One student stated that not being allowed to switch class had stopped them from being able to attend a significant percentage of a module, when they could have attended another session they had not been assigned to. A meeting with Level 6 students revealed similar challenges, with students with jobs and families finding the timetable hard to work around.

48. To better understand why students might not be continuing with their studies, the assessment team reviewed module outcome data from the university in detail from the three most recent examination sessions in 2021-22 and the first semester of 2022-23. Over these three sessions, a significant proportion of module sits (19 per cent overall) were failed either because of non-submission (Grade G) or 'non-submission and exit'. This suggested to the team that a significant minority of students were not engaging with their studies to the point of assessment.

49. It is worth noting that the assessment team did not find issues with the quality of teaching at the university. Indeed, students, when asked about the quality of teaching in meetings, were generally positive about their experience and the dedication of individual academic staff. Yet if a significant minority of the cohort was not able to engage with the teaching, this calls into question the appropriateness of the delivery model for the university's cohort.

50. In meetings with school and central management teams during the second visit, the assessment team found clear recognition that there was a group of students who were unable to engage with the course. Staff stated multiple times that students had 'complex lives', which made it difficult at times for them to engage, and that this was 'sometimes beyond our control'. The lack of understanding that new students had of higher education was described in one meeting with staff as 'seeing [higher education] like a black box'. These challenges were

characterised, however, as a function of the types of students that the university recruited, and therefore externalised. It did not appear that any consideration had been given to adjusting the delivery approach and providing alternative forms of support to students. This issue is explored in more detail in reference to condition B2.

B1 Conclusions

51. The assessment team considered that the university could have addressed this concern if there was a more appropriate approach to course delivery for the cohort of students who the university recruits. The university demonstrated awareness of the nature of its student cohort, and the challenges and opportunities that this might present, but overall the assessment team found little information that the teaching delivery model had been adapted to suit student needs. The university recognised that its cohort consists mainly of students who are working while studying and are from underrepresented backgrounds. The teaching model, however, was in many ways a traditional delivery model that would be more effective for more typical full-time cohorts, with delivery between 0900 and 1800 Monday to Friday and limited flexibility for students who need to change their timetable. There has been some consideration of alternative delivery models and increased use of blended learning in recent years at the university but adoption in the Business School was, at the time of the investigation, limited.

52. Given that at least a significant minority of students appeared unable to engage effectively with the teaching on their modules because of the way the course was structured, and the limited consideration of more flexible and appropriate models of delivery for such a cohort, it was the assessment team's view that the university had not provided all students with a high quality academic experience, in particular with reference to condition B1.3, which requires courses to be effectively delivered.

Condition B2: Resources, support and student engagement

53. 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 in paragraphs 53 to 97.

54. 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.'

55. The assessment team also particularly noted the clarification articulated in 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 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'

56. The assessment team considered the arrangements for student engagement relevant to condition B2.2b, including student involvement in relevant committees, and opportunities for students to contribute to course design through their feedback. The team regarded student engagement processes and practice to be appropriate and therefore did not identify any concerns in relation to condition B2.2.b.

Concern 2 (condition B2.2.a.): Limited central monitoring of student non-engagement and proactive support for students

57. The university operates a range of support services for students. These include a Personal Academic Tutoring (PAT) system and central support services, as described in paragraph 24. To reach a view about the steps the university had taken to ensure the sufficiency of academic support for students, the assessment team sought to understand the context of the undergraduate student cohort admitted to business and management courses at the university. In doing so, the team had regard to the expectation in condition B2.3 that 'significant weight' should be placed on 'the particular academic needs of each cohort of students based on prior academic attainment and capability; and […] 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' (see Annex A).

58. OfS data, as set out in paragraph 18, over a four-year period from 2018-19 to 2021-22, showed that 65.6 per cent of the university's students recruited were over the age of 21, with around half of these being aged between 21 and 30 and half being 31 years and over. Of these, 61 per cent were from IMD quintiles 1 and 2. In addition, 28.6 per cent recruited had no, unknown or other entry qualifications.[6] The complex needs of cohorts such as these means that significant effort needs to be expended on providing academic support for, and monitoring the progress of, students when they start their higher education course. From data submitted by the university, for the period from 2016-17 to 2019-20, a total of 6,922 students were recruited into Level 4; 2,815 of those did not continue with their studies past the end of that first year.

59. Continuation was highlighted by the university as a 'super KPI' (key performance indicator) in the Strategic Overview document provided to the assessment team on the day of the first visit; this was further reinforced in the Education and Student Experience Strategy 2022 to 2026. This strategy noted the PAT system as a key part of supporting and engaging with students and enabling them to thrive. A recent review of the PAT system had been undertaken across the university, with a new policy, staff handbook and student guide launched in the academic year 2021-22. A review of the PAT handbook for staff suggested that the main function of the system is to support students in their studies and to refer students to sources of information, relevant teams and support services if they are facing difficulties. The handbook provided, in Appendix 1, detailed guidance on how to set up and conduct meetings, but there was at no point any guidance for tutors on what to do if a student did not engage with the PAT system. This means there was no formal mechanism for referring students who did not engage with their PAT to central support services. While PAT meetings were recorded on a central 'e-vision' system, there did not appear to be any central monitoring of this data and it was not clear to the assessment team that this data was used to monitor engagement centrally.

60. The university has a Retention Action Plan (2022-2023), which is part of a suite of action plans that sit under the Education and Student Experience Strategy. The plan is owned by the Retention Working Group and aims to improve continuation rates. The revised PAT system was noted in the Retention Action Plan as implemented and complete. A number of follow-up actions taken forward to academic year 2022-23 related to a further review of student

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[6] Source: Data from the four-year aggregate (academic years 2018-19 to 2021-22) from the <u>OfS size and shape of provision data dashboard</u>, as published on 12 April 2023.

engagement with the system, online record keeping and administration, identifiers of student risk, PAT support for students with mitigating circumstances, students applying to suspend or withdraw, and other areas. A further review of the type noted in the Retention Action Plan was reasonable and would be expected one year after implementation. The assessment team's view was that the PAT system is in line with sector norms overall. However, given the cohort of students recruited to business and management courses, for example with a high proportion of students with low tariff or no formal qualifications on entry, the academic support needs of students are likely to be significant. Therefore the PAT system should be supplemented by proactive engagement monitoring elsewhere to provide sufficient support for students.

61. The university's approach to supporting students was outlined to the team in a document prepared for the evidence submission which showed the support mechanisms and context for students and references the 'begin, thrive, succeed' framework in place at the university. The document also referenced a number of central teams, including student support, the student information desk for administrative issues (SID) and the study hub for academic support. This document contained a slide for students with contact details for a number of issues such as engagement ("feeling homesick? Worried about staying on your course?"), money, mental health and wellbeing, disability support and mitigation. These arrangements were also described to the team in meetings with staff and students. The university had invested significantly in wider support functions in recent years, such as the English Language Centre and the Studiosity platform that allows students to get feedback on their writing prior to assessment submission. The operation of these teams, however, appeared to rely entirely on student self-referral or referral by the PAT. The presumption of self-referral was further reinforced by the university's quality handbook, in chapter 10 on Student Support, which provides an overview of student support mechanisms.

62. The most recent Retention Action Plan reviewed by the assessment team for the business school was from 2020 and noted a number of the complexities inherent in the Business School's cohort. Since this action plan was written, the Business School was successful in receiving £250,000 from the internal Vice-Chancellor's fund to set up a student success and intervention team specific to the Business School. According to information from the university, this team was in contact with 483 students during academic year 2021-22 and provided 83 students with bespoke learning plans and additional support. This is a positive step, but the number of students with bespoke learning plans appears low relative to the overall student population and in comparison to the number of students not continuing with their studies in a given year (1,118 students did not continue in 2019-20). Further, the assessment team were not provided with information on the impact of these learning plans so it was not possible to judge the effectiveness of these interventions. A further positive step the provider had taken involved setting up a system of named student advisors focused on different challenges a student might face in engaging with their studies (for example, pregnant students and student parents; care experienced students; students independent from families; students who are carers; under 18s; homeless students; and those who have experienced or are experiencing domestic abuse), in 2022-23. The evidence provided on these advisors was, however, limited to documentation and the team was therefore unable to form a judgement as to the impact of this change.

63. From the evidence reviewed by the assessment team, it was not clear how central teams took a proactive approach to monitoring student non-engagement, and consequently to providing proactive additional support for students. In the Retention Action Plan, most actions that had been completed to date were about putting teams in place rather than proactive monitoring and engagement with students. From the meeting with central operational staff, it was clear that there was no proactive monitoring of students and that there was a reliance on students either self-referring or being referred by academic or school-based teams. Beyond that, central operational staff had limited awareness of what would happen if students were not engaging. Actions in the retention plan such as 'additional support for students with multiple mitigations', where such students would be contacted by student engagement advisors, had no progress marked against them nor any indication when progress might be made. A further action, around evaluation of assessment data mid-semester and a review of non-submission, was noted in the action plan but taken forward to the present academic year. Some actions were being addressed by the Business School's student success and intervention team but, as noted in paragraph 62, it was not possible to discern the impact of this team. Thus, while a number of central academic support functions existed, they appeared to operate reactively and did not monitor issues that may have helped to identify at risk students proactively. In the assessment team's view this meant that the support provided to the particular cohort of students was not sufficient.

64. In the assessment team's first meeting with students, the majority had met with their PAT and were complimentary about the support offered. Indeed, one student noted the ability to meet with their tutor weekly in relation to a personal issue they had experienced. The availability of tutors and student awareness of these was further reinforced in meetings with student groups at Levels 4, 5 and 6 in the second visit. Thus, the assessment team did not have concerns that the students they met were not allocated a tutor or that they were unable to access them. The issue that arose, in the view of the assessment team, was about the students who did not meet their personal tutor and would be unlikely to meet with the assessment team. There did not appear, from the investigation, to be any formal mechanism to identify students at risk, or any method of detecting when a student had stopped engaging with their course, other than the PAT system and manual attendance monitoring. It was not clear to the assessment team how such data was used and reviewed, and no evidence was provided that such issues were monitored centrally to give an overview of students who might be at risk of dropping out of their studies and who might therefore require additional support.

65. The assessment team found that the PAT system is relied upon as the core mechanism for monitoring student engagement and identifying 'at risk students' at the university, which seemed limited given the context in which the university operates and the complex nature of the university's cohort and their likely academic support needs. During a meeting with senior professional staff during the first visit, the challenges of data availability and the levels of change in the university were acknowledged. This was reinforced during a meeting with operational managers in the second visit as being a key challenge the university was in the process of addressing, with investment in data quality, improving systems and a revised strategic planning framework for 2022-23 that provided performance data at school, course and unit level, linked back to the university's 'super KPIs'.

66. Again in the meeting with central professional staff, when asked how student engagement was monitored centrally, the PAT system was discussed in terms of all tutors meeting with their students in the first three weeks. It was also stated that tutors are expected to escalate non-

contact from a student to the student engagement team, but, as set out in paragraph 59, this was not mentioned in the PAT handbook. The conversation moved on to how the university identified students at risk of dropping out. It was noted that central teams did not have the relevant data, but if issues were raised by the tutor then central support was provided. When asked where students at risk were discussed, it was noted that these discussions took place 'in faculties'. The structure of the university means that faculties are academic structures consisting entirely of academic staff. Thus a lot of the monitoring, engagement and intervention work appeared to the assessment team to fall on individual academic staff, and that central teams and systems were not providing effective support for these staff in the conduct of their work to support students.

67. The level of reliance on the PAT system was again evident in a meeting with senior professional staff during the second visit. Here, when attendance issues were discussed, the main mechanism for noting this was said to be the tutor referring students to the engagement team. The engagement team is a central service that provides general advice and support to students on issues that may be affecting their attendance, and can also refer students onto more specialist services if required. A discussion of learner analytics to monitor student engagement with online resources and university systems also emerged during the meeting; it was acknowledged that this was presently being piloted in another faculty and presented a significant opportunity for the university with regard to monitoring and intervention. Towards the end of the assessment period, university-wide investment in learning analytics was approved for implementation in 2023-24. It was also acknowledged that at present the PAT system was the main way of monitoring students at risk of dropping out. The PAT policy, handbook and student guide were noted as a means of ensuring consistent support to students.

68. In a meeting with Level 4 module leaders, it also became clear that the onus was on academic staff to monitor attendance in classes. At the time of assessment, no official policy on attendance existed at the university, but one was under development. This was acknowledged by central professional staff as a priority for the following year, and was mentioned in the Retention Action Plan. Level 4 module leaders noted that it was possible to monitor attendance using BREO, the university's VLE. Staff also mentioned following up with students who did not attend and referring them to their personal academic tutor if needed. When asked whether this was established process and policy, module leaders stated that it was seen as good practice, rather than something they were required to do. Again, the assessment team noted the level of monitoring and engagement that individual academic staff were doing, which, given the university's context, appeared insufficient to meet the academic support needs of students.

69. In another meeting with academic staff, the pressures students face were discussed. It was acknowledged that the first year is the most challenging and there was a need to build more support into first year modules. Academic staff also reported being supported as personal tutors by having time allocated on the workload plan. This was confirmed via a review of the Academic Workload Planning Model for the university. When asked about the support they received as personal academic tutors, however, none referred to the policy or staff handbook. Instead, a number of examples were provided where academic staff worked with each other in course or department groups to share resources and good practice. In another meeting with academic staff, when asked what could be improved at the university, staff noted the need to recognise the level of support they provide their students because the students need it. The good practices and dedication of individual academic staff in relation to tutoring was clear to

the assessment team, but some disconnect between policies and processes and what was happening in practice was evident from these meetings.

70. Overall, it was clear to the assessment team that academic staff encountered during the visit were professional and dedicated to their students. Academic staff understood the needs of the student cohort, worked hard and went over and above policy expectations to support their students in higher education. Despite the availability of resources and support, as set out in the context section, the concern arose because there was no central monitoring of student engagement and there was a lack of clear attendance policy. Significant emphasis was placed on the PAT system and individual academics taking action in instances where students were not engaging with their studies. In a situation where the university operates across multiple locations, uses a combination of full-time staff and hourly paid lecturers for delivery of courses and recruits high numbers of students from non-traditional backgrounds, the lack of attendance policy and limited approach to monitoring student engagement meant that students who were struggling to engage may or may not have received the support they needed, depending on the actions of individual academic staff. Without effective monitoring of students who are at risk of dropping out, the university cannot provide additional and academic support for students who need it.

71. With a student cohort such as the university admits, this means that students did not receive sufficient support to ensure that they succeeded within and beyond higher education.

Plans relevant to monitoring student engagement and proactive academic support

72. The university provided the assessment team with information relating to a number of initiatives and changes, but the assessment team considered that it was too early for these to have had a material impact on concern 2 at the time of assessment. It is important to note, however, that in the team's view these plans appeared somewhat credible, given that they were in progress and had resources allocated, and may address the 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:

    a. The introduction of an attendance policy, which was at the time of assessment under development. It is imperative when operating in an environment such as the one faced by the university that there are clear expectations around student attendance and appropriate systems in place to monitor attendance. The assessment team's view was that such a system should not rely on the input of individual academic staff to be implemented effectively.

    b. New university-wide investment in learner analytics to track student engagement, as discussed with the senior professional staff. The university has invested significantly in its VLE, and the now agreed implementation of relevant learner analytics to monitor engagement across a number of university systems is the logical next step.

    c. A review of the first-year curriculum, as discussed with academic staff, that will be implemented next academic year (starting September 2023). This review, which includes a module devoted to academic skills and another devoted to quantitative skills, acknowledges the challenges students face when transitioning to higher education and is designed to support them.

Concern 3 (B2.2.a): The assessment team considered that in order to ensure that students have sufficient academic support to succeed, the provider could have taken more steps to develop a better understanding of non-continuation rates and to embed appropriate management processes

73. After the first site visit, the assessment team requested further continuation data, based on the underlying data that the OfS uses to construct student outcome indicators, for the university's business and management students, broken down by a variety of student characteristics.[7] Over the period from 2016-2017 to 2019-2020, the overall non-continuation percentage was 40.7 per cent, and this proportion was relatively steady over time. Thus, low levels of continuation were not new for the university. The team asked for this more detailed breakdown of continuation data to help determine whether there were particular sets of circumstances, courses or locations that drove low continuation.

74. The data from the university showed that male students were more likely not to continue than female students and that among different ethnic groups, black and 'other' students were the most likely not to continue. With regard to course and location of study, the university's complex setup, with business and management courses taught at multiple locations, as set out in the context section, made this harder to interpret, but it appeared that non-continuation had worsened at the Luton campus between 2016-17, when it was 16.5 per cent, and 2019-20, when it was 42 per cent. During this period the number of students at the Luton campus had increased from 361 to 1,306, suggesting a significant change in the way the campus operated. Other areas with low continuation were the LSC study centres, which started the 2019-20 academic year with around 450 students each.

75. A follow-up request for information after the second site visit provided data on the reasons for students leaving the university. During the three academic years covered by the university's own data (2019-20 to 2021-22), a total of 2,412 students left the university without receiving an award. A majority (1,879, 78 per cent) of these were classified as 'Academic failure/left in bad standing/not progress'. Other reasons included personal reasons (n=147), finding employment (n=10), transferring to another institution (n=109) and 'other' (n=124). While the assessment team initially interpreted the category 'successful completion of course' as meaning students successfully completed their course of study, the faculty annual monitoring report from 2020-21 suggested that students marked as 'course complete' may also have referred to students granted exit awards. Indeed, from the data provided, there was no category for exit awards, so the team were unable to make an assessment of the proportion of students to whom exit awards were granted. Clarity of data notwithstanding, the vast majority of those students who did not complete appear to have left because of academic failures, which may have been due to non-submission or due to failing a component of a module. This suggests that these students were not receiving sufficient support to ensure they were able to engage with and succeed in their course.

76. To understand what the university was doing to address low continuation, the assessment team reviewed university policies, strategies and action plans, which revealed a complex set of interacting strategies, objectives, success targets and action plans. A new Retention Working

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[7] 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 Bedfordshire within the business and management CAH2 subject area. It covered entrants in academic years 2016-17 to 2019-20 inclusive.

Group was established in January 2022 to 'drive forward developments to support student success'. This group oversees the Retention Action Plan 2022-23, which is a key document regarding the university's plans and activities around continuation. A set of targets running up to 2025-26 academic year, and a series of actions undertaken or already planned, were outlined at institution level. At no point was any reference made to individual faculties or parts of the university with problems with continuation. In the assessment team's view, this means the plan may be limited in its ability to improve the particular continuation rates for business and management courses. Work yet to be undertaken in this action plan included an analysis of assessment retakes and resubmissions, suggesting that further work needed to be done by the university to understand why students were not continuing. Without an understanding of the reasons for continuation, any plan to address the issue is less likely to be successful. Moreover, the Retention Action Plan did not assign tasks or areas of work to any individual function or person; all the actions in the document were owned by the working group. A more granular approach, with clear lines of responsibility and allocation of tasks to named individuals or posts, would be a step the university could take.

77. Cascading of the Retention Action Plan was addressed, in part, by a revised Strategic Planning framework for the university introduced in 2022, also referenced in paragraph 65 of this report. The framework was provided to the assessment team as a one-page graphic, as part of documentation received during the first site visit in November 2022. The shift in emphasis in the revised framework was intended to link unit, course and faculty-level decision making and planning back to central plans and strategies. The assessment team were able to see some elements of this at work, such as the high level strategies for Education and Student Experience and action plans such as EDI action plan and Retention Action Plan. the team were also provided with examples of two course and two unit enhancement plans from academic years 2020-21 and 2021-22 and a revised template for course enhancement plans for the 2022-23 academic year. The Faculty Operating Plan 2019-20–2021-22, Business School Retention and Participation Plan 2020 and a Faculty Annual Monitoring Report for 2020-21. The Business School plans are explored in more detail in the following paragraphs and the course and unit enhancement planning is addressed from paragraph 82 onwards.

78. There have been significant changes in the Business School in recent years focused on growth in student and staff numbers, an improved student experience, better learning resources and improved continuation. The Faculty Operating Plan 2019-20–2021-22 highlighted one of the faculty's key priorities: 'to understand why students do not continue or complete their studies and make evidence-based interventions to stem the significant loss both in-year and between years'. This cascaded down to an objective for 2020-21 'to make a concerted effort to improve retention'. Actions underpinning this noted: the development of a comprehensive action plan; to promote ownership in faculty of the university's access and participation plan; to adopt and integrate action planning around core data sets; and engage staff widely in personal and course planning. The action plan was provided in the form of a UBBS Retention Action Planning document. This document acknowledged many of the challenges the university's students face and suggested actions that needed to be taken at school level and university level. The quality of this plan, however, was limited by its lack of progress tracking and no indication of action owners or timelines for implementation. For example, some suggested actions related to timetabling flexibility, as discussed in paragraph 42 of this report. Commentary on the challenges commuter students face noted that 'limiting times required to be on campus will become more critical than ever especially as we know 90 per cent of

students combine work and study in order to be able to access education. With jobs in limited supply this is likely to have a negative impact on students and combined impact with the commute must be accounted for'. A more flexible approach to seminar attendance was suggested as part of the action plan but, as discussed in paragraph 42, this was not in place at the time of assessment. The Faculty Annual Monitoring 2020-21 report noted challenges with continuation and difficulties in interpreting the reasons behind high non-continuation, as discussed in paragraph 75 of this report. An improvement in continuation in 2020-21 is noted but a full dataset was not appended to the report.

79. A key action in progress from the annual monitoring was a requirement for improved course and unit management; another key action moving forward was a review of Level four provision. A covering note provided by the university to accompany the continuation data table acknowledged the challenges that the university's students face and outlined several initiatives undertaken to deal with continuation, including a redesigned foundation year and a new first year structure. These changes were discussed in detail in a meeting with Level 4 unit leaders and included core academic skills modules for all first year students. The changes at Level 4 would be introduced in the next academic year (2023-24), and appeared targeted and appropriate, but the impact on continuation cannot be seen yet. Course and unit management is discussed from paragraph 82 onwards.

80. In meetings, all students when asked were aware of people who had dropped out but gave a variety of reasons, including family commitments, work commitments and timetable clashes. Students were asked about where they would go for non-academic support and the majority were clear that the student information desk was the first place they would approach. Some Level 5 students noted slow response times or non-responses via email. Level 5 students were complimentary about the level of support from academic staff, but noted that new teachers might not have a proper university email address for the first three or four weeks of term, and that teaching staff on temporary contracts were less accessible than full-time staff. Level 4 students noted that those on temporary contracts were 'not as passionate' as other lecturers. None of the students met by the review team mentioned the Student Support Engagement Advisors from the engagement team, as described in paragraph 61, outlined in the Retention Action Plan.

81. A meeting with central operational staff revealed limited understanding of the continuation problem in the Business School. Several initiatives and working groups were discussed, but when staff were asked why the Business School continuation rate was so low, no-one could explain the drivers. General reasons for non-continuation were given, such as the cost of living, anxiety and caring responsibilities. These reasons were similar to those given by Level 4 unit leaders in another meeting. One member of central staff stated that an attendance policy was presently in development but had not been implemented. When asked how the university monitors students at risk of dropping out, the answer was that it does not have that data. When asked where 'at risk' students and the reasons for non-continuation are discussed, the central team responded that this was a faculty responsibility. The clear theme running through this meeting was that central staff did not see low continuation in the Business School as their direct responsibility.

82. Given the high proportion of students not continuing because of poor module results or non-submissions, the monitoring of individual modules would need to form a critical part of the university's approach to managing continuation. The way in which poorly performing modules

are managed by the university, however, did not appear to be working well. This was in part acknowledged by changes to the process piloted by the Business School in 2021-22 and discussed with the assessment team during the second site visit. Two documents outlined the changes made in terms of the structure of meetings and the way in which different levels of enhancement planning were linked together. These Business School pilots have since been adopted institution-wide for both course enhancement and unit enhancement planning but, from the evidence reviewed by the assessment team, it was not yet clear what impact the implementation of this revised process has had.

83. The use of Course Enhancement Plans and Unit Enhancement Plans were highlighted during site visits as a key method of addressing issues and making changes to improve provision and drive improvement in retention. Two examples of these were provided. First was the BSc Business Management report, which covered 13 programme variants across locations, looking back at 2020-21. The review of the programme was mainly qualitative and did not refer to individual unit performance. One action plan was provided to cover all 13 programme variants; all actions set out in the action plan were linked to a student satisfaction metric and no course-level actions about continuation were specified. Second was the BSc Travel, Aviation and Tourism Management report, which covered three variants, looked back at 2019-20. The report used a variety of quantitative data to review the preceding year and, the programme being relatively new, was able to compare Level 4 across two academic years. Student numbers were low for the period reported (11 students at Level 4 in 2018-19 and 29 students in 2019-20). The report referred to 'retention' and 'progression' by year. As mentioned in the faculty annual monitoring report discussed in paragraphs 75 and 78, retention refers to students staying within an academic year. Progression refers to students moving from one year to the next. Progression at Level 4 in 2018-19 was 55 per cent and there was a total of six Level 5 students in 2019-20 (which is 55 per cent of 11 students who joined in 2018-19). Thus the continuation rate dropped from 55 per cent to 17 per cent in the period covered by this report. Again the action plan did not pick this up, other than to note that there was a need to 'ensure students are aware of the importance of completing referrals – this would address the retention and progression challenge we currently face'. All metrics linked to in the action plan were student satisfaction-related.

84. For the 2022-23 course enhancement planning cycle, the template and guidance for course management plans stated the following in relation to continuation: 'if your course falls below the minimum threshold in the B3 dataset your actions must include initiatives to bring performance up above the threshold as quickly as possible.' The template and accompanying guidance also emphasised the need to use data to compile the report. This appeared to be a positive step in terms of process improvement but no examples of 2022-23 cycle plans for the Business School were provided so it was not possible to assess whether and how these addressed continuation. The deadline for submission of these reports was 28 September 2022 (within the investigation period) so these could have been provided to the assessment team.

85. At the time of assessment, modules were flagged as not performing correctly at an examination board if the average mark was lower than 47 per cent, but there appeared to be no monitoring of pass, fail or abstention rates via examination boards. Monitoring pass, fail and abstention rates would give a much clearer indication of what was happening to individual students at module level than using simple average percentage scores.

86. This approach was confirmed in the meeting with operational staff and reinforced in a meeting with Associate Deans in the Business School. A review of Level 4 exam board minutes showed evidence of module averages being discussed at examination boards, but no evidence of follow-up action being taken. For example, on 3 December 2021 the module BSS029.2 presented with an average of 46 per cent, which was explained by poor attendance and students not using the correct assessment brief. The same module presented with an average of 38 per cent on 11 February 2022. It appeared that the module leader was absent from this board, but a second-hand explanation of 'poor attendance and late enrolment' was provided by another module leader at the board. At the meeting of 1 July 2022, several modules were again performing below the threshold of 47 per cent and no follow-up action was in evidence.

87. Unit enhancement planning operates as a parallel process and involves reflecting on unit performance and outlining enhancement actions for future cycles. The assessment team was provided with two unit enhancement plans:

   - TAL023-1 Event Planning and Operations, reviewing the 2021-22 delivery to nine students. This unit had a pass rate of 22 per cent and an average mark of 32.5 per cent. Five students were withdrawn from the module for lack of engagement. Commentary was provided on the two assessments and a review of the first assessment was suggested for the next year as the mode chosen may have been too complex for Level 4 students, but no further actions were outlined.

   - MAR016-3 Public Affairs, reviewing the 2019-20 academic year. No data was provided on student numbers, pass rates, or average marks in this report.

88. The course enhancement plan template and guidance referred to in paragraph 84 suggested that Unit Enhancement Plans should be used only when a module is under-performing rather than for every unit. This is a reasonable step to avoid proliferation of planning documents and to focus efforts on areas that require the most attention. It is reasonable to expect that modules with high rates of failure or non-submission would be recorded and investigated, and actions taken to deliver improvements over time, but limited evidence of this was found by the assessment team. It is also worth noting that finding at an examination board that a student has stopped engaging may be too late, and does not allow proactive intervention to support the student.

89. As noted in paragraph 72, continuation data provided by the university indicated significant differences in continuation rates on many demographic differences, including sex and ethnic background. Several course leaders and senior managers referred to the challenges that students have when returning to study in an educational context. Academic staff were able to articulate in general terms the challenges that students faced, which included the need for employment, often full-time, caring responsibilities and having been out of education for some time. There was, however, no collective understanding of the low continuation issue.

90. In meetings with the Business School leadership, it was acknowledged that there was a problem with continuation and steps were being taken to tackle this, such as the review of first year modules. A meeting with heads of department acknowledged 'teething problems' with the first year, but the low continuation issue had been going on for some time, as reflected in the data. This suggested limited awareness of the issue. Across all groups of senior and operational staff, centrally and in the Business School, there emerged a common view that low

continuation was a function of the characteristics of the non-traditional nature of the student cohort, and a sense that the university believed its situation was exceptional. This led to low continuation rates effectively being characterised as part of the operating model. While significant effort had been expended in recent years by the Business School, at the time of assessment evidence of the impact of initiatives – such as the new course management process, the student success and intervention team, revised course and unit enhancement planning and increased investment in staffing – remained limited.

Actions relevant to improving continuation rates

91. The university provided the assessment team with information relating to a number of initiatives and changes aimed at improving continuation rates in business and management courses. The assessment team considered that it was too early for these to have had a material impact at the time of assessment. In the team's view these plans appeared somewhat credible, because they were targeted, and may help to address low continuation rates. Determining whether these actions are successful will require further monitoring by the university in relation to student outcomes. Such plans include:

    a. A redesigned foundation year and a new first year structure, which includes core academic skills modules for all first year students. The foundation year changes were introduced in 2022-23 and the first year changes will be introduced in the next academic year (2023-24). These changes appeared targeted and appropriate, but the impact on continuation cannot be seen yet.

    b. The introduction of more focused and data-driven course and unit management processes. The assessment team acknowledged the new strategic planning framework for the university and the refinements that had been made over recent years but were unable to see, from the evidence provided, the effective operation of these revised processes.

    c. The introduction of the Business School-specific success and intervention team. While the impact of this team had been demonstrated in terms of the number of students supported and the number of individual learning plans set up, evidence of impact in terms of improved continuation was yet to be seen.

92. However, significant and ongoing changes in the planning processes, and the relatively dated versions of faculty-level retention plans, course and unit enhancement plans and faculty operating plans provided to the assessment team meant it was not possible to judge the credibility of the changes or their potential impact.

B2 conclusions

93. The assessment team's view was that on balance the university had, at the time of the assessment, not taken all steps to ensure that each cohort of students registered on the business and management courses received sufficient support to ensure that they would succeed in and beyond higher education, as required under ongoing condition B2.a.ii. The assessment team considered recent initiatives, including the development of an attendance policy and user analytics to better understand student engagement with their course, to be positive contributions that were likely to have beneficial impacts going forward. The team also highlighted the positive support for students that individual academic staff often provided, which was clearly evident during the course of this assessment.

94. However, based on the existing position at the time of the assessment, the assessment team identified concerns:

Concern 2: Limited central monitoring of student non-engagement and proactive support for students (discussed in paragraphs 57 to 72). The assessment team's view was that there was an overreliance on individual members of academic staff to monitor and act on student attendance and engagement. There was also limited data collection around student attendance, with the data being collected manually by academic staff via the VLE. While the system of personal academic tutoring was in line with sector norms and had been subject to a recent review, it should not have been the main mechanism in place for monitoring students at risk of dropping out, given the context the university operated in and the type of students it recruited. The team's view was that the level of student engagement monitoring in place at the university was insufficient given the challenges the cohort of students at the university faced in accessing higher education. The lack of attendance policy and limited approach to monitoring student engagement and limited proactive action from central support services meant that students who were struggling to engage may or may not have received the support they needed, depending on the actions of individual academic staff. Without effective monitoring of students who were at risk of dropping out, the university could provide additional and academic support for students who needed it.

Concern 3: The assessment team considered that in order to ensure that students have sufficient academic support to succeed, the provider could have taken more steps to develop a better understanding of non-continuation rates and to embed appropriate management processes (discussed in paragraphs 73 to 90). The assessment team's view was that high rates of student attrition in the first year had been ongoing for a sustained period, despite a number of continuation-focused initiatives and changes in process having been made in recent years. This was coupled with limited understanding of the reasons for low continuation rates. High fail rates suggested there was an issue with the support that students received, and monitoring of module failures was not sufficient to allow the university to proactively intervene and offer additional support to students where this might have been needed. While university-level strategies existed and changes had been made to the planning framework, the assessment team found limited evidence of their effective implementation. The result was an inability to take effective action to address low continuation. This had a significant and negative impact on outcomes for those students who did not continue, and suggested that the university had not taken all the steps it could to ensure that students on their course received sufficient support; this could only be done if the specific needs of the cohort were understood. While the team acknowledged the challenges students with complex backgrounds face, the high number not continuing their studies had been sustained for a number of years and was exacerbated by the fact that there was limited understanding of the continuation problem.

95. Considering the information above, the assessment team's view was that the university could have taken further steps to ensure that the students on the courses in question received support sufficient for those students to succeed in and beyond higher education. Additional steps that could have been taken include, but are not limited to:

a. Clear lines of responsibility at faculty and university level regarding who the lead for continuation is, and further channelling of university-level resource, expertise and effort towards the continuation problem in the Business School.

b. Systematic analysis of student failures on modules and historical withdrawals, to provide a more detailed picture and understanding of why students do not continue their studies at the university.

c. Better real-time monitoring of engagement and a university-level set of criteria that can be used to identify a student who may be at risk of dropping out, combined with systematic analysis of student behaviour and non-attendance so that proactive additional support can be offered. At the time of assessment, the inability of the university to monitor student attendance and engagement limited the ability to effectively engage and deal with the low continuation issue.

d. A review of examination board processes and module performance criteria to ensure that under-performing modules are being picked up and addressed through the quality assurance and enhancement system. While the assessment team acknowledged the new course and unit enhancement planning process, this did not appear to be embedded and should be monitored closely.

Condition B4: Assessment and awards

96. 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 were 'assessed effectively' (B4.2.a)

   - whether each assessment was 'valid and reliable' (B4.2.b)

   - whether academic regulations were 'designed to ensure that relevant awards are credible' (B4.2.c) and

   - whether 'relevant awards granted to students were credible' (B4.2.e).

97. 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 student complaints (during the academic year 2021-22). This information was relevant to students on the courses under consideration being 'assessed effectively' (B4.2.a) and assessments being 'reliable' (B4.2.b). The team also reviewed National Student Survey information for 2020-21 and 2021-22, both quantitative and qualitative, and did not identify concerns relating to condition B4.

98. During on-site visits, the assessment team met with students currently studying the courses under consideration, across Levels 4 to 6, and with academic staff teaching on these courses. These meetings included discussion of topics relevant to assessments being 'effective' (B4.2.a) and 'valid' (B4.2.b) (i.e. that assessments 'in fact take place in a way that results in students demonstrating knowledge and skills in the way intended by the design of the assessment'). The assessment team did not identify any concerns relating to condition B4 during the course of its on-site visits.

99. As the team's investigation progressed it drew upon multiple sources of information, as identified above, that are relevant to condition B4. Following a risk-based approach it 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.