

Regulatory case report for Richmond, the American International University in London: Ongoing condition B3 investigation outcome

Summary

This report confirms that the Office for Students (OfS) has found Richmond, the American International University in London (the university) at increased risk of breaching ongoing condition B3 for its continuation and completion outcomes for full-time, first degree students.

Background

Richmond, the American International University in London, is a private university located in Chiswick Park, London. The university offers degrees that enable students to graduate with both a UK-accredited degree, and with a US degree.

The university was selected for assessment of its compliance with ongoing condition of registration B3 (student outcomes) as part of the OfS's 2022-23 annual prioritisation cycle. As set out in Regulatory advice 20: Regulating student outcomes, each year the OfS decides:

- which student outcome measures, modes and levels of study we wish to prioritise
- whether we should focus on any particular split indicators, such as subject of study or student characteristics, or on any other themes, such as partnership arrangements
- how many cases we will assess in that year.

We published the final prioritised categories for 2022-23 in a statement on the OfS website in November 2022.¹

The university was one of 12 higher education providers where the OfS opened an investigation in 2022-23. In selecting the university, we placed particular weight on the number of students potentially affected by performance below our numerical thresholds, the statistical certainty we had about that underperformance, and the number of indicators or split indicators that were below a numerical threshold.

The indicators in scope of our investigation are shown in Table 1.

¹ See OfS, [Prioritised categories for the 2022 and 2023 assessment cycles](#).

Table 1: Student outcomes dashboard data as of September 2022

Indicator or split indicator	Numerical threshold (%)	Indicator value (%)	Distance of indicator value from relevant numerical threshold (percentage points)	Statistical uncertainty distribution below numerical threshold (%)
Continuation				
Full-time first degree	80	73.5	-6.5	100
Completion				
Full-time first degree	75	60.5	-14.5	100

Investigation outcomes

In its written submissions to us, the university raised the following themes:

- reporting of student transfers to overseas providers
- the nature of its US-style educational model, and whether this had been reflected in the thresholds for completion
- actions underway to sustain improvements in student outcomes, including a move to new premises in 2022, and plans to rationalise the credit model to align it with the expectations of UK students
- that international students were more likely to have remained in their country of origin during COVID-19, raising questions about how international students were treated in our analysis.

The OfS considered the extent to which the information provided satisfied us that performance in relation to the indicators in scope of assessment was justified, despite being below the relevant numerical threshold, and responded to the university’s concerns. We have included some examples here to illustrate our approach to reaching our decision.

Reporting of student transfers to overseas providers

The university’s submission described its US-style educational model, which supports and promotes interinstitutional student mobility and the transfer of credit. Its American students often complete the first two years of a degree in the UK before transferring these credits to a US institution. We accepted that this model is likely to generate a higher number of overseas transfers than for other UK providers.

In its submission, the university explained that, as there is no specific Higher Education Statistics Agency code to report overseas transfers, these had been reported with a ‘reason for ending’ code

of 'Other'.² Due to the way the OfS student outcome indicators are constructed, reporting in this way generates negative outcomes, as students transferring overseas cannot be tracked in the OfS data. The university argued that if students who transferred to overseas providers were considered as having neutral outcomes in OfS data, in the same way as transfers to UK providers, its performance would exceed the numerical threshold for both the continuation and completion indicators.

The OfS considered whether this was a plausible explanation for the university's performance. Although the university had not historically had a process in place to record reasons for student withdrawals in its student record system, we accepted that the provider was reviewing its data collection so that in the future the OfS would be able to verify outcomes for students transferring to overseas providers. Although some information was provided about students who had been recorded as 'Other', we considered that the sources were not currently reliable enough to enable the OfS to verify the outcomes of students who had transferred to overseas providers in our data.

To assess the potential impact of overseas transfers, OfS analysts modelled the university's data, making the assumption that **all** students reported as 'Other' had transferred overseas. As OfS analysts identified that typically only 1 per cent of the entrant population for other OfS-registered providers report a reason of 'Other', compared with between 7 per cent and 21 per cent of the entrant population for this provider, we concluded that there was likely to be only a small number of students with genuinely 'Other' reasons for ending, and therefore a very low risk of our analysis being overstated.

For continuation, our modelling of students reported as 'Other' indicated that the university's performance was justified, as it would be above the relevant numerical threshold if all students reported as 'Other' were treated as overseas transfers. However, some uncertainty will remain until we are able to verify these outcomes against the university's internally held data. This led us to conclude that although the provider's performance was justified, there was an increased risk of breach for this indicator.

For completion, OfS modelling indicated some improvement in performance once the data was modelled to treat students reported as 'Other' as overseas transfers, but because of the significant starting distance from the numerical threshold, our modelling indicated that performance would remain below the relevant numerical threshold. We gave weight to this when reaching our conclusion that for completion, the reporting of outcomes for students transferring to overseas providers did not justify the university's performance and there was an increased risk of breach.

The university's US-style educational model

The submission described other aspects of the university's US-style educational model that it considered impacted its performance, including its delivery of four-year degrees, with performance and grades carrying through from the foundation year to the full qualification. We accept that this model is unlike that of many other providers delivering degrees with integrated foundation years, as final grades are usually based on the last two years of study only. However, we consider the

² The Higher Education Statistics Agency (part of Jisc), collects, assures and disseminates data about higher education in the UK on behalf of the OfS, via the student record data collection. This data is used to construct the OfS student outcomes indicators.

benchmarking factors we apply take into account the nature of the university's delivery model and the domicile of its students on entry.³

Our benchmarks are calculated for each provider as a weighted sector average, which takes account of that provider's particular mix of students and courses. Benchmarks give information about the values that the sector overall might have achieved for the indicator if the characteristics included in the benchmarking factors were the only ones that were important. The existence of an integrated foundation year is not directly used as a benchmarking factor, as we considered there to be overlap with the use of entry qualifications.⁴ For continuation we have benchmarked the university against providers that have course lengths of more than one year, and for completion, against providers with course lengths of three years or more, which aligns with the university's course lengths.

Although the university is not directly benchmarked against other providers offering a foundation year, by taking account of entry qualifications, we have factored in that, as for other providers offering a foundation year, the university's students may be less prepared for higher education.

Our analysis shows that many of the university's students are domiciled overseas. This means some of the other benchmarking factors relevant to UK-domiciled students may not apply. We have accounted for this in explicit additional groupings, to identify overseas students.⁵

For completion, the university considered that its performance below threshold was also due to the length of its degrees and extended completion times, as it considered this aspect of its model was incompatible with the OfS's census date for measuring completion outcomes of four years and 15 days after graduation. The university also stated that prior to 2019 it had not conferred exit awards, although did not explain how many students this would have affected.

To assess the possible impact on the completion indicator of the university's four-year degrees and extended completion times, OfS analysts modelled its data with a six year and 15 day census date for overseas transfers and exit awards. Because of the length of the time series for completion, it was only possible to do this for three entrant cohorts, but this showed that the university's performance would remain below the relevant numerical threshold in all three years of modelled data, reaching its highest for 2014-15 entrants at just under 70 per cent, but still below the relevant numerical threshold of 75 per cent. We gave weight to this when reaching our judgement for the completion indicator.

Actions underway to deliver or sustain improvements in student outcomes

The university stated that it, and its Board of Trustees, believes that it is 'meeting the expectations and requirements of the Office for Students and that the new strategic plan, 2021-26, delineates steps that will enable a sustained improvement in student outcomes.'

The university's submissions set out a number of actions already underway to sustain improvements in student outcomes, as part of its strategic plan for 2021 to 2026. These included:

³ See OfS, [Description and definition of student outcome and experience measures](#), page 111.

⁴ We considered this in our 2022 [Review of the selection and grouping of benchmarking factors](#), paragraphs 67 to 69 and 120 to 122.

⁵ See paragraph 107 of 2022 [Review of the selection and grouping of benchmarking factors](#).

- a retention and progression project
- annual review of individual degree programmes to identify trends in performance
- investment in estates and facilities, including a move to new premises in 2022
- increased student hardship funds and changes to scholarship arrangements
- investment in student support
- improvements to the curriculum
- reviews of marketing and admissions procedures
- reviews of individual academic advising
- rationalisation of the credit model.

The university also stated that it is using both quantitative and qualitative data to assess performance, including to identify potential correlations with protected characteristics.

While we accepted there was evidence of actions in place relevant to the delivery of positive student outcomes, we considered that some of these actions were substantively the same as in the university's previous strategic plan. We also considered that rationalisation of the credit model, while making the offering more attractive and more in line with the expectations of UK students, could have less impact on non-UK-domiciled entrants, and only from September 2025.

We also accepted that, while the university's move to new premises in 2022 was intended to address student dissatisfaction in the facilities and classrooms at its previous locations, and to increase staffing in support services, it was not clear how much impact on rates of completion this would have. Depending on the amount and type of support given, we considered that the move away from a residential to non-residential campus might not have a positive impact on completion. This move took place in 2022, so until further data is available, the impact of this move remains uncertain.

We considered that the available documents lacked evidence of the detailed steps to be taken to deliver the actions, the timescales for delivery and the owners of any actions, and that further development would be required to provide the OfS with assurance that the university had credible plans in place to deliver and sustain positive completion outcomes.

International students

In relation to the university's concern that international students may not be being treated fairly or equally in our analysis, we use benchmarking factors to take into account its particular mix of students, including additional groupings within two of the factors (entry qualifications and Associations between characteristics of students (ABCS) quintile). These additional groupings separate international students from students who have been otherwise categorised as 'Unknown', so that international students are treated as a distinct group.⁶ We accepted that the COVID-19 pandemic may have affected the actions and outcomes during some years, and that international students were likely to have remained in their country of origin while teaching was online, hybrid or

⁶ See paragraph 107 of [Review of the selection and grouping of benchmarking factors](#).

both during the pandemic. However, we noted that when we considered how the coronavirus pandemic may have affected one particular course with substantial practical elements, our analysis did not show a particular COVID effect.

For completion, there was a lack of evidence that the university's actions to date have had a positive impact. This was because the indicator has remained consistently below the threshold and benchmark for all years even after our modelling for overseas transfers, exit awards and longer completion times. While the pandemic may have impacted the outcomes in the most recent years of data, we concluded that there may be wider issues for completion, which could not be fully justified by the contextual information available.

Outcome of investigation

Having considered the contextual information, the OfS concluded that Richmond, the American University in London's performance was justified but at increased risk of breach of ongoing condition B3 in relation to its continuation outcomes, and not justified and at increased risk for its completion outcomes for full-time, first degree students.

For both indicators, this finding of increased risk was due to the current lack of verifiable data from the university about overseas transfers, creating uncertainty about the outcomes of students reported as 'other'. The contextual information available and our modelling of the data did not justify the university's performance below our numerical threshold for completion, although this modelling led us to conclude that performance was likely to be justified for continuation.

For completion, there was also lack of evidence that the university's actions to date have yet delivered or sustained performance above threshold. The completion indicator has remained consistently below threshold and benchmark, even when data is modelled to take into account the impact of the reporting of overseas transfers, longer completion times, and exit awards. We concluded that there may be wider issues for completion which were not fully explained by the contextual information available.

As further years of data are needed before the impact of these actions can be evidenced, the OfS has imposed a specific ongoing condition of registration, requiring the university to comprehensively review its performance for the completion indicator and take targeted action to ensure it delivers or sustains performance at or above the relevant OfS numerical thresholds by spring 2027. It is also required to monitor its continuation outcomes, and review its internal data to ensure the OfS can verify that students currently reported as withdrawing for 'other' reasons are transferring to overseas providers.