

Richmond, the American International University in London, Inc.: Specific ongoing condition B3A

Richmond, the American International University in London, Inc. ('the Provider') was registered on 8 March 2019.

The Provider was selected for assessment of its performance in relation to **Condition B3** in 2022. The outcome of the assessment is that the OfS has deemed the Provider to be:

- At increased risk of breach of Condition B3 in respect of its:
 - Continuation, full-time, first degree outcomes
 - Completion, full-time, first degree outcomes.

The Office for Students (OfS) has therefore imposed requirements to ensure that the interests of current and future students, and the interests of the taxpayer, are protected.

The primary reasons for this are:

- a. The Provider's internal data has not historically recorded details and evidence of its outcomes relating to student withdrawals, where these relate to overseas transfers. As a result, the OfS has not been able to verify outcomes for all students for the **Relevant Indicators**.
- b. The actions the Provider has taken have not yet led to sustained performance at or above the **Relevant Numerical Threshold** for its Completion, full-time, first degree outcomes.
- c. The Provider's plans were not sufficiently targeted to sustain outcomes at or above the **Relevant Numerical Threshold** in an appropriate timescale for its Completion, full-time, first degree outcomes.

To mitigate the risks associated with this increased risk of breach, the OfS has imposed Specific Condition B3A.

B3A Notice to improve outcomes for students

B3A.1 The Provider must undertake monitoring and reviews of its performance in relation to the **Relevant Indicators** which includes the following:

- i. A review of its internal data and maintaining complete and accurate records in its student record system, such that outcomes for all students, including those transferring to overseas providers, can be verified by the OfS. The records must link to the relevant student identifiers in the HESA student record, be supported by evidence, and be provided to the OfS on request;

- ii. A review of the effectiveness of its current improvement plans in light of the findings of the OfS in relation to this increased risk of breach;
- iii. Identification of targeted actions to improve outcomes in relation to the Completion full-time first-degree indicator within the Relevant Timescale;
- iv. Monitoring of its outcomes in relation to the Continuation full-time first-degree indicator, and where these are below threshold, identification of targeted actions to improve outcomes;
- v. Periodically review the implementation and effectiveness of any targeted actions for the Relevant indicators and, where appropriate, identify and implement new targeted actions.

B3A.2 Thereafter, the Provider must take such targeted actions as identified by its monitoring and reviews, as set out at **B3A.1** above, and any other targeted actions subsequently identified, so that its performance in relation to the **Relevant Indicators** is at or above the **Relevant Numerical Thresholds** within the **Relevant Timescale**.

B3A.3 Where the Provider's performance in relation to the **Relevant Indicators** is not at or above the **Relevant Numerical Thresholds** within the **Relevant Timescale**, before deciding that the Provider is in breach of this condition the OfS will consider whether the Provider's context otherwise justifies its performance.

B3A.4 The Provider must keep complete and accurate records of its monitoring and reviews carried out in accordance with **B3A.1**, including any targeted actions it takes to improve outcomes in relation to the **Relevant Indicators**, until the OfS has completed its assessment of performance set out in **B3A.8**. Any such records must be provided to the OfS on request.

B3A.5 The Provider's compliance with this condition does not in any way affect the ability of the OfS to take regulatory and/or enforcement action in respect of the Provider's compliance with any other condition of registration, including (but not limited to) ongoing Condition B3.

Timing and monitoring

B3A.6 The Provider must complete its internal data review, and review for its completion outcomes, as outlined in **B3A.1(i), (ii) and (iii)** above, within six months of this condition becoming effective. The Provider must submit confirmation that it has completed these reviews by email to regulation@officeforstudents.org.uk by 31 January 2025.

B3A.7 The OfS may undertake periodic reviews of the actions taken by the Provider to improve its outcomes in relation to the **Relevant Indicators**. We will identify whether any further information is to be requested from the Provider following the annual publication of **Outcome data**, or on receipt of any other relevant regulatory intelligence. The Provider must take all reasonable steps to provide any additional information requested by the OfS.

B3A.8 The OfS will undertake an assessment of the Provider's performance, in line with the guidance in Regulatory advice 20, in relation to all **Relevant Indicators** following the publication of **Outcome data** in spring 2027.

B3A.9 If, following this assessment, the OfS judges that the Provider remains at increased risk of breach, or in breach of Condition B3, the OfS reserves the right to take further regulatory action.

Definitions

B3A.10 For the purposes of this condition:

‘**Condition B3**’ means the condition set out in the OfS’s regulatory framework.

‘**Outcome data**’ has the same meaning as ‘outcome data’ in **Condition B3**.

‘**Relevant indicators**’ means the following indicators defined in ‘Description of student outcome and experience measures used in OfS regulation’ or similar documents published by the OfS (and, for the avoidance of doubt, includes a consideration of any related split indicators):

- ‘Continuation, full-time, first degree’
- ‘Completion, full-time, first degree’

‘**Relevant Timescale**’ means by 31 July 2026, so that student outcomes data is reflected in OfS dashboards published in spring 2027.

‘**Relevant Numerical Threshold(s)**’ means the numerical thresholds set by the OfS in respect of the **Relevant indicators**, namely:

- ‘Continuation, full-time, first degree’ – 80 per cent
- ‘Completion, full-time, first degree’ – 75 per cent