

Regulatory case report for EM Normandie UK Limited: Specific ongoing condition BA

Summary

This regulatory case report confirms that the Office for Students (OfS) has found that, following the assessment of its registration application, EM Normandie UK Limited (the provider) is at increased risk of breaching ongoing conditions B4 and B5, in particular due to its alignment with the English sector-recognised standards. The OfS has therefore imposed specific condition BA to require the provider to address these concerns.

Background

EM Normandie UK Limited is a small higher education provider based in Oxford, delivering courses through a partnership arrangement with its parent company (EM Normandie Business School) based in France. The course currently delivered by EM Normandie UK Limited has been developed and validated according to French academic standards. The EM Normandie Business school consists of seven campuses – located in France (Paris, Caen, Le Havre), the UK (Oxford), Ireland (Dublin), United Arab Emirates (Dubai), and the USA (Boston).

EM Normandie UK Limited delivers one course: Masters' in Management Programme Grande Ecole. This is a five-year course in which the first three years are undergraduate, and the last two years are postgraduate. Exchange students from the parent company can join EM Normandie UK Limited either during their undergraduate study, or during the two years of postgraduate study. Exchange students from the parent company are able to study at the provider for a minimum of one semester and a maximum of five years.

All providers applying to register with the OfS must meet the initial conditions of registration, including those that relate to quality and standards. As part of the registration process, all providers are required to undergo a quality and standards assessment. Information from this assessment enables the OfS to judge whether the quality and standards initial conditions are satisfied, and whether there is any future risk of breach of the ongoing conditions.

EM Normandie UK Limited applied for registration with the OfS on 17 May 2019. As part of the registration process, the designated quality body conducted a quality and standards review (QSR) in January 2022. The QSR assessed the provider against the core practices of the UK Quality Code for Higher Education. The assessment suggested that the provider did not meet all the requirements for compliance with some of the quality initial conditions. This included concerns about initial conditions B4 and B5 relating to how the provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications' frameworks and whether students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level, that are reasonably comparable with those achieved in other UK providers.

The OfS allowed the provider to submit an action plan, further evidence and conducted a further assessment with input from academic expertise to establish whether the provider was now compliant with the OfS initial conditions of registration B4 and B5.

The OfS assessment identified that those initial conditions were now met but there is an increased risk that EM Normandie UK Limited will not meet its ongoing requirements set out in ongoing conditions B4 and B5.

The key findings of the OfS assessment were, in summary, that:

- The standards set for EM Normandie UK Limited's Masters' in Management Programme Grande Ecole were broadly aligned with the relevant sector-recognised standards. There was evidence of alignment of postgraduate modules with threshold standards, but more work was needed to ensure consistency in how this was applied across all modules comprising the programme. The OfS assessment found broad alignment between masters' level work and sector-recognised standards in relevant documentation but found inconsistencies in this, in particular in undergraduate years 2 and 3. It was not clear whether the process EM Normandie UK Limited applied to its postgraduate levels of study, to ensure that standards set for its courses were in line with the sector-recognised standards, had been extended to Levels 4-6.
- The standards EM Normandie UK Limited had set for students to achieve beyond the threshold were reasonably comparable with those set by other UK providers for postgraduate provision, and there was benchmarking in place with international standards. However, the OfS found little information was available on the benchmarking process for undergraduate modules.
- Academic processes were in place to moderate course grades and externally verify course documentation and student work at masters' course levels. However, the OfS had some concerns about the ways in which knowledge of sector-recognised standards was being applied within course development and how EM Normandie UK Limited was ensuring that its assessment of knowledge, understanding and skills was in line with the sector-recognised standards.

The OfS has imposed a specific ongoing condition of registration that will ensure that the provider addresses the concerns identified in the OfS assessment. The specific ongoing condition requires the provider to:

- Take appropriate steps to ensure that, in respect of any awards granted to students who complete a higher education course provided by EM Normandie UK Limited, any standards set appropriately reflect any applicable sector-recognised standards
- Provide a commentary and supporting evidence to the OfS of the steps it has taken with supporting evidence within eight months of the date of its registration.

The specific ongoing condition also imposes reporting requirements on the provider to inform the OfS before it introduces any new courses or awards, so that the OfS can assure itself regarding the standards of any awards.

Relevant OfS conditions of registration

The revised ongoing conditions of registration B1, B2, B4 and B5 that came into effect on 1 May 2022 apply to EM Normandie UK Limited's registration.¹

The OfS's assessment showed that, while EM Normandie UK Limited meets the requirements for registration, there are still risks relevant to ongoing conditions of registration B4: Assessment and awards and B5: Sector-recognised standards.

Condition B4: Assessment and awards

This condition requires a provider to ensure that:

- students are assessed effectively
- each assessment is valid and reliable
- academic regulations are designed to ensure that relevant awards are credible
- 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
- relevant awards granted to students are credible at the point of being granted and when compared to those granted previously.

'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:

- providing stretch and rigour consistent with the level of the course
- testing relevant skills
- assessments being designed in a way that minimises the opportunities for academic misconduct and facilitates the detection of such misconduct where it does occur.

'Reliable' means:

- knowledge and understanding relevant to the subject matter and level of the higher education course
- 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 competencies.

'Valid' means that an assessment takes place in a way that results in students demonstrating knowledge and skills in the way intended by design of the assessment.

¹ See 'Revised ongoing conditions of registration B1, B2, B4 and B5' and 'Notice of determination of conditions of registration', under '1 May 2022', at: [Regulatory framework for higher education in England - Office for Students](#).

‘Credible’ means that, in the reasonable opinion of the OfS, relevant awards reflect students’ knowledge and skills.

The OfS’s assessment is relevant to revised ongoing condition B4 as the concerns identified – relating to how the provider’s programme and module learning outcomes, assessment criteria, and processes for marking standardisation, second marking and moderation reflect English sector-recognised standards – could negatively impact on the quality of assessments and awards. There is therefore an increased risk that students may not be assessed effectively and that awards may not be credible or reliable.

Condition B5: Sector-recognised standards

This condition requires a provider to ensure that, in respect of any relevant awards granted to students who complete a higher education course provided by, or on behalf of, the provider (whether or not the provider is the awarding body):

- any standards set appropriately reflect any applicable sector-recognised standards; and
- awards are only granted to students whose knowledge and skills appropriately reflect any applicable sector-recognised standards.

The OfS’s assessment is relevant to ongoing condition B5 as the concerns indicate that:

- The provider’s approach to ensuring it aligns with the English sector-recognised standards is inconsistent, and therefore the standards set by the provider may not fully reflect any sector-recognised standards.

‘Sector-recognised standards’ means ‘the standards contained in the document of that title published by the OfS from time to time.’²

- The provider’s approach does not fully reflect the English sector-recognised standards; therefore it may not ensure that the awards granted to students who complete its planned higher education courses reflect sector-recognised standards.
- The provider may not have adequate arrangements to ensure that awards are only granted to students whose knowledge and skills appropriately reflect any applicable sector-recognised standards because of a lack of clarity in the process for confirmation of awards in the provider’s academic regulations.

The OfS takes the view that the concerns identified through the OfS’s assessment place the provider at increased risk of breach of ongoing condition B5, as standards set may not appropriately reflect the sector-recognised standards, and that students’ knowledge and skills may not appropriately reflect those sector-recognised standards.

Decision

The OfS requires EM Normandie UK Limited to follow the requirements in Specific Ongoing Condition BA (EM Normandie UK Limited), which is set out below.

² See [Sector-recognised standards - Office for Students](#).

The OfS assessment and specific condition were shared with the provider as part of its provisional registration decision. The provider has acknowledged the concerns raised and has committed to undertake the actions detailed in the specific condition to address the concerns raised with the provider's assessment and awards and alignment with the sector-recognised standards.

Specific ongoing condition of registration for EM Normandie UK Limited

Specific Ongoing Condition BA (EM Normandie UK Limited)

Requirement to take action to address the concerns raised in the OfS standard assessment report conducted in September 2024.

EM Normandie UK Limited was registered on 3 February 2025.

Prior to making the decision to register the Provider, the Provider was assessed by the Office for Students (OfS) as meeting the initial conditions B4 (Awards and assessment) and B5 (Sector-recognised standards) which applied at the time of its registration application in May 2019.³ However, the OfS's assessment was that, although the Provider met the requirements set out in ongoing conditions B4 and B5 that would apply from the point of registration, it is at increased risk of breaching those ongoing conditions until it can ensure that its policies, processes and course documentation appropriately reflect the Sector-Recognised Standards that form part of the OfS's ongoing requirements.⁴

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

BA.1 The Provider, within eight months of registration, must:

- a. Take steps to ensure that, in respect of any Awards granted to students who complete a Higher Education Course provided by the Provider, any standards set appropriately reflect any applicable Sector-Recognised Standards. These steps are:
 - i. Ensuring that all its programme learning outcomes and, in particular at undergraduate level, its module learning outcomes appropriately reflect the standards set out in section A.3 Qualification descriptors of the Sector-Recognised Standards and that there is an appropriate alignment between programme and module learning outcomes.
 - ii. Ensuring that all its assessment criteria appropriately reflect the standards set out in section A.3 Qualification descriptors of the Sector-Recognised Standards.
 - iii. Ensuring that its processes for marking standardisation, second marking and moderation policy appropriately reflect the standards set out in section A.3 Qualification descriptors of the Sector-Recognised Standards.
- b. The Provider must provide to the OfS in the Specified Manner and at the Specified Time:

³ See [Regulatory framework for higher education in England - Office for Students](#).

⁴ See [Sector-recognised standards - Office for Students](#) and [How we regulate quality and standards - Office for Students](#).

- i. A written commentary that sets out the steps it has taken in response to BA.1(a).
- ii. Supporting evidence it has taken the steps set out in BA.1(a).

BA.2 Before the Provider provides any Taught Award at Undergraduate Level, including in partnership with another provider, the Provider's governing body must:

- a. Notify the OfS, in the Specified Manner, of its intention to provide a course with a Taught Award at Undergraduate Level. The notification must include the start date of the arrangement, the number of students forecast to be studying that course in the next five academic years, and how the Provider intends to ensure that the award is aligned with the English Sector-Recognised Standards.
- b. Undergo such further assessment as the OfS deems appropriate to ensure that any new Taught Awards are aligned with the Sector-Recognised Standards.
- c. Undertake such actions that the OfS may require prior to offering such a Taught Award.

BA.3 With the exception of courses and awards to which the provisions of BA.2 apply, where the Provider plans to introduce new Higher Education Courses or Taught Awards, the Provider's governing body must:

- a. Notify the OfS, in the Specified Manner, of its intention to deliver any new Higher Education Courses or Taught Awards at the point it intends to start advertising any new courses for recruitment purposes. The notification must include the start date of the arrangement, and the number of students forecast to be studying that course in the next five academic years.
- b. Prior to the introduction of the new Higher Education Courses or Taught Awards, submit a plan which describes the steps it has already taken and the steps it proposes to take to ensure that it can deliver courses or Taught Awards that are aligned to the English Sector-Recognised Standards and that its students receive a high quality academic experience. The plan should also include information as to how the governing body will monitor the provision to ensure that any standards set appropriately reflect any applicable Sector-Recognised Standards and all students receive a high quality academic experience.

BA.4 Where the Provider intends to enter into a new partnership arrangement with the intention of delivering a Higher Education Course or Taught Award, the Provider's governing body must:

- a. Notify the OfS, in the Specified Manner, of its intention to enter into such arrangements at the point of a partnership contract being signed. The notification must include the legal name of the partner organisation, the start date of the arrangement, and the number of students forecast to be studying on the course to be provided in partnership in the next five academic years.
- b. Prior to the introduction of the new partnership arrangement, submit a plan, agreed and signed by the proposed partner institution, which describes the steps it has already taken and the steps it proposes to take to ensure that it can deliver courses or awards that are aligned to the English Sector-Recognised Standards and that its students receive a high quality academic experience. The plan should also include information as to how the governing body of the Provider will monitor the new partnership arrangement to ensure that

any standards set appropriately reflect any applicable Sector-Recognised Standards and all students receive a high quality academic experience.

BA.5 This condition will cease to have effect on 27 January 2028.

BA.6 Where this condition ceases to have effect, that cessation does not in any way affect the ability of the OfS to investigate or take any form of regulatory or enforcement action in respect of any non-compliance (whether or not it remains ongoing in nature) which took place during the period that this condition was in effect.

Definitions

'Award' means any research award, taught award; and/or 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.

'Higher Education Course' means a course of any description listed in Schedule 6 of the Education Reform Act 1988.

'OfS' means the Office for Students.

'Provider' means EM Normandie UK Limited.

'Sector-Recognised Standards' means the standards applied to higher education, as published 2 March 2022, and located on the OfS website at www.officeforstudents.org.uk/publications/sector-recognised-standards/.

'Specified Manner' means in relation to the requirement in paragraphs BA.1(b), BA.2(a), BA.3(a) and BA.4(a) above, submitted via the 'OfS Regulation – Submissions' section of the OfS portal.

'Specified Time' means in relation to the requirement in paragraph BA.1(b) above no later than **30 September 2025** (eight months from final registration date).

'Taught Award' means a degree (including a foundation degree), diploma, certificate or other academic award or distinction granted to persons who complete an appropriate course of study and satisfy an appropriate assessment, as defined in section 42 (3) of the Higher Education and Research Act 2017.

'Undergraduate Level' means Levels 4, 5 or 6, as set out in Table 1 of the 'Sector-Recognised Standards', available at www.officeforstudents.org.uk/publications/sector-recognised-standards/.