

Regulatory case report for Croydon College: Ongoing condition B3 investigation outcome

Summary

This report confirms that the Office for Students (OfS) has found that Croydon College (the college) at increased risk of breaching ongoing condition B3 for its continuation and completion outcomes for full-time, first degree students.

In relation to the continuation and completion outcomes for students studying part-time, other undergraduate courses, the OfS found that the contextual factors submitted by the college justified its performance.

Background

Croydon College is a large further education college, delivering a selection of further education vocational courses, and full-time and part-time higher education undergraduate courses.

The college 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 college was one of 12 higher education providers where the OfS opened an investigation in 2022-23. In selecting the college, 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.

¹ See [Condition B3: Prioritised categories for the 2023-24 assessment cycle - Office for Students](#).

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

Table 1: Student outcomes dashboard data as of September 2022

Indicator or split indicator	OfS numerical threshold (%)	Provider indicator value (%)	Distance of indicator value from relevant numerical threshold (% points)	Proportion of statistical uncertainty distribution below numerical threshold (%)
Continuation				
Full-time, first degree	80	75.8	-4.2	96.1
Part-time, other undergraduate	55	27.5	-27.5	100.0
Completion				
Full-time, first degree	75	64.0	-11.0	100.0
Part-time, other undergraduate	55	41.4	-13.6	100.0

Investigation outcome

In its written submissions to us, the college provided contextual information to explain its performance under threshold for the indicators in scope of the investigation. Its submissions covered the following themes:

- Curriculum changes since 2013-14
- Changes to its senior leadership since March 2018
- The socioeconomic profile of its student population
- Actions taken to improve the quality of its provision
- The impact of termination of its student recruitment partnership with Acquire Learning UK Ltd.

The college co-operated fully with the investigation process, and submitted further information to clarify the actions it had taken to improve performance and its planned actions. We considered the extent to which this information satisfied us that the college's performance in relation to the indicators in scope of the assessment was justified, despite being below the relevant numerical threshold. We have included some examples of this information here to illustrate our approach to reaching our decision.

Curriculum changes

The college explained that, since 2013-14, it had made changes to its higher education portfolio. It has closed poor performing courses and realigned its provision to focus on the needs of local employers, the job market, and the local community. It also took into consideration the increased level of competition in the South London area from local universities. The college claimed that this may enable students to benefit from the regeneration opportunities in the Croydon region. Six creative arts courses were closed from 2017-18. The LLB Law degree was closed from 2019, and the BA (Hons) in Criminology, Psychology and Social Justice degree was closed from 2022.

The college set out that the curriculum offer has been, and continues to be, recalibrated to develop courses that are located within the Higher Technical Qualification and higher apprenticeship frameworks. This strategy is intended to offer its students the flexibility to complete courses in more manageable timeframes, with options to be certificated at the end of one year. We were satisfied from the information provided that the college has not sought to evade regulatory action by closing courses with weak performance and launching new courses in their place. The course closures were informed by the intention to remove courses that were no longer appropriate or viable for the student demographic. The college submitted limited information to contextualise how the closure of courses is intended to positively impact continuation and completion outcomes in detail. Although OfS modelling showed that performance would improve with these closed courses removed, the OfS did not consider that course closures justified the college's performance for the full-time indicators in scope. Analysis of the latest indicative data held by the OfS showed that outcomes improve when we consider just the three remaining full-time, first degree courses, so that the college is at or above threshold. However, we do not yet have two consecutive years of strong statistical evidence that the college's underlying performance is at or above the numerical threshold for these indicators.

In addition, although the college states in its submission that it will work to improve the quality of any underperforming courses, no information was provided about the actions that would be undertaken to improve performance, and no information was supplied to explain how pathways to highly skilled employment are facilitated.

Leadership

The college described changes in the senior leadership team, with the appointment of a new principal and chief executive officer in April 2018 and a new senior leadership team, including a new head of higher education. The submission stated that this meant the current leadership team did not know many of the historical reasons for lower continuation and completion rates for some of the full-time, first degrees for the period under review. We noted that some of the data under investigation relates to entrant years before the appointment of the current senior leadership team in 2018, because the data covers the following timeframes:

- for continuation, the data covers entrants in 2016-17 to 2019-20
- for completion, the data covers entrants in 2013-14 to 2016-17.

However, the new leadership team would have been in place for the continuation census date (one year and 15 days after entry) for 2017-18 entrants, and for the completion census date (four years and 15 days after entry) for 2015-16 entrants. We considered that the new leadership team would have had access to historical documentation, for example previous annual reports, minutes of meetings, and handover notes, and would have been able to discuss performance with relevant teaching staff. Therefore, we concluded that the leadership team would have had some historical information to analyse the areas of concern and reasons for poor performance, which could have informed any improvement plans.

We considered whether the college's performance had improved since the appointment of the new leadership team. The student outcomes data dashboard (published in April 2023) shows that continuation outcomes for full-time, first degree students have improved year-on-year since 2018-19 entry, from 72.9 per cent to 82.6 per cent in 2020-21, which is above the threshold.² Consideration of the latest indicative data that the OfS holds, indicates that the college has maintained this performance. For completion, outcomes have remained below threshold with a fluctuating pattern of performance, between 62.2 per cent and 72.7 per cent. However, when we modelled the completion data to remove the closed courses, this showed that performance was at or above the numerical threshold of 75 per cent in all three of the latest years of data. While performance therefore appeared to be above threshold, for both aggregate indicators we did not have strong statistical evidence (i.e. around 90 per cent or higher statistical confidence) that the college's underlying performance was at or above the numerical threshold.

When we considered the college's performance in relation to its benchmark values, this showed that for both continuation and completion outcomes the college was below benchmark.

Student demographics

We considered whether the socioeconomic profile of the college's student population, that it had set out in its submission and asked the OfS to consider, justified its performance. A review of the data showed that within the college's student cohort there were high proportions of mature students (aged 21 and over); female students; students from ethnic minority backgrounds; and students from Index of Multiple Deprivation (IMD) quintiles 1 and 2.³ The college's submission also outlined the complex family and personal circumstances that affect many of its higher education students, although it did not detail the support it offers to these students. The college submitted further information to contextualise some of the significant pastoral matters experienced by some students. This set out that the changes in the course portfolio are also designed to support students with significant personal challenges so that they have opportunities to complete courses within manageable timeframes. Our assessment took into account the points raised about the socioeconomic needs of students, and considered whether the higher proportions of students with specific characteristics justified performance below threshold. However, because OfS analysts had

² See [Student outcomes data dashboard - Office for Students](#).

³ See [Approach to linking data - Office for Students](#).

to make some general assumptions in relation to the students with significant pastoral matters to model the data, our findings were not conclusive.

We noted that the college had identified an issue with full-time, first degree male students continuing onto year two, and that a number of bespoke activities had been developed. We considered the OfS student outcomes data dashboards, referring to the versions published in September 2022 and April 2023. Both showed outcomes for male students below the relevant numerical threshold and benchmark compared with women, and showed that the distance from benchmark had widened in the most recent dashboard. It suggested that any actions taken in the past had not, at that point, delivered improvements.

We did not identify examples of indicators where outcomes of students with the particular characteristics identified by the college appeared to account for performance below the threshold. We did not consider that the college's student demographics explained its performance because we had already adequately accounted for differences in student outcomes as a result of particular student characteristics in the following ways:

- a. In setting the numerical thresholds underpinning condition B3, the OfS takes account of observable differences in past student performance where analysis shows that particular student, course or provider characteristics have historically been associated with outcomes that are worse than those of other students, once we have controlled for a range of other characteristics. Where appropriate, the OfS made a downward adjustment in setting the numerical thresholds, such that observable differences in student outcomes linked to particular student characteristics, which may otherwise contribute to a provider's underperformance, have been accounted for in setting the numerical thresholds against which performance is judged.
- b. The OfS benchmark values are calculated as a weighted sector average to allow meaningful comparison between similar types of students on similar types of courses in the sector to that of a particular provider.⁴ Benchmarks therefore help interpret a provider's actual performance relative to that in the sector overall once we have considered the mix of students at the provider or the provision being offered.

The assessment found that the college was performing below our numerical thresholds and below its benchmark values for all indicators in scope of assessment. In setting those thresholds and benchmarks, we judged that we had accounted for all of the student characteristics referred to in the college's submission. We concluded that the college's student demographic did not offer a justification for its performance, even after we had considered the complex needs of its students, because this was not conclusive.

Higher education improvement plans

The college's submission set out the planned actions it took following the change in leadership in 2018, and its registration with the OfS in 2019. This included details about a two-stage quality improvement plan put in place from 2018-19.

⁴ See www.officeforstudents.org.uk/data-and-analysis/benchmarking/.

We considered the college's improvement plan submitted to the OfS in March 2020 ('the OfS improvement plan'), and the actions set out under the improvement plans included in its submission.

Our analysis found that the college's OfS improvement plan was detailed. It clearly sets out targets and objectives, actions, ownership and milestones for delivery, with clear dates on which to review progress and further actions. This level of detail, however, was not present in the plans set out in the college's submission as part of the B3 investigation. The actions in the submission do not have specific delivery timeframes or set targets to assess progress, or identify any further improvements that may be required. The submission has no information to show when actions started and no clear ownership of the actions. Furthermore, the actions only describe the type of activities that providers undertake as part of normal course delivery, for instance curriculum review, student support, monitoring and reporting processes, and attendance monitoring.

We concluded that the current and planned actions described in the submission may, in principle, generate improvement. From the information provided, however, it is not clear if the college is resourcing and delivering them in a manner likely to sustain improvement. In summary, we found that the plans require further development to provide the OfS with confidence that the college has credible plans in place to deliver sustained improvement.

We have therefore imposed a specific condition of registration. This requires the college to undertake a review that will ensure its planned actions are sufficiently targeted and resourced to lead to sustained improvement for the continuation and completion, full-time, first degree indicators in the scope of our investigation. During the course of the investigation, the leadership team at the college has acknowledged the need to maintain detailed and credibly resourced plans, and has committed to reviewing its plans in accordance with the requirements set out in the specific condition.

Termination of partnership with Acquire Learning UK Ltd

We have considered the college's contextual evidence in relation to the part-time, other undergraduate, continuation and completion indicators. We accepted that the performance in the indicators included students recruited to a Higher National Certificate (HNC) in Business during 2014-15 and 2015-16 through a partnership agreement with Acquire Learning UK Ltd, a distance learning recruitment organisation. An investigation into the organisation's recruitment processes was held by the Department of Business, Innovation and Skills and the Student Loans Company in 2015. This resulted in the partnership agreement being terminated.

Having modelled the data to remove the relevant students from these indicators, the OfS was satisfied that the college's performance would have been above the relevant numerical threshold without their inclusion. Therefore, we concluded that the college's performance for the part-time, other undergraduate, continuation and completion indicators was justified.

Conclusion

We concluded that the data for the continuation and completion, part-time other undergraduate indicators reflects the historical withdrawal of the student recruitment partnership agreement with Acquire Learning UK Ltd. We were therefore satisfied that this contextual information justified historical performance for these indicators. We concluded that the college's performance in relation to the two part-time indicators in scope was justified.

When assessing the full-time, first degree indicators in scope, we identified that the college's submission demonstrated that it had already taken some steps to improve the quality of its first degree provision and to support the delivery of improved outcomes. We did not have sufficient evidence, however, that these actions would deliver sustained improvement in outcomes in an appropriate timescale, due to the lack of strong statistical confidence that its underlying performance was above threshold. We were also not satisfied that the college had adequately detailed plans in place to sustain improvement.

We considered the college's information about the influence of contextual factors relating to the socioeconomic background of its student population, the pastoral support challenges faced, and the rationale that informed the changes to its curriculum offer. We were not satisfied that these factors justified performance below threshold for the full-time indicators in scope. We did not agree with the college's position that the change of leadership in 2018 meant that it was unaware of its previous performance issues.

As further years of data are needed before the impact of any actions can be evidenced, the OfS has imposed a specific ongoing condition of registration B3C, requiring the college to undertake a review of its current improvement plans, and to take targeted action to improve outcomes for the two full-time indicators in scope of our investigation.