

Regulatory case report for the University of Bolton – finding of a breach of condition B2

Summary

This case report explains the regulatory judgement of the Office for Students (OfS) regarding a quality assessment of the University of Bolton ('the university') and its compliance with ongoing condition of registration B2. In it we explain why we have decided to conduct enhanced monitoring of the provider.

The Office for Students has approved a change of name for the University of Bolton to the University of Greater Manchester. The OfS's regulatory judgements of the University of Bolton's compliance with our quality conditions following the quality assessment will continue to apply to the university should it change its name on the OfS Register. This includes our enhanced monitoring of condition B2.

Background

The OfS requires all registered higher education providers' courses to meet a minimum set of 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 October 2022 the OfS decided to open an investigation into the quality of business and management courses provided by the University of Bolton. 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 was asked to give their advice and judgements about the quality of the university's business and management courses.

Through consideration of general monitoring intelligence and student outcomes data held by the OfS, and initial data provided by the university, the team narrowed its focus to undergraduate provision. It focused in particular on the specific undergraduate courses below as they represented a significant majority of undergraduate students in the Institute of Management:

- BSc (Hons) Business Management (and associated pathway degrees)
- BSc (Hons) Business Management with foundation year
- BA (Hons) Accountancy
- BA (Hons) Accountancy with foundation year.

¹ Available at [PART V – Guidance on the general ongoing conditions of registration](#).

The quality assessment report setting out the advice and judgements of the assessment team was published by the OfS on 12 September 2023.² Through its activities, the team identified four areas of concern that may have related to the University of Bolton's compliance with the OfS's conditions of registration:

- **Concern 1:** The assessment team found that academic staff resource could be overly stretched, which had an impact on some aspects of academic support, meaning that academic support was in some cases not sufficient for the cohort of students. However, it was acknowledged that academic support is multifaceted and that existing plans and initiatives have the potential to address the issues identified. This concern is considered under condition of registration B2 because this condition relates to students receiving sufficient academic resources and support.

The assessment team particularly considered the context of the student cohort recruited by the University of Bolton. It found that a high proportion joined through a 'non-standard' route and were then likely to require higher levels of academic support for onward success. The team found that existing staff were often seen to go above and beyond expectations in providing support to students. There was evidence to suggest that academic staff resources in relation to the university's methods for providing academic support could, however, be overly 'stretched', which has had an impact on aspects of academic support for some students. The assessment team saw examples of this through:

- a. The implementation of the personal academic tutoring system.
- b. The time for some students to receive marks and feedback on assessed work in relation to the university's policy and guidance to students.
- c. Academic staff capacity for providing academic support to students through individual assessment tutorials, which are a key means of providing feedback in the model used by the university.

While existing plans and initiatives the university was implementing were likely, in the assessment team's view, to positively address the issues identified under concern 1, this would depend on successful implementation and require continued monitoring.

- **Concern 2:** The assessment team found that support for avoiding potential academic misconduct was not consistently provided in assessment feedback via the online assessment platform at Level 4, although it was more consistently evident at Levels 5 and 6. This was one part of wider support available for avoiding potential academic misconduct, although an important one. This concern relates to condition of registration B2 because the assessment team considered that providing this support consistently is a step that the University of Bolton could have taken to ensure students had sufficient support to succeed.
- **Concern 3:** The assessment team found that the format for providing formative feedback on assessments may not have been sufficient for some students across a number of modules reviewed. This concern also relates to condition of registration B2 because the assessment

² See [Assessment case report for the University of Bolton](#).

team considered that ensuring consistent access to formative feedback is a step that could have been taken to ensure students have sufficient academic support to succeed.

- **Concern 4:** The assessment team found that students taking a foundation year received positive support to progress, reflected in good rates of progression into year one of their course. However, student success in subsequent years of study was lower. The assessment team saw a link between this and academic support for the onward success, that is completion rates and/or attainment, of progressing foundation year students. As such, the assessment team's view was that academic support for these students was not sufficient. This relates to condition of registration B2.

The OfS engaged with the university to understand its views on the concerns of the assessment team, both during and after the assessment. As part of this engagement, the university detailed progress that had been made in relation to the concerns set out in the assessment report since the initial assessment had concluded. The OfS then carefully considered the content of the quality assessment report, and the information given by the university during the engagement. Following this consideration, the OfS decided that the university was in breach of condition B2. This case report sets out the reasons for these decisions and the actions we have taken.

Relevant OfS conditions of registration and OfS regulatory finding

Our view is that the concerns raised by the assessment team represent a breach of condition B2, and our engagement with the provider following the conclusion of the assessment shows that there is continuing risk.

Condition B2

One requirement of this condition is that providers must take all reasonable steps to ensure that students receive 'resources and support which are sufficient for the purpose of ensuring a high quality academic experience for those students, and those students success in and beyond higher education'.

Resources include, but are not limited to, '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 'physical and digital learning resources that are adequate and deployed effectively to meet the needs of the cohort of students'.

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 support relating to understanding, avoiding and reporting academic misconduct', and 'academic support relating to the content of the higher education course.'

OfS judgement on condition B2

We have judged that the university was in breach of condition B2. Giving consideration to the university's non-traditional cohort, the assessment team found that the university did not ensure the sufficient number or effective deployment of staff resources to deliver a high quality academic experience in practice. The university was aware staffing levels were not at its own target, and this impacted on the delivery of personal academic tutoring and assessment marking times. By not ensuring sufficiency in number or effective deployment of staff resources, this led to a deficiency of academic support for students, impacting academic support and tutoring time for students, as well

as lengthening assessment marking times for some. We consider that it would have been reasonable for the university to ensure that staff resources were at its own identified target in order to consistently deliver for its students.

The team also found that Level 4 students were not consistently being sufficiently guided in respect of academic misconduct. The assessment team confirmed the consistent addressing of academic misconduct at Levels 5 and 6, which suggests that the university was ensuring sufficient support and guidance to most students in respect of academic misconduct, apart from those at Level 4. This indicates that providing this support and guidance is a step that the university could have reasonably taken for Level 4 students, but had not.

Evidence also indicated that the university was not ensuring that students received sufficient support via assessment tutorials. The team found that students often needed to seek out formative feedback themselves and, in the event they did not, support to some was not provided. Given the non-traditional cohort, it is our view that it would have been reasonable for the university to ensure that students were consistently receiving formative feedback on assessments across all modules and levels of study.

Evidence also showed that the university was not ensuring that a specific cohort of students on BSc (Hons) Business Management with foundation courses were receiving sufficient support. Evidence indicated differences in support between Level 3 of this course, and then Level 4 and above. Given the non-traditional cohort, and the evidence that the university understood the consistency of student characteristics and challenges facing them (including caring responsibilities and full-time employment), we consider that it would be reasonable for the university to have identified that these students had lower rates of continuation and outcomes in comparison to non-foundation year students, and to have taken action to better support such students.

How we came to our judgement

When coming to our regulatory judgement and consideration of what steps would be reasonable for the provider to have taken, we have focused and placed significant weight on the particular academic needs of the cohort of students. This is based on their prior academic attainment and capability, and the principle that when the academic needs of the cohort of students are greater, the number and nature of the steps needed to be taken are likely to be more significant.

The university engaged positively with the OfS during the quality assessment and has provided information of the actions it is taking in response to the report. For example, the assessment team noted that the university was in the process of securing additional staff resource at various levels of seniority at the point of assessment, and our engagement with the university in February 2024 confirmed this was in progress. The university also detailed a number of improvements to staff training and development with respect of assessment procedures and the importance of timely feedback to students. The university referred to improved NSS and student satisfaction scores as evidence of improvements in the areas of concern. We have considered these actions as part of our assessment of compliance and ongoing risk, and when considering the appropriateness of our intervention.

The assessment team acknowledged that plans to improve performance (particularly in relation to concern 1) were underway at the point of assessment, and stated that it was too early for those plans to have had a material impact on concern 1 at the time of the visits in late 2022. Our view is that the provider now has an appropriate action plan in place to improve performance and address

all of the concerns in the assessment report. We do not however consider that all risk of non-compliance has been mitigated. This is because a number of the provider's actions have not yet been enacted, while others are yet to have a substantial demonstrated impact on students.

Due to this, using our risk-based approach to regulation, we have determined that it is appropriate that the OfS monitors the provider's progress against its action plan until such a point at which it can demonstrate that all actions have been enacted, and are now having a demonstrable impact on students' experiences and outcomes.

Regulatory intervention

In considering our regulatory response following these findings, we have weighed up the relevant intervention factors and the OfS's general duties.³ We have also noted the scale and impact of these breaches; due to the university's context and the nature of the concerns, a large number of students could potentially be disadvantaged by the concerns outlined in the assessment report.

When considering how we could best address the breach of condition, we looked at what the most appropriate, effective intervention would be to deliver the intended outcome for students. While more significant interventions were an option, we have decided to conduct enhanced monitoring of the provider. We judged that this would be most appropriate intervention available to us, and that it is likely to encourage targeted action to improve the resources and support students receive on these courses. When coming to this judgement, we were conscious that we should not impose an intervention that is any more burdensome for the university than necessary, while remaining effective. The terms of the enhanced monitoring require the university to provide updates on its action plan at periodic intervals, until such a point at which the OfS judges the risk of non-compliance to have been sufficiently minimised.

³ See [PART I – The OfS's risk-based approach - Office for Students](#).