

Outcomes from institutional audit
The Code of practice in
institutional audit
Second series



Sharing good practice

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Summary

This paper is based on the 59 institutional audit reports published between December 2004 and August 2006. The paper examines the evidence to be found in audit reports relating to the use that higher education institutions make of the Quality Assurance Agency for Higher Education's (QAA's) *Code of practice for the assurance of academic quality and standards in higher education* (hereafter, the *Code*). Its focus is on the way in which the *Code* informs institutional processes and practices, rather than on the specific content of individual sections of the *Code*, most of which is covered elsewhere in the *Outcomes from institutional audit* series.

The context for the paper is set by a brief description of the *Code*, its intended role within audit inquiries, how reference to the *Code* was distributed among the various sections of the audit reports, and the distribution of features of good practice and recommendations across the *Code*'s 10 sections. The central part of the paper describes how institutions undertook responses to the *Code*, and the nature of its influence on institutional policy and practice. Three common themes in audit teams' analyses of institutional approaches to the *Code* are identified. They are: monitoring of responses to sections of the *Code*, and associated institutional responsibilities; institutional attitudes towards the *Code* and its role; and processes for embedding the *Code* within institutional practice and procedure.

The evidence suggests that the *Code* is generally well-embedded within the procedures of individual institutions, and that those procedures have in many cases been modified consequent on consideration of the relevant sections of the *Code*. It does however also reveal that the impact of different sections has not been uniform, with *Sections 1, 2, 4, 6 and 7* having been particularly influential.

There is also evidence that different institutions are making use of the *Code* in quite different ways, with some using the language of 'compliance', while others refer to 'guidance' and appear to use the issue of new and revised sections of the *Code* as an opportunity to stimulate constructive debate.

It should be noted that the nature of the links in reports between the features of good practice and recommendations, and the *Code*, varies considerably, in some cases being direct and specific, in others more oblique. There are also cases where commentary clearly relates to the *Code*, although this is not explicitly acknowledged.

Preface

An objective of institutional audit is 'to contribute, in conjunction with other mechanisms, to the promotion and enhancement of high quality in teaching and learning'. To provide institutions and other stakeholders with access to timely information on the findings of its institutional audits, QAA produces short working papers that describe features of good practice and summarise recommendations from the audit reports. Since 2005 these have been published under the generic title *Outcomes from institutional audit* (hereafter, *Outcomes...*). The first series of these papers drew on the findings of audit reports published between 2003 and November 2004. This paper is based on the findings of institutional audit reports published between December 2004 and August 2006.

A feature of good practice in institutional audit is considered to be a process, a practice, or a way of handling matters which, in the context of the particular institution, is improving, or leading to the improvement of, the management of quality and/or academic standards, and learning and teaching. *Outcomes...* papers are intended to provide readers with pointers to where features of good practice relating to particular topics can be located in the published audit reports. Each *Outcomes...* paper therefore identifies the features of good practice in individual reports associated with the particular topic and their location in the main report. Although all features of good practice are listed, in the interests of brevity not all are discussed in this paper. In the initial listing in paragraph 11, the first reference is to the numbered or bulleted lists of features of good practice at the end of each institutional audit report, the second to the relevant paragraphs in Section 2 of the main report.

Throughout the body of this paper, references to features of good practice in the institutional audit reports give the institution's name and the paragraph number from Section 2 of the main report. So that readers can readily refer to the relevant audit report, the name of the institution used when identifying references is the name that appears on the relevant audit report on QAA's website. For those institutions where a change of name has subsequently taken place, this is noted in Appendix 1 (page 19), and is the correct name at the time of publication of this paper.

It should be emphasised that the features of good practice mentioned in this paper should be considered in their proper institutional context, and that each is perhaps best viewed as a stimulus to reflection and further development, rather than as a model for emulation. A note on the topics identified for this second series of *Outcomes...* papers can be found at Appendix 3 (page 23).

As noted above, this second series of *Outcomes...* papers is based on the 59 institutional audit reports published by August 2006, and the titles of papers are in most cases the same as their counterparts in the first series of *Outcomes...* Like the first series of *Outcomes...* papers, those in the second series are perhaps best seen as 'work in progress'. Although QAA retains copyright in the contents of the *Outcomes...* papers, they can be freely downloaded from QAA's website and cited, with acknowledgement.

Introduction

1 QAA's *Code of practice for the assurance of academic quality and standards in higher education* (the *Code*) is made up of 10 sections, of which the following editions were in operation, or came into effect, during the period covered by this paper:

- *Section 1: Postgraduate research programmes* (January 1999, revised September 2004)
- *Section 2: Collaborative provision* (July 1999, revised September 2004 under the new title *Collaborative provision and flexible and distributed learning (including e-learning)*)
- *Section 3: Students with disabilities* (October 1999, revised February 2010 under the new title *Disabled students*)
- *Section 4: External examining* (January 2000, revised August 2004)
- *Section 5: Academic appeals and student complaints on academic matters* (March 2000, revised October 2007)
- *Section 6: Assessment of students* (May 2000, revised September 2006)
- *Section 7: Programme approval, monitoring and review* (May 2000, revised as *Programme design, approval, monitoring and review* September 2006)
- *Section 8: Career education, information and guidance* (January 2001, revised February 2010)
- *Section 9: Placement learning* (July 2001, revised January 2008)
- *Section 10: Recruitment and admissions* (September 2001, revised as *Admissions to higher education* September 2006).

2 The *Code's* role, as defined by QAA (Foreword to published sections), is to provide 'an authoritative reference point' for institutions in their assurance of the academic quality and standards of programmes. In the first edition, each section was structured into a series of precepts and accompanying outline guidance. The precepts identified 'those key matters which QAA expects an institution to be able to demonstrate it is addressing effectively through its own relevant quality assurance mechanisms'. The accompanying outline guidance was neither 'prescriptive' nor 'exhaustive': its purpose was 'to offer a framework for quality assurance and control which institutions can use, elaborate and adapt according to their own needs, traditions, cultures and decision-making processes'. QAA's stated expectation was that from the year 2000 individual institutions would be 'in a position to demonstrate how they are meeting the expectations contained in the precepts'.

3 Revised editions of the *Code* sections have replaced the notion of 'guidance' with that of 'explanation'; one of the aims of this change was to reduce opportunities for institutions to take a 'checklist' approach to the *Code*, though as indicated in the Summary (page 1), the extent to which this aim has been met varies between institutions.

4 All published sections of the *Code* state, in their forewords, that QAA's audit and review processes will consider the extent to which individual institutions are 'taking account' or 'meeting the expectations' of the *Code*'s sections and precepts. In revised editions, a preamble notes that the *Code* is 'a statement of good practice' that has been endorsed by the higher education community. Revised editions also point out that academic staff in departments and schools are not required to 'be aware of the detail of the various sections of the *Code*, although they might well be expected to be familiar with the institutional policies it informs and any parts which are particularly relevant to their responsibilities' (revised Foreword, paragraph 9).

5 The *Handbook for institutional audit* (2002) supplies further information for both institutions and audit teams regarding the place of the *Code* in institutional audit. Thus of the three main areas examined by audit the first and the third refer directly to the *Code*. The first is 'the effectiveness of an institution's internal quality assurance structures and mechanisms, in the light of QAA's *Code of practice...*' (*Handbook*, page 3, paragraph 11). The third area, concerned with sampling institutional quality assurance processes at the level of the programme ('discipline audit trails', or DATs), has as one of its elements 'scrutiny of the relationship between the programmes offered and...relevant sections of the *Code of practice*' (page 9, paragraph 44).

6 The object of audit inquiry regarding the *Code* was defined as follows:

When considering the institution's management of quality and standards, the audit team draws upon a range of external reference points, including the FHEQ [*The framework for higher education qualifications in England, Wales and Northern Ireland*], *Subject benchmark statements* and the *Code of practice*. In so doing, it is not seeking evidence of compliance, but rather for evidence that the institution has considered the purpose of the reference points, has reflected on its own practices in the relevant areas, and has taken, or is taking, any necessary steps to ensure that appropriate changes are being introduced:...in respect of the *Code of practice*, the team does not seek information about adherence on a precept-by-precept basis. It expects to see a statement in the institutional SED [self-evaluation document] about how the intentions of the precepts have been addressed, and to discuss during its visits any key changes that the institution has made to its practices and any areas that have caused particular difficulty (page 11, paragraph 55).

7 The guidance given to audit teams directs them to consider 'the use made of the *Code*' under the various headings of the report as appropriate. Thus, for example, the guidance under 'External examiners and their reports' points to *Section 4* of the *Code*, that under 'External reference points' to 'all sections'.

8 Like the reports in the first series, those published in 2004-06 made extensive reference to the *Code*. Of the total of 59 second series reports, 23 contained 10 or more paragraph references to the *Code*, widely dispersed across the sections of the report.

9 The audit reports identified a total of 14 features of good practice linked to varying extents with the impact of the *Code* on practice, though the features of good practice in question did not generally refer specifically to the *Code*. Four of the features of good practice related to the *Code* as a whole, four to *Section 2*, three to

Section 1, two to Section 4, one to Section 6, and one to Section 9. In many of these cases the focus of the feature of good practice was on a larger strategic or procedural initiative to which the *Code* might be seen to have made an input, or in the context of which institutional arrangements reflected the *Code*.

10 It may also be noted that the total number of features of good practice, and also of recommendations, relating to the *Code* in the second series audit reports falls well below the corresponding first series total, even when allowance is made for the larger first series cohort. The decline in both totals (especially in respect of recommendations) may reflect the increasing currency of the *Code* within the sector. In particular, the sections of audit reports headed 'External reference points' generally endorse the way in which institutions have embraced the *Code's* advice; this may point to the extent to which sound practice in this regard is increasingly the norm. It should also be noted that, while recommendations exceed features of good practice in this area, overall in the audit reports positive comments significantly exceed negative ones.

Features of good practice

11 As indicated in paragraph 9, the relationship between the features of good practice as given in the reports, and the *Code*, was sometimes less than explicit; for this reason, in the following list the paragraphs specifically referring to the *Code* have been quoted alongside the relevant feature of good practice:

- the University's demonstrable commitment to, and achievement of, an embedded academic quality culture [University of Ulster, paragraph 215 i; paragraphs 29 and 60]
'The previous audit report commended the University on the establishment of a coherent system of principles and practices which incorporates the *Code of practice*, the qualifications framework and subject benchmarks to assure academic standards. The audit team concluded that the University continues to maintain its policies and procedures under continuous review in the context of sector wide requirements, initiatives and revisions to the Academic Infrastructure. Discussions with staff indicated a high level of commitment to the continued development of staff skills and competencies to facilitate this, and the team considered this to be further evidence of an embedded quality culture seeking enhancements wherever possible.' [paragraph 60]
- the enhancement of the student experience by extensive external input into programmes across the University [Kingston University, paragraph 237 ii; paragraph 164]
'The detailed aims of the fields are described in the field specifications, which comply with University requirements and provide full information on the main features of the fields. Development of the provision was influenced by the FHEQ, undergraduate and draft postgraduate Computing benchmark statements, relevant sections of the *Code of practice*, the University key skills framework and the British Computer Societies' guidelines on Course Exemption and Accreditation.' [paragraph 164]

- the clarity, thoroughness, interrelatedness, management and presentation of documentation that supports the deliberative processes of the University College [Buckinghamshire Chilterns University College, paragraph 238 i; paragraph 60]
'The SED noted that the *Code of practice* is 'embedded' in its policies and procedures and minutes of both institutional and faculty committees show awareness of the *Code*. The AAC monitors institutional use of the Academic Infrastructure, including the *Code*, and recommends changes in practice and policy where appropriate. Staff explained that this has led to changes in guidance and procedures, such as working practices for the accreditation of prior learning. The Academic Registry produces clear policy, guideline and procedural documents that reflect the spirit of the *Code*, although there is opportunity for the placement learning policy to be further developed in this respect.' [paragraph 60]
- 'the support and environment for postgraduate research students, particularly at the local level [University of Manchester, paragraph 211 ii; paragraph 90]
'One of the University's current priorities is the development and enhancement of supervisory practice for research students. A new policy on the supervision of such students has been introduced which builds on previous practice and reflects the guidance in the revised *Code of practice*, published by QAA.' [paragraph 90]
- the support for postgraduate research students provided through the Graduate School, facilitating development of the University's research student community [University of Plymouth, paragraph 244 vi; paragraph 124]
'... the team considered that the School was making a significant input, under the direction of the Graduate Committee, to ensuring compliance of University procedures with the recently revised *Code of practice, Section 1: Postgraduate research programmes*.' [paragraph 124]
- the developing role of the Research Degrees Committee [RDC] in providing a collective view of quality assurance arrangements for research degrees as evidenced by the detailed examination of each precept in the revised *Code of practice, Section 1: Postgraduate research programmes* [University of London, paragraph 165 i; paragraphs 45 and 76]
'The team noted that the RDC was currently facilitating consideration by the Colleges and the University of the implications of the revised *Code of practice, Section 1: Postgraduate research programmes*. It had analysed this section of the *Code* and determined where, under current arrangements, responsibilities lay for ensuring adherence to the precepts. The team considered the documentary evidence relating to this analysis and formed the view that it provided evidence of good practice.' [paragraph 45]
- the rigorous process for approving formal international partnerships as exemplified by the arrangements with Taylor's College in Malaysia [University of the West of England, Bristol, paragraph 257 v; paragraph 129]
'A comprehensive Memorandum of Agreement is in place which adheres to the *Code of practice*.' [paragraph 129]
- the extent and quality of staff development [University of Northumbria at Newcastle, paragraph 245 iii; paragraph 115]

'With the planned expansion of e-learning and distance delivery of programmes as part of a move towards greater use of blended learning, the team welcomes the University's intentions to review its procedures in the light of publication of the revised *Code of practice, Section 2: Collaborative provision and flexible and distributed learning (including e-learning)*.' [paragraph 115]

- the institutional framework for the assurance of quality and standards which defines central control and the devolution of authority and responsibility and includes appropriate checks and balances [City University, paragraph 320 i; paragraphs 152 and 161]

'The Validation and Academic Handbooks and the Partnership Policy for Awards of City University are all referenced to the section of the *Code of practice* on collaborative provision. The University is reviewing its current practice through QASC [Quality and Academic Standards Committee] and the Validation and Foundation Degree Committees in the light of the revised section of the *Code* on collaborative provision.' [paragraph 152]

- the comprehensive quality assurance process that supports collaborative provision [University of Surrey, paragraph 221, bullet 1; paragraph 120]

'All quality assurance processes [for collaborative provision] are laid down in a Quality Assurance Handbook, produced specifically for Associated Institutions, which is consistent with the University's Academic Standards Guidelines and these guidelines are in turn consistent with the *Code of practice*.' [paragraph 120]

- the robustness and apparent effectiveness of the design it has adopted for annual evaluation of pathways and programmes [paragraphs 61 and 70], and the design of its arrangements for responding to external examiners' reports and communicating to them the actions it has taken [University of Huddersfield, paragraph 317 ii; paragraph 77]

'From 2004-05 external examiners will be invited to make specific comment on the use of external reference points, including the Academic Infrastructure. The standard report form for external examiners has been modified accordingly and is consistent with the advice offered by the *Code of practice, Section 4: External examining*.' [paragraph 77]

- the College's approach to external examiners and their reports [Henley Management College, paragraph 213 ii; paragraphs 54-62]

'The team also confirmed that the College's approach to external examining was in alignment with the relevant sections of the *Code of practice*.' [paragraph 62]

- implementation of the University's Assessment Process Handbook [University of Bolton, paragraph 196, bullet 2; paragraph 32]

'The University's assessment policy, which is linked to its Learning and Teaching Strategy, is embodied in the Assessment Process Handbook - a Code of practice, which reflects precepts of the *Code of practice, Section 6: Assessment of students, published by QAA*.' [paragraph 32]

- the organisational and support arrangements underpinning the contextual enquiry project pursued off-campus (in the UK or overseas) by students at stage 3 of the undergraduate programme [Dartington College of Arts, paragraph 176 iv; paragraph 98]

'Specifically, in relation to the contextual enquiry project (CEP), pursued off-campus (in the UK or overseas) by students at stage 3 of the undergraduate programme, the team noted that relevant guidelines drew on the section of the *Code of practice* on placement learning.' [paragraph 98]

Use of the *Code* as a whole

12 The institutional audit reports (second series) provided a comprehensive view of the overall response of institutions to the *Code* and its sections. This was to be found, as suggested in paragraph 11 (pages 5-8), under the entry on 'External reference points', although a third of the reports also provided overall comment within the entry on 'The institution's framework for managing quality and standards, including collaborative provision'. The general impression given by the reports was that institutions had given thorough consideration to the individual sections of the *Code*, and that the review of practice in the light of the *Code* had led to revisions to quality and standards frameworks. Institutions were found to have developed, or modified, internal codes of practice and quality assurance policies and procedure, as a consequence of such reviews. Many reports indicated that specialist working groups, committees or officers had addressed particular sections of the *Code* within an overall institutional response strategy. There was wide reference also to the consideration and assimilation of individual precepts. The overview role taken by central deliberative bodies in monitoring ongoing implementation of the *Code* was similarly widely noted. Half the reports (29) clearly indicated continuing institutional attention to the *Code* as it evolved.

13 Reports also suggested some variation in institutions' view of the role of the *Code* with respect to their management of quality and standards. While some institutions' view of their response to the *Code* was one of 'compliance', others approached it rather as a 'guide' to good practice and enhancement.

14 Common themes in audit teams' consideration of institutional approaches to the *Code* included: monitoring of responses and implementation, and the associated responsibilities; institutional attitudes towards the *Code*; and the processes of embedding of precepts and associated guidance. These themes are discussed in paragraphs 15-25 (pages 8-11).

Monitoring and responsibilities

15 This area gave rise to several recommendations, and to a number of concerns, as well as to one feature of good practice. The recommendations had a unifying theme: the need for an institutional system for monitoring the *Code* sections as they developed through revised editions. In most cases, the reports noted the typically systematic initial actions taken to address the *Code*, and the subsequent loss of focus. The lack of clear monitoring arrangements was generally linked with a lack of clarity about responsibilities for oversight.

16 Thus, in one instance, a report proposed that, 'with regard to the ongoing review of [institutional] systems and procedures against the continuing evolution of the *Code of practice*...the [institution] should formalise the loci of responsibility for the oversight of the sections of the [*Code*] with appropriate timescales and reporting lines'. In another

example, the report observed that 'mechanisms for monitoring the [institution's] developing practice in the context of all sections of the *Code* as periodically revised [were] not fully in place', and recommended clarification of 'the locus of responsibility for ensuring consistent engagement with the Academic Infrastructure'.

17 Another report noted a lack of clarity both as to which body or person was responsible for implementation and as to the mechanism for monitoring progress on the part of the institutional committee responsible. In a further case, the report noted the 'considerable variability' in the treatments of different *Code* sections as well as in 'the clarity of the mechanisms for checking that practice remained consistent with the *Code*...over time'. With particular respect to institutional responsibility for oversight of the *Code*, one report was unable to discover 'any collective central discussion of the sections of the *Code*...nor was it explicitly in the remit of any central committee to discuss such matters'.

18 By contrast, one institution whose initial incorporation of the *Code* had been commended by a previous audit team was found to have 'continued to maintain its policies and procedures under continuous review' in the context of external factors such as 'revisions to the Academic Infrastructure'. This sustained development was 'further evidence' of the institution's 'commitment to, and achievement of, an embedded academic quality culture' [University of Ulster, paragraph 215 i; paragraph 60]. Another report's comments on the care taken by an institution in its mapping and updating processes incorporated the institution's view of the *Code* as 'a relevant component against which practice can be audited, and [as] a potential driver for further developments'. The link between the *Code* and institutional development was a topic in several reports.

Institutional attitudes to the *Code*

19 The evidence of many reports (14) shows a division between those institutions which view the *Code* as an auditing and/or developmental aid and those which treat it as requiring 'compliance'. With respect to the latter, several reports quoted institutional self-evaluation documents indicating, for example, that institutional regulations and systems 'require programmes to be compliant with the QAA *Code of practice*...' or that there was systematic review of sections as published 'to ensure that the [institution] is compliant with the precepts'. One report, noting a similar review process, also noted the institution's publication of a 'Summary document illustrating compliance with the QAA *Code of practice*'.

20 Some reports regarded 'compliance' in a more questioning spirit. One report, while acknowledging 'timely and appropriate' engagement with external reference points including the *Code*, 'noted, however, that the approach taken was generally limited to that of compliance, thus missing opportunities to engage more proactively with these important reference points for the purposes of quality enhancement'. Another report observed that 'the language of the mapping exercise was exclusively in terms of compliance, with little attention paid to the distinction between "precepts" and "guidance"'. The report further noted that it was 'not clear...whether the advisory nature of the *Code* had been fully appreciated' and suggested (although not as a formal recommendation) that the institution 'promote a higher level of engagement

with the *Code* in its senior committees, so that future discussion and decisions about the management of quality and standards could be informed by a greater shared awareness of the *Code* and its expectations'. The same report further noted that 'the *Code of practice* had been given limited consideration at committee level, primarily in a purely administrative manner, and was not yet well embedded in its adoption, or understood by staff'.

21 Conversely, one report quoted an institutional self-evaluation document which stated that, instead of 'adopting a minimal compliance strategy in respect of the *Code of practice*, we have endeavoured to adopt a more considered and constructive approach in which the different sections and component precepts are used at all levels of the institution to identify scope for further enhancement of provision'. This report further noted the systematic embedding and monitoring of the *Code's* guidance in institutional regulations and departmental practices. Another institution's self-evaluation document referred to its 'reflective' rather than 'compliant' approach to the *Code*. The corresponding report traced the institutional mechanisms for responding to the *Code* and its sections, and concluded that the institution had used the *Code* 'as a set of guides to good practice in the sector with which to reflect upon and change its procedures when it felt the need'. A further self-evaluation document stated that the *Code* was regarded as 'a source of good practice...against which to benchmark our practices, rather than as a set of rules set in stone'. The report in question went on to note the 'rigorous' approach taken by the institution to embedding the *Code's* principles in the University's frameworks.

22 Another report, having noted the procedures for checking the *Code* sections against institutional policy and practice and taking action as necessary, quoted the institution's view of the *Code* as not 'a rule book', and of its relationship with it as one of 'informed and thoughtful engagement'. Elsewhere, a report quoted the institutional self-evaluation document's view of the *Code* as 'an opportunity to review and, where appropriate, improve current practices', noting the scrutiny by 'an appropriate grouping' of each *Code* section when published and the instances of 'positive outcomes' which had arisen. The institution's aim was to adhere to the precepts 'while recognising that the guidance offered...[was] not prescriptive'.

23 In a wider context, a citation of good practice relating to 'the enhancement of the student experience by extensive external input into programmes across the University' drew in part on the Academic Infrastructure including the *Code*. [Kingston University, paragraph 237 ii; paragraph 164].

Use of the *Code* to inform institutional procedures

24 The evidence of a number of reports indicated that where *Code* precepts were embedded in institutional policies and procedures or in internal codes of practice, it might be regarded as unnecessary for academic units or individual staff to explicitly receive or be aware of the *Code* - a view supported by revised editions of the *Code* (see earlier text reference on page 3, paragraph 4). Two reports particularly noted the *Code's* role in the development of internal codes of practice. One institution had 'developed internal codes of practice drawing upon the good practice set out in the *Code*...which had helped it to reflect on issues relevant to the assurance of quality and

the maintenance of academic standards'. Another institution had similarly drawn on the *Code* in developing its own internal codes, 'each covering the scope of one of its sections and setting out...the related [institutional] procedures'. The report noted that the approach 'provides the means for both testing whether the precepts are being met and for making them explicit to staff by reference to procedures with which they are familiar'. In this instance, the institutional arrangements facilitated general critical awareness of the relationship between the *Code* and internal practices.

25 In a further case, the embedding and monitoring of the *Code* within institutional procedures was linked with an institution's generation of policy documents deemed to be a feature of good practice [Buckinghamshire Chilterns University College, paragraph 238 i; paragraph 60].

Use of individual sections of the *Code*

Section 1: Postgraduate research programmes

26 The second series institutional audit reports provide wide evidence of the influence of both the original and revised versions of *Section 1* on institutional arrangements for postgraduate research programmes. The report headings under which consideration of this section was largely focused were those on academic and personal guidance and support for students (23 reports) and on external reference points (12). There was a small amount of overlap between the entries, which in total referred to 31 institutions. There were three features of good practice attributable in whole or in part to this section, and there was also one linked recommendation. It should perhaps be noted in this context that this section of the *Code* incorporates Research Council requirements, and is therefore couched in a more prescriptive tone than other sections.

27 In general, reports confirmed that institutions had reviewed their arrangements in the light of the section's precepts and brought them into line as necessary. Numerous reports on institutions audited between December 2004 and June 2005 indicated responses to the 2004 edition. Particular matters receiving a series of positive mentions in this context included: supervisory arrangements (six mentions, precepts 11-14); internal codes of practice (six mentions, precept 3); and research student training (three mentions, precept 18). Some reports, for example, noted moves towards establishing supervisory teams (precept 12: University of Leicester, paragraph 130; University of London, paragraph 113); others noted the alignment of internal codes of practice for supervisors, students, or both, with the guidance contained in the section (University of Worcester, paragraph 114; Kingston University, paragraph 106; St George's Hospital Medical School, paragraph 117). Another report noted an institution's research student training procedures, which were 'well established' and 'comprehensive', and had been updated in the light of the 2004 edition (Imperial College, London, paragraph 147). A further report identified a feature of good practice in an institution's support, particularly at local level, for postgraduate research students. Within the feature of good practice the report noted both the development of training in research skills and that of supervisory practice in the light of the revised edition [University of Manchester, paragraph 211 ii; paragraph 90]. Conversely, one report encouraged an institution to 'pay particular

attention to the precepts of the *Code* relating to supervisor training and training in research skills' and to develop a more co-ordinated, less optional approach than that in place.

28 Some reports linked the section with institutions' development of their research environments, and the role of graduate schools (precept 5). One report identified a feature of good practice in the support for the research student community provided by the graduate school, which was 'making a significant input...to ensuring compliance of University procedures with the recently revised *Code*...' [University of Plymouth, paragraph 244 vi; paragraph 124]. Another report found good practice in the way in which an institutional research degrees committee had led the development of 'a collective view of quality assurance arrangements for research degrees as evidenced by the detailed examination of each precept in the revised *Code*...' [University of London, paragraph 165 i; paragraphs 45 and 76].

29 It should be noted that the forthcoming *Outcomes...* paper on academic advice, guidance and support will also cover aspects of support for postgraduate research students.

Section 2: Collaborative provision and flexible and distributed learning (including e-learning) (formerly titled Collaborative provision)

30 It should be noted that the volume of material to be addressed was smaller in the case of this section, since a number of institutions where collaborative provision was judged to be 'large and complex' were scheduled to receive separate collaborative provision audits. Of those reports which encompassed collaborative provision within the overall institutional audit, almost all included reference to *Section 2*; indeed, some reports on institutions for which separate collaborative audits had been scheduled also considered the section and its effect. While the report section on collaborative provision was naturally the main location for comment, that on external reference points was also much used. In several cases reports employed both of these headings for comment on the way in which this section of the *Code* had been used by institutions. Most reports provided general endorsements of institutional responses to the section; in particular, a number noted responses to the revised version of the section published in 2004. More generally, reports noted the *Code's* influence in such areas as institutional procedures and guidelines, academic and policy development and institutional codes of practice.

31 Several reports commented on institutional practice with respect to formal collaborative agreements and the *Code*. One report noted as good practice the fact that an institution's 'rigorous' approval process for overseas collaborative provision included a 'comprehensive' memorandum of agreement aligned with the *Code* [University of the West of England, Bristol, paragraph 257 v; paragraph 129]. In another case, an audit team endorsed the institutional claim, made in its self-evaluation document, that its collaborative agreements were 'compliant' with the *Code* (Henley Management College, paragraph 132). In a further case, an audit team found that formal agreements were 'in alignment with the precepts...with the exception of formal specification of detailed arrangements for termination'. The report encouraged the institution to 'develop explicit exit strategies to protect its own interests and those of its students in the event of closure of a collaborative

arrangement' (Thames Valley University, paragraph 207, precept A10). Another report noted an institution's recognition of the need to formalise collaborative arrangements via written agreements 'to ensure that it meets in full the expectations of the section of the *Code* on collaborative provision' (Imperial College, London, paragraph 165). One report advised an institution of the need to ensure that the formulation of collaborative agreements reflected institutional policy - which was itself accordant with the *Code* - in two respects: that the agreements preclude the operation of 'serial' arrangements for provision leading to the institution's awards, and that they include a mechanism for institutional approval of publicity material employed by the collaborating institution.

32 Other recommendations linked with this section concerned approval, monitoring and review procedures, the appointment of external examiners, and the exercise of central oversight. In the case of approval, monitoring and review, one report noted the absence of any explicit mention of the *Code* in procedural documentation for collaborative provision. It was thus unclear how collaborative partners were made aware of the awarding institution's expectations, or how the institution monitored the alignment of approval, monitoring and review processes with the *Code*. The report proposed that the institution devise a means of ensuring collaborating institutions' awareness of its expectations regarding the Academic Infrastructure. Another report, while generally endorsing the way in which approval and review procedures for an institution's collaborative provision took account of the *Code*, nonetheless proposed that it 'test the security' of its existing and planned arrangements against the guidance in the 2004 edition. This advice appeared to reflect a strategic intention to expand collaborative provision despite the absence of a systematic institutional overview of quality and academic standards.

33 Another report, within a composite recommendation on the management of collaborative provision, advised an institution of the need for review of its system for appointing external examiners to collaborative programmes, in order to draw on a wider range of sectoral expertise comparable with appointments to internal programmes. In the similar context of a broader recommendation, a further report found that quality assurance arrangements for an institution's collaborative provision were largely devolved and that there was little central oversight, contrary to the expectations of the *Code*.

34 The incorporation of flexible and distributed learning into the 2004 revised edition of the section is reflected in several audit reports. One institution, for example, was found to have drawn on the revised version in issuing guidance to staff on 'provision incorporating work-based and distance learning'. Another institution, planning to expand e-learning and the distance delivery of programmes, intended to review its quality management arrangements applicable to this area of provision in the light of the 2004 edition, an intention contributing to an overall feature of good practice for 'the extent and quality of staff development' [University of Northumbria at Newcastle, paragraph 254 iii; paragraph 115]. In contrast, as part of a recommendation covering the need to address the Academic Infrastructure as a whole, a report observed the challenges posed to both providers and students by those aspects of *Section 2* specific to flexible and distributed learning.

35 Elsewhere, two features of good practice attached to institutions' overall quality management frameworks for collaborative provision included references, in the contributory main text, to the consistency of policy and procedural guidelines with this section of the *Code* [City University, paragraph 320 i; paragraphs 152 and 161; University of Surrey, paragraph 221, bullet 1; paragraph 120].

36 More detailed information about institutions' management of their collaborative provision, as revealed by the second tranche of institutional audit reports, may be found in the *Outcomes... series 2 paper Collaborative provision in the institutional audit reports*. The conclusions reached in that paper are consonant with the discussion in the preceding paragraphs.

Section 3: Disabled students (formerly titled Students with disabilities)

37 Reference in the audit reports to *Section 3* was largely positive, indicating mapping and alignment of institutional practice, and citing instances of initiatives to promote inclusiveness for disabled students. There were, however, neither features of good practice nor recommendations explicitly linked with this section of the *Code*. The entries under 'Academic and personal guidance and support' provided most comment, although several reports considered this section under 'External reference points'. The total number of institutions receiving comment on this section under all entries was 21.

38 More specifically, in three institutions, audits of support mechanisms had been conducted in the light of the section's guidance. In one instance the report noted the institution's recognition of the need, identified by such an audit, for the introduction of explicit policies and procedures designed to anticipate disabled students' requirements. A further report, noting an institution's use of the section in its assessment of its services for students with disabilities, encouraged the institution to continue to enhance its support arrangements.

39 An extended consideration of matters relating to this section may be found in the *Outcomes... paper, Institutions' support for students with disabilities 2002-06*.

Section 4: External examining

40 Direct reference to *Section 4* occurred in three-quarters of the reports. Not surprisingly, the report entry under 'External examiners and their reports' accounted for all but one of these references, although further reference in some reports appeared under 'External reference points' and within the discipline audit trails. With few exceptions, comment on institutional response to this section was positive. Reports noted its bearing on institutional review of procedures and regulations for the operation of the external examiner system, and general alignment with its precepts and advice. Several reports commented specifically on institutions' use of the 2004 edition of this section. A similar number confined their endorsement to restatement of institutional claims of alignment. Some reports confirmed a particular area of alignment, such as regulations for the appointment of external examiners, rather than giving a more general endorsement.

41 The section had textual links with two features of good practice and one recommendation. In a further case, discussed in paragraph 44, a key recommendation, while it did not refer to the *Code*, had an evident relationship to its guidance.

42 One of the two features of good practice was found in an institution's 'design of its arrangements for responding to external examiners' reports and communicating to them the action it has taken' [University of Huddersfield, paragraph 317 ii; paragraph 77, precept 13]. The broader context for this feature of good practice included the modification of the external examiner's report form and its consistency with advice given in *Section 4*. In particular, the report noted provision in the revised form for external examiners to comment on institutional use of external reference points, including the Academic Infrastructure.

43 In the second case, a full account was given of the 'robust' working of external examining processes, including the use of external examiners' reports. In identifying good practice in the College's approach to external examiners and their reports, the audit team also confirmed its 'alignment with relevant sections of the *Code of practice*' [Henley Management College, paragraph 213 ii; paragraphs 54-62].

44 One institution was advised to ensure the currency of its published information on the roles and responsibilities of its external examiners, and its consistency with advice given in the *Code*. In another case, an institution was recommended as a matter of essential action 'to ensure that the management of standards is fully informed by a rigorous and scrupulous institutional consideration of all external examiners' reports and the provision of adequate and complete responses to these reports'. This recommendation's linkage with precepts in *Section 4* was not a matter of textual note. It serves perhaps as an example of the implicit rather than explicit relationship of much material in the reports with advice given by the *Code*.

45 The *Outcomes...* paper *External examiners and their reports* gives full details of the findings of audit reports on this area, and supports the conclusions drawn in paragraphs 40-44 in stating that 'Overwhelmingly, the evidence of the audit reports indicates that institutions' external examining arrangements were working satisfactorily'.

Section 5: Academic appeals and student complaints on academic matters

46 There was direct reference to *Section 5* in reports on only seven institutions. Comment was concentrated under the heading on external reference points. One report included an advisable recommendation on the need for the institution concerned to develop arrangements meeting the *Code's* expectations, with particular reference to the monitoring, evaluation and review of appeals by students on taught courses. Two reports observed the section's influence on policy development. Another observed use of the section to revise the appeals process following an advisable recommendation, in the institution's preceding audit report, that the institution should clarify arrangements in this area.

Section 6: Assessment of students

47 Two-thirds of the second series reports made reference to *Section 6*. Reference under 'the institution's framework for managing quality and standards' extended to 23 institutions. There was also a range of comment under 'External reference points' and 'discipline audit trails'. In two cases the role of *Section 6* was also mentioned under 'External examiners and their reports'.

48 While the section was linked with seven recommendations, but only one feature of good practice, the great generality of comment endorsed institutional practices in respect of the *Code*. Many reports noted the section's direct influence on assessment policy and frameworks, and institutions' incorporation of precepts into their internal processes. Thus good practice was found in the content and implementation of an institutional assessment handbook reflecting the section's precepts [University of Bolton, paragraph 196, bullet 2; paragraph 32].

49 The shared theme across the recommendations was the need for consistency in policies, procedures and implementation. One institution was advised to provide clear, coherent policies and regulations for assessment, progression and awards 'that align with the QAA's *Code...Section 6...and which are applied consistently across the [institution]*'. In another instance, an audit team checked progress in local implementation of the institutional assessment policy, which had been revised to accord with the *Code*. The report found that implementation of the policy varied across faculties, and underlined the need for consistency in arrangements for the moderation of marking and the provision of feedback to students. Examples of variability in processes and provision included: assessment and classification mechanisms; assessment feedback; assessment criteria; extenuating circumstances; plagiarism; and regulations for re-assessment.

50 The matters touched upon in paragraphs 47-49 are considered in full detail in the *Outcomes... paper Assessment of students*.

Section 7: Programme approval, monitoring and review

51 Three-quarters of reports made some reference to *Section 7* of the *Code*. The report heading on 'Internal approval, monitoring and review processes' produced 38 references, and there were numerous references also under 'External reference points'. In some cases institutions appeared under both headings. While no features of good practice were related to institutional responses to the section, there were five recommendations linked to a greater or lesser extent with this section. Comment largely indicated alignment of institutional practice with the *Code's* precepts and guidance. Several reports confirmed alignment in all three areas, and similar numbers with respect to either annual monitoring or periodic review. Three times as many, however, specifically confirmed alignment of approval processes with the *Code's* guidance.

52 Recommendations focused on two matters: the source of authority for approval; and the role of external input. One audit report quoted *Section 7*, precept 3, to the effect that institutions should ensure that the approval and review of programmes 'involves appropriate persons who are external to the design and delivery of the programme', and precept 6: 'The final decision to approve a programme should be

taken by the academic authority, or a body acting on its behalf. The body should be independent of the academic department, or other unit that will offer the programme...'. Respecting precept 3, two other reports recommended a more rigorous approach to the employment of external subject and professional expertise.

53 Respecting precept 6, a further report had concerns about the final authority in approval decision residing not with a central institutional deliberative body but with a discontinuous series of 'transient' approval panels which would be 'unlikely to be able to provide a structured consistency in overseeing the final approval of awards'. Another report noted the team's concern in relation to 'the very devolved responsibility for confirmation of approval', and expressed further reservations about the 'limited circulation and consumption' of both approval and review reports, and recommended the development of means to ensure scrutiny and accountability.

54 The *Outcomes... paper Validation, approval and periodic review* discusses matters related to this section of the *Code* in more detail.

Section 8: Career education, information and guidance

55 Reference to *Section 8* was made in a number of reports under the entries on student guidance and external reference points, and in some cases under both. The total number of institutions involved was 13. There were no features of good practice or recommendations attributed to the section, and most comment was general, indicating mapping or alignment of institutional policies and procedures with the section, or the establishment of reviews intended to do this. One report indicated a need for greater alignment and the development of a more proactive approach to student employability. Other reports commented positively on the use of feedback from students on their experience of careers guidance and on institutional policy in this area. In a further case, a report noted the implementation of strategies aligned with the section, including 'a programme of staff development to support future curriculum developments in career education, information and guidance'.

Section 9: Placement learning

56 The total number of institutions receiving comment on this section was 14, and references were generally positive. While reference was concentrated under the headings on student guidance and external reference points, two reports included comment within the discipline audit trails. Most references were general, and indicated 'embedding', 'alignment', 'influence', 'engagement' or 'enhancement'. One report noted that use of the section had 'informed practices affecting the quality of learning opportunities'. In another case, the role of guidelines drawing on the section was linked with identification of good practice in organisational and support arrangements for an off-campus project [Dartington College of Arts, paragraph 176 iv; paragraph 98].

57 One report recommended, in line with precept 3, that institutional policy and practice in placement learning be reviewed to ensure that 'all placement providers for students undertaking work-based learning required by a programme are suitably prepared, whether or not the placement is arranged by the student or the [institution]'.

58 The *Outcomes...* paper *Work-based and placement learning, and employability* covers this topic in more detail.

Section 10: Admissions to higher education (formerly titled *Recruitment and admissions*)

59 The *Outcomes...* paper in this series on recruitment and admission of students, which considers this area in detail, concluded that the section 'did not appear to have played a prominent part in the arrangements institutions had made for developing and monitoring their policies and procedures', and noted that reference to *Section 10* was to be found in reports on a total of only seven institutions. As that paper also observed, while there were few explicit references to the section in the reports, implicit reference to precepts could be traced. Instances included reference to promotional materials (precept 2) and selection policies (precept 3). Also, while the substance of a number of the features of good practice and recommendations in reports could be linked with the precepts of this section, the link was not a direct one.

60 Among the explicit considerations of institutional responses to the section, which were largely contained in the entry under 'External reference points', two reports noted review of institutional policies and procedures to 'ensure' or 'make explicit' institutional 'compliance' with the section. One report noted the role of a central admissions unit, which ensured that 'all admissions practices and procedures [were] guided by the relevant section of the *Code*'. Another report quoted an institution's view that while in general its practice met the 'intended effects' of the section, 'some further action was needed to meet the requirements for a formal procedure for interviewing applicants and for publication of the complaints procedure relating to applications'.

Conclusions

61 The institutional audit reports analysed in the second series of *Outcomes...* papers gave a comprehensive view of institutions' overall responses to the *Code*. In general, the reports indicated a thorough consideration by institutions of the individual sections of the *Code*. They also indicated that reviews of practice guided by the *Code* had led to successful implementation of revised institutional frameworks, codes, policies and procedures for assuring academic quality and standards.

62 The evidence of the reports showed that the sections of the *Code*, covering postgraduate research programmes, collaborative provision, external examining, assessment, and programme approval and review had been particularly influential across the sector. There was also evidence that the remaining sections, some of which had a more circumscribed scope, were influencing institutional policy development, albeit to varying extents.

63 The reports suggested a degree of variation in institutions' approaches to the role of the *Code* in relation to their management of quality and standards. Thus while some institutions focused on 'compliance' with the *Code*, others approached it rather as a 'guide' to good practice and enhancement.

Appendix 1 - The institutional audit reports

Note

In the period covered by these papers a number of institutions underwent a variety of scrutiny procedures for taught degree awarding powers, university title and research degree awarding powers. Reports of the individual scrutiny processes were provided to QAA's Advisory Committee on Degree Awarding Powers, and its Board of Directors, and formed the basis for advice to the Privy Council on the applications made by the respective institutions.

In most cases the scrutiny processes also provided information which, in the form of a bespoke report, QAA accepted as the equivalent of an institutional audit report. Only those reports which conform to the general pattern of the institutional audit reports are included in the list below.

2004-05

City University

Cranfield University

University of Hull

University of Leicester

University of Newcastle upon Tyne

University of Nottingham

The Queen's University of Belfast

University of Surrey

University of Ulster

Goldsmiths College, University of London

Queen Mary, University of London

Royal Holloway and Bedford New College (Royal Holloway, University of London)

University of London

University College London

Birkbeck College, University of London

Imperial College of Science, Technology and Medicine (Imperial College London)

St George's Hospital Medical School

University of Derby

De Montfort University

University of Gloucestershire
University of Hertfordshire
Sheffield Hallam University
University of Huddersfield
Kingston University
London Metropolitan University
Leeds Metropolitan University
Liverpool John Moores University
University of Luton¹
University of Northumbria at Newcastle
Oxford Brookes University
University of Plymouth
Staffordshire University
London South Bank University
University of Sunderland
University of Teesside
University of East London
University of the West of England, Bristol
University of Westminster
Buckinghamshire Chilterns University College²
Canterbury Christ Church University College³
University of Chester
Liverpool Hope University
University College Winchester⁴
Henley Management College⁵
Harper Adams University College

¹ Now the University of Bedfordshire

² Now Buckinghamshire New University

³ Now Canterbury Christ Church University

⁴ Now the University of Winchester

⁵ Now merged with the University of Reading

Conservatoire for Dance and Drama

American InterContinental University - London

2005-06

University of Manchester

Courtauld Institute of Art

Heythrop College

University of London External System

London School of Economics and Political Science

University of Bolton

Thames Valley University

University of Central England in Birmingham⁶

University of Worcester

Birmingham College of Food, Tourism and Creative Studies⁷

Dartington College of Arts⁸

The Arts Institute at Bournemouth

⁶ Now Birmingham City University

⁷ Now University College Birmingham

⁸ Now part of the University College Falmouth

Appendix 2 - Reports on specialist institutions

2004-05

Birkbeck College, University of London

Imperial College of Science, Technology and Medicine (Imperial College London)

St George's Hospital Medical School

Henley Management College

Harper Adams University College

Conservatoire for Dance and Drama

Campus of American InterContinental University - London

2005-06

Courtauld Institute of Art, University of London

Heythrop College

University of London External System

London School of Economics and Political Science

Birmingham College of Food, Tourism and Creative Studies

Dartington College of Arts

The Arts Institute at Bournemouth

Appendix 3 - Titles of *Outcomes from institutional audit papers, Series 2*

In most cases, *Outcomes...* papers will be no longer than 20 sides of A4. Projected titles of *Outcomes...* papers in the second series are listed below in provisional order of publication.

The first series of papers can be found on QAA's website at www.qaa.ac.uk/enhancement

Titles

- Institutions' frameworks for managing quality and academic standards
- Progression and completion statistics
- Learning support resources (including virtual learning environments)
- Assessment of students
- Work-based and placement learning, and employability
- Programme monitoring arrangements
- Arrangements for international students
- Institutions' work with employers and professional, statutory and regulatory bodies
- Recruitment and admission of students
- External examiners and their reports
- Collaborative provision in the institutional audit reports
- Institutions' arrangements to support widening participation and access to higher education
- Institutions' support for e-learning
- Specialist institutions
- Student representation and feedback
- Academic guidance, support and supervision, and personal support and guidance
- Staff support and development arrangements
- Subject benchmark statements
- The framework for higher education qualifications in England, Wales and Northern Ireland
- Programme specifications
- Arrangements for combined, joint and multidisciplinary honours degrees programmes

The adoption and use of learning outcomes

Validation and approval of new provision, and its periodic review

The self-evaluation document in institutional audit

The contribution of the student written submission to institutional audit

Institutions' intentions for enhancement

Series 2: concluding overview

Appendix 4 - Methodology

The analysis of the institutional audit reports uses the headings set out in 'Annex H' of the *Handbook for institutional audit: England (2002)* to subdivide the Summary, Main report and Findings sections of the institutional audit reports into broad areas. An example from the main report is 'The institution's framework for managing quality and standards, including collaborative provision'.

For each published report, the text is taken from the report published on QAA's website and converted to plain text format. The resulting files are checked for accuracy and coded into sections following the template used to construct the institutional audit reports. In addition, the text of each report is tagged with information providing the date the report was published and some basic characteristics of the institution ('base data'). The reports were then introduced into a qualitative research software package, QSR N6®. The software provides a wide range of tools to support indexing and searching and allows features of interest to be coded for further investigation.

An audit team's judgements, its identification of features of good practice, and its recommendations appear at two points in an institutional audit report: the Summary and at the end of the Findings. It is only in the latter, however, that cross references to the paragraphs in the main report are to be found, and it is here that the grounds for identifying a feature of good practice, offering a recommendation and making a judgement are set out. These cross references have been used to locate features of good practice and recommendations to the particular sections of the report to which they refer.

Individual *Outcomes...* papers are compiled by QAA staff and experienced institutional auditors. To assist in compiling the papers, reports produced by QSR N6® are made available to authors to provide a broad picture of the overall distribution of features of good practice and recommendations in particular areas, as seen by the audit teams.

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