



Institutional audit

University of London International Programmes

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Preface

The Quality Assurance Agency for Higher Education's (QAA's) mission is to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education. To this end, QAA carries out Institutional audits of higher education institutions.

In England and Northern Ireland QAA conducts Institutional audits on behalf of the higher education sector, to provide public information about the maintenance of academic standards and the assurance of the quality of learning opportunities provided for students. It also operates under contract to the Higher Education Funding Council for England and the Department for Employment and Learning in Northern Ireland to provide evidence to meet their statutory obligations to assure the quality and standards of academic programmes for which they disburse public funding. The audit method was developed in partnership with the funding councils and the higher education representative bodies, and agreed following consultation with higher education institutions and other interested organisations. The method was endorsed by the then Department for Education and Skills. It was revised in 2006 following recommendations from the Quality Assurance Framework Review Group, a representative group established to review the structures and processes of quality assurance in England and Northern Ireland, and to evaluate the work of QAA.

Institutional audit is an evidence-based process carried out through peer review. It forms part of the Quality Assurance Framework established in 2002 following revisions to the United Kingdom's (UK's) approach to external quality assurance. At the centre of the process is an emphasis on students and their learning.

The aim of the Institutional audit process is to meet the public interest in knowing that universities and colleges of higher education in England and Northern Ireland have effective means of:

- ensuring that the awards and qualifications in higher education are of an academic standard at least consistent with those referred to in *The framework for higher education qualifications in England, Wales and Northern Ireland* and are, where relevant, exercising their powers as degree awarding bodies in a proper manner
- providing learning opportunities of a quality that enables students, whether on taught or research programmes, to achieve those higher education awards and qualifications
- enhancing the quality of their educational provision, particularly by building on information gained through monitoring, internal and external reviews and on feedback from stakeholders.

Institutional audit results in judgements about the institutions being reviewed. Judgements are made about:

- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the academic standards of awards
- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

Audit teams also comment specifically on:

- the institution's arrangements for maintaining appropriate academic standards and the quality of provision of postgraduate research programmes

Institutional audit: report

- the institution's approach to developing and implementing institutional strategies for enhancing the quality of its educational provision, both taught and by research
- the reliance that can reasonably be placed on the accuracy and completeness of the information that the institution publishes about the quality of its educational provision and the standards of its awards.

If the audit includes the institution's collaborative provision the judgements and comments also apply unless the audit team considers that any of its judgements or comments in respect of the collaborative provision differ from those in respect of the institution's 'home' provision. Any such differences will be reflected in the form of words used to express a judgement or comment on the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that the institution publishes, and about the quality of its programmes and the standards of its awards.

Explanatory note on the format for the report and the annex

The reports of quality audits have to be useful to several audiences. The revised Institutional audit process makes a clear distinction between that part of the reporting process aimed at an external audience and that aimed at the institution. There are three elements to the reporting:

- the **summary** of the findings of the report, including the judgements, is intended for the wider public, especially potential students
- the **report** is an overview of the findings of the audit for both lay and external professional audiences
- a separate **annex** provides the detail and explanations behind the findings of the audit and is intended to be of practical use to the institution.

The report is as concise as is consistent with providing enough detail for it to make sense to an external audience as a stand-alone document. The summary, the report and the annex are published on QAA's website.

Summary

Introduction

A team of auditors from the Quality Assurance Agency for Higher Education (QAA) visited University of London International Programmes (the International Programmes) from 23 May to 27 May 2011 to carry out an Institutional audit. The purpose of the audit was to provide public information on the quality of the learning opportunities available to students and on the academic standards of the awards that the International Programmes offers on behalf of the University of London.

To arrive at its conclusions, the audit team spoke to members of staff throughout the institution and to current students, and read a wide range of documents about the ways in which the International Programmes manages the academic aspects of its provision.

In Institutional audit, the institution's management of both academic standards and the quality of learning opportunities are audited. The term 'academic standards' is used to describe the level of achievement that a student has to reach to gain an award (for example, a degree). It should be at a similar level across the UK. The term 'quality of learning opportunities' is used to describe the support provided by an institution to enable students to achieve the awards. It is about the provision of appropriate teaching, support and assessment for the students.

Outcomes of the Institutional audit

As a result of its investigations, the audit team's view of University of London International Programmes is that:

- confidence can reasonably be placed in the soundness of the institution's present and likely future management of the academic standards of the awards offered through the University of London
- confidence can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

Institutional approach to quality enhancement

The International Programmes' institutional approach to enhancement occurs in two main ways: through the International Academy focusing on student lifecycle issues and thus benefiting the student body as a whole; and through individual college-led initiatives which thus benefit students on individual programmes or groups of programmes. While the audit team observed a wide variety of enhancement processes, there is no systemic sharing of good practice in place. It is therefore recommended that the International Programmes introduce a systematic method of disseminating good practice as identified by its various quality assurance processes.

Postgraduate research students

The International Programmes does not currently offer research degree programmes.

Published information

The audit team found that reliance could reasonably be placed on the accuracy and completeness of the information the International Programmes publishes about the quality of its educational provision and the standards of its awards.

Features of good practice

The audit team identified the following area as being good practice:

- the Code of Advertising which sets out the rules and responsibilities of recognised teaching institutions with respect to advertising University of London International Programmes' provision (paragraph 88).

Recommendations for action

The audit team recommends that the International Programmes consider further action in some areas.

Recommendations for action that the team considers advisable:

- ensure as a matter of urgency that there is a formal agreement in place between each lead college or consortium and the University of London (paragraph 24)
- ensure as a matter of urgency that there is a formal agreement in place between the University of London and those independent teaching institutions that have been awarded Diploma Teaching Status, in line with the *Code of practice, Section 2* (paragraph 82)
- ensure that oversight of programmes offered through the Diploma Teaching Status scheme is managed effectively within the deliberative system of the University of London International Academy so that the University of London is able to exercise appropriate oversight (paragraph 83)
- ensure that the location of study is recorded on either the certificate or transcript for diplomas offered through the Diploma Teaching Status scheme, in line with the *Code of practice, Section 2* (paragraph 85).

Recommendations for action that the team considers desirable:

- update the overarching Quality Framework of the University of London International Programmes to reflect the annual monitoring requirements of the University of London (paragraph 36)
- introduce a systematic method of disseminating good practice as identified by its various quality assurance processes (paragraph 75).

Reference points

To provide further evidence to support its findings, the audit team investigated the use made of the Academic Infrastructure, which provides a means of describing academic standards in UK higher education. It allows for diversity and innovation within academic programmes offered by higher education. QAA worked with the higher education sector to establish the various parts of the Academic Infrastructure, which are:

- the *Code of practice for the assurance of academic quality and standards in higher education*

- the frameworks for higher education qualifications in England, Wales and Northern Ireland, and in Scotland
- subject benchmark statements
- programme specifications.

The audit found that, on the whole, the International Programmes took due account of the elements of the Academic Infrastructure in its management of academic standards and the quality of learning opportunities available to students, but recommends action as noted above.

Report

1 An Institutional audit of University of London International Programmes (the International Programmes) was undertaken during the week commencing 23 May 2011. The purpose of the audit was to provide public information on the International Programmes' management of the academic standards of the awards that it delivers on behalf of the University of London (the University) and of the quality of the learning opportunities available to students.

2 The audit team comprised Professor Mark Davies, Dr Andrew Eadie, Professor Ian Robinson and Ms Linda Smith, auditors, and Mr Jeremy White, audit secretary. The audit was coordinated for QAA by Dr Gillian King, Deputy Director, Reviews Group.

Section 1: Introduction and background

3 Since 1858 students worldwide have been able to study for a degree of the University of London without the requirement of having to study at one of its colleges, through the University of London International Programmes. The colleges of the University of London and the University of London International Academy collaborate to deliver the provision of the University of London International Programmes, which leads to awards of the University of London.

4 The International Academy, which employs about 190 people, is one of the four central academic bodies of the University of London and is the University's means of exercising oversight of the International Programmes' activities. Twelve colleges, known as the lead colleges, provide academic direction for the International Programmes. There are collaboration agreements in place between the International Academy and most of the lead colleges, and the division of responsibilities between the two is set out in schedules to the agreements.

5 The International Programmes currently has over 50,000 students worldwide studying in over 180 countries. The diverse student body may be considered 'non-traditional' as it includes students in poorer and developing countries, mature learners, those with special needs due to disability, or geographic, economic, environmental, professional and social factors, and those with limited educational opportunities.

6 The teaching model of the International Programmes is distinctive in UK higher education. In keeping with its mission 'to provide worldwide access to the internationally-renowned programmes and awards of the University of London and its Colleges' the International Programmes' students study remotely, there being (with one exception) no requirement to attend for study. Nevertheless, many students do choose to receive study support through a network of independent teaching institutions, some of them recognised by the International Programmes.

7 Prior to August 2010, the International Programmes was known as the External System.

8 The last QAA Institutional audit took place in November 2005. Shortly after that audit the University reported on its own review of the then External System (the Vice-Chancellor's External System Review Group), making recommendations concerning new governance systems, the appointment of a dean to provide leadership, a rebranding exercise, feedback from students on their experiences, and changes in financial practices. The present audit team noted implementation to a greater or lesser degree of all the

recommendations of that review and agreed with the University that its recommendations were complementary to those of the 2005 audit report.

9 New University statutes and ordinances in 2008 specified the then External System as a central academic body of the University. In 2010 that central academic body became the University of London International Academy and the programmes it delivered in conjunction with lead colleges and consortia became the University of London International Programmes, the externally-used name of the system.

10 The previous Institutional audit of 2005 found that broad confidence could be placed in the soundness of the University's current and likely future management of the quality of its academic programmes and the academic standards of its awards offered through the University of London External System. The audit report identified features of good practice such as the introduction of an innovative form of student representation by the London School of Hygiene and Tropical Medicine. The report also identified recommendations for action and advised the University to: review the way the External System Academic Board operated to improve efficiency and speed; develop agreements with third-party (teaching) institutions to ensure that the interests of the University and its students are adequately protected; establish a strategy for the more effective use of statistical data in the evaluation of standards (this was also noted in the previous report of 1995); address fully all aspects of the Academic Infrastructure, in particular considering the *Code of practice* and the existence of programme specifications; and consider the establishment of minimum expectations for the academic guidance and personal support of students.

11 In response to its own review and the 2005 Institutional audit, the University introduced a new system of governance for the then External System in 2007-08 and new academic regulations for programmes.

12 Concerning the Academic Infrastructure, work commenced in 2006 on the production of programme specifications, which are now in place for all programmes, and steps have been taken to more completely align the University's awards with *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ).

13 The University established the Institutions Review Group to pursue the creation of agreements with independent teaching institutions. Its 2006 report culminated in the Institutions Policy Framework of 2009, which provides a roadmap for, and register of, closer alignment with some of those institutions that support the University's students.

14 In relation to statistical data, the University initially continued the development of an in-house data management system, though this was eventually abandoned in favour of commercial software, which has already started to produce data and will produce formal academic records in 2011-12. Until then, the International Programmes is reliant on a system it described as 'outdated'. This notwithstanding, student data has been gathered and presented so as to inform both the annual monitoring process and the University's strategic position.

15 In relation to establishing minimum expectations for students, the University initiated considerable activity that culminated in the establishment of such expectations in the Student Charter of 2011. The audit team noted that, although the Charter provided statements that academic guidance and personal support were available, it did not specify any minimum levels.

16 The audit team noted significant developments since the last audit, some driven internally and some externally, all of which either supported the University in maintaining an

overview of its activities or enhanced the learning experience of students. However, the team considered that some developments could have been implemented earlier.

17 The defining feature of the International Programmes is that of the independent student, though approximately 80 per cent of undergraduate students seek out a third party provider for supplementary tuition, support and/or guidance. The retention of an emphasis on flexibility of student choice and flexibility of provision is reflected in the International Programmes' strategic plan, which in turn drives the structure and mechanisms of the institutional framework for managing academic standards and the quality of learning opportunities. Thus the focus of the management of the International Programmes is primarily on securing the academic standards of its awards, rather than setting out to provide a consistent quality of learning experience irrespective of where a student learns. Nevertheless, the University does recognise that many of its students require learning support and is increasing provision in this area.

18 The University of London International Programmes is the result of collaboration between 12 lead colleges and the University. The University and the lead colleges are joined together in a federation, but are legally distinct entities that have chosen to work together by accepting the University's set of statutes, ordinances and regulations. The colleges are termed 'lead' because they provide academic direction to the programmes and provide learning support to students, and in some cases the colleges take joint responsibility and form a consortium to do so. Academic debate tends to be at lead college or consortium level, with the conclusion of that debate presented to the University for its consideration. Students are registered with and are awarded degrees by the University of London, which also appoints examiners to set and mark the assessments. The International Academy is the business, administrative and development support to the International Programmes.

19 The Board of the International Academy is the principal decision-making committee, reporting to the University's Collegiate Council, which has overall responsibility for the academic affairs of the University. Within the International Academy, academic matters are dealt with by the Academic Committee, chaired by the Dean of the International Programmes and reporting to the Board of the International Academy. The principal sub-committees of Academic Committee of relevance to the audit are: the Learning, Teaching and Assessment Sub-committee; the Quality Assurance and Student Lifecycle Sub-committee; the Institutions Sub-committee; and the Systems and Technologies Sub-committee. From a scrutiny of the minutes of these deliberative bodies the audit team considered that, in the main, the University was using these bodies to good effect in the management of the International Programmes.

20 Executive leadership and management of the International Programmes is vested in the Dean of the International Programmes; each programme or group of cognate programmes has a programme director who provides academic leadership and facilitates student support, and a programme manager who deals with administrative aspects. The audit team noted many and extensive articulation points between college-based staff and the management and delivery of the programmes, and formed the view that such staff are an essential component in the International Programmes system. College staff populate the central deliberative bodies to such an extent that, in practice, there is little college-university separation of the academic corps that gives the International Programmes its academic credibility. The audit team agreed with the University's view that this arrangement is appropriate. Further, the team considered that, despite the overlap in personnel between university and college bodies, the locus of management and overview was in general with the University.

21 The International Programmes' Quality Framework document, revised in 2010, gives principles and processes governing and relating to the various aspects of the assurance of quality and standards, explains the relationship between the different parties involved in programme management and delivery, and specifies a schedule of systematic reporting, including the overall annual report of the International Academy to the Collegiate Council and the Vice-Chancellor. However, despite its comprehensive nature, many staff the audit team met did not use the Quality Framework and did not appear to know of it.

22 The University has recently developed a Learning, Teaching and Assessment Framework, which reinforces and operationalises the External System Strategic Plan 2009-12 and advocates an ongoing consideration of methods deployed in teaching and the support of students; indicates institutional directions of change in learning enhancement; and offers a guide to lead colleges and consortia in the development of their own learning and teaching strategies. The audit team viewed this framework as providing a focus for developments that are, in general, sensible and pedagogically sound.

23 The audit team noted disagreement among university staff as to which body had responsibility for setting the standards of the awards: some cited the University and some the lead colleges or consortia, though the University's briefing paper made plain that the setting of academic standards was the responsibility of the University and that the maintenance of those standards was the responsibility of the lead colleges or consortia. The team also noted that the locus of standards setting is not clear in the proposed formal collaboration agreement between the University and the lead colleges or consortia. The Vice-Chancellor of the University informed the team that the University sets threshold academic standards that are matched to the FHEQ, but that standards relating to degree classifications may show some variance across programmes and between the International Programmes and those awarded by the lead colleges, a notion reflected in the University's regulations. However, other staff the audit team met understood that standards achieved at the level of degree classifications were identical across the University and the colleges. The team concluded that the University will want to make its position on standards both more widely known by its staff and clearly stated in relevant formal documents.

24 In 2009, the International Academy Chief Operating Officer noted considerable anomalies in the formal agreements covering the relationship between the University and the lead colleges or consortia, including that some had expired. As a result, the Board of the External System agreed in 2009 that new agreements should be developed. The audit team noted further anomalies in the agreements but heard that their accompanying schedules that specify, for example, quality assurance and financial arrangements, were updated annually. A new scheme for formal agreements was devised in 2010 and on the whole the audit team considered that the new, proposed collaborative agreement and its schedules provided concise and utilitarian reference points for the governance and the operation of each collaboration and covered an appropriate range of topics, and concluded that the agreement provided a sound foundation for the relationship. However, at the time of the audit the new agreement had yet to be signed by all lead colleges and consortia, and there were indications that some might not sign. This absence of formal agreements gave the team cause for concern in protecting the interests of students, and consequently the University is advised to ensure as a matter of urgency that there is a formal agreement in place between each lead college or consortium and the University of London.

25 For many years institutions independent of the University have offered to prepare students for assessments, and developing agreements with these independent teaching institutions was a recommendation of the previous audit. Students the audit team met were generally satisfied with the support they received, for a fee, via these institutions. The University sees these institutions as playing an important role, both in helping

students to succeed in their studies and in promoting and increasing access to the University's programmes.

26 The Institutions Policy Framework (see paragraph 13) is the means by which the International Academy formally recognises and supports some independent teaching institutions, in order to ensure that the quality of learning opportunities is maintained and to provide clear advice and guidance to students about available venues for tuition support. Recognition applies to specific programmes on named campuses, and includes the requirement to participate in quality assurance processes and to abide by a code for advertising and promotional materials. Support available to recognised institutions from the University includes marketing and business development, and workshops about the programmes of study, dependent on which programmes are supported by the institution.

27 Recognised independent teaching institutions fall into two types: affiliate centres and registered centres. The audit team had difficulty, from the associated definitions, in readily identifying which type, affiliate, or registered, the University had more confidence in. University staff indicated that affiliate was the superior. The status of centres within the Institutions Policy Framework is clearly communicated to students via the International Programmes website. The University offers support for independent teaching institutions as they move towards recognition through a 'candidacy phase' that may last up to three years.

28 Within the Institutions Policy Framework, the quality assurance of recognised centres is governed by the Institutions Quality Assurance Framework, which sets out the principal policies and procedures through which standards are maintained and the quality of provision is assured, and exists to ensure that the relationship between the University, lead colleges and consortia, and recognised centres, meets the aims of the Institutions Policy Framework.

29 In conclusion, the audit team regarded the overall framework for managing standards and quality as largely containing the required structures, checks and balances for appropriate oversight of the International Programmes' activities, though significant aspects of the overall framework, the Learning, Teaching and Assessment Framework and the revised Quality Framework, are relatively new and the team was unable to make judgements on their effectiveness.

Section 2: Institutional management of academic standards

30 As noted earlier (see paragraph 23), the University sets threshold academic standards that are aligned with the FHEQ. Each of the lead colleges has its own processes for the management of academic standards, and the outcomes of these then receive institutional oversight by consideration in the appropriate deliberative committee of the International Academy.

31 Proposals for new programmes normally emerge from the lead colleges and are subject to close scrutiny within the lead colleges and the International Academy. Detailed design then takes place within the lead colleges who scrutinise the full proposal using their own internal academic approval processes. In its reading of committee papers, the audit team noted the detailed level of scrutiny afforded at approval events, the external peer assessor's contribution, and the corresponding rigour required in follow-up action before approval would be recommended at the International Programmes' Learning, Teaching and Assessment Sub-committee and Academic Committee.

32 Final approval to launch a new programme is only granted by the Vice-Chancellor following positive recommendations from both Academic Committee and the Board, and

once a formal agreement has been developed between the International Programmes and the lead college. A programme is approved indefinitely, albeit subject to regular periodic review.

33 The annual monitoring is both reflective and forward-looking and is overseen by the Quality Assurance and Student Lifecycle Sub-committee. Annual monitoring of the International Programmes comprises four stages: the annual programme and planning review; the production of an annual programme report; the subsequent consideration of annual programme reports by lead colleges and the Quality Assurance and Student Lifecycle Sub-committee; and finally the production of an overall annual report for consideration both by the International Academy and the University.

34 The annual programme and planning review comprises a meeting of programme and university stakeholders for each award. The outcome of the review is the annual programme report. This report is considered by the lead college and then both the report and any outcomes of lead college deliberation are considered by the Quality Assurance and Student Lifecycle Sub-committee. External examiners' reports are included in full, together with the formal response from the programme team. Reports were appropriately reflective and in some cases reflected upon the outcomes of student feedback, from surveys conducted by the International Programmes or by the programme team.

35 Annual programme reports are considered in some detail by the Quality Assurance and Student Lifecycle Sub-committee, focusing on aspects both positive and also those that require further attention. In some cases, the sub-committee draws evidence from all annual reports in order to make cross-programme comparisons.

36 An overall annual report is compiled by the International Academy for consideration by the Academic Committee and Board, and which '...summarises issues, concerns and good practice from the annual programme reviews and the External/ Intercollegiate Examiners' reports...'. These reports are presented to the University's Academic Quality Advisory Committee, to the Collegiate Council and Board of Trustees of the University. In their reading of these reports, the audit team has observed that the latest only addresses matters concerning academic standards through an overview report of external examining, and learned that the University now requires the other elements to be produced under separate cover for different institutional audiences, considering the quality of learning opportunities and enhancement agendas. These changes in process are not yet reflected in the International Academy's Quality Framework, and the audit team thus considers it desirable for the University to update the overarching Quality Framework of University of London International Programmes to reflect the current annual monitoring requirements of the University of London.

37 Periodic programme review takes place every four to six years, and is the principal mechanism enabling the University to review provision and to monitor the standard and quality of the award. There are three principal models of periodic programme review in use, two based within the lead colleges, and one operated centrally by the International Programmes.

38 In all three cases, there is a panel-based peer review process, drawing on both external and internal membership. The panels consider a self-evaluation together with supporting evidence, including programme specification(s) and programme regulations; external examiner's reports; annual programme review reports; a selection of learning resources, including the student handbook; a sample of subject guides; examiner commentaries; access to online library and other learning resources; prospectuses; student feedback; curriculum outlines; and staff profiles. The panel meets privately to consider the

evidence presented, and subsequently meets staff and students to explore lines of enquiry that it has identified.

39 The final panel reports are considered by lead colleges, the Quality Assurance and Student Lifecycle Sub-committee and Academic Committee. The Quality Assurance and Student Lifecycle Sub-committee carries responsibility for the oversight of follow-up action from the review, receiving both the final report of the panel, and then within 12 months, the lead college's formal response to the panel recommendations and its associated action plan. The Quality Assurance and Student Lifecycle Sub-committee also takes forward any institutional issues raised, and through the annual programme and planning review monitors actions assigned at programme, college or departmental level.

40 In its reading of typical audit trails, the audit team was able to confirm that the process was detailed and self-critical, containing sufficient data to enable judgements to be made. Further examination demonstrated that matters identified for attention in the periodic programme reviews had been addressed, and that officers within the International Programmes had been monitoring progress.

41 In summary, the audit team found that the processes for programme approval, monitoring and review are thorough, rigorous and fit for the purpose of managing the academic standards of the International Programmes. The processes are well-coordinated by the programme managers in the International Academy.

42 The role of externals is well-defined, focusing almost entirely upon reassuring the University of the academic standards of the International Programmes. External examiners are appointed (annually, and for no more than four years) by the International Academy, following nomination by the appropriate lead college. They are generally drawn from outside the University of London, but in common with practice throughout the University, a small proportion is drawn from other University of London colleges which offer appropriate academic disciplines. These 'inter-collegiate' examiners carry an additional remit to assure that comparability of academic standards is maintained throughout the University of London.

43 The Guidelines for Examinations contain detailed advice for externals, who have also been provided with a dedicated external examiners' information page on the International Programmes website. The specific duties of external examiners are well-described. They are required to produce an annual written report to the Dean of the International Programmes, using a standard template. The template permits externals to raise matters of a confidential nature directly with the Dean. Reports are considered by lead colleges (for subject-related matters), by the Programme Manager for any administrative matters, by the Quality Assurance and Student Lifecycle Sub-committee to bring together the report and any response from lead colleges and the International Academy, and finally by the Academic Committee for system-wide issues.

44 While external examiners' reports are not expressly shared with students, they are published openly on the University's website. The University will no doubt wish, as it routinely reviews its alignment with the *Code of practice*, to find a mechanism to ensure that students are made aware of the availability of these reports.

45 The audit team had the opportunity to scrutinise many external examiners' reports, were able to follow their consideration within the institutional committee processes, and subsequently to note matters of both good practice and concern raised at institutional level within the overall annual report. They noted that where matters of concern were raised, examiners received a timely response from the Programme Director and the matters were followed up in the subsequent annual action plan. The audit team believes that the

International Programmes' use of independent external examiners is fit for purpose, strong and scrupulous.

46 The International Programmes has taken a number of steps to engage with the Academic Infrastructure. All programmes are aligned with the FHEQ and the audit team noted that, in aligning with the Framework, programmes were compared with the national subject benchmark statements wherever appropriate. In 2009, International Programmes formally conducted a mapping exercise to consider the engagement of the International Programmes with the *Code of practice*. While this work is not yet complete, an update on the mapping process was presented to the Quality Assurance and Student Lifecycle Subcommittee in April 2011. Programme specifications are now in use throughout International Programmes. They prominently feature within student handbooks, and all include the detailed programme assessment regulations. The audit team believes that, while progress to engage with the Academic Infrastructure has been slow since the last audit, significant steps have been taken.

47 The University made the point in meetings with the audit team that during assessment the principal risk to standards and reputation is the possibility of plagiarism in assessed work, and that its generic approach to assessment is thus to make use of time-constrained unseen examinations for all core assessments. Increasingly, technology is permitting the introduction of other forms of assessment, particularly at postgraduate level (where programmes are typically smaller), and while this may well evolve in the future, for the moment the University continues to insist upon a minimum of 70 per cent and 60 per cent of assessment to be unseen examinations for undergraduate and postgraduate programmes respectively.

48 The detailed academic regulations for each programme are considered and agreed at initial programme approval, and are published as an appendix to the publicly available programme specification. The audit team noted that the programme-specific regulations included detailed assessment criteria; a positive feature which would be of significant assistance to students studying at a distance.

49 Examinations are held in approved centres throughout the world, administered from the International Programmes' central offices in London. There are detailed procedures for the approval of new centres and for the conduct of examinations. Examination centres are themselves subject to a periodic review of processes and arrangements, conducted upon the University's behalf by a private auditing company, and audit reports were thorough and identified a number of procedural improvements to enhance the management of examination centres.

50 The comprehensive Guidelines for Examinations and a number of associated assessment procedures and processes give detailed guidelines on the conduct of assessment, the consideration of assessment offences, the handling of extenuating circumstances and the constitution, role and terms of reference for boards of examiners. Students are signposted within their student handbooks to processes for appealing or claiming mitigation.

51 The audit team found that assessment policies and procedures were clear and well-signposted for students, and met the constraints imposed by assessment at a distance. Assessment arrangements are robust and well-managed.

52 The University described how it has, since the last audit, invested significant resource into developing a bespoke management information system, to little benefit, and has now committed to working with a commercial provider to develop a system appropriate for the particular needs of a large distance-learning student population. Progress is good;

the system commenced limited operation in 2010, but will only fully roll out in 2012. Thus, while the data currently available for monitoring and review purposes provided sufficient information to enable the processes to operate satisfactorily, the International Programmes is some way behind its ambition to respond to the recommendations of the last QAA audit in a more timely manner.

53 Feedback is formally gathered from students both by the International Programmes (in biennial academy-wide undergraduate and postgraduate surveys focusing largely upon administrative matters and the student experience) and at a programme level where the programme team believes that the feedback would contribute value. The outcomes from the former are reported formally through the Quality Assurance and Student Lifecycle Sub-committee and the Academic Committee, and from the latter are considered by the appropriate group in the lead college. In both cases they are also considered in annual programme and planning review meetings and appropriate follow-up action is identified and agreed.

54 In view of the above findings the audit team considers that confidence can reasonably be placed in the soundness of the International Programmes' present and likely future management of the academic standards of the awards that it makes on behalf of the University of London.

Section 3: Institutional management of learning opportunities

55 Given its focus on the independent learner, the International Programmes has come late to the involvement of students in the management of learning opportunities in a systematic way, although in line with the outcomes of the Vice-Chancellor's External System Review Group report, there have been movements towards understanding students' perceptions of their programmes. These have included more comprehensive student membership of the deliberative bodies, annual surveys of the experience of students and the launch of an alumni association in 2006. In 2009-10, action resulted in student membership of some International Academy subcommittees, and in March 2011 there were six members on five committees.

56 Increasing use of a virtual learning environment and the new web portal, which will allow students a secure, single sign-in facility for online services and educational communities, should enable better communications given that students will all be expected to be online in 2011-12. Setting up the Student Voice Project (see paragraph 72) indicates student representation issues are built into proposed developments.

57 Involving students in quality in any formal and systematic way was not a priority for the International Programmes until 2010, despite the fact the QAA audit in 2005 identified that student representation was very limited. The University of London External System Strategic Plan 2009-12 refers to quality as the second of its four aims, but throughout makes no reference to involving students. However, the International Programmes now expresses a strong desire to ensure student membership of University of London Academic Committee and its key committees, with the exception of the Board. The audit team noted that, while the Academic Committee already includes within its constitution representation from the University of London Union, it considers that the University will benefit from greater representation on subcommittees from the International Programmes' students. No training is offered to student members by the International Programmes, though members said they were briefed. Some 56.5 per cent of students surveyed by the student written submission were satisfied their voice was being listened to, but the survey suggested that students would like more evidence of closing the loops.

58 There is student representation on faculty and course module committees with variable evidence of attention being given to students' views, although students and staff gave the audit team examples of the student voice informing developments. There is evidence of variable practice in lead colleges in engaging students both formally and informally in deliberative processes. Virtual learning environment developments in the consortia and in the Bloomsbury Learning Environment showed staff are concerned to involve students through developing informal channels and also formally by asking them to developmentally test learning materials.

59 Proactive use of the virtual learning environment as a conduit for continuous improvement was evidenced by non-UK students who had identified the need for seeing a wider range of study guides, and within four to five months the situation had been rectified. Such students also were concerned that they do not always get responses to their feedback. Through the newsletter and portal this is beginning to be addressed and is part of the new Student Charter.

60 There is evidence of student feedback being acted on and the Law Library has been improved following information from student surveys in 2008-09. Recently a student has been a member of Periodic Programme Review and there are indications that the role is understood. Annual programme reviews also now have a section dedicated to student feedback gathered from formal and informal mechanisms, including information about admissions from the Information Centre.

61 The University of London Union sees the student written submission as students' views being independently conveyed for the first time with the hope that this will be the norm henceforth. The report has been discussed at committees in 2010-11, including Academic Committee. The Student Voice initiative was only begun in 2011 and staff who met the audit team were not well informed of the purpose. Staff were more familiar with student representation in their own lead colleges.

62 The results of the 2009 undergraduate student survey have been reviewed through the International Programmes' deliberative structure and recommendations accepted. The International Programmes is now better placed to act on results from such surveys.

63 Training staff in designing interactive learning activities for cross-cultural, widely international audiences takes time. The implementation plan to accompany the Learning, Teaching and Assessment Framework is designed to recognise that, to leverage investment and help student retention and progression, staff need to develop in learning and teaching technologies. The Learning, Teaching and Assessment Framework aims to bring direction and shared purpose to pedagogical development within the International Programmes. The strength of this framework is dependent on the agreements lead colleges sign up to in the coming months, together with any associated service level. The audit team considered that developing and making the Learning, Teaching and Assessment Framework operational should be a priority for the International Programmes.

64 While the International Academy owns and manages the process of delivery of material to students and is developing the portal with lead colleges, the quality of learning material is a shared responsibility with the lead colleges. Learning technologists have an informal community of practice which the audit team considered, if more formal and requiring lead college representation, might accelerate the sharing of knowledge.

65 The mid-cycle review in 2008 noted progress in a number of initiatives related to academic support and guidance at individual programme level. Programme management staff continually work to keep material updated and the Quality Assurance and Student Lifecycle Sub-committee assures this. Students informed the audit team that key documents

like examiners' commentaries (notes provided by examiners following an exam to show examples and standards of excellent, good and acceptable answers) were generally up to date on websites. The International Programmes staff have a critical role in ensuring quality of learning support, especially as student numbers increase, as noted by the Learning, Teaching and Assessment Sub-committee. It is noted that while chairs of boards of examiners have a formal opportunity to meet, there is no similar opportunity for programme directors and learning from this might speed the sharing of good practice.

66 Although some prospectuses and websites indicate the careers for which students may be qualified on successful completion of awards, consideration of employability is generally left to lead colleges. The Dean identified a need for a strategic approach so that if the International Programmes were to expand in the UK then this may be an aspect for attention.

67 In view of the above findings the audit team considers that confidence can reasonably be placed in the soundness of the institution's present and likely future management of the quality of the learning opportunities available to students.

Section 4: Institutional approach to quality enhancement

68 The institutional approach to enhancement, as described in the briefing paper, occurs in two ways. Firstly through the International Academy focusing on student lifecycle issues and thus benefiting the student body as a whole. Secondly through individual college-led initiatives which thus benefit students on individual programmes or groups of programmes.

69 Enhancement at institutional level is driven by annual consideration of the strategic plan through the committee structure, which itself is driven by the annual and periodic review of programmes undertaken within the colleges which have enhancement at programme level as a key outcome. The strategic plan includes the commitment to providing 'a higher quality student experience'. Areas highlighted for enhancement include student support, extending formative assessment, identifying and sharing good practice and the introduction of the Strategic Information Technology Services management information system. A number of examples of enhancement in these areas were seen by the audit team.

70 It is intended in the future that enhancement will be supported by the Learning and Teaching and Assessment Framework which, when fully established, will have learning and teaching strategies developed at the individual programme level. At present, strategies for learning and teaching have been developed for two programmes and a further four are under development.

71 The International Programmes' approach to enhancement is through the concept of managing student expectations. Currently, the International Programmes is undertaking a project to enhance the quality of support and academic guidance for students. The project has seven strands: support and guidance in the area of study skills development; a review of student handbooks; development of technology-enhanced learning and linked support; promoting interactivity; guidelines and standards for exam reports; access to taster materials; development of formative assessment; and aims to set minimum student expectations for all the International Programmes' provision in each of these areas.

72 Students are seen by the International Programmes as having a vital role in producing enhancement through student feedback via student surveys, the programme review processes currently in place and through membership and participation in the committee structure. The Student Voice Project is extending this work and has four

components, namely: Student Surveys and Feedback; Student Membership (Governance), which aims to increase student membership of the committees which deliberate on the International Programmes; Student Representation, which aims to have a student representatives for each programme; and Student Community, which aims to produce a greater sense of student community within the student population. This process has only recently begun and would seem to have great potential to enhance the student experience, although it is too early for the audit team to tell.

73 In the briefing paper, the International Programmes highlights three examples of technology-driven enhancement currently in place or underway. The new Strategic Information Technology Services management information system and the portal project are due to be fully implemented by 2012. The portal will allow improved access to the University's administrative processes for the students, and the provision of improved information for the academic and administrative staff. The University continues to seek to improve the content and the use of virtual learning environments. The International Programmes has maintained and developed an online library to support its programmes since 2001. Since its inception, the use of the library has quadrupled.

74 An important part of the International Programmes approach to quality enhancement is the Centre for Distance Education. One of the aims of the Centre is to 'enhance Distance Learning and its status in Higher Education.' The Centre for Distance Education promotes enhancement by supporting research projects in distance learning and through the appointment of individual members of teaching staff as Centre for Distance Education fellows. Fellows may also be appointed from independent teaching institutions.

75 While the audit team observed a wide variety of enhancement processes, there is no systemic sharing of good practice in place. It is therefore recommended that the International Programmes introduce a systematic method of disseminating good practice as identified by its various quality assurance processes.

Section 5: Collaborative arrangements

76 While it could be argued that the subject of this entire report is a form of collaborative provision between the University on the one hand and the lead colleges and consortia on the other, this section is confined to relationships that the University has with organisations that the University has recognised to teach its International Programmes, where such teaching is a mandatory element of the learning process. The link here is encompassed within the International Programmes' Institutions Policy Framework and is closer than that described for affiliate and registered centres, though is independent of whether the organisation is recognised as affiliate or registered.

77 Some independent teaching institutions have been given 'Diploma Teaching Status' (formerly known as 'permission to teach') to provide education prior to and at the early stages of undergraduate study. In registering for these diplomas, students are required to enrol at specific independent teaching institutions for face-to-face teaching, an arrangement that marks out this provision from all other International Programmes provision.

78 The lead college or consortium has the responsibility for managing the link. All teaching and formative assessments are conducted by the teaching institution, and the lead college or consortium retains responsibility for the programme of study and for summative assessment. The University of London International Academy provides the teaching institution with study materials and guidance on the operation of aspects of the provision from admission to examination, and stipulates student support arrangements.

79 Five diplomas (in Computing and Information Systems, Creative Computing, Economics, Law, and Social Sciences) are offered and are one or two-year programmes designed to give access to higher education, including to the University's International Programmes, for students who typically do not have standard entry qualifications. The diplomas constitute a significant proportion of the International Programmes, involving over 4,000 students.

80 Evidence available to the audit team indicated that the diplomas are aligned with level 4 of the FHEQ that is, at the level of certificate of higher education. The programmes carry the title 'diploma' to satisfy local markets. While recognising the reasons for using the term 'diploma', the team urges the University to nonetheless be vigilant in ensuring that there is no ambiguity for students and potential students concerning the level of study.

81 Admissions decisions are made by the independent teaching institution within a framework stipulated by the lead colleges or consortia and in cases where there is automatic progression to an International Programmes degree programme, the independent teaching institution effectively controls some admissions to the degree programmes.

82 Institutions seeking Diploma Teaching Status apply to the appropriate lead college or consortium, which has the responsibility to inspect the applicant institution against its own criteria and to monitor the relationship in keeping with its remit for programme management. Diploma Teaching Status is granted for a fixed period of typically two to three years. The institution agrees to abide by the information it supplied on its application form and by subsequent requirements placed on it by the University or lead college or consortium. However, the audit team noted an absence of a formal, signed bipartite agreement covering Diploma Teaching Status. Without such agreement the team concluded that a high level of risk was present in the relationships and that the interests of students were not sufficiently safeguarded. Consequently, it is advisable to ensure as a matter of urgency that there is a formal agreement in place between the University of London and those independent teaching institutions that have been awarded Diploma Teaching Status, in line with the *Code of practice, Section 2: Collaborative provision and flexible and distributed learning (including e-learning)*.

83 The approval and review of institutions with Diploma Teaching Status is managed by the lead college or consortium, and the audit team heard and read conflicting evidence concerning which body formally approved the outcomes of approval and review processes, in particular whether the body was located within the University or the lead colleges or consortia. Consequently, the team considered that the locus of quality management of these awards was unclear and in some cases rested with the lead college or consortium. The team formed the view that there was significant doubt as to whether, in these cases, quality management processes are, effectively, at one remove from the business of the University. As a result, it is advisable to ensure that oversight of programmes offered through the Diploma Teaching Status scheme is managed effectively within the deliberative system of the University of London International Academy so that the University of London is able to exercise appropriate oversight.

84 The audit team heard that staff development specifically targeted at diploma teaching staff is informal and considered that the University may wish to formalise and record these activities so that it can assure itself that staff are developed in an appropriate way to deliver the University's programmes.

85 The audit team viewed examples of diploma certificates and the accompanying transcripts and noted that neither indicated the place of study. As a result, it is advisable to ensure that the location of study is recorded on either the certificate or transcript for

diplomas offered through the Diploma Teaching Status scheme, in line with the *Code of practice, Section 2*.

Section 6: Institutional arrangements for postgraduate research students

86 Although the University indicated that it had been many years since research students were admitted under the then External System, it was unable to confirm that all had graduated. The audit team considered it unlikely that any students remained registered and did not investigate further, though noted that the University's lack of registration information resonates with the team's conclusions concerning management information.

Section 7: Published information

87 The process to ensure the accuracy and completeness of printed information, for example the prospectus, is a joint operation between the International Programmes and the lead colleges. Up to three drafts of the material are widely circulated to all relevant stakeholders before final sign-off and publication. The institution sees its website as being an increasingly important source of information for prospective and current students. All materials for the website undergo an initial verification process which includes sign-off by staff with direct responsibility for the material. When the material is published online it becomes the responsibility of its 'owner' to ensure that the material is updated when necessary.

88 The International Programmes, with input from the lead colleges, has responsibility for ensuring the accuracy of information regarding recognised independent teaching institutions, including compliance with the International Programmes Code of Advertising, which sets out the rules and responsibilities of recognised institutions with respect to advertising University of London International Programmes. The recent QAA audit of the International Programmes' involvement with the Singapore Institute of Management praised the arrangements which are in place via the Code of Advertising to ensure the accuracy and completeness of publicity materials, and the Code of Advertising is recognised here as a feature of good practice.

89 The student written submission makes a number of points regarding the accuracy of published information. The website and prospectuses provide students with accurate information about the institution, programmes on offer, cost implications and nature of study. This point was corroborated by the students the review panel met in audit visits. The introduction of the Strategic Information Technology Services will improve aspects of the International Programmes' communication with students as it is intended to make all communication processes much faster.

90 The student written submission suggests that the following needs attention with respect to information provided to students: clarity of the Institutions Policy Framework, that is more information, advice and guidance could be provided for students acquiring additional support from local independent teaching institutions; publishing 'recognised' teaching institutions' pass rates, availability of learning resources, numbers of enrolled students and the offerings of University of London pathway modules will enable students to make more informed choices, as well as increase students' use and understanding of the Institutions Policy Framework; the International Academy could explore the possibility of setting up regional information centres where large cohorts of the International Programmes students exist, allowing easier local access to information; the International Programmes has recently investigated the disparity in levels of examination centre fees, and should inform the student

body of any actions taken to address students' concerns. The audit team noted that the International Programmes was already addressing some of these issues.

91 The audit team found that reliance could reasonably be placed on the accuracy and completeness of the information that University of London International Programmes publishes about the quality of its educational provision and the standards of its awards.

Section 8: Features of good practice and recommendations

Features of good practice

92 The audit team identified the following area as being good practice:

- the Code of Advertising which sets out the rules and responsibilities of recognised teaching institutions with respect to advertising University of London International Programmes' provision.

Recommendations for action

93 Recommendations for action that is advisable:

- ensure as a matter of urgency that there is a formal agreement in place between each lead college or consortium and the University of London
- ensure as a matter of urgency that there is a formal agreement in place between the University of London and those independent teaching institutions that have been awarded Diploma Teaching Status, in line with the *Code of practice, Section 2*
- ensure that oversight of programmes offered through the Diploma Teaching Status scheme is managed effectively within the deliberative system of the University of London International Academy so that the University of London is able to exercise appropriate oversight
- ensure that the location of study is recorded on either the certificate or transcript for diplomas offered through the Diploma Teaching Status scheme, in line with the *Code of practice, Section 2*.

94 Recommendations for action that is desirable:

- update the overarching Quality Framework of the University of London International Programmes to reflect the annual monitoring requirements of the University of London
- introduce a systematic method of disseminating good practice as identified by its various quality assurance processes.

Appendix

University of London International Programmes' response to the Institutional audit report

The University of London International Programmes (hereafter International Programmes) welcomes the findings of the audit team that confidence can be placed in our present and likely future management of the standard of awards and of the learning opportunities available to our students. The International Programmes thanks the audit team for their constructive engagement and for recognising good practice in addition to providing helpful recommendations.

The International Programmes continues work to develop its formal agreements with colleges of the University federation and consortia to reflect our shared mission and goals. A review of the Institutions Policy Framework, which governs our relationship with independent teaching institutions, is under way and will take account of the QAA recommendations relating to Diploma Teaching Status.

The Quality Framework of the International Programmes has already been updated to include the annual monitoring requirements of the University of London. Methods of disseminating good practice identified by our quality assurance processes are being explored.

The International Programmes is delighted that the auditors acknowledged our long history of providing access to University of London awards to a diverse and global study body and the distinctive model of teaching which supports our mission. Steps are under way to ensure that the recommendations from audit are addressed and integrated into our longer-term plans for the enhancement of teaching.

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