University of London International Programmes

Institutional audit

May 2011

Annex to the report

Contents

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 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 the International Programmes offers on behalf of the University of London.

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.

Institutional arrangements for 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 of 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 153).

Recommendations for action

The audit team recommends that the International Programmes considers 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 35)
- 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 144)
- 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 146)
- 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 148).

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 65)
- introduce a systematic method of disseminating good practice as identified by its various quality assurance processes (paragraph 138).

Section 1: Introduction and background

The institution and its mission

1   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 operational model of the International Programmes is distinctive in UK higher education. The colleges of the University of London and the University of London International Academy collaborate to deliver the University of London International Programmes, which lead to awards of the University of London.

2   Twelve colleges, known as the lead colleges, provide academic direction for the International Programmes. The International Academy, which employs about 190 people, is one of the four Central Academic Bodies of the University of London and is responsible for the University's contribution to these collaborations. The division of responsibilities between the International Academy and the lead colleges is set out in schedules to the collaboration agreements.

3   The International Programmes currently has over 50,000 students worldwide studying in over 180 countries. The mission of the International Programmes is 'to provide worldwide access to the internationally-renowned programmes and awards of the University of London and its Colleges'. 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.

4   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.

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

The information base for the audit

6   The International Programmes provided the audit team with a briefing paper and supporting documentation, including that related to the sampling trails selected by the team. The index to the briefing paper was referenced to sources of evidence to illustrate the institution's approach to managing the security of the academic standards of its awards and the quality of its educational provision. The team had a hard copy of all documents referenced in the briefing paper; in addition, the team had access to the institution's intranet.

7   University of London Union produced a student written submission setting out the students' views on the accuracy of the information provided to them, the experience of students as learners and their role in quality management.

8   In addition, the audit team had access to:

- the report of the previous Institutional audit, November 2005
- the report on the mid-cycle follow-up to Institutional audit, 2008
- the institution's internal documents
- the notes of audit team meetings with staff and students.

Developments since the last audit

9   At the time of the previous audit the then External System was undergoing review, undertaken by the Vice-Chancellor's External System Review Group. This review reported in 2006 and made five main recommendations. These recommendations did not overlap significantly with those of the previous QAA audit, but the audit team agreed with the review report's comment that its recommendations are 'entirely complementary to the QAA's findings'. The recommendations were: new governance arrangements are to be established; a Dean will be appointed to provide overall leadership, including academic leadership, to the External System; the External Programme is to be renamed and re-branded by a process of consultation with stakeholders; greater emphasis is to be made in systematically seeking, and responding appropriately to, student feedback on the whole of the student experience, including from alumni; and significant changes in financial practices will be implemented. From a review of the available evidence the team concluded that, to a greater or lesser degree, all the recommendations were implemented.

10   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. University of London International Programmes is the externally-used name of the system.

11   In line with the outcomes of the internal review, there have been movements towards understanding the students' perceptions of the 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.

12   The previous QAA Institutional audit of November 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 as features of good practice: the introduction of an innovative form of student representation by the London School of Hygiene and Tropical Medicine; and the role of the External and Internal Student Administration Division in both the administrative support of students and in the enhancement of administrative processes and procedures. The audit 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 for the assurance of academic quality and standards in higher education* (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.

13   As a result of the report of the Vice-Chancellor's External System Review Group and in responding to the recommendation concerning Academic Board, the University introduced a new structure of governance for the then External System in 2007-08, which articulated with changes to central university governance. The structure comprises a Finance Committee and an Academic Committee, which both report to the Board of the University of London International Academy. Subcommittees of the Academic Committee include a Quality Assurance and Student Lifecycle Sub-committee, and a Learning, Teaching and Assessment Sub-committee. This latter group was established later, in 2010, taking on some responsibilities formerly lodged elsewhere and filling a gap on general learning and teaching issues.

14   Accompanying the new governance structure, new academic regulations for programmes were put into place, which, though not varying greatly in substance from the previous regulations, were presented in more accessible language, acknowledging that students were the primary audience. The regulations are presented online, programme by programme, and together with the relevant programme specification (see paragraph 82).

15   In response to the audit recommendation concerning agreements with teaching institutions, the University established the Institutions Review Group, whose report of 2006 resulted 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, recognising them at one of two levels (see paragraph 38).

16   In response to the audit recommendation concerning statistical data, the University continued the development of an in-house data management system, though its slow progress led to a review by external consultants, following which the system was abandoned. The University explained in its briefing paper that since then it had taken considerable steps in the acquisition of commercial data management software, though full roll-out of management information from these new systems would not be available until 2012, and that the University was still reliant on a system it described as 'outdated'. The audit team noted the positive way in which the recommendation was addressed but

considered that a more timely response was warranted, a view shared by staff the team met. Nonetheless, student data has been gathered and presented so as to inform both the annual monitoring process and the University's strategic position.

17 In response to the audit recommendation concerning the Academic Infrastructure, work commenced in 2006 on the production of programme specifications, which are now in place for all programmes. 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). In addition, in 2009 the Quality Assurance and Student Lifecycle Sub-committee reviewed the University's position in relation to the *Code of practice* and identified a number of areas for action (see paragraph 83).

18 In response to the audit recommendation concerning minimum expectations for students, the University initiated considerable activity culminating in the establishment of such expectations in the form of a student charter, approved by Academic Committee in 2011. While the audit team welcomed the progress made, it considered that the production of the charter could have been more swift and that, although the charter provided statements that academic guidance and personal support were available, it did not specify any minimum levels.

19 In conclusion, 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, as noted above, the team considered that some developments could have been implemented earlier.

Institutional framework for the management of academic standards and the quality of learning opportunities

20 The defining feature of the International Programmes is that of the independent student. To some extent and depending on the programme of study, students can choose to study independently online; through a more traditional, though increasingly less common, paper-based approach to distance learning; or by seeking out a third party provider for supplementary tuition, support and 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 academic standards, rather than setting out to ensure a consistent quality of learning experience. That experience will vary greatly, in part according to the needs of the individual student. Nevertheless, the University does recognise that many of the International Programmes' students require some form of support, and to develop and extend that support has instigated various schemes and practices, which are discussed later in this annex.

21 The University of London International Programmes is the result of collaboration between 12 lead colleges of the University and the International Academy of 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. For the International Programmes the colleges are termed 'lead' because they provide academic direction to the programmes. In some cases, for example law, the colleges take joint responsibility for providing academic direction and form a consortium to do so. Lead colleges or consortia are responsible for the academic development, maintenance and review of programmes, and for the support of students' progression through the programmes. Lead colleges or consortia carry out these duties

using their own internal policies, procedures and bodies, which differ substantially from lead college to lead college, in part owing to differences in organisation size. Thus, 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, and as stated earlier, is one of the four central academic bodies of the University of London.

22   Through the International Programmes the University offers a range of programmes at levels 4 to 7 of the FHEQ, encompassing programmes leading to honours and master's degrees, and a range of awards termed 'diplomas': undergraduate certificates, undergraduate diplomas, diplomas for graduates, postgraduate diplomas. Although the audit team noted no evidence of lack of alignment with the FHEQ, it did find the nomenclature, particularly the use of the word 'diploma' confusing. However, the students the team spoke to were aware of the level of their programmes of study, which is clearly stated in programme specifications.

23   The Board of the International Academy is the principal decision-making committee. It is chaired by the Vice-Chancellor and reports to the University's Collegiate Council. The Collegiate Council has overall responsibility for the academic affairs of the University and sets the University's regulations. Within the International Academy, academic matters, including the determination of academic policy, are dealt with by the Academic Committee, chaired by the Dean of the International Programmes and reporting to the Board of the International Academy. Academic Committee has five subcommittees and one Subject Committee for Undergraduate Laws, which each have membership from the lead colleges and make recommendations to their parent committee. Chairs of the subcommittees are members of the Academic Committee. The principal subcommittees of relevance to the audit are: the Learning, Teaching and Assessment Sub-committee, which reviews policy and procedures in those areas; the Quality Assurance and Student Lifecycle Sub-committee, which monitors learning opportunities for students, including considering new programme proposals and monitoring the outcomes and actions of annual monitoring, periodic review and external examining; the Institutions Sub-committee, which develops and monitors policy in relation to independent teaching institutions; and the Systems and Technologies Sub-committee, which advises on the ways in which information and communication technologies impact on the management of the student experience. 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 its International Programmes. In particular, the team noted that Academic Committee gave rigorous scrutiny, via minutes, to the activities of its subordinate bodies.

24   Partly in response to the 2005 audit, The Board of the International Academy, Finance Committee and Academic Committee are evaluated through an annual review conducted by the Central Secretariat of the University, whereby members respond to specific questions about the effectiveness of the relevant body and its procedures. A review is stipulated by the University's ordinances. The review report is received and discussed by Collegiate Council and the Board of the International Academy. The bodies reporting to Academic Committee are similarly reviewed, but on a biannual basis and by the Head of Quality in the Corporate Performance and Quality Directorate (that coordinates academic management and policy, quality and standards) of the International Academy, who produces a report that includes recommendations for action and is discussed by Academic Committee and the Board of the International Academy. The audit team saw evidence that the recommendations of the review of 2009 had been actioned. The team considered that the mechanisms employed in the evaluation of deliberative body function were generally

effective and appropriately probing and fit for purpose, though noted that the results of the evaluations were not always fed back to the bodies that report to Academic Committee.

25   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 and who is a member of the Corporate Performance and Quality Directorate.

26   The University's briefing paper noted that 'the contribution of the college-based academic community remains substantial and is essential in delivery and assessment of the programmes'. 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 indeed an essential component in the International Programmes' system. Although in the proposed formal agreements between the lead colleges and consortia and the central University there is a clear distinction between the functions of both parties, college staff populate the central deliberative bodies, including the Board of the International Academy, to such an extent that, in practice, there is little college-university separation of the academic corps that give the International Programmes its academic credibility. The audit team agreed with the University's view expressed in its briefing paper 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 through its executive and deliberative structure.

27   Principles governing and relating to the various aspects of the assurance of quality and standards, and the processes involved, are contained within the International Programmes' Quality Framework document, revised in 2010, which also explains the relationship between the different parties and how they come together to deliver programmes and to support students. The Quality Framework includes outlines of the programme approval, monitoring and review processes, and specifies a schedule of systematic reporting, which comprises: reports from external and intercollegiate examiners, annual programme reports, statistical data, feedback from students on their experiences, and the overall annual report of the International Academy to the Collegiate Council and the Vice-Chancellor. However, despite the comprehensive nature of the Quality Framework, many staff the audit team met did not use it and did not appear to know of it.

28   The Quality Framework also gives provision for thematic review, which takes a horizontal snapshot, reviewing and evaluating practice in a particular theme across all programmes. The Quality Framework explains that thematic reviews are conducted by a panel that includes external input and a student or graduate of the International Programmes. The panel's report makes recommendations to the Quality Assurance and Student Lifecycle Sub-committee, which is responsible for instigating and monitoring resultant action. The report is also presented for endorsement to the Academic Committee, which may additionally instigate action. In 2009 a review focused on external examining, and in 2010 on student handbooks. Although the report of the thematic review of external examining was produced by a panel that did not include student or graduate membership, it was conducted as a pilot exercise, before the current Quality Framework came into effect. The audit team heard that the University intends to continue with thematic reviews, though not necessarily on an annual basis. The team viewed thematic reviews as complementing the International Academy's other quality assurance processes.

29   At the time of the audit, the University was in the process of producing an online academic handbook, available to all stakeholders, that compiles much of the already available information into a single resource. It is intended that the handbook will include key

policy documents, procedures, guidance notes, forms, lists of awards and their programme specifications and regulations.

30   The Learning, Teaching and Assessment Framework, developed in 2009-10 and in operation from 2011-12, was discussed and approved by both the Learning, Teaching and Assessment Sub-committee and the Academic Committee and approved by the Board of the International Academy. This Framework reinforces and operationalises the External System Strategic Plan 2009-12 and advocates a consideration of the 'approach to teaching and supporting…students on a systematic and on-going basis', indicates institutional directions of change in enhancing the student learning experience, and offers a guide to lead colleges and consortia in the development of their own specific learning and teaching strategies, which are in the process of being produced. The audit team viewed the Learning, Teaching and Assessment Framework as providing a focus for developments that are in general sensible and pedagogically sound.

31   There was consensus among some staff the audit team met that the setting of academic standards was the responsibility of the University, but that the maintenance of those standards was the responsibility of the lead colleges or consortia, and this position was reflected in the University's briefing paper. However, other staff indicated that academic standards were set by the lead colleges or consortia. Further, the locus of standards setting is not clear in the proposed formal agreement between the University and the lead colleges or consortia, which indicates that each college's academic board is responsible for 'standards and quality in respect of the programmes offered through this Agreement' and also that the Collegiate Council is 'responsible for academic standards of University of London awards made by Central Academic Bodies'.

32   The Vice-Chancellor of the University indicated to the audit 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 from programme to programme within the International Programmes and may show variance between a lead college's programme within the International Programmes and a cognately similar college-based programme. This notion was reflected in the University's regulations, the first of which was recently amended by removing the sentence 'candidates granted degrees shall have attained the same academic standard irrespective of mode or place of study or examination'. This deletion was sanctioned in order 'to remove the possible misconception that the University ensured comparability of standards across the Colleges'. However, other staff the audit team met were operating under the notion 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.

33   In 2009 the International Programmes' Chief Operating Officer noted in relation to the formal agreements covering the relationship between the University and the lead college or consortium that some had expired or had never been signed; few, if any, reflected the working relationship between the then External System and the lead colleges; many lacked agreed processes for review; and in general they were inconsistent with each other.

34   As a result, the Board of the External System agreed in 2009 that new agreements should be developed. The audit team noted that some agreements with lead colleges or consortia are with the University and some are with the External System. Some agreements are for a fixed period, though others have no expiry date, but may have a notice period of, for example, five years. Some contracts have not been revisited for many years, for example since 1993, and, at the time of the audit, some had elapsed. Typically, the agreements have accompanying schedules that specify, for example, quality assurance and financial

arrangements, and the team heard that these were updated annually by the Corporate Performance and Quality Directorate.

35   Staff the audit team met indicated that the University was moving towards a consistent contract with the lead colleges and consortia. Following discussion by the Board of the International Academy and Collegiate Council a new scheme for formal agreements was devised in 2010, as described in paragraph 36. At the time of the audit the new agreement had yet to be signed by all lead colleges and consortia, and the audit team was informed that there were indications that some might not sign, but enter into a different relationship with the University. This absence of formal agreements gave the team cause for concern in protecting the interests of the International Programmes' students. 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.

36   The new formal agreement is between the University and each lead college or consortium and consists of the generic agreement itself plus lead college-specific or consortium-specific quality assurance schedules. Each agreement sets out the relative responsibilities and obligations of the lead colleges and consortia and the University for, among other things: programme development, approval, maintenance, review and closure; student admission and progression; student assessment; links with independent teaching institutions; student support (where given); student complaints and appeals; dealing with external examiners and their reports; and dispute resolution and termination of the agreement. The schedules set out policy and operational responsibilities in a tabular format clearly specifying the role of each body or postholder (and who holds the post) in relation to detailed aspects of quality assurance. The new scheme for agreements includes an annual review of the collaboration and provides for the scrutiny of college-level business plans. On the whole, the audit team found that the proposed 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.

37   For most programmes there is no requirement to attend for study, indeed most programmes have been designed so that they can be completed through independent study. However, for many years institutions independent of the University have offered to prepare students for the assessments, mostly written examinations, of the International Programmes. Developing agreements with these third-party (teaching) institutions was a recommendation of the previous audit. The University estimates that approximately 80 per cent of its undergraduates who study with the International Programmes access the services of third-party institutions, and students the audit team met were generally satisfied with the support they received, for a fee, via these institutions. The support offered varies and can include full-time and part-time classes and occasional revision sessions, online or correspondence services, support facilities such as local libraries, and opportunities to network with other students. The University sees these independent teaching 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.

38   The Institutions Policy Framework, though not embodied as a palpable document, is the means by which the International Academy formally recognises and supports some independent teaching institutions, or centres, that provide teaching and learning support to the University's students. This recognition is designed to ensure that the quality of learning opportunities is maintained, as stipulated by the Board of the International Academy, and to provide clear advice and guidance to students about available venues for tuition support. The Institutions Policy Framework encourages independent teaching institutions to improve the support they offer, and thereby serves to protect and enhance the reputation of the University.

39   This recognition applies to specific programmes on named campuses. The Institutions Policy Framework includes the requirement for recognised institutions to participate in quality assurance processes and to abide by a code for advertising and promotional materials, as governed by a generic set of rules and conditions that independent teaching institutions agree to on application to be recognised. 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. The Economics, Management, Finance and Social Sciences suite of programmes and the Undergraduate Laws Programme consortium also run regional providers' conferences and additionally visit institutions to give on-site advice.

40   At the time of the audit, the University was looking to extend its network of recognised independent teaching institutions to 'widen opportunities for students to access local learning support'. The University indicated that normally recognition will occur after several successful years of supporting the University's students, but that the University can offer support for, perhaps younger, independent teaching institutions as they move towards recognition. This 'candidacy phase' may last up to three years, during which such institutions can access the University's study materials, a virtual learning environment and receive marketing support.

41   The University, through the Institutions Policy Framework, has identified two tiers of recognised institutions. Those that the University considers can demonstrate 'a sustained commitment to high standards in respect of teaching, support and administration' are termed affiliate centres. Those that the University considers can demonstrate 'standards in respect of teaching, support and administration that are of a level acceptable to the University of London for the purposes of supporting the International Programmes' students in their preparations for examination' are termed registered centres. From these definitions the audit team could not readily identify which type, affiliate, or registered, the University had more confidence in. Discussions with university staff indicated that affiliate was the superior, but staff also indicated that the distinction was not as clear as it could be. The Board of the then External System noted that, in relation to standards of teaching, support and administration, registered centres demonstrate an acceptable level and affiliate centres demonstrate a commitment to maintaining a high level. The team heard that affiliate centres do not receive any specific benefits over registered centres, save the use of the term 'affiliate', although on application affiliates may gain permission from the University to verify the documents produced by prospective students to demonstrate their qualifications. The status of centres within the Institutions Policy Framework is clearly communicated to students via the International Programmes' website.

42   The quality assurance of recognised centres is governed by the Institutions Quality Assurance Framework, which, within the Institutions Policy Framework, sets out the principal policies and procedures through which standards are maintained, and the quality of provision is assured, concentrating on two tools: annual monitoring and periodic review. These tools plus the initial recognition collectively form the Institution Review Cycle, which aims to ensure that quality assurance processes are consistently and fairly applied. The Institutions Quality Assurance Framework exists to ensure that the relationship between the University, lead colleges and consortia, and recognised centres meets the aims of the Institutions Policy Framework in an effective and mutually beneficial manner, through the monitoring and review of both the academic aspects of the relationship and the overall student experience. The Institutions Quality Assurance Framework is used by independent teaching institutions to guide them in the requirements to become a recognised centre, and contains detailed information on what the University will look for in establishing new recognised centres, including institutional organisation and ethos, administrative capacity,

teaching approach, support available to students, physical resources for learning, and mechanisms for students to feed back on their experiences.

43   Initial recognition requires a self-evaluation document to be submitted by the applicant institution and a visit by a review panel comprising representatives of the International Programmes. The visit includes meetings with senior staff, teaching staff and students and in many cases the observation of one or more teaching sessions. The panel produces a report, modelled on the Institutions Quality Assurance Framework, which is considered by the Institutions Sub-committee, the Academic Committee, the Board of the International Academy and the University's Collegiate Council. Annual monitoring is a paper-based exercise whereby the recognised centre completes a report containing quantitative and qualitative information to a standard template. The report is analysed by a readers' panel at the University and that analysis reported to the Institutions Sub-committee. Periodic review occurs three to five-yearly for registered centres and five to seven-yearly for affiliate centres and is organised in similar fashion to the application process, with self-evaluation, panel visit and report transmission.

44   However, in order to populate the Institutions Policy Framework and establish it as a working system, in 2009, 72 independent teaching institutions were provisionally allocated (by Academic Committee on the recommendation of the Institutions Sub-committee) to the Institutions Policy Framework and their status subsequently confirmed, or otherwise, by the periodic review process, the ultimate decision resting with the Board of the International Academy. The level of the allocation, affiliate or recognised, was based on the experience and knowledge of staff from the University, lead colleges and consortia who had worked with the institution. At the time of the audit, periodic review had taken place for a considerable proportion of these institutions and it was the University's intention to complete all periodic reviews by the end of 2011, though it noted that some reviews may be conducted by videoconference for geographic regions where the safety of the review panel could not be guaranteed. The audit team examined a sample of these review reports, and the associated minutes of the Institutions Sub-committee and the Academic Committee, and noted that not all reports had resulted in the confirmation of the institution within the Institutions Policy Framework and that many had requirements to be addressed before affiliate or registered status could be confirmed. The team regarded this as evidence of a robust process.

45   The Institutions Policy Framework has been in place since 2009 and, to examine its continued suitability, a review was commissioned by the Institutions Sub-committee in early 2011. At the time of the audit the review was at too early a stage for the audit team to express opinion on its effectiveness.

46   The University has no formal collaborative activity with other organisations apart from awarding Diploma Teaching Status to independent teaching institutions, as part of the Institutions Policy Framework. The link here is closer than that described for affiliate and registered centres (though all diploma teaching institutions are included in the Institutions Policy Framework as recognised centres) and will be considered in the section on Collaborative provision.

47   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

Approval, monitoring and review of award standards

48   As noted earlier (see paragraph 32), the University sets threshold academic standards that are aligned with *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ). Each of the lead colleges or the cross-college laws consortium has its own processes for the management of academic standards, and the outcomes of these are then considered by the appropriate deliberative committee of the International Academy, thus bringing oversight of such matters at University level. Curriculum design focuses largely upon the setting of academic standards; the University asserts that in a distance learning programme, the learning experience is purely within the control of the student rather than the purview of
the institution.

49   For convenience, approval, monitoring and review of programmes will also be discussed in this section.

Approval

50   The International Academy reviewed its programme approval procedures in 2010, requiring new proposals to be considered in detail by the newly-formed Learning, Teaching and Assessment Sub-committee (LTASC), and clarifying the parallel nature of both academic and financial/resourcing approval processes.

51   Proposals for new programmes are now subject to close scrutiny before 'permission to plan' is granted. Support is required from both the lead college and LTASC, following which the Dean of the International Programmes will permit progression to more detailed planning. The lead colleges, all of which are subject to independent Institutional audit by QAA, then take the full proposal through their own internal academic approval process, within which the University requires appropriate peer external scrutiny. In cases where the identification of an appropriate lead college is difficult, for example, where a programme is developed by a consortium of colleges, then the LTASC will itself convene a validation sub-panel. In its reading of approval papers, the audit team noted the detailed level of scrutiny afforded at approval events, the cognisance given to the external peer assessor's contribution, and the corresponding rigour required in follow-up action before approval would be recommended to Academic Committee.

52   Subsequently, the fully developed proposal is considered by the International Academy LTASC and the Academic Committee. In its reading, the audit team noted that engagement by committee members brought both a mature appreciation of the needs of the programme development team, and a willingness to seek imaginative yet secure approaches to programme approval. For example, in one case, the Academic Committee approved a joint approval event by both the lead college and the University in order to foreshorten the subsequent committee processes.

53   In addition to academic consideration, the associated business case for new proposals is considered by the International Academy Finance Committee and the Board. In its discussions with staff, the audit team heard that an embryonic academic and costing model may be used to inform the initial business case, which identifies both the funding stream for lead colleges, and also the appropriate financial overhead necessary to provide, at institutional level, for the International Programmes' infrastructure and resources such as

the University Library, the International Programmes online library and virtual learning environment. Annual planning and budgeting within the lead colleges provides for staff, associated physical facilities and local recurrent funding.

54   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 after 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.

55   The audit team heard that updates to student learning materials and minor changes to modules may be made using lead college quality management processes following consideration during the annual programme and planning review (APPR) process (see paragraph 59). Such changes are kept to a minimum, and good notice is given in order to minimise curriculum turbulence for students, many of whose study will take considerably longer than a typical student on a taught programme in an institution at which face-to-face learning is the norm. In reading papers associated with such changes, the audit team noted the detailed and thorough nature of the scrutiny brought to bear within the lead colleges and programme deliberative groups, although they were unable to identify any mechanism whereby the International Programmes could be reassured that such minor changes did not conflate without institutional oversight into a more significant modification.

56   More significant changes to the curriculum (typically more than one third of an undergraduate programme, or more than half of a master's degree) follow a formal process through lead college and International Academy committees in a manner similar to that for a new course development. The audit team heard of examples where a number of the International Programmes degrees have used these processes to modify their structure to better align with the FHEQ, and also of where changes were made to programme structures in order to improve equity between the curriculum volume of the International Programmes and similar awards delivered to on-campus students within the lead college.

57   The International Programmes' students study at their own pace, and study patterns often extend in excess of those of their full-time colleagues learning on campus. The University thus requires lead colleges to give at least five years notice of programme closure, and only if unsuccessful in inviting other colleges to adopt the programme would the closure be formally agreed and announced. The closure process is well-defined and followed scrupulously.

Monitoring

58   The current process evolved from that described in the previous audit report, following detailed discussions at the International Academy's Quality Assurance and Student Lifecycle Sub-committee (QASL) over the period of 2008-09. It is now both reflective and forward-looking and is overseen by QASL. Annual monitoring of the International Programmes now comprises four stages; the APPR; the production of an annual programme report (APR); the subsequent consideration of APRs by lead colleges and QASL; and finally the production of an overall annual report for consideration both by the International Academy and the University.

59   The APPR comprises a meeting of programme and university stakeholders for each award which scrutinises external and intercollegiate examiners' reports; annual programme reports; analysis of statistical data; and collation and consideration of student feedback. The APPR meeting has lead college and International Academy membership. Discussions with staff confirmed the audit team's understanding that the APPR meeting 'provides an opportunity to share experience, and reflect on issues that have arisen during the course of

the preceding year, particularly where these impact on the student experience. The meeting also seeks to identify good practice and provides an opportunity to initiate planning of changes to programmes'. The APPR is itself not minuted, but provides the vehicle, action lists and evidence for the construction of the APR. The APRs thus provided the lens through which the audit team was able to consider the efficacy of APPR.

60   Following the APPR meeting, an APR is written and considered deliberatively by the lead college and then both the report and any outcomes of lead college deliberation are considered by QASL. It is thus that cross-programme opportunities for enhancements may emerge. The audit team was able to scrutinise a number of APRs. The reports were helpfully created in accordance with an institutional template, the first section forming a reflection upon academic matters, the second providing detailed student cohort statistics (see paragraph 94) and reflecting upon business matters. The external examiners' reports were included in full, together with the formal response from the programme team (see paragraph 76). In its reading the team found that the APRs were appropriately reflective, for example, exploring the underlying reasons for student withdrawal and proposing changes to improve matters; observing on the improved learning experience of students following the roll-out of the virtual learning environment; exploring opportunities for new International Programmes awards; student competence in the English language; and more effective promulgation of assessment deadlines.

61   In some cases, APRs reflected upon the outcomes of student feedback, from surveys conducted by the International Programmes or by the programme. The audit team also heard that feedback on academic matters might be received directly by the Programme Director or the International Programmes' student enquiries team. It was intimated that such feedback was collated and monitored by the Programme Manager, and while matters of urgency would be addressed immediately, more general feedback would be discussed in the APPR meeting, and addressed in the APR itself.

62   The audit team also noted that in 2010, as an example of deliberative action taken within a lead college, the London School of Economics and Political Science Programme Board had engaged in a 'standardisation exercise' whereby it engaged a number of external examiners to double mark scripts from similar modules from both internal and International Programmes, in order to be better able to confirm the normal statements of comparability sought from externals in their annual reports. The exercise confirmed the broad comparability, and the School has determined to repeat the exercise on a periodic basis.

63   In its reading, the audit team was able to confirm that APRs are considered in some detail by QASL, focusing on aspects both positive and also those that require further attention. One pertinent example noted by the audit team was a review triggered at least in part by APR commentaries, which resulted in the subsequent redefinition of the required standard of English for new students. In another example, QASL sought reassurance that action had been taken to address concerns regarding the data presented at assessment boards. The audit team was able to explore this particular matter in greater detail with senior staff, and was reassured that, not only was immediate action taken to correct the presentation of data, but longer-term work had been put in hand to prevent a recurrence. In some cases QASL draws evidence from all APRs in order to make cross-programme comparisons. For example, as a single one-off exercise the committee considered a detailed analysis of demographic, completion and classification profiles, and developed a further programme of research in order to inform future programme planning.

64   A planned innovation, incorporated within the collaboration agreement, is the introduction of an annual lead college review. All APRs relating to a particular lead college will contribute to a meeting between the International Academy and lead college staff in order to review the operation of the International Programmes' provision in that particular

college. Actions identified in these meetings and any follow-up action thus instigated will be reported in the following year's APPR meeting and other committees, as appropriate. From its discussions with staff, the audit team considered that the lead college review meetings were expected to be helpful in due course.

65   The International Academy Quality Framework indicates that 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 APRs and the External/Intercollegiate Examiners' reports following the completion of both academic and calendar cycles of any given year...'. These reports are presented by the Academic Quality Advisory Committee of the University (see paragraph 137) to the Collegiate Council and Board of Trustees of the University. In the reading of these reports, the audit team observed that the latest only addresses matters concerning academic standards through an overview report of external examining. The International Academy explained 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, although these changes in process are not yet reflected in the International Academy's Quality Framework. The audit team thus considers it desirable for the University to update the overarching Quality Framework of the University of London International Programmes to reflect the current annual monitoring requirements of the University.

Periodic Review

66   Periodic Programme Review (PPR) takes place every four to six years, and is the principal mechanism that enables the University, as the awarding body, to review provision and to monitor the standard of the award and quality of the provision. There are three principal models of PPR in use, reflecting the variety of approaches taken to reviewing the International Programmes' courses:

- college-based programme review where an International Programmes programme is reviewed in isolation or alongside its internal counterpart
- college-based departmental/faculty review where an International Programmes programme is reviewed alongside all internal cognate provision within a department or faculty
- International Academy administered review where an International Programmes programme, or portfolio of programmes, is reviewed in isolation. This mechanism normally applies to programmes where there is no single lead college, or where a bespoke review is exceptionally required.

67   PPR is a panel-based peer review process, and from the scrutiny of records from a number of such events, the audit team confirmed that panels always included peer external membership. The panels typically receive a self-evaluation together with supporting evidence, including programme specification(s) and programme regulations; external examiner's reports; APPR reports; a selection of learning resources, including the student handbook; a sample of subject guides; examiner commentaries; access to online library resources; virtual learning environment access; prospectuses; student feedback; module, course and unit 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 the panel has identified. While the detailed approach is a matter for the panel, the focuses of the review are defined by the University to include:

- how individual units of study and progression pathways relate to a programme's overall aims and learning outcomes

- the currency and overall effectiveness of the learning materials, resources and guidance in relation to the programme specification, in the light of:
  - current research and practice in the relevant discipline
  - developments in pedagogical methods for effective distance-learning
  - technological developments for enhancing the distance-learning experience
- the appropriateness of the assessment methods for examining student attainment of intended learning outcomes
- student achievement and progression
- the use of the Academic Infrastructure and any requirements of professional, statutory and regulatory bodies (PSRBs)
- the extent to which minimum expectations for the academic guidance and personal support of the International Programmes' students are met
- ensuring that the University of London's Academic Regulations and quality assurance mechanisms of the International Programmes and lead college are implemented effectively, and that any variations in practice are addressed
- reviewing the interface between the International Programmes and the lead colleges in the management and enhancement of the quality of the programme.

68   In the case of college-based PPRs, the lead college employs its own detailed review processes, and the report of the review will be approved within its own deliberative structure before release to the International Programmes.

69   The final reports are considered by lead colleges, QASL and Academic Committee. QASL 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. QASL takes forward any institutional issues raised, and through the APPR process monitors actions assigned at programme, college or departmental level.

70   In its reading of both the PPR audit trails provided by the University and of other PPR-related material in committee papers, the audit team was able to sample each of the three mechanisms used for conducting the PPR. The self-evaluations were found to be detailed and self-critical documents, and contained sufficient data from the legacy student record system to enable judgements to be made. The final review reports were similarly thorough, and made well-evidenced recommendations for programme development. The team found that, in the case of departmental/faculty-based review, the distance learning provision received perhaps a lighter-touch scrutiny, and there were no recommendations focusing purely on the International Programmes. The team learnt in meetings, and was subsequently able to confirm in its sampling of PPR material, that in the case of some of the larger provision, lead colleges also conducted periodic subject-based reviews, which were able to test academic alignment between internal programmes and those of the International Programmes.

71   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. It is however, desirable that changes within the University's quality management processes are properly reflected within the International Programmes' own Quality Framework.

External examiners

72   The University's use of external examiners within the International Programmes was reviewed in 2009 using the thematic audit process (see paragraph 28), and was found to be in good health.

73   The role of external examiners is well-defined, focusing almost entirely upon reassuring the University of the academic standards of its International Programmes, and principally seeking to:

- ensure that the standard of the award is consistent, in the field of study concerned, with that of the national university system
- consider the extent to which the processes for the assessment of the International Programmes' students are sound and have been fairly conducted
- be involved and influential in the decision-making process of the Board of Examiners and to endorse the decisions made by the Board.

74   External examiners are appointed (annually, and for no more than four years) by the International Academy, following nomination by the appropriate lead college, according to criteria detailed within the guidelines for examinations. The University takes care to ensure that there is no potential conflict of interest in any examining appointment. Externals are generally appointed from outside the University of London, but in common with practice throughout the University, a small proportion is drawn, at the lead college's discretion, from other University of London colleges which offer appropriate academic disciplines. These 'inter-collegial' examiners act as traditional externals, with an additional remit to assure that comparability of academic standards is maintained throughout the University of London. There will always be at least one external appointed to a named programme; additional externals are appointed as the student load dictates, and a singleton external would always be drawn from outside the federal University. In the very few cases when externals consistently fail to submit their report, they would not be reappointed at the point of annual renewal.

75   While there is no formal induction for the International Programmes' externals, lead colleges invite their International Programmes externals to college induction, where offered. However, the Guidelines for Examinations contain a detailed section giving advice for external examiners, and they have been provided with a dedicated external examiners' information page on the International Programmes' website. It is intended that externals will be given access to the International Programmes' Academic Handbook which is expected to be published in the near future.

76   The specific duties of external examiners are well-described; in particular they are required to approve assessment instruments; have the right to, and may be asked to sample marked assessments; must attend the examination board for their programme; and are invited to the APPR meeting. They are required to produce annual written reports to the Dean of the International Programmes, using a standard template. These are considered by lead colleges for subject-related matters, by the Programme Manager for any administrative matters, by QASL to bring together the report and any response from lead colleges, by the International Academy, and finally by the Academic Committee for system-wide issues. The University acknowledges that the lead colleges will respond in slightly different ways, according to their internal systems. QASL, in its consideration of the programme APR is able to confirm that all externals have received a response from the lead college. In addition, the Dean of the International Programmes will also respond to any administrative matters raised by externals.

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

78   A report summarising external examining outcomes is contained within the overall annual report, submitted by the International Academy to the University's Academic Quality Advisory Committee, which subsequently is expected to produce a University Quality Overview Report (a synopsis of all annual reports submitted by colleges and central academic bodies of the University) for consideration by the Collegiate Council. The overall annual report is also presented to the Academic Committee and Board for reference (see paragraph 65).

79   The audit team had the opportunity to scrutinise many external examiners' reports during the course of their visit, and was able to follow their consideration within the APPR, by QASL, and subsequently to note matters of both good practice and concern raised at institutional level within the overall annual report. The team 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 considers that the International Programmes' external examining system is fit for purpose and that strong and scrupulous use is made of independent external examiners.

Academic Infrastructure and other external reference points

80   The University has, since the last audit, made a number of steps to engage with the national Academic Infrastructure; it decided to align with the FHEQ, and it formally conducted a mapping exercise to consider the engagement of the International Programmes with the *Code of practice*; programme specifications are now in use throughout the International Programmes.

81   The audit team has noted from its reading that, since 2008, the PPR exercises for the undergraduate programmes in the London School of Economics and Political Science, in Heythrop College, in the Masters Epidemiology programmes and in the BA English have all aligned with the FHEQ. The planning processes were detailed, for example in Heythrop College, taking care to introduce detailed descriptors for each level of the programmes. In English, the programme team took the opportunity to better align module and programme structures for International Programmes' and internal college provision.

82   Programme specifications are in wide use; they are prominently featured within programme regulations, and all include the detailed programme assessment regulations which are crucially important to students as they plan their progress through their study.

83   The 2009 alignment exercise against the *Code of practice* elicited institutional support for mapping against only five sections of the *Code of practice*, arguing that, for example, it was unnecessary to align with the *Code of practice, Section 1: Postgraduate research students*, when the International Programmes did not recruit any research students. The exercise identified that, while the International Programmes aligned well with the five sections concerned, there were four general areas where improvements might still be made. QASL also asked for further work to be done in an attempt to reflect the *Code of practice, Section 8: Careers education, information, advice and guidance*, where it was believed that, for some students who registered through recognised teaching institutions, it might be appropriate for the University to offer a limited service in conjunction with the recognised institution. While this work is not yet complete, an update on the mapping process was presented to QASL in April 2011 identifying the progress made thus far since

2009. The audit team noted that the update also revisited the mapping against the *Code of practice, Section 3: Disabled students*, which has recently been updated. The thematic review of external examining (see paragraph 28) also made several minor recommendations in order to better align with the *Code of practice, Section 4: External examining*.

84   In most cases, other external reference points are unlikely to have significant impact; remote independent learners are unlikely to be able to engage in the structured and supervised training required by many professional or regulatory bodies, and thus there is little market for such recognition. The audit team did, however, learn that some programmes were developed with reference to appropriate professional standards, and noted that in aligning with the FHEQ, programmes were compared with the national subject benchmark statements where appropriate.

85   The audit team believes that, while progress to align with the national Academic Infrastructure has been slow since the last audit, significant progress has been made. All the International Programmes' programmes are now aligned with the FHEQ, national subject benchmarks are used in programme design, and there is good engagement with relevant sections of the *Code of practice*, although some further work remains to be done.

Assessment policies and regulations

86   The University draws attention in its briefing paper to the fact that the challenges associated with assessing many thousands of students in hundreds of assessment centres around the world predicate against the significant use of individual coursework within the International Programmes, and made the point in meetings with the audit team that the principal risk to standards and reputation is the possibility of plagiarism. Thus the generic approach to assessment is to make use of time constrained unseen examinations for all core assessments.

87   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. While the briefing paper predicts little change in the short term, it does indicate that such matters are always considered during review activities, and this was confirmed by the audit team in meetings with staff and in its scrutiny of PPR documentation.

88   The detailed academic regulations for each programme are considered and agreed at the initial programme approval, and are published as an appendix to the publicly available programme specification, and make copious references to the detailed student programme handbook. The audit team noted that the programme-specific regulations included assessment criteria; a positive feature which would be of significant assistance to students studying at a distance. It was also noted that in the cases of consortia, care was taken to ensure that the academic regulations met the most stringent requirements of the constituent colleges.

89   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 periodic review of processes and arrangements, conducted upon the University's behalf by a private auditing company. Sampling of reports from the independent auditing company demonstrated that the audits were thorough, and the audit team read of

their consideration at committee in which the University identified a number of procedural improvements to enhance the management of examination centres.

90   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 provide copious referenced regulatory material. Students are signposted to processes for appealing or claiming mitigation within their student handbooks.

91   The University routinely reviews its examination processes; the Guidelines for Examinations are updated regularly, examination centres are updated routinely with any changes in procedure, and the Board has just established a review of the International Programmes Assessment System, principally drawing upon practice in other international public examination schemes.

92   Detailed marking is carried out by examiners (members of academic staff), associate examiners ('contractor' examiners), assessors (subject specialists appointed when the lead college cannot provide the appropriate expertise) and assistant examiners ('contractor' staff employed for marking purposes only), who are nominated by the lead colleges against defined criteria, but are appointed by the University of London International Academy. Some modules have a designated chief examiner who has specific responsibilities for the operation of the assessment process, for standardisation between the various members of the marking team, and for producing the Examiner's Commentary (see paragraph 117). Assessments may only be designed by examiners, associate examiners and assessors, who, while not formally inducted or trained, are recruited for their subject knowledge and experience, and who are mentored by experienced examiners following their first appointment. The constitution, role and terms of reference for boards of examiners are carefully defined in the Guidelines for Examinations, and the audit team read that external examiners had commended the detailed marking schemes, marking processes and the management of examination boards. Where external examiners made comment regarding possible improvement in the presentation of data for examination boards, action was taken immediately.

93   The audit team found that assessment policies and procedures were clear and well signposted for students, and while principally based upon the use of unseen and time constrained examination, met the constraints imposed by assessment at a distance.

Management information - statistics

94   The International Programmes Quality Framework indicates that deliberative processes are informed by '…statistical data in order to detect trends for the International Programmes.... The data presented to these committees include the following: student applications, offers, new and total registrations, examination pass rates, assessment offences and awards. In addition, individual programme data on recruitment, progression, retention and examination performance are monitored as part of the Annual Programme and Planning Review process, with observations being included in the Annual Programme Reports'. These management statistics are made available for each programme team by the International Programmes, and are formally presented in the second section of the APR, having been considered at the APPR meeting. The University acknowledges that little data is available on student progression, although recognising that such an analysis is difficult to meaningfully interpret in the context of programmes through which students progress at their own pace. Through its reading of APRs and records of PPR events, and from discussions with staff, the audit team appreciated the challenges of working with legacy student record

systems, but concluded that the data currently available for monitoring and review purposes provided sufficient information to enable the processes to operate satisfactorily.

95   Work is currently underway to define a model for student progression and retention, in order to provide a context for data considered through committees and to allow for a qualitative as well as quantitative analysis. The audit team heard how the University 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. The University is thus someway behind their ambition to respond to the recommendations of the last QAA audit in a more timely manner (see also paragraph 16).

96   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 QASL 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 APPR, and appropriate follow-up action was identified and agreed.

97   In summary, the International Programmes continues to maintain a legacy student management system which, on the whole, provides sufficient, timely and robust data to enable tracking of individual students through their study (but see paragraph 150), and to provide programme-level data for annual and periodic review activities. Significant investment in a commercial student record system is underway, and elements of the system have already been rolled out. The International Programmes intends that the system will provide 'cradle to grave' (enquiry to graduation) student tracking, student performance and financial management information within the next two years.

Section 3: Institutional management of learning opportunities

98   As stated earlier, for most programmes there is no requirement on students to attend for study, indeed most programmes have been designed so that they can be completed through independent study. In this teaching model the management of learning opportunities by the International Programmes could be seen to be minimal: the focus of the management of the International Programmes is primarily on securing academic standards, rather than setting out to ensure a consistent quality of learning opportunities. However, increasingly, the International Programmes seeks to support students itself (for example through the provision of a virtual learning environment) and encourage enhancement of the support provided by independent teaching institutions. This section of the report deals with management of learning opportunities which are considered to fall within the International Programmes' responsibility. Matters related to those institutions which have Diploma Teaching Status are dealt with in Section 5.

99   In the past year progress has been made to review the teaching model by developing a Learning, Teaching and Assessment Framework (LTAF) which will incorporate lead college strategies for teaching and learning. Complementing the LTAF, developments are expected on the new academic model for programme development that focuses on enhanced support for learners in all new, future programmes. Against this backdrop, the models of teaching and learning adopted by lead colleges vary by college, programme, module and level, although agreement exists in considering the student as an independent

learner. The International Programmes is making some progress in using the student voice in decision making and is beginning to definitively state what students can expect in the Student Charter (2011) (see paragraphs 18 and 134).

Academic Infrastructure and other external reference points

100   This area has been dealt with under Section 2.

Approval, monitoring and review of programmes

101   This area has been dealt with under Section 2.

Management information - feedback from students

102   This area has been dealt with under section 2. See also paragraphs 61 and 133.

Role of students in quality assurance

103   The International Programmes now places importance on inviting and listening to student views. Lead colleges and consortia have their own various approaches, sometimes including student representation. There is a student member of Academic Committee, and practice now is enabling student membership of most subcommittees and on thematic reviews with the purpose of enhancing quality. At the mid-cycle review 2008 it was noted that current initiatives included strategies to develop the range of student feedback activities and student representation. The annual student survey, committee membership, the reports from, and support of the student written submission, indicate actions taken.

104   Having formalised the committee structure to address the Academic Infrastructure helps the International Programmes to be in a stronger position to receive and consider approaches to student involvement and consider feedback from various sources. There is some evidence of consideration of wider institutional learning across lead colleges in this respect, as the latter learn from each other through the International Programmes' committees regarding, for example, the virtual learning environment and provision of learning materials. For the International Programmes, the opportunity for systematically embedding continuous improvement derived from student participation and feedback has occurred mainly in the year prior to audit. The approach is actively developing; student committee members comment on their views being positively received; some good practice has been identified, but processes cannot yet be considered embedded. The Student Voice Project (see paragraph 133) has only recently begun and is not widely known about.

105   The audit team found the student written submission (SWS) a comprehensive and helpful document for the International Programmes. The submission and the report have been received by senior management and committees. The SWS was compiled by a former University of London Union (ULU) president, now a Liaison Manager on contract to the ULU, who travelled extensively to elicit student views. Evidence from student members of the International Programmes' committees was included in the SWS, as were students through the ULU SWS online survey and alumni. The SWS is an informative document summarising a wide range of views and making practical recommendations, many of which were endorsed by students with whom the audit team met.

106   The International Programmes is trying to hear the student voice in person as well as electronically through developing opportunities in the virtual learning environment. Information is regularly being put on the web. As students are so widely dispersed and working at a distance, full representation is a challenge. The International Programmes pays

expenses to UK-based students, but it was clear to the audit team that the full range of international students still needs to be engaged. Student members the audit team spoke to were enthusiastic and well informed about their roles and the committee structure, but there is limited evidence of embedded practice and success in making a difference to engagement.

107   There is evidence of student representation at independent teaching institutions with some evidence of success in getting results in changes to study guides (by a lead college) and on administrative issues like improved access formalities. Informal feedback is also collected from students in inspection and approval visits to independent teaching institutions. Lead college academics visit all institutions with Diploma Teaching Status at least once a year. Feedback from lead college visits to independent teaching institutions is channelled into changes in practice through a variety of means, including annual programme and planning review (APPR).

108   Overall, there is inconsistency but considerable recent progress in enhancing the role of students in quality assurance. Some work remains to be done to engage the full range of international students.

Links between research or scholarly activity and learning opportunities

109   Scholarship and research devoted to pedagogy, vocational and distance learning is championed by investment in the Centre for Distance Education (CDE).

110   The CDE holds special interest seminars, workshops and an annual conference. Effectiveness measured by attendance indicates over 100 staff attended annual events from across lead colleges. Sessions are led by researchers well established in relevant fields, including assessment, collaborative learning online and approaches to improve retention. There is evidence of learning technologists and others developing learning opportunities from their knowledge and such research activity. Students indicated where they had benefitted from using recently developed online activities such as formative assessment.

111   Lead college staff encourage independent teaching institutions to integrate online activities into their teaching. In the SWS, students from some independent teaching institutions reported that they found considerable value in sessions led by academics from lead colleges, where they were able to learn directly from research into teaching. At the same time, the SWS and lead colleges noted variable practices in teaching and variation in the quality of provision of teaching and service in some independent institutions. Concern was expressed by a lead college that some students were 'spoon-fed' and not encouraged to be independent learners. Students value research-led teaching as do the academics marking assessment. External examiner reports and discussions at quality committees indicate strong performances from the International Programmes' students, especially postgraduates in projects and dissertations, and programme designs are highly praised. There is evidence of initiatives including training and development provided by lead colleges for lecturers at independent institutions so to challenge the teaching model using research to better deliver the student experience.

112   Postgraduate students the audit team met, and evidence from those in the SWS, indicated they benefit from opportunities to engage with research-active lecturers, especially via email. When active exchange occurred, this was considered very good. This is, however, a variable opportunity depending on lead college approach, the robustness of the relationship, individual lecturers, and payment of supplementary fees for formative assessment. The audit team met staff working on large-scale programmes at undergraduate

level and who expressed some concerns about managing student expectations, given the growing accessibility to staff through the virtual learning environment. They suggested that the new Student Charter might help define expectations. Postgraduate students expressed concern about the growing size of online groups.

113   The International Programmes staff manage the interface between the International Programmes and lead colleges to ensure the proactive management of study guides. These are showing evidence of research delivering enhanced learning opportunities.

114   Ownership of the overall teaching and learning framework and overseeing its implementation is a shared one with lead colleges. The Learning, Teaching and Assessment Sub-committee (LTAS) is considering and agreeing new ways forward, which involve enhancing programme development to meet the changing needs of students, and the Learning and Teaching Framework puts more emphasis on learning design so using student feedback and reducing the 'focus on content per se'. The audit team considers that the International Programmes might steer this more proactively to have a robust framework to manage student expectations and facilitate further the sharing of good practice among staff. LTAS noted that, as increased use of the virtual learning environment is required, contracts with lead colleges will reflect the amount of use a college is likely to make of the virtual learning environment.

Resources for learning

115   The International Programmes has invested considerably in the virtual learning environment as a strategic direction of travel integrated with the Learning and Teaching Framework to assure a future which will be robust for expansion of student numbers and managing expectations for more interactive learning. The virtual learning environment, as part of the business transformation programme, is a feature offering considerable resource to learners and its potential is an asset to the learning model. It aims to provide a range of services under one URL. The International Programmes has invested in a portal project which has begun to enhance and simplify the gateway for students into their studies and to online facilities. Having begun with facilitating online entry, it is moving its focus towards student information. There is access to the online library, resources, networks and email. It enables lead colleges to deliver news; subject guides; study packs and handbooks; discussion forums; computer marked assessments; legal research exercises; online presentations; and recorded lectures. The Bloomsbury Learning Environment (BLE) embraces a virtual learning environment for the lead colleges who are members of it and is separately developing its learning opportunities. Students the audit team met complained of complexities of signing on to the various BLE resources. This should be eliminated when the International Programmes portal subsumes this aspect. It was the view of the learning technologists and some students to whom the audit team spoke that improving the simplicity with which students access their learning resources is likely to help usage. Investment of research funding is further likely to develop the platform and related staff abilities to enable and encourage learning. The International Programmes is developing jointly the overarching learning framework to drive this expansion.

116   The University of London International Programmes Strategic Plan 2009-12 notes in its second aim (Quality change): 'for a number of years the External System has been on a journey from being an exam provider to offering complete programmes of education, and very substantial progress has been achieved'. Students in the SWS and those to whom the audit team spoke requested more formative assessment. LTAS considers that prioritising this might help satisfy demand while opening up cost and quality issues. The new Learning, Teaching and Assessment Framework is expected by LTAS to help drive this development.

117   LTAS is using the framework to update practice and to outline future levels of support in teaching materials and approaches. The use of examiners' commentaries (notes provided by examiners following an exam to show examples and standards of excellent, good and acceptable answers) was noted by LTAS as needing evaluation and by students as needing updating. Some lead colleges have updated these, and student feedback to the audit team, as well as through student surveys, shows the importance of this activity to students.

118   Although the International Programmes aims to widen participation in higher education, little mention is made of managing additional needs certain students may require for successful study. Recently, the International Programmes has established a subcommittee to address such issues and the audit team heard of progress from students. Inclusivity is not itemised in agreements with independent teaching institutions with Diploma Teaching Status and consideration might be given to this, informed by the *Code of practice, Section 3: Disabled students*.

119   The Student Charter, recently posted to the website, was new to students the audit team met or not known by those beyond the UK. It was said to be a fair representation by those students who had read it. Staff suggested it might be successful in managing expectations. Already, LTAS has identified the need for some consistency with any charters issued by independent teaching institutions with Diploma Teaching Status.

120   Students have access to the online library once they are registered. Overseas students the audit team met valued the library and managed to develop sufficient skill to search for what they wanted using guides online. There is an additional payment if a student is in London and wants to have full lending rights. The Laws library online has been developed through investment and in response to student feedback. It now offers extensive databases and facilities for learning navigation and how to search.

Admissions policy

121   All admissions are managed by the staff of the International Programmes at its London base, Stewart House. Certain recognised centres may facilitate by verifying qualifications, helping with advice and guidance and so on. Staff were clear that this is a vital part of maintaining integrity and quality. Students who fail to meet the minimum entry levels are advised to study a foundation year offered at independent teaching institutions.

122   Applicants are clearly informed of minimum qualification on the websites. APPRs occasionally identify problematic levels of English language (see paragraph 63) but a minimum standard is required. With a diploma from a recognised independent teaching institution with Diploma Teaching Status, which includes relevant passes prescribed by the lead college or consortia, students can progress to levels 5 and 6. Students identified difficulties concerning access to centres for some administrative processes, especially at certain independent teaching institutions.

123   Statistics available show that the International Programmes students generally achieve a smaller proportion of good honours awards compared to the rest of the sector. LTAS discussions emphasised that achievement of the defined academic standards was essential, and that students must be recruited with integrity, in the full knowledge of the challenges of independent study, and the associated reduced prospects of achieving high classifications.

Staff support (including staff development)

124   The International Programmes assures itself of identifying and addressing staff development needs formally through annual appraisal and informally as needs arise. The strategic plan indicates that success of the mission of the International Programmes depends on staff and their capability to deliver change.

125   Admissions staff have regular updates on processes and knowledge, referring more complex queries to lead college or consortia staff. Student feedback suggests the information, advice and guidance by admissions staff is good. The International Programmes' staff make use of the University staff development team as required and can take the International Programmes' courses at reduced rates. The CDE offers the chance to keep up with online pedagogy and there is evidence of interest at regular seminars and annual conference. Visiting fellows offer the chance to share knowledge.

126   Variable opportunities are offered to staff at independent teaching institutions by the International Programmes and/or lead colleges. These include twice yearly conferences to which they may be invited and occasionally helped with travel costs. Some programmes develop tutor notes.

127   Evaluation of staff development can be difficult to measure, especially as there is no evident overall staff development plan. The Strategic Information Technology Services (SITS) student record system may be able to help with evidence. The Learning, Teaching and Assessment Framework should identify where gaps may be and how to address them.

128   In summary, regarding student learning opportunities and students' expectations, the Student Charter developed in 2011, while setting out what students might expect to receive from the International Programmes during their course of study, does not define minimum levels of provision. There is substantial ongoing activity in the Learning Teaching and Assessment Sub-committee. It is, however, too early to say whether and how the implementation plan for the Learning, Teaching and Assessment Framework will have an impact on developing further the definition of minimum standards of provision, including the proposed core standards. The Framework's efficacy will depend on an effective mapping to strategies for learning and teaching of the lead colleges. Lead colleges currently take their own approaches to teaching, and the International Programmes' deliberative systems will need to be able to identify through, for example, APPR and programme approval, whether the adopted core standards are being met**.**

Section 4: Institutional approach to quality enhancement

129   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. The recent QAA audit of the International Programmes' involvement with the Singapore Institute of Management stated that enhancement activity was largely found to be the responsibility of the lead colleges.

130   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 (SITS) management information system. Examples of enhanced student support and new assessment include the undergraduate law programme which is utilising technology more for its delivery. Identifying good practice is achieved through the Annual Programme Planning and Review process and the periodic review processes currently in place and considered at academy level by the Quality Assurance and Student Lifecycle Sub-committee and the Academic Committee. Regarding the dissemination of good practice, the programme managers play a crucial role at both formal and informal levels. The providers conference for the undergraduate law programme for the staff in independent teaching institutions is a good example of enhancement in practice through the sharing of good practice. This event promoted the establishment of Communities of Practice for sharing good practice in undergraduate law provision. The introduction of SITS (see paragraph 135) will enhance student experience by producing a faster turnaround for offers.

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

132   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. Each programme currently offers students a degree programme at an academic standard of the lead college, a variety of learning resources, a robust examination process and guidance on university regulations. This approach derives from the mission statement and the International Programmes' desire to keep the programmes it offers affordable. Enhancements therefore currently focus on extending the range of formats of materials available to students and the range and type of interactions with students.

133   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. Good examples of using feedback from students to produce enhancement are demonstrated by the International Primary Health Care programme and the London School of Hygiene and Tropical Medicine. This work is currently being extended and deepened trough the Student Voice Project. The Student Voice Project 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 representative 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 the team considers that it has great potential to enhance the student experience. The International Programmes is therefore encouraged to continue to support this important initiative.

134   During a meeting with senior staff on the briefing visit, it was stated that the recent introduction of the Student Charter was a good example of the academy's commitment to improving the learning experience of students. The students who met the panel during the briefing visit indicated their support for the Charter and were impressed by the International

Programmes' desire to obtain feedback from them on their experience through student surveys. In contrast, the students who met the panel on the audit visit were unaware of the existence of the Charter. The International Programmes is therefore encouraged to ensure that the Charter is more widely promoted to the students. The students the audit team met stated that the enhancements they would wish to see implemented are improved feedback on their performance, a greater range of assessment methods and an improvement in their engagement with the University of London.

135   The e-Benchmarking exercise undertaken by the International Programmes in 2008 gave the programmes a reference point for future development and stated that such exercise undertaken on a regular basis would provide a vehicle for enhancement and the sharing of good practice. In the briefing paper, the International Programmes highlights three examples of technology-driven enhancement currently in place or underway. The new SITS management information system and the Portal project are due to be fully implemented by 2012. This 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. Good examples of this discussed with the audit team are the video tutorials in statistics provided by the London School of Economics and Political Science for the Economics, Management, Finance, and Social Sciences suite of programmes, and the increased use of the virtual learning environment in the undergraduate law programme. 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. Students who met the panel had mixed views on use of the library which were dependent on their area of study. The audit team saw evidence that law students' views are significantly influencing the development and enhancement of the online library.

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

137   Within the governance structure of the University of London, the Collegiate Council has responsibility on behalf of the Board of Trustees, for the determination of academic strategy and policy and for the discharge of academic affairs. Collegiate Council is supported in this by the Academic Quality Advisory Committee (AQAC), which undertakes and submits to the Council the annual University Quality Overview Report. AQAC also promotes quality enhancement and shares good academic practice across the University. The International Programmes is required to submit an annual report to AQAC as part of the process described above which confirms the International Programmes' compliance with University quality assurance regulations and reports on the International Programmes interaction with external examiners, including identification of good practice. In addition, each year the University asks for a commentary on a thematic enquiry. Recently, these have been mitigating circumstances in 2007-08 and student surveys in 2008-09.

138   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

139   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, especially since there is the intention of a formal legal agreement signed by both parties. In these cases all parties are members of the federal University. This section, however, is confined to relationships that the University has with organisations that the University has sanctioned to teach its International Programmes, where such teaching is a mandatory element of the learning process. These relationships are collaborative in the sense used by the *Code of practice, Section 2: Collaborating provision and flexible and distributed learning (including e-learning)*.

140   In its briefing paper, the University explained that, as part of its widening access agenda, some independent teaching institutions had been given Diploma Teaching Status (formerly known as 'permission to teach') to provide education prior to and at the early stages of undergraduate study, initially in some regions where the secondary school system is truncated in comparison to the UK. 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. Diploma Teaching Status is distinct from the recognition of institutions as affiliate or registered, but is encompassed within the Institutions Policy Framework, thus institutions must be recognised before Diploma Teaching Status can be conferred. The lead college or consortium has the responsibility for managing the link.

141   At the time of the audit, five diplomas (in Computing and Information Systems, Creative Computing, Economics, Law, and Social Sciences) were offered in this way 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, though not all students choose to transfer to a degree programme. The diplomas have increased in number from three at the time of the previous audit and constitute a significant proportion of the International Programmes' provision, involving over 4,000 students. For example, of the 50 campuses recognised by the Undergraduate Laws programme consortium, 33 have Diploma Teaching Status for the Diploma in Law.

142   The University's online and paper-based prospectuses indicate that on completion of these diplomas students can progress to the second year of an honours degree and/or it is clearly stated that some study is at first year degree level. This evidence indicates that the diplomas are aligned with level 4 of *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ), that is, at the level of certificate of higher education, and this was confirmed by discussions with university staff. University staff explained to the audit team that the title 'diploma' was applied to these programmes to satisfy local markets where use of the term 'certificate' might indicate study at a lower level. 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, especially since the International Programmes offers other programmes, which are aligned with levels 5 or 6 of the FHEQ, with the word 'diploma' in the award title.

143   Admissions are controlled by the independent teaching institutions, which, through written tests and interview, assess ability, motivation and maturity of candidates. Given that there is automatic progression from the diplomas to an International Programmes degree programme, the independent teaching institutions effectively control some admissions to these degree programmes.

144   The procedure for institutions seeking Diploma Teaching Status is to 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. For example, the London School of Economics and Political Science's criteria in respect of institutions seeking Diploma Teaching Status embrace the following: financial probity, status and stability of the institution; management of the programme; student selection, teaching and learning support; premises; the library; and systems of evaluation. Diploma Teaching Status is granted for a fixed period of typically two to three years after which it has to be renewed and this normally involves re-inspection. 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. For example, there may be guidelines on minimum hours of teaching per unit of study and student attendance requirements. 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, in particular, for all facets of summative assessment. It provides the teaching institution with study materials and guidance on the operation of aspects of the provision from admission to examination, and stipulates the support that students receive. However, the audit team noted an absence of a formal, signed bipartite agreement covering Diploma Teaching Status, that set out the responsibilities of both the University, as the awarding body, and the institution. 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, for example in the event of insolvency of the teaching institution. Consequently, the University is advised 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*.

145   Approval and review of institutions with Diploma Teaching Status is managed by the lead college or consortium, and the audit team heard that lead colleges or consortia make decisions relating to approval and review and report that decision to the Institutions Sub-committee. A scrutiny of the minutes of the Institutions Sub-committee revealed that outcomes from approvals and reviews are reported there and may be approved or merely noted. The team also noted that the Institutions Sub-committee agreed that 'regarding College decisions in respect of Diploma Teaching Status…normally a positive college outcome should be acceptable to ISC', and that a paper presented to the team stated that approvals are presented to the Board of the International Academy for final ratification, but the team could find no evidence of such ratification in the minutes of the Board. The team also noted that the minutes of the Academic Committee stated that 'all permission to teach arrangements must fit into the Framework categories and that the locus of responsibility will continue to be with the Lead College', and that Institutions Sub-committee debated whether 'the Lead College/Consortium makes the decisions on permission to teach…and then reports them onward to Institutions Sub-Committee (and thence Academic Committee) for ratification, or whether it makes recommendations to Institutions Sub-committee, which would in turn then make the decision'. However, the team could not determine the resolution of this debate.

146   In one case, Institutions Sub-committee indicated that an application for Diploma Teaching Status should be approved, subject to endorsement by the Academic Committee, but the audit team was unable find such endorsement, and further noted that only one application for Diploma Teaching Status was explicitly approved by Academic Committee. Although the audit team noted that when one independent teaching institution applied to change the place of study of a Diploma Teaching Status programme, its application was considered by the Institutions Sub-committee, based on staff comment and a scrutiny of committee minutes and other documents, the team considered that the locus of quality management of these awards, in particular decisions relating to approval and review, was

unclear and in some cases rested entirely with the lead college or consortium. The team considered that there was doubt as to whether, in these cases, quality management processes are, effectively, at one remove from the business of the University, even though the University is the awarding body. Consequently, the University is advised 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 is able to exercise appropriate oversight.

147   There are some formal opportunities for the development of staff who teach the diplomas, as part of overall development for staff at institutions within the Institutions Policy Framework (see paragraphs 124 to 128). 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.

148   The audit team viewed examples of diploma certificates and the accompanying transcripts and noted that neither indicated the place of study. As a result, the University is advised 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*.

149   Birkbeck, University of London, is both a lead college and an independent teaching institution with Diploma Teaching Status. The audit team noted that despite its status as a lead college, it is subject to standard approval, monitoring and review procedures as a Diploma Teaching Status independent teaching institution. Birkbeck was admitted to the Institutions Policy Framework following a visit, though no teaching was observed, and much care was taken to ensure that there were no conflicts of interest, especially in relation to teaching, the setting and marking of assessments, and involvement in programme management and development.

Section 6: Institutional arrangements for postgraduate research students

150   In its briefing paper, the University explained that the International Programmes does not offer research degree programmes, though this has not always been the case. The External System (as it then was) last recruited research students in 1998, and by the time of the audit the University thought that most, if not all, had graduated. If any students remained, their supervision would be managed via the lead colleges. Given the long period since the last initial registration, the audit team formed the view that it was very unlikely that any students remained registered with the International Programmes and therefore did not undertake further investigation. However, although the University did not believe that any students remained registered, it was not able to confirm this. This further supports the conclusions of the team concerning management information (see paragraph 94).

Section 7: Published information

151   The process to ensure the accuracy and completeness of printed information, for example the prospectus, is led by the Corporate Performance and Quality directorate together with colleagues from the Global Networks and Communities directorate and the lead colleges. Up to three drafts of the material are widely circulated to all relevant stakeholders before final sign-off and publication.

152   The International Programmes 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.

153   The Global Networks and Communities directorate (GNC), with input from the lead colleges, has responsibility for ensuring the accuracy of information regarding recognised independent teaching institutions, including compliance with the Code of Advertising, which sets out the rules and responsibilities of recognised institutions with respect to advertising University of London International Programmes. Independent teaching institutions which are either recognised or proposed are given guidance by the GNC on the content of their own promotional material. An annual audit of promotional material is undertaken by the GNC which can recommend termination of an agreement if any breach is found. During the audit visit the audit team was provided with two sets of documentation detailing communication between the International Programmes and lead colleges over advertising. 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. The Code of Advertising is recognised as a feature of good practice.

154   The International Programmes is not obliged to provide teaching quality information publicly. However, it does publish programme monitoring information and programme specifications on its website.

155   The student written submission (SWS) makes a number of points regarding the accuracy of published information. The website and prospectuses seem to provide students with accurate information about the International Programmes, programmes on offer, cost implications and nature of study. This point was corroborated by the students the review team 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.

156   The SWS further suggests that smaller teaching institutions have varied in the accuracy of some information published and that there is confusion relating to information about continuation and examination fees. The SWS also indicates that examination centre fees are considered to be too high in some countries, with students unprepared for this. The SWS states that the recent introduction of the Student Charter intends to address issues of variable expectations that have been identified across programmes.

157   The SWS suggests (and the audit team concurs) that the following areas need 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 Learning, Teaching and Assessment Sub-committee had already begun to address some of these issues.

158   The audit team found that, overall, reliance can 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.