

American InterContinental University - London

MAY 2005

Preface

The Quality Assurance Agency for Higher Education (QAA) exists to safeguard the public interest in sound standards of higher education (HE) qualifications and to encourage continuous improvement in the management of the quality of HE.

To do this QAA carries out reviews of individual HE institutions (universities and colleges of HE). In England and Northern Ireland this process is known as institutional audit. QAA operates similar but separate processes in Scotland and Wales.

The purpose of institutional audit

The aims of institutional audit are to meet the public interest in knowing that universities and colleges are:

- providing HE, awards and qualifications of an acceptable quality and an appropriate academic standard, and
- exercising their legal powers to award degrees in a proper manner.

Judgements

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

- the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the quality of its programmes and the academic standards of its awards
- the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that the institution publishes, and about the quality of its programmes and the standards of its awards.

These judgements are expressed as either **broad confidence**, **limited confidence** or **no confidence** and are accompanied by examples of good practice and recommendations for improvement.

Nationally agreed standards

Institutional audit uses a set of nationally agreed reference points, known as the 'Academic Infrastructure', to consider an institution's standards and quality. These are published by QAA and consist of:

- *The framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ), which include descriptions of different HE qualifications*
- *The Code of practice for the assurance of academic quality and standards in higher education*
- subject benchmark statements, which describe the characteristics of degrees in different subjects
- guidelines for preparing programme specifications, which are descriptions of the what is on offer to students in individual programmes of study. They outline the intended knowledge, skills, understanding and attributes of a student completing that programme. They also give details of teaching and assessment methods and link the programme to the FHEQ.

The audit process

Institutional audits are carried out by teams of academics who review the way in which institutions oversee their academic quality and standards. Because they are evaluating their equals, the process is called 'peer review'.

The main elements of institutional audit are:

- a preliminary visit by QAA to the institution nine months before the audit visit
- a self-evaluation document submitted by the institution four months before the audit visit
- a written submission by the student representative body, if they have chosen to do so, four months before the audit visit
- a detailed briefing visit to the institution by the audit team five weeks before the audit visit
- the audit visit, which lasts five days
- the publication of a report on the audit team's judgements and findings 20 weeks after the audit visit.

The evidence for the audit

In order to obtain the evidence for its judgement, the audit team carries out a number of activities, including:

- reviewing the institution's own internal procedures and documents, such as regulations, policy statements, codes of practice, recruitment publications and minutes of relevant meetings, as well as the self-evaluation document itself
- reviewing the written submission from students
- asking questions of relevant staff
- talking to students about their experiences
- exploring how the institution uses the Academic Infrastructure.

The audit team also gathers evidence by focusing on examples of the institution's internal quality assurance processes at work using 'audit trails'. These trails may focus on a particular programme or programmes offered at that institution, when they are known as a 'discipline audit trail'. In addition, the audit team may focus on a particular theme that runs throughout the institution's management of its standards and quality. This is known as a 'thematic enquiry'.

From 2004, institutions will be required to publish information about the quality and standards of their programmes and awards in a format recommended in document 03/51, *Information on quality and standards in higher education: Final guidance*, published by the Higher Education Funding Council for England. The audit team reviews progress towards meeting this requirement.

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ISBN 1 84482 482 9

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Printed copies are available from:

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Registered Charity No 1062746

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Summary

Introduction

A team of auditors from the Quality Assurance Agency for Higher Education (QAA) visited the London Campus of American InterContinental University (AIUL) from 9-13 May 2005 to carry out an institutional audit. The purpose of the audit was to provide public information upon the quality of the opportunities available to students and upon the discharge of responsibility for the awards of the Open University under its validation arrangements. The audit did not seek to arrive at judgements upon other awards offered by AIUL under United States accreditation, or on the wider corporate University of which AIUL is one part.

To arrive at its conclusions the audit team spoke to members of staff, to current students, and read a wide range of documents relating to the way that AIUL manages the academic aspects of its provision.

The words 'academic standards' are used to describe the level of achievement that a student has to reach to gain an award (for example, a degree). It should be at a similar level across the UK.

Academic quality is a way of describing how well the learning opportunities available to students help them to achieve their award. It is about making sure that appropriate teaching, support, assessment and learning opportunities are provided for them.

In institutional audit, both academic standards and academic quality are reviewed.

Outcome of the audit

As a result of its investigations, the audit team's view of AIUL is that:

- at present, no confidence can be placed in the soundness of AIUL's management of the quality of its programmes
- at present, there can be no confidence in AIUL's institutional level capacity to manage effectively the security of the awards validated by the Open University.

Features of good practice

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

- the quality of support for students offered through the Counselling Service
- the support provided for a wide range of internships offering professional experience to students
- the development of templates for the formative assessment of dissertations in the Department of Fashion
- the staff development days organised by the Departments of Fashion and Business Studies.

Recommendations for action

The audit team also recommends that AIUL should consider further action in a number of areas to ensure that the academic quality and standards of the awards it offers are maintained.

It is essential that AIUL:

- ensures that the management of standards is fully informed by a rigorous and scrupulous institutional consideration of all external examiners' reports and the provision of adequate and complete responses to these reports
- ensures that all American InterContinental University London, and American InterContinental University (Corporate), promotional, marketing and advisory materials relating to the UK awards available to students on completion of study at AIUL are accurate, complete, unambiguous and do not mislead.

The team advises AIUL to:

- clarify and embed further its policies, structures and procedures for the management of quality and standards, thereby providing accountability at programme level and collective responsibility at institutional level
- develop a comprehensive and integrated approach to the provision of its student services

- put in place an effective system for two-way communication with students on all aspects of the student experience on the AIUL campus.

It would be desirable for AIUL to:

- identify relevant functions and purposes for exploiting the student data that it gathers
- further extend the positive work of the Faculty and Staff Development Committee in providing professional development opportunities for faculty teams and individuals.

both good practice and academic standards. The findings of the audit suggest that AIUL has made an initial response to the FHEQ, subject benchmark statements, programme specifications and the *Code of Practice for the assurance of academic quality and standards in higher education*, published by QAA, but these reference points are still to be fully incorporated into the work of the institution.

Summary outcomes of the discipline audit trails

BA Hons Business Administration

The audit was not able to confirm that the standard of student achievement in this programme is currently appropriate to the title of the award and its location within *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ), published by the QAA, or that the quality of learning opportunities available to students is suitable for a programme of study leading to the award of BA Hons Business Administration.

BA Hons Fashion Design, BA Hons Fashion Marketing, BA Hons Fashion Design and Marketing

The standard of student achievement in the programmes is appropriate to the titles of the awards and their location within the FHEQ. The quality of learning opportunities available to students is suitable for a programme of study leading to the awards of BA Hons Fashion Design, BA Hons Fashion Marketing and BA Hons Fashion Design and Marketing.

National reference points

To provide further evidence to support its findings the audit team also investigated the use made by AIUL of the Academic Infrastructure which has developed on behalf of the whole of UK higher education. The Academic Infrastructure is a set of nationally agreed reference points that help to define

Main report

Main report

1 An institutional audit of the American InterContinental University London (AIUL, the London Campus) was undertaken from 9-13 May 2005. The purpose of the audit was to provide public information on the quality of the opportunities available to students and on the discharge of responsibility for the awards of the Open University under its validation arrangements.

2 The audit was carried out using a process developed by the Quality Assurance Agency for Higher Education (QAA) in partnership with the Higher Education Funding Council for England (HEFCE), the Standing Conference of Principals (SCOP) and Universities UK (UUK), and endorsed by the Department for Education and Skills. For institutions in England, it replaces the previous processes of continuation audit, undertaken by QAA at the request of UUK and SCOP, and universal subject review, undertaken by QAA on behalf of HEFCE, as part of the latter's statutory responsibility for assessing the quality of education that it funds. The audit took place as a result of AIUL's successful application to become a subscriber to QAA and this was AIUL's first experience of academic audit.

3 The audit checked the effectiveness of AIUL's procedures for establishing and maintaining the academic standards of its validated programmes; for reviewing and enhancing the quality of its programmes of study; for publishing reliable information; and for the discharge of its responsibilities under its institutional accreditation and validation arrangements for providing degrees awarded by the Open University. As part of the audit process, according to protocols agreed with HEFCE, SCOP and UUK, the audit included consideration of an example of institutional processes at work at the level of the programme, through discipline audit trails (DATS), together with examples of those processes operating at the level of the institution as a whole. While drawing into consideration the general management of quality in the institution, the scope of the audit

centred upon those programmes offered by AIUL which lead to awards, validated by the Open University, that fall within the framework for UK higher education.

Section 1: Introduction: the American InterContinental University - London

The institution and its mission

4 AIUL is the London Campus of the American InterContinental University, a federal university institution based in Atlanta, Georgia (henceforth referred to as 'AIU Corporate' or 'the University'). This is described in AIUL's self evaluation document (SED) as a private, for-profit university with campuses in the USA, London and Dubai. AIUL as an institution for higher education was originally founded in 1970 as the American Fashion College of Switzerland, in Lucerne. It was chartered as an American degree-awarding institution in 1971, initially offering Associate degrees and from 1974, Bachelor's degrees. In 1978 the campus moved to London as the American College in London. In 1995 ownership passed to the American InterContinental University. AIUL was recognised by the UK authorities as being able to offer courses leading to a degree of a recognised body in 1998. AIUL is now one of the seven AIU (Corporate) campuses worldwide. In 2001, AIU (Corporate) was purchased by Career Education Corporation of Chicago, USA (CEC), a major American provider of private education. The London Campus is located in a number of buildings sited in Marylebone, central London.

5 AIU (Corporate), across all its campuses, is licensed as a degree-granting institution by the Nonpublic Postsecondary Education Commission of the State of Georgia, USA, and is accredited by the Commission on Colleges of the Southern Association of Colleges and Schools, Decatur, Georgia (SACS). In 2002, AIU (Corporate) underwent its decennial 'Reaffirmation of Accreditation' by SACS. In addition to these American licensures and

accreditations which encompass the corporate University, AIUL has specific and separate UK accreditation. In August 1998 AIUL applied for the validation of a range of its programmes by the Open University Validation Services (OUVS), to award the degrees of the Open University to successful AIUL degree-level students.

Institutional accreditation (which accompanied this validation process) was granted for the period 1999 to 2004. The review of this accreditation was undertaken in October 2004 and resulted in renewal for a further period of two years. AIUL has sought to establish itself as a member institution of the UK higher education community, and in recent years has become an Associate member of SCOP (2002), a member of the Council of Validating Universities (2002), a subscribing member of QAA (2002) and a member of the Universities and Colleges Admissions Service (UCAS) (2003).

6 AIUL is therefore accredited by SACS to award a range of American undergraduate and graduate degrees. A part of this provision is also validated by OUVS, leading to the awards of the Open University in the subject areas of business, fashion, interior design, visual communication, and media production. It is this latter provision that is the principal focus of the audit. AIUL also offers programmes in other subjects, for instance computing, and a number of master's programmes.

7 AIUL is a relatively small institution. Since 1997 the total number of students registered by the institution has been between a minimum of 618 and a peak of 1,048 (in 2000). In spring 2004 there was a total of 873 registrations, of which 692 sought degrees. The audit team was told that about 20 per cent of students study part-time. Calculation of student numbers is a complex operation due to the pattern of part-time student numbers, the availability of multiple entry points to programmes across the year, and the substantial number of United States (US) students who take modules as part of a regular US Study Abroad Programme (SAP) offered by AIUL. Well over one-third of the registrations in

2004 were for courses in business (295), with courses involving the Fashion Department registering 135 students. Not all registered students proceed to the final award stage. In October 2004 the academic staff establishment at AIUL comprised some 25 full-time, salaried staff and a further 39 part-time faculty (see also below, paragraph 106). In addition, approximately 80 staff work in academic-related and support areas, the majority on full-time contracts.

8 The Governance of AIU (Corporate) in the US is vested in a Governing Board, to which the University's Chief Executive and Chief Academic Officer are both accountable. The AIU Governing Board meets in Atlanta, Georgia, three or four times a year. In London, the chief executive of AIUL is the Campus President, who reports to the chief executive of AIU (Corporate). In the SED, AIUL stated that a 'flat management structure' is operated across the organisation, appropriate to its small size. The Campus President meets with the heads of the campus management units on a fortnightly basis, constituting the central management team. The seven academic departments are each headed by a programme dean, and the deans are ex officio members of the Academic Management Committee (AMC). As with a number of other academic committees at AIUL, this is chaired by the Senior Vice-President and Academic Dean, described in the SED as 'de facto and de jure [the]...chief academic officer', with the responsibility for overall academic management.

9 The SED summarised the AIUL mission, which is derived from the AIU (Corporate) Mission Statement and Purpose-Related Goals, as being that of a career-oriented university dedicated to the preparation of its students academically, personally and professionally for the world of work. The SED also characterised the distinctiveness of the London Campus's provision as residing in a combination of the vocational orientation of its programmes, the advantages of its small size, its international student population, its dual accreditation and quality assurance relationships, its customer-

friendly ethos and its central London location.

10 AIUL has no collaborative provision under which other institutions act as partners in the delivery of its programmes. It has a number of articulation agreements relating to student admission, credit and transfer (see paragraphs 133-134 below).

Background information

11 The publicly available information for this audit was that provided by AIUL prospectuses, and published on its website. As a private institution, AIUL is not subject to the requirements and expectations relating to the provision of public information set out by HEFCE. No previous QAA audit reports or subject review reports were available for consideration.

12 AIUL initially provided QAA with:

- an institutional SED, together with two substantial dossiers of appendices
- a discipline self-evaluation document (DSED) for each of the two subject areas selected for the DATs.

13 During the briefing and audit visits, the audit team was provided with a considerable number of additional documents, in hard copy and on disc. These included the reports of accrediting bodies (see below paragraphs 82-92). During the audit visit, AIUL provided a range of requested illustrative documentation relating to the principles and practice of the London Campus, including committee minutes, documentation relating to the selected DATs, external examiners' reports and related documentation, and examples of student's assessed work.

The audit process

14 A preliminary meeting was held at AIUL in July 2004. Matters discussed included the range of provision at AIUL, the pattern of internal monitoring and review, the distribution of students across programmes and the relationship with OUVS as the validating agency for AIUL UK awards. Following the preliminary meeting QAA

confirmed that two DATs would be conducted during the audit visit. QAA received the institutional SED in December 2004.

15 On the basis of the SED and other available information, the audit team confirmed that the DATs would focus on the discipline areas of business and fashion. AIUL provided QAA with DSEDs and supporting documentation for these DATs in February 2005.

16 At the preliminary meeting for the audit, the students at AIUL were invited, through their Student Government Association (SGA) to submit a separate document expressing views on the student experience at the University, and identifying any matters of concern or commendation with respect to the quality of programmes and the academic standards of awards. They were also invited to give their views on the level of representation afforded to them, and on the extent to which their views were noted and acted upon. The student written submission (SWS) was received by QAA in February 2005, and took the form of a brief but indicative statement, with no claim to be fully representative (see below paragraphs 96-97). The audit team is grateful to the officers of the SGA for preparing this statement to support the audit.

17 A briefing visit was conducted at AIUL from 28 February to 3 March 2005. The purpose of this briefing visit was to explore with the Senior Vice-President, senior members of staff and student representatives, matters of institutional-level management of quality and standards, raised by the University's SED, the SWS and published documentation. At the close of the briefing visit, a programme of meetings for the audit visit was agreed with AIUL.

18 The audit visit took place from 8 to 13 May 2005. During the visit, 10 meetings were held at institutional level with groups of staff and students at AIUL. Meetings were also held with staff and students in the two DAT subject areas. The audit team is grateful to all those who made themselves available to discuss the AIUL arrangements for the management of academic quality and standards.

19 The audit team comprised Dr P Campbell, Professor M Everist, Dr H Fletcher and Professor H Griffiths (auditors) and Ms S Lang (audit secretary). The audit was coordinated for QAA by Dr PJA Findlay, Assistant Director, Reviews Group.

Section 2: The audit investigations: institutional processes

The institution's view as expressed in the SED

20 The SED listed the major characteristics of the AIUL framework for the assurance and enhancement of quality and standards. These included:

- an explicit framework for external oversight by AIUL's accrediting/validating agencies
- the careful consideration of reports received from accrediting/validating agencies
- the definition of standards
- the systematic and scrupulous consideration of reports from external examiners
- quality assurance procedures for course design, approval, monitoring and review
- the aspiration to progressively devolve responsibility to the departmental level, whilst at the same time maintaining an appropriate level of oversight at the Campus level
- the involvement of a wide range of staff
- a strong emphasis on student consultation
- close liaison between committees and clarity of roles and responsibilities.

21 In describing this framework, the SED explained in detail the particular context of the dual accreditation of AIUL programmes and awards (see paragraphs 5-6 above) and identified a number of interrelated elements which operated within the two separate accreditation systems, and the consequent

differences in the focus of external review requirements. The SED drew particular notice to the importance of features of compliance within SACS as they were applied to AIU as a corporate body and to AIUL. The SED further explained that in assuring the quality of its programmes and in order to comply with its SACS accreditation requirements there was a need to acknowledge the emphasis which was placed upon such input-related measures as academic resource infrastructures, academic remuneration and contractual matters, and the evaluation of faculty (academic staff) by students. These examples together with the evaluation of academic staff performance within periodic appraisal procedures were identified within the SED as being some of the key features of SACS requirements.

22 The SED proposed that as a result of its dual accreditation, AIUL was required to operate within a 'greater array of quality assurance processes than any other campus of the University'. The SED indicated that as a consequence its quality assurance processes were operating at the Campus level, at the OUVS-validated degree level and at the individual programme level. The SED further defined the AIU London Campus and OUVS-validated degree levels of activity as constituting a 'quality assurance' focus for its activities while programme level processes were identified as 'quality management' activities. These three interrelated processes and their 'smooth, effective and efficient operation' are regarded by AIUL as 'pivotal to the delivery of the academic programmes'. The SED recognised however that AIUL's quality assurance and management processes had not previously worked as effectively or transparently as it now believed they were doing, and further acknowledged that 'although a great deal has been achieved, much remains to be done'.

23 The SED also included a substantial account of issues and matters for clarification that had arisen within the accreditation relationship between the OUVS and AIUL. A number of these matters related to AIUL processes for the assurance of academic quality

and particularly the manner in which the confirmation of the academic standards achieved by students within AIUL programmes could be agreed. Particular matters for resolution had included clarification of accountability for the process of academic assessment, ownership of the process, responsibility for action, and the determination of roles and responsibilities within the accreditation relationship itself.

24 During the audit visit, AIUL made available the newly produced 2005 AIUL Quality Assurance Handbook, which contains details of course approval requirements as well as those for programme monitoring, and procedures for course evaluation and for matters associated with the approval and appointment of external examiners. The Handbook provides details of the programme annual monitoring process as well as the recently introduced periodic review procedure and subsequent departmental review requirements. There is also a section detailing the requirements for AIUL 'articulation' or credit transfer agreements with other institutions. In addition AIUL publishes annually a Faculty Handbook and a Student Handbook. The April 2005 edition of the Faculty Handbook includes a summary of AIUL's mission and organisational structure, staff recruitment and promotion policies, selected curriculum development policy and student management requirements. The Student Handbook includes information on academic and general policies related to information technology (IT) access and learning technology support, student responsibilities and student affairs.

The institution's framework for managing quality and standards

Organisational structures and committees

25 Documentation accompanying the SED included a comprehensive organisational diagram, which explained the committee and line management structure operating within AIUL. Within this organisational framework AIUL has two complementary management systems. These are responsible, respectively, for overseeing the academic, and the support and

administrative, activities. The academic committee structure includes the Academic Board, the Academic Management Committee (AMC), the Faculty and Staff Development Committee (FSDC), the Admissions Committee, the Learning and Teaching Committee (LTC), the Academic Planning Committee (APC), and the Library Committee. There is also a provision for the establishment of ad hoc working parties. These have included, for example, a working party established to consider the use of assessment criteria within AIUL. The Academic Board, which meets three times each year, includes three members external to AIUL and also has the benefit of an Academic Advisory Council with external membership. Line management of all faculty (academic staff) and academic support staff is the responsibility of the Senior Vice-President and Academic Dean who also chairs Academic Board, and the AMC, and has a substantial involvement in all academic decision-making. Each academic programme area has a programme dean who is responsible for the academic courses (modules) in their area, and the named awards which are delivered in the area. Major academic support functions include the Department of Academic Affairs, headed by the Academic Registrar, the Director of Library and Information resources, the Head of Media Education Services, and an administrative and academically focused post of Institutional Research Officer.

26 The administrative and academic support committee structure includes the Campus Executive Committee (CEC), which receives reports from other administrative committees but which also considers matters associated with facilities provided to support the academic provision. There is a separate line management responsibility held by the Campus President which includes responsibility for all administrative and support facilities including human resources and personnel functions, IT services, student support services, marketing and promotional services, student portal communications and all aspects of non-academic student management.

27 AIUL also has a Campus Institutional Effectiveness Committee (IEC), which acts as a management 'bridge' between the academic and administrative committee structures. The IEC is chaired by the Senior Vice-President, and has direct accountability to AIU (Corporate) for all AIUL strategic planning; it is guided by the AIU (Corporate) Institutional Effectiveness and Assessment Planning Guides and planning cycles. The IEC receives academic programme reports on operational planning matters and programme achievement targets as well as reports on student recruitment, student satisfaction and other surveys, examination protocols, individual programme development plans, SACS accreditation requirements and reports on financial and resource related matters. The IEC produces an annual executive summary of AIUL's Campus Performance, which is submitted to AIU (Corporate) for consideration and comment. This Campus Performance Report includes a financial report, a review of curricula development, an overview of student recruitment and associated performance indicators including student retention and credit transfer matters. There is also a consideration of teaching and learning, of student support and guidance, of student progression and achievement, of learning resource provision and of quality assurance, quality management and quality enhancement issues. In the IEC Executive Summary report for 2003, AIUL described the role of the IEC as being 'the primary guardian of process compliance'. Thus, for instance, in managing AIUL's mapping of its compliance with the various sections of the *Code of Practice for the assurance of standards in higher education (Code of practice)*, published by the QAA, the AIUL IEC had identified members of the campus who were to take responsibility for oversight of specific sections of the *Code* and their implementation. However, although certain elements of the business agenda of the IEC could be seen to be reflecting upon, informing and supporting the development of a quality assurance and academic standards framework, in the view of the audit team these did not provide an overarching basis for developing,

embedding or strategically enhancing the academic strategy of AIUL. The work of IEC had been undertaken by a limited membership of staff which was not representative of the faculty, and contributory attendance had often been low. The committee structure reporting lines also indicated no clear relationship between the Academic Board and the IEC.

28 The SED further explained that the Academic Board and its committees are 'at the heart of the Campus's system of quality assurance for taught course provision'. The Academic Board is also identified by AIUL as the 'primary guardian both of academic standards and of academic quality in relation to all OUVS-validated degrees'. In undertaking its responsibilities it is intended that the Board should have oversight of all annual monitoring procedures, approve annual monitoring reports submitted to OUVS, approve the appointment of external examiners and of academic policies, and oversee the relationship with the OUVS. In addition the Board receives and comments upon overview reports which relate to compliance with the *Code of Practice* and the FHEQ, published by the QAA.

29 The audit team noted that much of the academic and administrative committee structure and framework within which academic standards and quality assurance was managed had been established only recently. This framework was continuing to evolve as AIUL matured as an academic organisation and adjusted to the requirements of its validating University and the demands of operating a dual accreditation framework. Thus the IEC had been established in 2002, and this had been followed with the establishment of the LTC as recently as 2004. The LTC had then been given the specific task of developing an internal periodic review process, which had not existed previously. Similarly, the APC had only recently been established in 2004. It was difficult for the team to make a confident judgement on the efficacy or otherwise of such recently established committees. In considering the committee structure, however, the team observed that a considerable number of the

academic-related committees were chaired by the Senior Vice-President and Academic Dean, and also that there was overlapping membership in the major committees which was, in part, a reflection of the small number of staff. From the minutes available to the team it was clear that some meetings of committees had a very small number of members attending.

30 The audit team formed the view that the structure was still evolving and had yet to be robustly established. It appeared that the intention within AIUL for the appropriate establishment of academic standards and quality assurance procedures which complied with UK requirements had only become fully explicit with AIUL's entry to membership of QAA in 2002, but that the response was still in development. The team also noted that, partly in response to an October 2004 Institutional Reaccreditation Review conducted by the OUVS, the constitution, terms of reference and membership of AIUL Academic Board, AMC and the FSDC had all been revised in 2005 and that the committee structure was under continuing review. These revisions included an extended opportunity for students to contribute to university debate through increased membership of committees, extended the elected representation from AIUL academic staff and increased the level of external membership on committees, all of which the team considered to be helpful developments.

31 While these initiatives aimed at underpinning the quality assurance and academic standards framework were recognised by the audit team there were a number of issues that remained to be addressed. The initial OUVS accreditation report of 1999 had anticipated a transition within AIUL from a managerial to a more collective responsibility, particularly 'for aspects of quality management and review'. The OUVS report of the AIUL Institutional Review (reaccreditation) visit of October 2004 noted however, that 'progress on this front had been limited' and that 'the Academic Board had yet to emerge as an academic authority trusted to take an effective

part in the work of the campus and taking a full rather than a formal responsibility for quality assurance and enhancement'.

32 The audit team considered the minutes of the Academic Board and its subcommittees and, on the basis of the evidence in these records, concurred with the concerns expressed by OUVS. The team formed the view that while enhancement of the quality assurance functions of Academic Board, the AMC and the FSDC were appropriate, the very recent recognition of the need for their introduction by AIUL suggested that a more strategic and integrated ownership of the processes and responsibilities associated with quality assurance and academic standards was yet to be fully demonstrated and confirmed. The team noted particularly the need for further clarification of the benefits, contributions, and restrictions which existed as a result of working within a dual accreditation framework and dual reporting cycles, and the need to demonstrate the effects which the recent reformation of the committee systems would have on the distribution of future executive and collegial responsibilities within AIUL.

33 While AIUL was able to explain the duality of emphasis which existed in the two distinct reporting cycles required by its accrediting bodies, it was not able to provide a simple and clear confirmation of the interrelated points at which academic and administrative decisions were able to be confirmed within these dual accountability processes. In particular the audit team noted the lack of any robust, or sequential due processes for the handling of the outcomes of the OUVS review visit of October 2004 (see paragraphs 85-95 below). The team also considered that there was a need to consider carefully the respective responsibilities of Academic Board and IEC, and to consider how these two committees, both with a remit for institutional overview, could work together to provide a clearly established single central focus for the review of quality-related information and for strategic academic planning.

34 The audit team reviewed the overall organisation of the committee structure within AIUL and the manner in which this was able to

contribute to a rigorous and transparent management framework for the institution. The team concluded that the present committee structure was over complex, contained substantial duplication in membership, and lacked clarity with regard to the relationship between committees and their respective areas of responsibility and consequent lines of accountability. In particular the role and function of the Academic Board, taken together with its relationship to IEC, required further attention, with an explicit confirmation of the focus of responsibility for the formulation of academic strategies, academic quality assurance and academic standards.

35 At the level of the subject discipline, AIUL has established a Faculty Departmental Committee (FDC) for each discipline related faculty group. The FDCs conduct programme level meetings and consider matters that are related to the individual award bearing programmes, the courses (modules) and associated matters. Meetings are governed, in principle, by AIU (Corporate) institutional effectiveness guidelines for the processing of all committee calendar business. FDCs are chaired by the programme deans. Deans can raise programme matters at AMC. The audit team found, however that there was some inconsistency in the structural relationship between the business agendas of programme level committees, the central committee processes and broader management requirements relating to the annual academic cycle. While some annual institutional requirements are fully accommodated within some departmental committee agendas, for example the consideration of annual monitoring reports, in other departments there is less evidence of any planned approach to the handling of annual business calendars.

The admissions process

36 The promotion of AIUL programmes, together with all other programmes offered by the University, is undertaken through the production of an AIU Corporate 'Catalog' which forms the AIU Corporate prospectus. This is available for consultation on-line and there is a

supporting website; also available is prospectus material produced locally for the AIUL campus. Admission targets are set by the Campus President acting in consultation with the AIU (Corporate) Chief Executive Officer and the AIU (Corporate) finance officer. For US-based students, the applications process and the assessment of student suitability for admission to all AIUL accredited programmes, including those leading to OUVS awards, is undertaken through an admissions team based in Chicago. UCAS listing for AIUL programmes commences in the autumn of 2005.

37 The SED indicated that there is academic representation on the Campus Admissions Committee, that all students are required to 'undergo testing in basic English and mathematics proficiency', and that academic agreement is required for final approval of student entry to be confirmed. There are minimum entry requirements for entry into campus programmes and there is a credit transfer policy in operation. The SED described the admissions assessment policy as 'liberal as far as entry qualifications are concerned'. The audit team reviewed the recruitment data available for the programmes. This indicated a marked variation in the entry qualifications presented by students and a wide international recruitment profile. The team considered that the minimum entry requirement for entry into degree-level programmes at AIUL was lower than would normally be expected in UK degree-level education. The team concluded, on the basis of this review, together with substantial corroborative comment from students, that the AIUL recruitment policy was a significant contributory factor to the low level of academic achievement within certain programme areas, particularly in the business subject area. The team advises that if the present AIUL recruitment policy were to be continued, then in order to safeguard academic standards more securely in future, a more extensive and comprehensive level of resource for learning support would be required than was at present available. While accepting the value of offering study opportunities to students from a wide range of educational and

cultural backgrounds, the team was not able to be confident that all students were fully aware of the demands of degree-level study, or that AIUL had included in its planning all the necessary support arrangements to help less able students to succeed.

The management of assessment

38 The SED indicated that the operational assessment framework for AIUL is based upon the use of generic assessment criteria, the use of double-marking protocols that are based upon the Open University mandate documents of 2002, the facilitation of student work which supports a 'collaboration of standards' and the provision of grading exercise models to support consistency in marking and to provide an induction framework for new academic staff. The SED outlined the main examinations arrangements which require a board of examiners to be convened for each named OUVS award, of which external examiners are members. Each external examiner is required to provide an annual external examiner's report that is commented upon by the programme dean following consultation with faculty and students. Annual monitoring reports include a response to the external examiner. The annual monitoring report is submitted to the Academic Board and then forwarded to the OUVS for comment. AIUL also has formal procedures in place for the handling of plagiarism and for academic appeals.

39 The SED stated that it has only been through its involvement in the delivery of OUVS awards that AIUL has recognised the importance of the external examiner system, which AIUL identifies as being 'critical to the assurance of comparability of standards across the sector'. The SED further explained that AIUL university protocols for the appointment and work undertaken by external examiners were initially approved by the Academic Board in 2003. Approved protocols include approval of draft assessment requirements, the arrangements for the sampling of student work, attendance at the final meeting of boards of examiners meetings and the confirmation of the levels of student award and achievement.

40 The audit team were provided with details of the supportive actions which had recently been undertaken by AIUL to consolidate the mechanisms for the management of its assessment processes and define more precisely its operational guidelines. These included the development of further guidelines for external examiners from July 2004, and the introduction of invigilation protocols. A working party had been established for the development of generic campus assessment criteria and these had been introduced from January 2005. There had been an identification of specific responsibility for the mapping and addressing of those sections of the *Code of practice* related to assessment and examination, carried out in 2004. The team also noted the recent establishment of a moderation board process in the business programme area, which aimed to manage more effectively the assessment process in this area. The team saw details of the extensive discussions which had taken place with the OUVS regarding the clarification of an appropriate assessment methodology which could be used within AIUL in order that it might manage the requirements of its dual accreditation in a more effective and transparent manner. This included clarification of the calculation methodology for determining the final grades of students within courses (modules), and the calculation of the final level of award to be made.

41 The audit team recognised that these initiatives would continue to bring AIUL's assessment systems into a closer alignment with expected standards elsewhere in the UK higher education sector. The team observed that many of these initiatives were very recently introduced, and found instances where they had not yet been fully adopted and where academic ownership and understanding of the requirements within due processes were yet to be fully demonstrated. In considering the ongoing management of the assessment process and its relationship to the maintenance of academic standards, the team noted a number of matters of serious concern with regard to the management of assessment and the assurance of standards. As the SED made

clear, these were well known within AIUL, having been identified both by external examiners and by OUVS over the last three years. The issues related mainly to the business programme area (see paragraphs 150-154 below).

42 Consideration of the records of boards of examiners meetings, particularly for the business programme, indicated to the audit team that there had been continuing concerns expressed by external examiners since 2002 on matters related to the non-availability of sufficient evidence upon which the student achievement of academic standards could be based. These matters had yet to be satisfactorily resolved. The team concluded that, notwithstanding ongoing measures taken by AIUL to address the situation, it was not possible to have confidence in the future consistent management of the assessment procedures, or in rigorous support for the role of the external examiners across all disciplines within the provision at AIUL.

43 The audit team concluded that the operational management of assessment within AIUL was a matter for continued improvement and that substantial progress was being made in agreeing principles and procedures for the future operation and management of assessment practice within OUVS accreditation requirements. The team noted however that there remained inconsistencies in the rigorous application and understanding of assessment practice and requirements, particularly with reference to the role of the external examiner.

The institution's intentions for the enhancement of quality and standards

44 The SED explained that generic enhancement considerations for quality and standards originated from within the production of programme-specific reports, which could be related to OUVS accreditation requirements, and from within AIUL's annual monitoring cycle. The SED provided a comprehensive list of enhancement initiatives that had been developed or initiated by AIUL over the last three years. Of these the most significant, in the view of the audit team, were

the production of comprehensive guidance for external examiners, the production of a learning and teaching strategy and guidelines policy on excellence in teaching, a review of assessment strategy and the revision of the AIUL assessment criteria. A large number of other new developments were also highlighted in the SED.

45 The audit team noted the varied nature of this wide-ranging programme for enhancement at both institutional and programme level. Much of this had emerged as a result of the responses to the OUVS and from within the annual monitoring and reporting procedures at programme and institutional levels for both OUVS and AIU (Corporate). The team formed the view therefore that while much of this activity was supporting the necessary introduction of more transparent and accountable practices, it was in considerable part a reaction to external requirements. It also appeared that many, though not all, of the numerous developments cited in the SED were of recent origin and the team found during its visits that there was only limited understanding of these various new initiatives among the staff and students whom they would directly affect. The team therefore judged that it was possible that AIUL, in its otherwise commendable intention to enhance the quality of its work and to meet the expectations of external UK agencies, had undertaken a programme of change and development that was over-ambitious, in terms of the scale and timing of its plans, for the size and the capacity of the London Campus. Furthermore, the team found it difficult to identify a clear organisational focus for the formation of a reflective and proactively planned approach towards a realistic strategy for academic development and enhancement.

Internal approval, monitoring and review processes

46 The SED explained that the design and validation of its US programmes are subject to approval by the AIU at the corporate university level rather than campus level. This is to ensure that all AIU (Corporate) programmes offered for

US qualifications at the University's different campuses are seen to comply with the accreditation requirements of SACS. To support this aspect of its strategic requirements AIU (Corporate) provides its campuses with models for curriculum approval and for the sequential consideration by each campus of all matters associated with programme development, the introduction of new programmes and marketing and promotional guidelines.

47 At campus level within AIUL, programme development proposals are framed within the corporate planning cycles of the AIU (Corporate) and, the audit team was told, are perceived at AIUL as being primarily market driven. Discussions on strategic programme development are also informed by the AIU (Corporate) market analysis and the development guidelines which are contained within the University Institutional Effectiveness and Assessment Plan and the American Intercontinental University 2005-2010 University Strategic Plan.

48 The SED explained that for OUVS validated, award bearing programmes AIUL redesigns its US programmes to ensure that they meet OUVS requirements. In particular OUVS programmes are designed to acknowledge the requirements of the Academic Infrastructure, published by the QAA. Accordingly, programme specifications are constructed within the guidelines pro forma provided by the OUVS.

49 During the course of the development of proposals for validation, AIUL encourages departments and programme areas to include external consultation on the proposals from both academic and professional peers. This includes comment on the content, currency and the likely market potential of the proposal. Individual departments have received effective and critical comment on new programme proposals through these mechanisms. The audit team also noted the contribution to curriculum development of the Industry Advisory Boards which had been established for each department, (see paragraph 102 below), and the use of specialist consultants in some discipline areas. The SED pointed out that in

the case of one new programme a special ad hoc committee was established to advise on the programme development, together with a newly constituted Industry Advisory Board. A review of the recent minutes of the APC and its terms of reference confirmed the consideration of programme proposals, but suggested that the committee had tended to concentrate on individual submissions and had not yet begun to fully articulate these discussions within the overall academic strategy of AIUL.

50 At the campus level, newly developed proposals for programmes are initially considered at departmental and faculty meetings. The APC (established in 2004), has the campus responsibility for considering proposals for new programmes of study submitted to it from the department or faculty level. APC has a specific remit in the consideration of the market recruitment potential and resource requirements for proposed new programmes. Approved proposals are forwarded to Academic Board for comment and approval. The Campus IEC may also comment on resource or other approval matters associated with AIUL dual accreditation.

51 Following internal approval at AIUL, a programme submission is forwarded to AIU (Corporate) and SACS. Once the programme is established at AIUL as a US validated programme and has seen a cohort of students through, it may be considered for application to OUVS (or other appropriate UK institution) for validation. In the case of the OUVS the arrangements for validation then follow established OUVS procedures. The OUVS publishes a Handbook for Validated Awards, which contains detailed guidelines and policies for its accredited institutions on validation, annual monitoring, and other accreditation requirements including the production of programme specifications.

52 OUVS determines the composition of the required validation panel, which will be responsible for the approval of the validation submission. OUVS may consult with AIUL on the membership of the panel. Panels always include external members who have a

particular expertise in the discipline or subject areas associated with the validation proposal and representatives from the OUVS. AIUL may have observers at validation events. The audit team noted that recent validation events had been conducted within these OUVS guidelines and that the OUVS validations were conducted in a rigorous and detailed manner.

53 The audit team explored with staff their understanding of the extent to which programmes could be modified without formal approval. There appeared to be uncertainty regarding the level of changes to the curriculum and to assessment strategies, which could be undertaken without triggering the need for revalidation and/or the approval of the validating university. In this context, the team noted the changes which were taking place across AIUL with regard to assessment weightings, the mode and methodology of assessment, and the redefinition of assessment criteria particularly in the business programme areas in the current academic year. The team noted particularly the revised course (module) assessment specifications and standardised assessment weightings that had been developed since the revalidation of the business programmes in 2003 and which were being applied across all courses (modules). AIUL will wish to consider whether staff should be more aware of the possible impact of a number of changes to a programme and of the need to define formally where the cumulative effect is to substantially alter the programme with potential implications for the award.

54 The audit team judged that the curriculum development and approval procedures in place at AIUL were well informed by advice from practitioners and professionals in the relevant fields. The team was not able to form a view on any independent internal approval processes operated by AIUL as the programmes under consideration in the audit were approved through OUVS validation, following the OUVS guidelines. However, the preparation for OUVS validation required appropriate development work from course teams with regard to the production of programme specifications and

course documentation.

Annual monitoring

55 The dual accreditation arrangements followed by AIUL require the campus to respond to two annual monitoring cycles. For the AIU (Corporate) reporting cycle, AIUL produces an annual Campus Institutional Effectiveness report for each programme and support department. These reports are subsumed into a whole-campus report that is submitted to AIU (Corporate), and forms the AIUL campus contribution to the overall AIU (Corporate) planning cycle. This campus report includes a review of resources, student recruitment and income generation. It also includes consideration of curriculum, teaching, learning and assessment matters, student support and guidance issues, student progression evaluations, quality assurance, management and enhancement matters.

56 For all OUVS validated programmes, AIUL produces an annual course monitoring report within a standard template structure provided by the OUVS. This includes provision for consideration of statistical data, for the inclusion of a critical analysis of the programme performance, the requirement for a detailed consideration of external examiners reports and for the consideration of issues that the programme teams have concentrated upon in the review period. Reports are also required to consider the strengths and weaknesses of the programme, student feedback, and of opportunities for enhancement. They are also required to include an action plan at the programme level for the coming monitoring period. These programme level reports are generated by the programme dean, are required to be discussed at the faculty/departmental board meeting, are received by the AMG and Academic Board and are then forwarded to OUVS for comment.

57 The audit team read a number of AIUL annual monitoring reports at the programme level and considered that there were examples of an emerging and rigorous approach towards the utilisation of such reports and their contribution to academic quality assurance

processes. There were examples of the self-critical identification of programme strengths and weaknesses, the identification of action plans and of enhancement opportunities, evaluative responses to external examiners' comments, consideration of student feedback issues, consideration of employer and industrial liaison requirements and a consideration of data and statistical information related to programme planning requirements. The team found examples of constructive engagement with issues raised through student feedback.

58 There were also examples in some discipline areas of a less robust and less comprehensive approach towards the production of the annual monitoring report. In particular the audit team noted in the business programme reports a less evaluative approach towards the discussion of external examiners reports than was found in other disciplines. The team considered that the annual monitoring report for 2004 from the business area to be inadequate in its discussion of the most recent external examiners' report (see paragraph 147 below) and in its consideration of student feedback and of student progression and achievement statistics. This is particularly regrettable as business is the largest programme area offered by AIUL. The team also noted considerable variability in the way in which reports from different programmes identified and confirmed the embedding of the emergent institutional quality assurance and academic standards policies, for example related to assessment criteria development.

59 The audit team also recognised substantial differences in the apparent ownership of the annual monitoring reports. Certain examples were clearly written by a single individual and contained numerous references to individual subjective opinions while others appeared to have been generated as a result of a consultative and collegial process. The team could detect no guidance within AIUL as to the appropriate standard of reflective evaluation that was expected in programme level monitoring reports. AIUL is recommended to establish more helpful guidance in this respect,

and to explore opportunities for the sharing across departments of good practice in annual monitoring.

60 The SED acknowledged substantial shortcomings in the production of specific annual monitoring reports since the introduction of the process and characterised the initial approach to annual monitoring as 'a catalogue of errors of omission and commission'. The annual monitoring process required by OUVS is now in its third reporting year of operation at AIUL, but the audit team found that it has still to be fully embedded and understood by all academic staff. Overall, the team concluded that while the process of programme level annual monitoring was becoming more familiar in AIUL, and was effective and useful in some areas, there were still examples of divergent approaches being taken to the production of reports. It was not clear to the team that this variability was being addressed by a self-critical evaluation of the reports when they were considered by the Academic Board. A higher level of consistency needs to be achieved before AIUL can be confident that the monitoring process is operating effectively.

61 The OUVS annual reporting cycle also requires AIUL to produce an institutional level Annual Monitoring Report to the Open University, referred to as the Executive Summary (ES). This annual report offers AIUL an opportunity, within a set of guidelines, to comment both on matters of an institutional nature and on programme matters. The audit team noted that in its receipt of recent reports, OUVS had indicated that they did not 'adhere to OUVS expectations in terms of process and coverage' and that they did not 'evidence effective internal procedures for annual monitoring and review'. The team considered the AIUL, ES reports for 2003 and 2004 and concluded that AIUL had not yet fully met the requirements of the validating University body in providing the evaluative overview of quality assurance processes that was expected in the ES report.

62 In examining the detail of the 2003 and 2004 ES reports, the audit team found substantial commentary on actions which AIUL had taken within the annual cycle in order to develop its quality systems. While these reports offered a comprehensive listing of activities within the year there was little evidence of evaluative review based on constructive self-reflection which might have derived from a careful institutional-level consideration of the annual monitoring reports from departments, or of how this might be built upon in the development of its quality assurance or academic standards practices. There was also little reflection upon the manner in which the monitoring and reporting process involved the wider academic community in the formulation of a strategic direction for AIUL or, as OUVS had commented 'about the extent to which institutional positions are based on the effective debate within the campus about the effectiveness of the institution's central quality assurance and enhancement processes'.

63 The audit team also noted with some concern the manner in which the ES for 2004 was progressed. The Academic Board had received a first draft of this report at its meeting in November 2004. The minutes record no detailed discussion of the contents of the report and provide little indication of Academic Board taking ownership of the report. The minutes of the meeting indicate that the Board then gave 'authority to the Chair to process the entire report by correspondence with Board members'. The team formed the view that while this might be considered a means of progressing the report expeditiously, there was little demonstration of a confident collective committee ownership of this significant strategic review document, or of the involvement of the convened Academic Board in determining its final contents.

64 In reaching this conclusion the audit team particularly noted the statement in the SED relating to the Academic Board, that its 'major responsibilities are the supervision of the annual monitoring of programmes of study, the approval of annual monitoring reports to OUVS, and the

monitoring of the manner in which OUVS handles its relationship with the campus'. In reviewing the business agenda of the following meeting of Academic Board the team noted that while the agenda contained a supplementary item which included the receipt and consideration of the response from the Open University to the Campus 2004 ES report, there appeared to be no final draft of the ES report itself for the Academic Board to receive and approve, even following Chair's action. The team concluded that the process for the progression and ownership of the ES report to OUVS was not yet sufficiently embedded nor transparently owned at the senior committee level.

65 In further reviewing the effectiveness of the overall annual monitoring process the audit team examined the terms of reference of the Academic Board. The team found that the terms of reference provided effective guidance for the production of programme reports and their submission within the AIU (Corporate) reporting cycle of the Board. However they did not include any overarching responsibility for determining the content of any strategic reports to OUVS.

66 In view of the Board's lack of authority, in this respect, for contributing to a strategic overview of academic quality, and considering the process adopted for the generation of the ES report submitted to OUVS in 2004, the audit team concluded that there was a significant weakness in the role of Academic Board with regard to its overview in the monitoring of quality and standards.

OUVS involvement in internal review

67 AIUL's most important relationship with regard to the assurance of the quality and standards of its UK awards is with its validating University. The OUVS provides AIUL with an annual evaluation and critical analysis giving feedback on the AIUL annual monitoring programme reports and the AIUL ES report. The OUVS feedback report provides for comment on achievement, the quality of AIUL reporting, enhancement plans, and matters for action. In the evaluation of the annual review process and the documentation associated with this the

audit team endorsed a number of conclusions that had been identified and reported to AIUL within the OUVS annual monitoring feedback pro forma. The team noted matters for commendation, which include the growing commitment towards including external examiners in degree classification assessment discussions, particularly in the Visual Communications programme, progress on the development of generic assessment criteria and level descriptors, enhanced support for the development of English language usage, clarification of honours classification calculations and grade award methodology, increased levels of full time faculty staff, a 'reduced reliance on external examiners reports as the trigger for self critical monitoring and review' and a concern for enhancement of the learning environment.

68 The 2003-2004 OUVS feedback also contained a number of more critical points for the attention of AIUL. The most significant of these, in the view of the audit team, related to the full involvement of academic staff and the effective use of monitoring reports. The team confirmed the basis for these more critical recommendations through its meetings with AIUL staff and its consideration of the annual monitoring process papers and ES report to OUVS. The team agreed that there were grounds for concern regarding 'the extent to which institutional policy positions are based on effective debate within the campus and about the effectiveness of the institution's central quality assurance and enhancement processes'. The team also endorsed criticism regarding the paucity of information contained in the AIUL Executive Summary. The OUVS feedback was also critical of the manner in which the monitoring reports are effectively utilised at the campus and corporate levels, and pointed to 'perceived tensions between the policies of AIU and the emergent needs of the London campus which are signalled in the Business Administration (programme) report'. On the basis of the evidence seen in the audit, the team concurred with these comments and with the concern expressed in the feedback report with regard to the lack of an integrating approach

which could draw together the various elements of annual monitoring activity, and establish a more coherent structure and procedure for undertaking quality assurance activity.

Periodic review

69 Prior to 2004, AIUL had no internal periodic review procedures that related to the monitoring of academic standards and quality assurance matters at the programme or departmental level. In May 2004 AMC took the decision to establish a LTC as a subcommittee with the remit for 'monitoring the learning and teaching functions of the campus and for conducting periodic reviews of programmes delivered at the campus'.

70 LTC also has the responsibility for monitoring 'the impact of the Campus Learning and Teaching Strategy'. Members of the subcommittee are nominated by the Senior Vice-President and it reports to the AMC. The subcommittee has formed an initial methodology and policy for its activity and has identified a timetable for the conduct of its business to 2006. The process for conducting periodic reviews has also been submitted to AIU (Corporate) for fuller consideration.

71 The periodic review focus is intended to include the scrutiny of both academic and support departments. The methodology is based upon a peer review process and includes consideration of resource matters, the learning and teaching strategy and cross-departmental comparison. The audit team noted that the 2005 AIUL Quality Assurance Handbook included a description of the process, which indicated that final periodic review reports would be submitted to Academic Board, where an action plan will be agreed and this will be monitored by the IEC. The team also noted the recent addition of formal student representation on internal periodic review panels in addition to external consultative membership on these internal panels. The team commended this move towards both a greater inclusive use of student representatives and the increased availability of critical external commentary on programmes

72 The audit team viewed the development of a periodic review process as a timely initiative. At the time of the audit only one periodic review had been conducted. This had provided a positive evaluative framework and perspective on the specific programme concerned and had led to improvement of the resource support available and the subsequent quality of the student learning environment. The team noted that academic staff had been given ownership of the process and had welcomed the benefits that the procedure had contributed to the development of the programme. Although the team recognised these new initiatives and the positive view that was held of these events, there was no established or clearly embedded experience of these within AIUL and only one periodic review had been completed at the time of the audit. While the team therefore acknowledged periodic review as emerging good practice, the robustness of the process and the scrupulous use of the outcomes arising from it were still to be fully demonstrated as a consistent element in AIUL's enhancement and quality assurance activities. The team also believed that AIUL may wish to give particular attention to the manner in which the outcomes of the annual monitoring cycle are to be related to the periodic review cycle and how these would jointly be considered and used at the Academic Board level.

External participation in internal review processes

73 As noted above, OUVS validation and review procedures include external membership of panels. For programme validation this involves senior academics from the relevant discipline. Before submission for validation, AIUL also draws on external advice from employers, professionals and academic experts in developing new curricula. In addition, AIUL uses external advice in its committees, for example, the Academic Board has three external members. The recently introduced periodic review process includes an external adviser in the relevant discipline as a full member of the review panel. For the review

which had recently taken place, the audit team noted that the external member had been a high profile representative of a relevant professional body; the report of the internal review indicated that the external input had been substantial and constructive and had led, through the report, to improvements in the resources for the programme.

74 The audit team also acknowledged the establishment of a broader external framework of reference for the University with the establishment of the Academic Advisory Council (AAC) in July 2004. The AAC had been given the remit to 'receive and comment upon the Annual Academic Report of' AIUL and to offer 'such other advice as the Council deems appropriate'. The Council meets once each year to receive a report and was described in the SED as 'a small, prestigious body with no executive powers'. The team acknowledged the potential value of this initiative but questioned the effectiveness of the Council's advisory role, given the apparent lack of response to the questions raised by the validating body regarding the strength of the central processes and committee relationships within AIUL and the strategic role of the Academic Board. Both these areas for attention had been identified within the OUVS reaccreditation report of January 2005, and in earlier OUVS communications.

External examiners and their reports

75 The SED stated that external examiners are appointed by the Academic Board and that their reports are submitted to systematic and scrupulous consideration as part of the annual monitoring process. Comments on the reports are then fed back to the Academic Board together with the programme dean's commentary on them. The SED commented that not only was the external examiner system largely unknown to the institution before validation by OUVS (1998) but that in the early years of the system's operation, the necessity of responding to external examiners' reports was little appreciated. External examiners are consulted on matters of programme design and

approval. The SED stated that all the programmes offered by AIUL (including non-OUVS-validated programmes) are characterised by the use of external examiners. AIUL also stated that external examiners' reports were discussed at student forums and faculty-student committees.

76 AIUL has produced a set of Guidelines for Facilitating and Supporting the work of External Examiners which were approved at the Academic Board in July 2004, in time for the receipt of external examiners' reports in 2005. The Guidelines are based on the *Code of practice* for external examiners, published by QAA and will in future provide support in developing further AIUL's procedures for the management of the assessment process and the role of the external examiner in the process. They are designed primarily for the information of external examiners but also serve as an aide mémoire for programme chairs. The SED considered that the publication by AIUL of the Guidelines was an instance of quality enhancement and cited feedback from external examiners in general as evidence of the maintenance of standards and quality of provision. There is a further account of the institution's use of external examiners in the Quality Assurance Handbook (2005) and the audit team noted some minor discrepancies between the two documents regarding the timing of appointment. The team reviewed external examiners' reports for visual communications, interior design, liberal arts, fashion, and business. The reports had been considered by the programme deans in consultation with their staff and in the majority of cases the responses offered had engaged with both the general thrust and the specific detail of the reports. In some cases, the external examiner, in accordance with the Guidelines, had written a covering letter to the Senior Vice-President, elaborating on his report. While the programme chair had responded to the report, it was not clear to the team that the covering letter had always been shared with the department. The sequence of external examiners' reports for business (2002, 2003 and 2004) was interrupted by the fact that the

external examiner for the reports produced in 2002 and 2003 was appointed as the Dean of Business, and therefore wrote a less formal document for 2003.

77 The audit team found evidence of a programme-level response to external examiners' reports in most disciplines, but discovered little trace of institutional-level monitoring of external examiners' reports. The newly-promulgated Guidelines are also uninformative in this regard. In meetings with staff, the team were told that all members of Academic Board read the external examiners' reports together with the responses from programme deans, but the team saw no evidence, in the form of written summaries or records, of strong, scrupulous or effective institutional procedures for ensuring that the responses to external examiners were timely, and appropriate.

78 The consideration of the July 2004 report by the external examiners on the Business Administration programme exemplified for the audit team the difficulties arising within AIUL with regard to the institutional handling of external examiners reports. Successive reports in this area had indicated very substantial difficulties in carrying out the role effectively, including in particular a lack of access to assessments. In July 2004, all three external examiners of the Business Administration programme submitted collectively an extremely negative report which included wide-ranging criticism of the management of quality in the subject area and of the standards of student achievement (see below paragraphs 150-154). The situation was sufficiently serious for the examiners to refuse to confirm the degree awards. In the view of the team, the programme dean's response to this report failed to address in a sufficiently constructive manner many of the critical points made by the external examiners.

79 In reviewing the follow up processes at the executive and the Academic Board level to the receipt of the external examiners reports, the audit team noted that an executive response to the July 2004 report for the business area was

prepared by the Senior Vice-President as Chair of Academic Board for receipt at the Academic Board meeting of 14 July 2004. A second report was prepared in the same way for the meeting of Academic Board on the 19 November 2004. Following the Academic Board endorsement of the AIUL executive response paper on the 14 July, this was dispatched to the Vice Chancellor of the Open University requesting the conferment of degrees on the basis of the Academic Board's resolution. The Open University did not give its agreement to this proposal. A number of individual recommendations for degree conferral were, however, subsequently agreed by the external examiners.

80 The audit team considered the nature of the institutional responses contained in the two reports. The team considered that neither the earlier report nor the more comprehensive report produced by the Senior Vice-President addressed adequately the very serious points of criticism regarding quality and standards that had been raised in the collective report of the external examiners. This second report, accepted by the Academic Board, failed to indicate in detail how AIUL was intending to address the grave deficiencies that had been identified in the external examiners' joint report. Significantly, the Board also failed to question the quality of the programme-level commentary on the report. The team considered that the response of the Academic Board to this serious issue, which had involved the expression of fundamental concerns relating to a major area of the Campus provision by a group of external examiners, had not exhibited the level of responsibility and self-critical insight which its terms of reference demanded. The various responses made by AIUL (from the department, the institution and its officers) to the joint external examiners' report were considered by the team to be indicative of a defensive and insular approach to external scrutiny and advice.

81 The audit team also noted that even in smaller programmes, where in general, issues relating to quality and standards are less problematic, some institutional-level matters

had remained unresolved from year to year. On the basis of the evidence that it examined, and notwithstanding the quality of some individual programme-level responses to reports, the team was not able to have confidence that AIUL as an institution was making strong and scrupulous use of the reports that it receives. The case of the Business Administration Report also suggested to the team that the senior committee levels of AIUL were not taking an effective overview of those reports so as to inform appropriately the management of the standards awards for the programmes offered.

External reference points

82 The SED made little reference to the external reference points which form the Academic Infrastructure. The audit team noted that while these reference points might form a useful guide for practice in AIUL, a full acknowledgement of them should only be expected in the context of those programmes accredited for UK awards. The team learned that the *Code of practice* was reviewed by the IEC in meetings held between May and October 2004. The team observed that the language of the mapping exercise was exclusively in terms of compliance, with little attention paid to the distinction between 'precepts' and 'guidance'. IEC's report was presented to Academic Board with the note that 'as a result of the exercise a number of matters of non-compliance had been detected and remedied'. It was not clear to the team exactly what matters of 'non-compliance' had been detected and remedied, since the mapping exercise contained very few points of action. In meetings with senior staff, the team were told that changes to the Guidelines for Facilitating and Supporting the work of External Examiners and to the Internship Handbook were the result of the mapping exercise, but the copy of the report that was filed with the minutes of the Academic Board contained no recognition of either issue as an example of 'non-compliance'. The team concluded that the various sections of the *Code of practice* had been given some attention within AIUL, but it was not clear how systematic or commonly

shared this consideration had been, whether the guidance had been taken fully into account at the relevant operational levels, or whether the advisory nature of the *Code* had been fully appreciated. The team would recommend that AIUL promote a higher level of engagement with the *Code* in its senior committees, so that future discussion and decisions about the management of quality and standards could be informed by a greater shared awareness of the *Code* and its expectations.

83 The FHEQ is principally enshrined in AIUL's development of programme specifications; these are all written in a format approved by the OUVS and also embed the benchmark statements for the relevant subject. The audit team found that the benchmark statements were understood variably across the institution. In discussions with the fashion staff, the team found a widespread understanding of the implications of the statements, together with a flexibility and subtlety in their use. By contrast, it was unclear that the business staff had any real engagement with the relevant Subject benchmark statement.

84 The audit team found that the overall level of engagement with the Academic Infrastructure at AIUL was, at this stage, still low. The FHEQ, programme specifications and subject benchmarks are in part addressed through the adherence to OUVS guidelines, but it was not clear that their purpose was always understood; the *Code of practice* had been given limited consideration at committee level, primarily in a purely administrative manner, and was not yet well-embedded in its adoption, or understood by staff.

Programme-level review and accreditation by external agencies

85 The audit team examined the SACS external review process and the OUVS Institutional Review in considering AIUL's processes and mechanisms for managing and handling external review, validation and accreditation.

86 As a constituent of AIU (Corporate), AIUL is subject to the institutional review and accreditation requirements of the SACS for all of its programmes. AIUL received its SACS reaffirmation of accreditation visit in 2002 and was required to provide a SACS self-study reaccreditation submission document for this visit. AIU (Corporate) subsequently received its reaccreditation in 2002 for a period of 10 years.

87 The original OUVS institutional accreditation of AIUL took place in 1999 and at that time AIUL was given a quinquennial approval for its accreditation. The OUVS reaccreditation visit took place in October 2004 and AIUL provided an institutional SED for that visit. The OUVS Institutional Review Report (of the reaccreditation review, referred to hereon as the OUVS Report) was sent to AIUL with an accompanying letter in February 2005. The report and the accompanying letter of confirmation indicated formally to AIUL the outcomes of the reaccreditation visit and indicated that 'the accreditation of AIU-London be renewed only for a period of two years with a further Institutional Review being scheduled for the early part of academic year 2006/7'.

88 The OUVS Report commended progress on a number of matters including a growing collegiality amongst the academic community and the emergence of a staff development programme, the development and adoption of generic assessment criteria and their relationship to learning outcomes, level descriptors and the recognition of the need for common standards within curriculum. The report further commended the 'emergence of programme structures contextualised by the appropriate academic infrastructure (subject benchmarks and qualifications frameworks)'.

89 However, the OUVS Report further indicated that it was 'only' because of the new procedures which remained to be introduced across the campus that the validation panel 'did not feel it necessary or helpful to impose conditions on this two year approval'. The report concluded that AIUL's 'discharge of the responsibility of accredited status was not encouraging'. The validation panel was

however aware of a range of new arrangements and accepted AIUL confidence and assurances that the 'future would be more secure'. The report concluded that a closer working relationship would be of mutual benefit to both parties.

90 The OUVS Report further indicated that the reaccreditation agenda in 2006 would be informed by this developing context and by the recommendations of the original 1999 accreditation report. The report emphasised that for 2006 'substantial concrete advances' would be expected, and that a number of specified requirements should be met. The six principal requirements included a strengthening of the strategic overview and impetus of Academic Board, more effective recording of committee work, a review of committee structures and reporting lines, a greater involvement of faculty, and a dissemination of the emerging good practice in the management of assessment observed in the Business School.

91 The audit team particularly noted that the OUVS Report also highlighted the original anticipation in the 1999 accreditation that there would be a 'transition from managerial to collective responsibility' at AIUL, particularly for aspects of quality management and review, but the reaccreditation had found that progress on this front had been limited. The report also observed 'that the Academic Board had yet to emerge as an academic authority trusted to take an effective part in the work of the Campus and taking a full rather than a formal responsibility for quality assurance and enhancement.'

92 The audit team reviewed the progress of the OUVS Report in its consideration by AIUL. The team particularly noted the high level of significance of the report for the management of quality and standards at AIUL, containing as it did an unusual time limitation, a number of clear warnings, and a list of specific requirements to be fulfilled to a deadline, including one which related explicitly to the effectiveness of the Academic Board. Following the OUVS visit, the AIUL AMC had responsibility

for initial consideration of the outcomes of the OUVS Institutional Review. That committee briefly discussed the recommendations and noted that they would receive fuller consideration on receipt of the formal report. Academic Board similarly deferred full consideration of the outcomes until the full text of the report had been received. The main recommendations of the review were therefore not considered at the formal meetings of committees held in the autumn of 2004. At the November meeting of the Academic Board, under a separate item, authority had been given to the Chair 'to process the impending OUVS Annual Monitoring Report (ES) by correspondence with Board members'. The ES subsequently produced contained an extensive section detailing AIUL's view of the six requirements that it understood were to be made by OUVS Institutional Review. This was in advance of the formal receipt of the OUVS report in February 2005. The team noted that the initial AIUL response in the ES report included comment upon matters that had not yet been fully confirmed by the validating University and had not been fully discussed within the AIUL committee structure. The team noted that OUVS had considered this an inappropriate approach to the response. The team considered that the premature response from AIUL to the OUVS Report suggested only a limited awareness of the seriousness of the matters identified, failed to address some of the issues raised by it, and misinterpreted others.

93 AIUL then received the confirmed OUVS Report in February 2005 and discussed its response at the following AMC meeting and at a combined AMC and APC meeting held in February, at which a second, revised version of the response was approved. The AIUL Academic Board received the OUVS Report for discussion at its meeting in April 2005. This was accompanied by the response of the AMC made in February which was then identified as constituting the 'campus' response'. The response to the OUVS Report thus adopted by AIUL concentrated upon matters of interpretation of detail and included much reference to the historical difficulties that had

existed in the relationship between AIUL and the OUVS. It also characterised the OUVS Report in sharply critical terms. The audit team was unable to identify in the responses any systematic evaluation of the six required areas for action upon which OUVS renewal of accreditation in 2006 would be based. The team considered that there was insufficient attention given by the Academic Board and its committees to the strategic and operational actions which would be needed in order to meet the academic quality assurance, strategic, structural, and enhancement matters that had been raised in the OUVS Report. This was particularly surprising as the report which Academic Board was considering itself contained specific encouragement to the Board to take more decisive collective action in such a context.

94 The audit team, on the basis of what it found in its own enquiries, considered that the OUVS Report was appropriate, balanced, supportive and merited serious attention. On the basis of its meeting with senior executives of AIU (Corporate) the team gained the impression that the Report had not been considered in depth beyond AIUL, and must therefore be primarily a local London Campus responsibility. From the evidence available to it the team found that there was no clearly established procedure for the receipt of the report; that the initial responses although promptly made were in danger of being premature and were not fully considered; and that Academic Board was insufficiently involved in the discussion and debate on the report. It further considered that the response from AIUL adopted by Academic Board lacked a serious engagement with the substance of the report, was not fully alert to the significance of its recommendations, and lacked the relevant action plan to meet the matters raised in the report. It appeared to the team that the final response had been also drafted by the Senior Vice-President and not been subject to wider debate, discussion or amendment within committee. The team therefore formed the view that AIUL's current capacity for responding effectively and in a consultative, timely and fully relevant manner to external critical comment and externally generated reports was in doubt.

95 AIUL had, at the time of the OUVS Institutional Review in October 2004, also participated in a trial OUVS Administration Audit review exercise. This had been conducted by the OUVS in conjunction with AIUL and had concentrated upon all aspects of the administrative functions and areas of responsibility within the University. The outcomes of this provided both AIUL and the OUVS with valuable experience on the future methodology for quality assurance monitoring of administrative provision that will be introduced to the OUVS Reaccreditation and Accreditation methodologies from 2006. The audit team commended this as a useful and constructive experience for both the OUVS and AIUL.

Student representation at operational and institutional level

96 The SED stated that the strong emphasis on student representation at AIUL was a part of the institutional framework for quality assurance. There are opportunities for student representation, by the AIUL SGA, on Academic Board, IEC, LTC and the Library Users' Committee. There are also student forums held within some academic departments. The SGA considered that it was limited in what it could contribute because of the relatively small number of students involved in its work, with none of the officers holding sabbatical posts, and by its modest financial position. Both the SGA officers and staff met by the audit team were concerned about this situation, but the institution emphasised that student views could be heard easily, as in a small organisation like AIUL any student with a concern could make an appointment to talk to the President. The SGA has regular weekly meetings with the President, although officers were concerned that these meetings did not cover all aspects of the student experience. AIUL is also aiming to strengthen the relationship with the SGA by nominating a member of the Student Services staff to be the formal link between the SGA and the campus management. Training was available for SGA officers through the National Union of Students, but they were not able to then train other student representatives on

committees. The team learnt that the SGA had recently taken the initiative to develop a new constitution, which it was proposing to AIUL for acceptance, with the aim that a genuine and productive student government could emerge in the future. Quite separately, AIUL had provided the team with a copy of an existing SGA constitution as a part of the documentation for the audit, and the team learned that this was a document used across AIU (Corporate) campuses. However, it appeared that this had not previously been shared with the officers of the SGA at AIUL, as they were unaware of its existence.

97 The audit team met with SGA officers during the briefing visit and with five groups of students during the audit visit. The team found that many students were unaware of any system for student representation on AIUL committees or faculty forums. Some departments, such as the Fashion Department, have operated faculty forums since at least January 2003 and these seemed to be much appreciated by the students concerned, however these forums do not operate as formal staff-student liaison committees. Other departments do not yet operate comparably productive forums, and students from several departments reported that they did not have the benefit of meeting with faculty to raise issues of concern. Students also found it difficult to know who the SGA officers were, or how to have issues raised by them. The SWS to the audit produced by the SGA quite properly drew attention to the fact that the views recorded in it were mainly those of students in the Business Department, and made it clear that the SGA encountered difficulty in obtaining other students' views. The SGA officers believed that communication between all groups needed to be improved and suggested that a student social facility, such as that found at other UK universities, could be of benefit. In meetings with students the team heard many students express the view that no effective mechanisms existed for them to discuss important issues, such as the exact requirements for the achievement of two degree awards (see below paragraphs 177-180)

and problems with financial aid and charge administration. Some students acknowledged that forums were poorly attended by students when they were held, partly because of the difficulty of expressing their views anonymously and partly because of student apathy. The team noted that the OUVS had previously recommended that AIUL set up more formal staff-student liaison committees.

98 The audit team was concerned that appropriate mechanisms to support student representation and staff-student liaison were not yet in place across all departments. It would encourage AIUL to constitute student forums on a more formal and consistent basis. The team also recommends that AIUL provide further support and encouragement to the SGA and to student representatives at all levels in order that the student views can be better understood and taken into account in developing the quality strategy.

Feedback from students, graduates and employers

99 As noted above, the audit team received a SWS from the AIUL SGA. This had been produced by a small number of students, recently elected to run the SGA. Although brief, it addressed the quality of the academic support systems, the accuracy of information provided by AIUL, and the broader student experience, including opportunities for feedback, and student representation. The SWS contained critical and helpful comments which guided the audit team in its investigations.

100 In principle, feedback from students is obtained from the student representation on AIUL committees (see above paragraphs 96-97), and from end-of-course questionnaire and student satisfaction surveys carried out at the start, middle and end of their studies. When analysed this data provides an overview of the students' views of the operation of the course and provides for open comments on individual tutors. Summaries of the questionnaires seen by the audit team showed a wide range of comments about individual members of staff, and some duplication of comments. The team

heard that these summaries were used in annual performance reviews of staff. Annual monitoring reports showed varying degrees of consideration of student course evaluation questionnaires (for example, that of individual modules). Students met by the team were concerned that they could not identify direct results from their responses in feedback and there appeared to be no formal route established for doing this. It appeared to the team that there was considerable variability across subject areas in providing appropriate opportunities for students to comment, by questionnaire or meeting, on their overall study experience, rather than on individual modules. As an example of good practice, visual communications reported several feedback mechanisms in their annual monitoring reports, including class evaluations, termly student forums, tutorials, informal classroom interaction, and an open-door policy. This department also reported that several actions have taken place as a direct result of issues raised by students, such as the installation of additional PCs throughout the campus for essay writing and internet access; two additional E-Macs in the art centre; and improvements in the library environment and its extension. The team noted that a working party had recently been established to investigate how best practice in terms of student feedback may be developed.

101 The audit team would advise AIUL, in carrying out its review of the effectiveness of student feedback, to consider carefully the scope and intended function of the existing feedback arrangements, and to ensure that there are ways in which students can be informed of actions taken as a result of their comments.

102 Although no programmes at AIUL have professional body accreditation, the design of the programmes is informed by feedback from external examiners, Industry Advisory Boards and through feedback from the companies providing industrial and business placement; contacts are more active in some departments than others. In the Business Department, the Industry Advisory Board and the internship scheme all inform the curriculum and the Department is represented on a recently

established Internship Committee. The Industry Advisory Board in the Fashion Department has also provided useful input into the curriculum for several years, and internships provide employer feedback into the curriculum. Staff development events have also included input from employers. The first in the series of internal periodic reviews carried out by AIUL, for the Interior Design Department, also benefited from employer input through an external member. In general the audit team found that AIUL is using employer feedback in a positive and constructive manner.

Progression and completion statistics

103 The SED explained how statistical data relating to entry profile, progression and performance are provided by the Institutional Research Officer (by means of the 'Campus 2000 database) for the purposes of annual monitoring, and how the processes for assembling these data were largely triggered by OUVS validation and had therefore been introduced after 1999; the SED also identified weaknesses in the delivery of statistical data in the early years of OUVS validation. The audit team saw evidence that progression and completion data were now made available to departments as part of the annual monitoring process. The accuracy of the data is currently assured by the Campus Senior Vice-President. AIU (Corporate) also publishes a Fact Book which contains performance-related information for the University as a whole.

104 In discussions with staff, it became clear that the data with which departments were provided were not entirely suitable for the purpose to which they were put. Fashion staff pointed to the difficulty in the use of progression data when there are multiple starting, progression and completion points possible during a student's career, and observed that their monitoring was at the level of the individual student. However, the fashion staff also pointed to the effective manner in which ad hoc requests for data were treated by the Institutional Research Officer, where the specifications for those data were generated by the department itself.

105 The audit team found that, while the collection of data and the production of statistics and indicators was well supported, the effective use of statistics was not embedded within the institution. The team observed that AIUL has not yet identified clearly the intended use for the data currently collected. Its fitness for purpose when the purpose has not yet been determined therefore remains doubtful.

Assurance of quality of teaching staff, appointment, appraisal and reward

106 The SED explained the particular situation of AIUL with regard to the recruitment of staff. The financial model followed by the London Campus, as for all campuses of the University, recognises that the only source of income is provided on the basis of student enrolment. When the roll of students falls, departmental budgets are adjusted accordingly. The result of this is that particular caution is observed in the hiring of full-time staff, and flexibility of operation depends on a substantial number of part-time staff on fixed term contracts. The audit team observed that this in turn raised challenges with regard to assuring the quality of staff and their ongoing commitment to the institution. The SED reported that the proportion of full-time staff on the AIUL establishment had changed from 25 per cent to 39 per cent between 1999 and 2004. Most of the staff at AIU are therefore on part-time contracts. In the course of one of the DATs the audit team learned that the terminology of 'full-time' staff contracts is particular to the institution. 'Full time' in AIUL means a permanent contract, but usually implies that the academic member of staff is only contracted to work three or four days per week. Thus, for instance, in one academic subject area only two members of academic staff are contracted to work for five days per week. The SED confirmed the difficulty in appointing good quality staff, and listed a number of measures that had been recently introduced to try to improve this through appointment and induction procedures, rewards and incentives. The London Campus has also approved, in

2003, a formal structure, 'Interconnexions', for consultation between management and employee representation; this has led to review of human resources policy in a number of areas.

107 Induction at institutional level rests with the Director of Human Resources, often providing bespoke programmes for individual appointees. New faculty members are observed by the programme dean during their probationary period, and periodically thereafter, while the deans are observed annually by the Senior Vice-President. Students complete course evaluation questionnaires on staff teaching performance at the end of each course and these are made available to the dean and the Senior Vice-President. All teaching is evaluated in the context of the AIUL policy statement Characteristics and Evaluation of Excellence in Teaching. Meetings with staff confirmed that appraisal was based on academic criteria, but that it also had financial benefit. The audit team was informed that the Campus does not hesitate to act where standards of teaching and assessment continue to be sub-standard even after remedial action and support, and that a number of adjunct faculty (part-time academic staff) had been denied renewal of contract on the grounds of inadequate teaching and poor interaction with students. One full-time faculty member had been moved out of the teaching arena altogether.

108 The large number of part-time staff appointments meant that there was no infrastructure of a permanent, day-to-day academic staff availability at AIUL to offer support to students. The student perspective as communicated in meetings with the audit team indicated that there had been a pattern of last minute appointments of instructors to courses in the business area. The students believed that these staff had often been ill-prepared and lacked sufficient understanding of grading conventions and of the requirements expected by external examiners. It was also reported that in the business area staff had been asked to teach courses at the last minute which appeared to be at the very limits of their qualifications, with resultant difficulties for the

students' learning experience and achievement. Statements made by students to the team also suggested that on occasion staff were insufficiently prepared for the teaching task in which they were engaged. The SGA advised that students would like to see instructors regularly teaching the same courses so that they could refine and improve the quality of their teaching. The Fashion DSED also reported that students had left the programme because of a problem with a lecturer, who was subsequently dismissed. In its examination of course paperwork and assessed work the team found that some staff were unaware, for example, of how to mark final degree stage (level 400) work such that two examinations had to be declared 'null and void' by the moderation board. The Business Department had acknowledged the problems arising from a high proportion of part-time staff and had received agreement for four extra full-time staff in 2005. It has also recently moved towards arrangements whereby only full-time staff teach level 300 and 400 courses.

109 The audit team found that AIUL has in place appropriate formal arrangements for the appointment, induction, and appraisal of staff. The constraints placed upon the pattern of staff employment by its funding model pose very considerable challenges which the Campus has sought to address through a variety of initiatives. AIUL has also taken steps to recognise and reward good teaching performance. Nevertheless, the concerns raised by students regarding staff competencies suggested to the team that in a number of cases AIUL is failing in its duty to students by the appointment of part-time staff who are not able to fulfil the role because of poor timing or inadequate briefing. To deal with this by the dismissal of staff after such inadequacies have been reported by students at the end of a module is clearly not sufficient. AIUL needs to consider how it can strengthen its arrangements for the induction, preparation, staff development and pattern of employment for part-time academic staff.

Assurance of the quality of teaching through staff support and development

110 AIUL has in place a comprehensive Faculty and Staff Development Policy and an extensive programme of events available to all staff. Staff development includes provision for attendance at conferences, courses, in-house workshops, sabbaticals, and the use of on-line tutorials developed by the University's corporate headquarters at CEC. Paid sabbaticals are available for up to one term if the appropriate cover can be found. The FSDC has overall responsibility for this provision and meets four times per year. The remit of the committee was widened in 2003 to include administrative as well as academic staff. During 2003, for the first time, it enabled the Campus to sponsor three members of staff to study for master's qualifications. Staff with whom the audit team met commented favourably on the availability of staff development opportunities.

111 The audit team found examples of increasing staff development opportunities in some departments. The Business Department is addressing staff development in a number of ways, such as a greater use of team teaching and a move towards more staff meetings to discuss teaching issues and curriculum development linked to specific staff needs. This Department provides weekly staff development sessions, lasting from two hours to all day, including a workshop on how to develop teaching modules linked to specific learning outcomes, and a workshop on assessment strategies. The Dean of Business has also established a teacher/lecturer training programme in association with the Chair of FSDC. Staff in the Business Department agreed that there were many opportunities for staff development and they were encouraged to undertake research for publication, although it could be difficult to manage conflicting time pressures. Part-time staff had been able to participate in the staff development activities provided for fashion staff, such as the seminars on learning outcomes and dyslexia. The team found that peer observation is being conducted

across AIUL in a variety of ways. Within the Fashion Department it is only mandated for new staff, but there is a substantial amount of co-working in the department which provides similar development.

112 The audit team were encouraged by the level of staff development available, and by the establishment of a committee taking an institutional overview of professional development and support for staff. The team recommends that AIUL further develop and embed the provision across the Campus for both academic and administrative staff, with particular attention to the needs of its part-time academic staff.

Assurance of the quality of teaching delivered through distributed and distance methods

113 There is no distance learning undertaken through AIUL.

Learning support resources

114 The SED indicated that the development and delivery of learning resources is set within the context of the Strategic Plan, the Learning and Teaching Strategy and the IT Service Provision Policy. Allocation of funding to maintain and develop resources is dependent largely on student numbers, and is the responsibility of the Campus President in consultation with the Senior Vice-President, the heads of the Learning Resource Centre (LRC) and of Media Educational Services and the Campus Director of Information Technology. Larger developments, such as the library improvements that had been required by SACS accreditation, are funded separately.

115 The LRC was expanded in the summer of 2004 in response to the SACS Report. Students met by the team generally felt that this was welcome, but that the new space was not yet being effectively utilised. The SED acknowledged an imbalance between books and journals, but pointed out that within the validation relationship OUVS had consistently confirmed the adequacy of the information

resources to support the programmes. However, both the SWS and students met by the team indicated that the library still required improvement in quantity and quality of resources provided. Students also had difficulty purchasing recommended texts through the bookshop, with several texts recommended to students being old editions that were no longer printed. The Business Department acknowledged that there is still a need to increase the funding for student learning resources, to provide better library facilities and to enhance the broader learning experience. The SED indicated that students were able to access facilities at several other libraries, but students expressed some dissatisfaction that they had to travel to other libraries to access materials that they needed. Students were also unaware of the interlibrary loans facility available to them.

116 The provision of sufficient computer terminals or desktop PCs for general student use is also an issue for the Campus, although space was provided in the autumn of 2003 for an expansion in the number of PCs for such use. These machines provide access to private email, students' AIUL email accounts, the Campus Intranet and the internet. A prototype 'Student Portal' is currently being rolled out which will enable access for students to information concerning their grades and their financial situation at the Campus, will provide various forms on-line, and include contact with the Academic Affairs Department regarding changes to personal details. The Student Portal Manager and the staff of the Information Technology Department are available to assist students and faculty with IT-related support issues. Students informed the team that it was often difficult to access a machine as many of the computer rooms were used extensively for teaching. This was particularly the case in the business programme area where the provision of IT facilities appeared to be inadequate for the guaranteeing of student access.

117 The Head of the LRC conducts periodic library-user surveys, the results of which are considered both by him and by the Campus

IEC. He also receives feedback on the library service through AMC, Academic Board, and Library Users' Committee, which meets once a term. The audit team was concerned to hear that AIUL did not, however, benchmark the provision of information resources and facilities against other UK higher education provision of comparable size, and that local managers were not undertaking medium-term planning in the development of resources to meet developing needs of the curriculum. The team heard that AIUL, as a private institution, did not network with colleagues in the sector through the Higher Education Academy and professional associations for support services. AIUL has to provide connection to the internet by means of a private ISP as it is not eligible to connect to the SuperJanet network enjoyed by the sector. Negotiations with the Joint Information Services Committee (JISC) were ongoing regarding the ability to use JISC facilities such as those provided for plagiarism detection.

118 In part as a response to the periodic review report, improvements have been made in the Visual Communications Department, such as the upgrade of the photo studio to provide a larger and better equipped space, a comprehensive upgrade of the Macintosh computer facilities, and the permanent employment of a full-time technician within the Mac Labs. The Department is aware of the planning and budgeting needed to provide for the considerable enhancement of facilities needed to meet student requests and industry demands. In contrast, it was noted that substantial investment is needed in the Interior Design Department to support the curriculum. The provision of specialist resources is showing improvement in some areas, but still more investment is needed in others.

119 Overall, the audit team considered it likely that the resources available to students were, in many areas of AIUL's provision, somewhat below the level normally required for degree-level study. There was little indication that AIUL itself carried out the necessary enquiry to know whether this was the case or not. The team recognised that there had been some improvement in the learning resources over the last two years, but

recommended that this ongoing improvement be further supported through a more coordinated approach, benchmarking against other providers and undertaking the necessary medium-term planning.

Academic guidance, support and supervision

120 The SED noted that the full-time academic staff provide academic guidance where necessary, although students are encouraged to resolve academic issues first with individual instructors for each course. The SWS expressed the view that the provision of academic support was very variable between departments, with a general lack of academic support systems once students have commenced their programme. The SWS was firm in asserting that 'there is one issue which is raised throughout the student population....this is that there is a lack of academic support systems once students have entered the University'. Students acknowledged that in principle an 'open door' policy existed all the way to the President, but many students would not wish to make such a direct approach and others were concerned about anonymity. They pointed out that the Academics Affairs Department is not staffed by academics, nor is it familiar with the intricacies of all departments, and it was therefore unable to provide help in some areas. Sufficient access to academic support is particularly problematic with regard to part-time staff because of the lack of availability outside class times, and also because these staff are sometimes unaware of course and departmental changes.

121 The audit team was told that the information made available to students regarding course assessment was of variable quality. Some departments provided clear guides through the Student Handbook, but according to students met by the team, others had, until recently, provided very little or only confusing information. Students in some departments found both assignment briefs and assessment criteria unclear. It was acknowledged that there had been some recent improvement with the introduction of a generic

guide, but students were still unclear regarding what they had to do to achieve a particular grade and there appeared to be a continuing lack of clarity regarding the US and UK grade differences. Students in some departments, such as Fashion, could easily contact tutors for clarification whereas this appeared to be more difficult for students from other departments such as Business and Interior Design.

122 Programme handbooks contained extensive information to students on the curriculum, including details of the facilities available, course syllabuses and schemes of work. These should provide students with a plan for progression through their studies. However, the audit team heard from students that courses (modules) could be taken out of order across years and that there was inadequate progression advice. The variable sequence could be through student choice, or because staff were unavailable to teach particular courses. The Business Department had recently taken steps to prevent this practice, but students indicated that it was still occurring in most departments. Students were concerned about the implications of this, for instance being obliged to take a more advanced course before they were prepared for it.

123 The SED indicated that students are given oral and written feedback on their work in the department, particularly in respect of mid-term and final assessments in each course they take. The quality of feedback on assessed work did, however, appear to be variable across the departments, with many students emphasising that they did not receive feedback on their achievement or how to improve. Business staff informed the team that they gave feedback forms to students, but students said they did not get them. Members of the audit team observed that the feedback seen on business assignments was neither formative nor consistently related to the assessment criteria. Fashion students, however, were happy with feedback provided. The SGA had recommended that AIUL establish guidelines to ensure a greater level of consistency in this area. The team would support this recommendation.

124 The AIUL Internship Department offers an internship programme for AIUL students. This programme has enabled students to experience and utilise a broad variety of external employability skills that have complemented their learning experiences within AIUL. Internships have a monitoring and support policy and all internships are vetted before commencement. This provision appeared to the audit team to be a distinctive strength of AIUL, an aspect that was well managed and appreciated by students.

125 International students are supported by the General Education Department, which provides English language support on an ongoing basis. During 2002 the Department implemented 'Accuplacer', a computerised diagnostic test in English (and mathematics) for all new degree entrants. All new students, other than those transferring credits at an appropriate level from properly accredited higher education institutions, are required to undergo Accuplacer assessment. As a result they may be required to register in Developmental Level [level Zero] classes in English and mathematics before being permitted to proceed to level 100 General Education courses. During 2003 the Campus introduced the 'Plato' computerized developmental learning system, to complement Accuplacer and it is anticipated that this will assist students to improve particular areas of language difficulty. The Campus also provides a Language Support Centre that offers continuing support to students who have already progressed in their academic programmes but who still experience some difficulty in the use of written and spoken English: the Centre will offer help to students working on theses or presentations for examination purposes, and it will work with any student referred by a faculty member. The Visual Communications Department was particularly complimentary about this facility, and about the support for students with special needs provided by the Counselling Service. The Business Department, however, considered that simply asking students to take basic mathematics and English courses when they first arrive is insufficient and serves to encourage plagiarism because

students often continue to struggle academically. The audit team met students who confirmed that plagiarism was a major problem for AIUL in the Business Department.

126 The audit team found that while there were pockets of good academic support there was a lack of a coherent strategy across the Campus regarding the support required by widely differing groups of students. Many students found it difficult to contact staff to receive the academic advice that they needed. The Internship scheme constitutes good practice. The variable standard of feedback on assessed work is a particular concern.

Personal support and guidance

127 The Department of Student Services provides a range of pastoral support to students including advice on financial and personal matters. This includes a Careers Service and Counselling Centre. It also operates the student housing facilities and arranges cultural activities such as Study Tours. The Counselling and Admissions services were praised by the SGA in the SWS, while students informed the audit team that they considered that careers advice could be improved.

128 The audit team found that the arrangements provided for counselling were particularly sound and well managed. The Counselling Centre is housed in a separate flat with two interview rooms and a waiting room, ensuring confidentiality to students who need assistance. Appointments are necessary with one of the two members of staff in the centre, but they are also available '24/7' by mobile phone, office phone, or text message in emergencies. Their remit includes responsibility for disabled students including those with mental health problems. Students' needs are identified by the Admissions Department and the two departments then work closely together to ensure students receive appropriate help. The Counselling Centre provided statistics for the team showing a large and growing number of face-to-face sessions for students with problems. Statistics provided by staff at the centre showed the increase in sessions and clients over the last three years, the

proportion of full-time students receiving counselling (56 per cent in 2004), the proportion from each department over three years, and the proportion with each type of problem over three years. In 2002, most problems were concerning depression or stress, whereas in 2004 these were still the main problems, but student behaviour in housing and the classroom, and problems resulting from serious incidents such as rape and mugging, had increased.

129 Personal tutoring arrangements vary between departments. Visual communications students find it relatively easy to see their tutors. The Dean of Visual Communications pointed out that, in her department, small class sizes allowed for close and continuous faculty-student interaction and every student is assigned a personal tutor with whom they are encouraged to meet at least once per term. A tutor will assist with monitoring a student's progress within the programme and give advice on the many aspects of their university life, or direct them to others, when appropriate. Student feedback is sought through these tutorial sessions, classroom evaluations and from regular student forums which are held once per term. The Business Department is much larger and students experienced difficulties in contacting tutors when they had problems. A new system of mentors (personal tutors) is being introduced in the Business Department to try to improve support for students. From discussions with students and staff, a strong perception was evident that the mixed class sessions with SAP students were also an issue for teaching quality, as the SAP students were thought to be less committed to their studies, and to cause disruption to classes, therefore affecting the work of degree students. SAP students also appeared to have greater calls on Student Services because of their personal circumstances.

130 There is an Orientation Day for all students on arrival at AIUL. An Orientation Handbook provides useful information, including the requirements of the two degrees and a URL to the main Student Handbook for further details. The Student Handbook identifies

the process to be followed for academic appeal, though students did not appear to be fully informed of this process. The Business Department has indicated that the introduction of a new grade appeal form has helped to tackle grade inflation and fewer students now appeal their grades, as the appeal process has made grading more transparent.

131 An issue raised by many students concerned the transparency of fees and other charges and the process for access to financial aid. The audit team heard several complaints that the process for accessing federal aid appeared overly complex and left them in difficulty at times. The team also heard that additional charges levied for the UK degree, late registration, and extra classes were not made sufficiently clear to students before they arrived in London. Staff from Student Services explained the complex nature of the requirements placed on them regarding the issue of federal aid. They also showed the team an information sheet, detailing all charges, that was given to students.

132 The audit team considered that the processes operated by AIUL for the distribution of financial aid and for the collection of fees and charges were not well managed and that more could be done to assist students in understanding their financial commitments and in accessing financial support. The team found that the work of the Counselling Service constitutes good practice. In general, considerable differences in quality of service were evident in the different areas providing support for students. The audit team therefore would advise AIUL to introduce more systematic internal self-evaluation of the service provided to the student, and to develop a comprehensive and integrated approach to the provision of its student services (see also paragraphs 119 and 126 above).

Collaborative provision

133 AIUL does not have any collaborative partnership arrangements in the usual sense, but it does have articulation agreements with several institutions in Malaysia, Poland and the

UK. These agreements provide straightforward arrangements for reciprocal credit transfer and operate within an AIUL Code of Practice derived from QAA's *Code of practice* section on collaborative provision. The AIUL Code provides for students transferring up to 75 per cent of the credits necessary to gain any qualification at AIUL, including the OU validated degrees.

134 AIUL currently has such articulation agreements with:

UK: Aspect Colleges, NCC Ltd, Rhodex International

Poland: University of Lodz

Malaysia: HELP Institute, INTI College, KDU College, Lim Kok Wing University, Raffles La Salle College, Sedaya College, Sepang Institute of Technology.

Section 3: The audit investigations: discipline audit trails

135 In each of the selected DATs, appropriate members of the team met staff and students to discuss the programmes, studied a sample of assessed student work, saw examples of learning resource materials, and read annual reviews relating to the programmes. Their findings in respect of the academic standards of named awards are as follows:

Business

136 The AIU business DATs considered the Bachelor of Arts (Honours) Business Administration programme which was originally validated by the OUVS in 1999 and reviewed in 2003 with subsequent revalidation approval.

137 The documentation provided for the DAT included a programme handbook and a self-evaluation summary. The programme handbook included a student handbook section and the currently validated programme specifications. The documentation also included the programme annual reports for 2003 and 2004. The validated OUVS programme specification was contained in the programme handbook and this included the course

(module) level specifications. These contained details of course delivery, individual course descriptions, course prerequisites, student performance objectives (learning outcomes), teaching methodology, assessment weighting and course policies including attendance requirements.

138 The OUVS programme specification is designed to meet the requirements of the FHEQ and the *Code of practice*. The audit team found that the completion of the course (module) level programme specifications supplied with the original DAT documentation were inconsistent and varied in content and on matters of detail and there was no evidence of an overarching standard being applied to their completion. There were examples that contained detailed assessment criteria and marking schemes that corresponded to expected levels of student achievement, while others contained no assessment criteria and only a minimal reference to grading policy and practice.

139 In further considering the clarity of course (module) specifications and their relationship to the FHEQ and the requirements of the Code of practice, the audit team received more recent examples of course templates than were provided within the SED for the audit. These included examples of recently introduced revisions designed to address the lack of standardisation indicated in the course (module) specifications. However, the team could find no clearly integrated strategy for undertaking, embedding and reviewing this activity within the annual monitoring reports for the programme area.

140 Within these new course (module) specifications which were being completed using the OUVS template, assessment weightings were being standardised and were beginning to indicate a clear relationship between examinations and course work with a consequent rationalisation of assessment methods. The audit team found no fully articulated honours level assessment rationale underpinning these changes either within AIUL's learning and teaching strategy, or within the business programme annual monitoring

reports, or within departmental meetings. The team's review of these revised course specifications indicated that there were still inconsistencies in their completion. There were examples that contained assessment criteria while in others these were still absent. While the team acknowledged the recent, and necessary, progress that had been made in the definition and control of standards through the introduction of new course template specifications, this work was still at too early a stage to be reflected clearly in the operation of assessment.

141 The audit team understood that the recent revisions to the course template contents were being undertaken in order to address substantial and serious weaknesses in assessment practices. These included the effect that over-marking and subsequent grade inflation was having upon the outcomes of assessment. Evidence of patterns of grade inflation had been identified internally and had been evident since 2002. The revisions were also related to more fundamental issues which external examiners for the programme had raised since 2002. These included concerns related to the robustness of the overall assessment process and the manner in which the academic standards reached by all students in a cohort could be securely examined and confirmed.

142 The audit team formed the view that while a discussion of the importance of providing standard programme specifications was occurring within the Department this had not yet been fully embedded, articulated or established as a part of the academic strategy of the department. The team found little clear consideration within the quality assurance processes of the programme area of the impact that the ongoing redrafting of course (module) specifications would have on the progress of students currently enrolled on programmes, or of the revalidation requirements that might arise from these changes. The Department had, however, undertaken the delivery of workshops to explain the changes in grade calculation procedures and assessment methodology to students.

143 Student progression and completion data are provided through the central support services of AIUL. The AIU (Corporate) annual reporting cycle requires programmes to comment on performance and recruitment targets, 'attrition' rates and other market focussed statistical performance indicators. Statistical data may be accessed in a variety of formats including trend analysis, quarterly analysis of recruitment, entry profiles, levels of student credit achievement and student grades of performance, progression analysis, and gender and demographic profiles. Individual student transcripts of performance are available, through password-protected systems, to the individual student and to academic staff.

144 The analysis undertaken of programme statistics within the departmental annual monitoring report to the OUVS submitted in December 2004 contained little formal consideration of the full statistical information available to the Department or of the statistical appendices that are attached to the report. The report confirms that, 'target numbers have, again, been generally met,' and then discusses the general context of international business education. The report indicates the continuing difficulty of managing 'grade inflation' and associated student perceptions that develop when 'students have been given a false sense of their academic worth.' In evaluating student progression the report refers to departmental concerns that 'too many students were being allowed to go forward towards the Open University degree who simply were not up to the standard required'. The report recognises the need to introduce necessary quality assurance measures to address this, including the introduction of moderation boards and particularly the requirement for the introduction of internal AIU London qualifying examinations to confirm student suitability for entrance to the OUVS programmes. The audit team noted that this requirement had also been identified in the previous year's departmental annual monitoring report. The team found no reference to the resolution of this issue in AIUL's Annual Monitoring Executive Summary Reports to the OUVS for 2003 or 2004 or in the

Academic Board Minutes of 17 November 2004. The team concluded that while reference was being made to statistical and other data at the programme level, there was insufficient coordinated, sequential discussion of all the strategic matters raised by the data and the report within AIUL's central quality assurance monitoring procedures.

145 In the departmental annual monitoring reports to the OUVS for 2003 and 2004 there is no substantial consideration of quality assurance data associated with student satisfaction surveys, which is available at the campus level, or with the student perception of their learning experience at either the institution or the programme level.

Consequently although annual monitoring reports identify particular aspects of individual staff development requirements at programme level there is no transparent way in which they are matched to a strategic consideration of the learning needs of students or to the students' perceptions of the strengths and weaknesses of the provision.

146 The annual monitoring process at AIUL is in its third year of operation. Business programme annual monitoring reports are produced in accordance with the template provided by the OUVS. The production of the report is the responsibility of the Dean. The audit team noted examples of individual agenda items drawn from the annual monitoring report being discussed at the faculty/departmental meetings. However, there appeared to be no formal process for sharing and agreeing the report within departmental meetings prior to its submission, and little opportunity for feedback to staff on the receipt of the report at the institutional level of AIUL, or by OUVS.

147 Analysis of the annual monitoring reports for 2003 and 2004 indicated that there were examples of improved procedures being introduced. These were associated with assessment and assessment criteria, staff development, the clarification of grade equivalence between UK and US systems, the introduction of academic grade appeals

procedures, the central coordination of assessments, and the control of the order and sequence within which students would be allowed to register for courses (modules) as they progressed through the programme. While these examples were being progressed, the audit team also noted significant omissions. Other disciplines had rigorously and systematically considered the reports of external examiners, their outcomes and responses, and covered course content development, statistical evaluation, academic standards issues and other quality assurance matters while those of the business discipline were less inclusive in their focus. In the 2004 report for example, following the critical report of the external examiners in July 2004 in which external examiners indicated that 'We cannot agree that the standards being set are appropriate for the award of a first degree from the OU', there is no adequate discussion of the response provided to the external examiners' report and no discussion of the academic rationale upon which the business programme area is basing its honours capability and determining its academic standards. The team also found that the significant proposals raised in the annual monitoring and review (AMR) reports did not appear to have been carried forward for discussion at higher levels in AIUL. These included, for example, the need for AIUL to introduce a qualifying entrance examination to OUVS programmes to safeguard the academic standards in the programme and the need for the review of the 'open access minimum/entry qualifications regime' operating at AIUL for OUVS programmes.

148 The audit team concluded that there was insufficient AIUL guidance on the required standards which were expected to be met in the completion of annual monitoring reports and little consideration of the manner in which they were consequently able fully to contribute to the operational and strategic quality assurance agendas of AIUL. There may be a need for a clearer statement regarding the institutional responsibility for responding to AMR reports, thus avoiding the danger of seeing them as merely a response to the requirements of the validating University.

149 On the evidence of the AMR reports, the audit team judged that while some much-needed development was being undertaken in the Business area, and there was an evident capacity to evaluate and identify areas for improvement, there remained issues relating to the demonstration of clear accountability and ownership. AIUL particularly needs to clarify the relationship between the departmental responsibilities and outcomes of AMR and the arrangements for responding to these within the committee structure and executive levels of the institution.

150 The audit team reviewed the minutes of Board of Examiners meetings for the programme. These indicated that there had been a substantial number of quality assurance and academic standards concerns raised since 2002. In November 2002 external examiners had adjourned any decisions on degree awards because 'the sample of work...that had been made available to them did not permit them to determine with sufficient precision the overall standards and performance of the cohort'. At the reconvening of the Board in December 2002 there was sufficient student work available upon which the external examiners could make a decision. At this meeting recommendations were being made for awards which were not available within the validated scheme and for which OUVS authority had to be sought through Chair's action. In June 2003, the Board considered substantial issues of plagiarism related to a specific module and then received reports from both external examiners present which related 'to their inability to confirm the other grades of candidates before the Board because of significant concerns relating to the management of the examinations process and the academic standards applied by markers'. In January 2004, external examiners once more requested the adjournment of the Board requiring more detailed scrutiny of the work of students in the final two years. In the July Board of Examiners in 2004, external examiners again raised concerns regarding the internal moderation of award classifications and the limited scope of the sample of work available to be seen by them. The audit team further noted

that one external examiner appointed for postgraduate and undergraduate business programmes had, in his letter of resignation, indicated that, in the period between his appointment in November 2003 and the time of his resignation in January 2005, he had only been involved in one consideration of any examination papers or assessed work at master's level and that was in November 2004. More importantly he had not been invited to view any student assessed work during his period of office and could not 'make any comments regarding level of achievement or the grades that have been awarded' as no master's level student work had been made available. At the July 2004 Board of Examiners meeting the three external examiners indicated that they were not prepared to sign the OUVS Examination Board pro forma for the recommendation of awards, requested a written explanation of the working of the Faculty Moderation Board and expressed concern regarding the whole assessment process.

151 AIUL received the external examiners' report for the business programme shortly following the July 2004 meeting of the Board of Examiners. All three external examiners for the BA Hons Business Administration programme jointly signed the report, which took the form of a comprehensive overview of assessment and examinations, with advice and recommendations on academic standards. The report identified fundamental concerns regarding the academic standards being achieved within the programme, which included the identification of 'alarmingly low standards of student achievement that...have been observed through...sampling of final examination papers'. The audit team noted that this had led to the recommendation of an overall reduction of two degree classification bands for the cohort at the Board of Examiners convened in April 2004 and that the externals were of the view that 'AIUL has substantially lost sight of the standards which they should be seeking to achieve'. The report continued that academic 'standards do not bear favourable comparison with those of other undergraduate programmes...on either side of the Atlantic'.

The report also contained fundamental criticisms in the quality of teaching and learning available to the students as indicated by subsequent student performance. The external examiners noted that the agreement to produce the joint report was an expression of their concern 'for the learning and teaching standards at the university'. The report concluded by stating that the examiners were unable to confirm 'that the standards being set are appropriate for the award of a first degree from the Open University'.

152 The reconvened Board of Examiners then met on 7 September 2004. The three external examiners confirmed specific awards but declined to confirm others because 'there was insufficient relevant evidence on which any recommendation might be based'. These decisions by the externals were supported by a number of quality assurance and academic standards observations addressed by them to the programme area for consideration and action at the Board. These included: that module prerequisites should be uniformly applied within the programme; that 'Honours' courses (modules) should only be taken in the third and fourth years of the programme and that specific honours courses (modules) should only be available in the final honours year of study; that duplication of courses being taken by students should be prevented; that 'self directed student studies' should not be used in OU validated programmes; that 'basic quality assurance' procedures should be introduced immediately into the business department; 'that there should be a programme director, that assessment schemes should be uniform across the degree, that provision should be made for the archiving of assessed work to allow external judgements to be made, that external examiners should be provided with sight of final examinations papers after the external examiners had checked the draft and their comments had been included, and that forms of assessment other than examinations should be moderated'.

153 In the light of the fundamental issues related to the security of academic standards

raised by the external examiners' report, and following further correspondence, the OUVS, together with AIUL, determined to recommend the suspension of further registrations onto the BA (Hons) Business Administration programme, with effect from January 2005. OUVS placed the programme in an OUVS 'special measures' category for support requirements. The audit team confirmed the necessary promptness of these actions as a precautionary measure related to the protection of academic standards of Open University awards.

154 The audit team found that at the level of the programme there appeared to be no single point at which the external examiners' report was fully discussed by the staff concerned and a comprehensive response made. In Business Faculty departmental meetings held in October 2004 consideration was given to a range of issues raised in the external examiners' report, including improving the administrative support and the management of assessment. The Faculty had also discussed the standards issues raised, and it was acknowledged that 'the gap between actual and expected standards...is true in many subject areas and most critical at 300 and 400 levels' [that is, at the final award stage]. However, the team did not find evidence of a systematic and full consideration of all the points raised in the report, with accompanying action planning to address the deficiencies. Further evaluative consideration of the report appeared to have been subsumed into the wider consideration of the OUVS proposal that recruitment into the business programme be suspended.

155 The audit team also considered the recent introduction of moderation board procedures within the business programme area, and the effectiveness of those procedures. Moderation Board functions include the checking of examination papers and the management of the assessment processes, the consideration of comments from external examiners on examinations papers, the reviewing of marked and assessed student work for each course (module) and matters associated with the procedures for examinations. The work of the boards was clearly contributing to the more

effective management of the assessment procedures in the department. The moderation board had, however, itself found that there were continuing instances of grade inflation having to be dealt with by the board through reduction of grades for courses, that there were substantial numbers of plagiarised projects requiring exceptional action to be undertaken within the assessment process, and that there was continuing incorporation within examinations questions of material which 'continues to teach' and which it is 'not appropriate to do...in a level 3 paper'. The team noted that the Moderation Board was responding to these matters as they emerged within its business agenda but concluded that while the management of the process was becoming more effective the understanding of assessments requirements at honours standard had not yet been demonstrated to be securely embedded within the Department.

156 The audit team acknowledged that these developments and other actions (see paragraph 76 above) indicated progress in addressing a number of the matters of concern raised by the external examiners. However, the team was unable to determine fully where the responsibility lay for any clear, comprehensive, integrated and effectively communicated approach for the addressing of all the matters raised by the externals, either the programme or at the institutional level of responsibility. The institutional response to the report is discussed above (paragraphs 77-80). On the basis of the evidence available, the team therefore concluded that in the business programme area the critical role of the Board of Examiners and the contribution of the external examiners to assuring the academic standards of the awards had not yet been fully embedded and consolidated within an established assessment procedure. It was too early to have confidence that the necessary actions would be taken at the department and institution level to provide this essential security for the awards.

157 The audit team noted that, prior to the introduction of the standardised AIUL course assessment guidelines in January 2005, there was evidence of substantial confusion among

both the student body and academic staff regarding the basis upon which an assessment judgement was being made, the translation of that judgement into an awarded grade which satisfied both US and British academic standards requirements, and the understanding of the student as to how the grade had been determined. The team recognised the progress which had been made in providing clarification and guidance on assessment, moderation and examination protocols at the programme and the university levels and the provision of explanatory workshops and guidance packs to staff and students on these matters.

158 The audit team noted that these measures had been introduced to address 'particularly for the business department...the history of grade inflation' which had been caused by the 'high pressure to award grade A or B for examinations and assignments'. These pressures were being caused in part because of the need of US students 'to acquire specific grades to transfer back to other programmes in the USA' and to maintain the US financial aid support. The team was not able to confirm the secure and consistent application of these reforms at the discipline level. In coming to this view the team noted the lack of a clearly articulated relationship between the generic AIUL 'Course Assessment guidelines' and the 'Assessment Criteria and Guidelines on Marking and Assessment' which are issued to academic staff and which support the completion of guidance feedback sheets to students to inform them of their progress. The team reviewed the use and effectiveness of this guidance and feedback sheet system through examining the examples provided with the student assessed work within the DAT, and considered the system and its use as a means of communicating with students on their progress and grade attainment. The team found the completed guidance sheets for students to be inadequately utilised by academic staff, lacking in consistent completion and containing little in the way of formative guidance notes provided for students which would enable them to fully understand the basis upon which they were being assessed.

159 The audit team was provided with a comprehensive sample of examination papers and project assignment papers. The team also viewed a substantial representative sample of student work, which was composed of examination scripts, completed assignments, and project work from the business undergraduate programme area. In reviewing the sample of student examinations scripts auditors found substantial confirmation of the matters raised by external examiners. In reviewing student assignments auditors noted that assessment guidance and student feedback cover sheets were present but the substantial majority contained no completion of the criteria referenced sections designed to provide information on the students' performance against assessment criteria. There was little formative comment on the student performance against the achievement criteria provided on the feedback sheet. There was no evidence of double-marking of assignments.

160 Students indicated that feedback was only available if it was sought out on their initiative and that there was no regular and secure way in which they could obtain formative academic comment on their assignment performance. Students were normally expected to obtain final grade allocations for examinations and assignments by means of their electronic AIUL records. The audit team concluded that while the system for providing formal feedback was in place its role and function as a means of providing appropriate formative feedback to the student on their performance was not consolidated within the assessment rationale of the Department and did not yet effectively contribute to the establishment of academic standards at undergraduate level.

161 The business programme area uses a student forum as a means of supplementing student representation at faculty programme board meetings and there is a programme area newsletter that provides details of discipline activities. The students seen by the audit team had little knowledge of the forum and its role as a means of communicating with the student body. Student forum discussion notes from

2003 included matters associated with the provision of accurate information to students in both the US and the UK on their automatic entitlement to UK awards. These forum notes from 2003 recorded six student complaints being raised which were associated with inaccurate information being provided to US master's level students who had been informed by both US and UK admissions staff that an automatic entitlement to OU and US master's qualifications was available at AIUL. Undergraduate students saw this lack of precision in the presentation of information on the automatic entitlement to both OU and US qualifications while studying at AIUL as characteristic of their experience when admission to AIUL had been sought (see also paragraphs 177-180 below).

162 The audit team reviewed its overall findings for the DAT on the basis of the documentation provided, and the meetings with students and staff in the business area. The team was not able to confirm, on the basis of the reports provided by external examiners, that the standards expected of students in the BA Hons Business Administration programme were appropriate to the title of the award and its location within the FHEQ. The team recognised that a large number of intended improvements were either in train or envisaged at the time of the audit, and endorsed the pattern of support that had been put in place by the OUVS. Nevertheless, it was not able to confirm that the quality of learning opportunities was yet suitable for a programme of study leading to the named award.

Fashion

163 The DAT covered BA Hons Fashion Design, BA Hons Fashion Marketing and BA Hons Fashion Design and Marketing. The DSED consisted of the most recent annual monitoring report (for each programme), the programme handbook, course outlines, programme specifications, a list of staff delivering the programme and a copy of AIUL's learning and teaching strategy. The programme specifications are based on the OUVS specification pro forma, and make clear links to

the FHEQ, Subject benchmark statements (Art and Design; General Business and Management). In discussion with staff, the team found a clear understanding of the programme specifications and their relationship to subject benchmark statements.

164 Progression and completion data are made available for annual monitoring reviews, as are grade curves. In addition, the Programme Chair requested information ad hoc at various points during the year, and relevant data that were provided effectively by the Institutional Research Officer. The audit team was made aware of the difficulty of using conventional progression data in the AIUL context of frequent student entry and exit points. While departmental use of the data was as good as could be expected, it raised some questions concerning the management of progression and completion data in the AIUL institutional context.

165 The audit team saw annual monitoring reports for all three programmes and discussed them with staff. Careful consideration of programme delivery was a regular activity within the department, and it was clear that the department were looking to enhance this, especially with regard to the articulation between module-level review and programme-level review. Here, the Programme Dean explained how the development of a pro forma for the coordination of evaluation data from individual courses was part of this enhancement strategy; the form was subsequently made available to the team. However, the team found little evidence of feedback from the institutional level on the effectiveness of the annual monitoring reviews.

166 External examiners' reports were carefully considered within the Department, with full responses prepared by the Programme Dean. Although the team was told elsewhere in the audit that external examiners' reports were considered by Academic Board, there was little evidence that any institutional-level scrutiny had found its way back into the department.

167 The audit team looked at assessed work and assessment strategies for a range of modules across the levels of the programme, covering Basic Principles of Design, International Retailing, Knitwear, the Senior Thesis in Fashion Design, and the Senior Thesis in Fashion Marketing. In all the material seen by the team, there was a clearly articulated set of assessment criteria which allowed the staff to mark using the entire range. The quality of feedback to students was high, and marks were well calibrated against assessment criteria. The Department had developed and introduced very helpful templates to assist students in the work on their dissertation (senior thesis). These constituted good practice in formative assessment. The team formed the view that marking standards were secure and sometimes even over-demanding. The team found that programme specifications were being well used in the construction of the subject-specific grading criteria, and that assessment is well calibrated against the statements in the *Subject benchmark statement* for Art and Design. Overall, assessment strategies in the Fashion Department were well managed. The standard of student achievement is appropriate to the titles of the awards and their location with the FHEQ.

168 The audit team was provided with student handbooks as part of the DSED. As might be expected, there was a good deal of overlap between the handbooks for the various fashion programmes. The handbooks largely consisted of course descriptors with a certain amount of orientation material. While the handbooks provided the material that the students needed, the team heard that the course-descriptor format required by OUVS meant that some of this material was intimidating and little used by the students.

169 Learning resources had raised some concerns with students who pointed to poor library provision that had been only very recently improved, and to some serious difficulties with equipment for computer assisted design. Students reported a successful intervention by the Programme Dean with the provision of five PCs, two scanners and a

remote printer to support computer-aided design (CAD) in fashion. In discussion with staff, it was unclear whether this additional support had arisen out of annual monitoring or other formal reporting. It appeared that it had been agreed as a matter of negotiation between the Programme Dean and the Senior Vice-President arising out of complaints raised at student forums.

170 Students are supported by a personal tutor. Each of the three assistant programme deans serves as a personal tutor to one-third of the student body. This is already a strain on the assistant deans, a position exacerbated by the recent resignation of one of them. Students nevertheless spoke warmly of the personal and academic support that they received from the fashion staff. Students also reported very positively on the internships (placements) in which they participated during their degree, and it was clear that high profile and productive placement opportunities were made available. In conversations with staff, it became clear that there are currently two different routes for the undertaking of internships with different credit weightings; the team were pleased to note that the revalidation of fashion had resolved these anomalies.

171 Student feedback was difficult to track in the context of the DAT inquiry. Student evaluation forms were passed initially to the central institution and then only to the programme deans. There are no synopses of student evaluations made available to students, and the team detected a certain cynicism on the part of the students about the exercise. Students learned about the effects of their comments through such publications as the Fashion Newsletter. The team thought that there was a quality loop waiting to be closed, one of the very few in fashion that remained without attention, but also noted that this was an institutional practice that would require an institutional solution.

172 Staff-student liaison is conducted by means of student forums; both staff and students spoke enthusiastically about these forums. They are well attended on both sides and undertake

important work: the instance cited of the fashion marketing laboratory resulted from a problem with access to CAD labs. Raised in a student forum, this matter was communicated to the Department and Programme Dean effectively, and formed the basis of expeditious solution.

173 On the basis of discussions with staff and students, examination of assessed work, and consideration of the DSED material, the team concluded that the quality of learning opportunities is suitable for programmes of study leading to the named awards of BA Fashion Design, BA Fashion Marketing and BA Fashion Design and Marketing and their place in the FHEQ.

Section 4: The audit investigations: published information

The students' experience of published information and other information available to them

174 The SED observed that as a higher education institution outside the public sector, AIUL is not required to produce the same range of public material as HEFCE-funded institutions. Nevertheless, it produces a large amount of material for public use, including the AIU (Corporate) and AIUL publications. Of these the most important are the Catalog, the annual University Factbook, the prospectuses and the website. The Catalog and Factbook are corporate publications which are reviewed and updated annually by committees chaired by AIU (Corporate) senior officers. Staff explained that there was no systematic annual review of published material relating to AIUL programmes.

175 The audit team saw published information produced by AIUL for promotional purposes (Prospectus, website, programme-specific brochures), for induction (Orientation Handbook) and the institution-wide Student Handbook. It also examined programme-level handbooks in fashion and business. The provision and quality of information was

discussed by the team with a large number of students at five student meetings.

176 In the course of the audit it became clear to the team that there were a range of issues to be addressed around effective communication with students, and it appeared that often students found difficulty in contacting the relevant staff or in gaining access to the information that they required. The team found that in the feedback from students that they reviewed, students were very critical of the means by which they could communicate with staff (see paragraph 97 above). Staff, however, appeared to have only limited awareness of students' difficulties regarding information and communication.

177 Students found the published information available to them was broadly helpful, but identified a major concern which focused on a single but crucial issue. In discussions with students, the possibility of gaining two degrees 'for the price of one', as the SED expressed it, was repeatedly raised as an important reason for the selection of AIUL as an institution at which to study, but in the same meetings great dissatisfaction was expressed at the way in which this expectation - raised before admission - was realised during the students' course of study.

178 This concern was expressly highlighted in the SWS, which pointed to a lack of awareness of students, before their arrival at AIU, that the likelihood of getting a British degree was independent of the likelihood of getting a US one. The SWS cited the front page of the AIU website 'Our Bachelor Degree programs are designed to provide you with two internationally recognized degrees: a British and an American Bachelor's Degree', and argued that the exact relationship between UK and US awards was 'insufficiently explained in available publicity materials'. The SWS also pointed to the absence of the assessment guide in the Business Department, which might have made the award requirements more clear, a situation which had in the past led to 'frequent argument...among faculty and students'. This has now been produced.

179 The audit team found that the AIUL prospectus offered similar statements, claiming that: 'Students can benefit from earning two internationally recognised bachelor's degrees' and 'you do not have to do any additional work to qualify for the British degree as well as the US degree: it is conferred automatically. You receive twice the recognition with qualifications that will open doors on a global scale'. However, the team found that in documents presented to students on admission, the necessity of further study, and a higher grade point average, for achieving two awards, was made more explicit as was the fact that the award of an OUVS degree was not in fact automatic. In a presentation to students on the business programme the point was made quite clearly: 'The British system has additional requirements and only certain students will be eligible for this degree'. Nevertheless, during its visit the team was given promotional material that still referred to the 'automatic' conferral of two degrees. The team also noted that the misleading information offered in this context had also previously led to misapprehensions regarding AIUL master's level programmes, which had now been addressed.

180 In conversations with students met by the audit team, the concerns expressed in the SWS were found to be if anything understated. One student described the material in the prospectus and on the website as 'deceptive' and other students expressed similar concerns. Staff went further and suggested that some students did not realise the restrictions until the time came for the selection of level 300 or 400 courses a view that was also supported by student opinion. Some staff had been unaware of the statements made in the publicity material, and explicitly disagreed with what was claimed. When this issue was raised by the team with senior managers they drew attention to the fact that the publicity material about which the team had raised concerns had been made available to the OUVS at the time of its Institutional Review of AIUL, and that no comment or criticism had been made at that time. The team considered that, quite apart from the position of the validating authority,

there was the issue of the responsible ownership of the programmes provided by AIUL and of its proper duty to students in representing what was required for an award. AIUL must be sensitive to the need not to allow market considerations to override academic probity.

181 The audit team found that the information provided to prospective and current students with regard to the requirements for qualifying for degree awards is misleading and that it is essential that AIUL take urgent action to ensure the accuracy of all the relevant promotional materials.

Findings

Findings

182 An institutional audit of the American InterContinental University London (AIUL) was undertaken during the week 9 - 13 May 2005. The purpose of the audit was to provide public information on the quality of the opportunities available to students and on the discharge of responsibility for the awards of the Open University under its validation arrangements. As part of the audit process, according to protocols agreed with the Higher Education Funding Council for England (HEFCE), Standing Conference for Principal (SCOP) and Universities UK (UUK), two audit trails were selected for scrutiny at the level of an academic discipline. This section of the report of the audit summarises the findings of the audit. It concludes by identifying features of good practice that emerged from the audit, and recommendations to AIUL for improving current practice.

The effectiveness of institutional procedures for assuring the quality of programmes

183 AIUL operates within a dual accreditation framework. This requires that it satisfies both the strategic planning framework of the corporate University (AIU (Corporate) of which it is the London campus, and the annual monitoring and review (AMR) requirements of the Open University Validation Services (OUVS), with respect to its UK awards. AIUL consequently also operates within two monitoring and review cycles, providing documentation to both the AIU (Corporate) and OUVS. The self-evaluation document (SED) identified these two reporting processes as having distinctly different emphases. The AIU (Corporate) AMR/review cycle has a more market driven, customer-focused emphasis while the OUVS cycle relates firmly to the UK higher education quality assurance and academic standards context, with different reporting requirements. The OUVS as the representative of the validating University is responsible for all validation and accreditation procedures as they relate to UK awards of AIUL.

184 Partly in response to these dual requirements, AIUL has established a complex assortment of different committees and subcommittees to address quality-related issues, a number of which had been very recently introduced. Because of the small number of full-time academic staff on the establishment, the membership of these committees is often overlapping and there is a real possibility that business is unnecessarily duplicated. It was not clear that the majority of staff at subject level yet understood the functions and relationships of committees, or were well acquainted with the policies generated by them. There is a danger that the very rapid, and often simply reactive, introduction of a large number of new structures and policies for the assurance of quality and standards is consuming the energy of senior staff and in itself creating risks to quality. There will therefore be benefit in reviewing and rationalising the committee structure so as to provide a more coherent and integrated oversight of quality and standards. In particular, the role of Academic Board requires strengthening, perhaps through consolidation with its subcommittees and also through a greater genuine involvement of its members in major academic decision-making and formulation of policy. The relationship between Academic Board and the Institutional Effectiveness Committee, both with a similar remit for quality assurance matters, also merits attention. Finally, AIUL may wish to reflect on the wisdom of placing an unusually exclusive reliance for academic leadership on a single post, that of the Senior Vice-President and Academic Dean.

185 AIUL has very recently published a number of guidelines to support staff in the management of quality and to explain the quality assurance requirements. These include a Quality Assurance Handbook, and Guidelines...for External Examiners. These are likely to be of value in assisting staff in understanding AIUL's quality assurance arrangements, but the former publication in particular was produced at the time of the audit and it was therefore too early to assess its usefulness. Recognition of the importance of

good communication with staff in embedding quality management practices has come rather late but is nevertheless to be encouraged.

186 Arrangements for the initial development and approval of programmes at AIUL follow the guidelines laid down by the OUVS and were found to be soundly based. They expect staff to develop programme specifications in line with the QAA Academic Infrastructure, and there is a positive involvement of external advisors with experience of industry in the development of programmes. The AIUL AMR procedures at the institutional and departmental levels are in the third year of operation and are not yet applied at a consistent standard or embedded fully at the departmental or the institutional levels. There is no clearly integrated, robust relationship between the production of the departmental/discipline level AMR and the consequent institutional AMR report to the validating University. The monitoring arrangements only variably include consideration of student feedback on programmes, and in general the representation of students, formal consideration of their views, and a systematic responsiveness to the student voice are all relatively underdeveloped at AIUL.

187 Periodic review procedures at the programme level have only recently been established and while the audit found that the single review which has been carried out produced generally positive outcomes, it was not clear that the process was yet well understood within AIUL. That review included an external member with relevant professional experience who had played a valuable role in the process. However, there is as yet insufficient evidence upon which a judgement on the full contribution of periodic review to the quality assurance activity may be made. External reviews carried out by the OUVS have presented AIUL with reasoned and appropriate critical comment on AIUL quality assurance, academic standards and enhancement issues. In considering the way in which inputs from OUVS external review had been received and managed, the audit team concluded that AIUL has not yet established a sufficiently rigorous or embedded process for the

timely and appropriate ownership, management, or response to the external assurance provided by its UK validating body.

188 The SED emphasised that there should be no problem for students in raising issues of concern within AIUL as the management team operate an open door policy. The audit team heard that students were aware of this opportunity but that they were not all comfortable with approaching AIU staff in this way. Students expressed a concern about confidentiality and anonymity. The Student Government Association (SGA) is small, has a limited remit and does not benefit from sabbaticals or financing, so that there is a limit to what it can achieve on behalf of the student body. The SGA does not therefore provide training for other student representatives and most other students were unaware of the SGA officers and what they were achieving. The team was concerned that appropriate and systematic mechanisms were not in place for staff-student liaison, and recommends that AIUL provide further support and encouragement to the SGA and student representatives at all levels in order that the student views can be better taken into account.

189 Questionnaires are regularly used to elicit student feedback on courses (modules) and there are occasional general questionnaire surveys conducted. It is recommended that AIUL seeks to make greater use of module evaluation for improving learning rather than primarily for assessing staff performance, and that feedback is also sought from students on their overall experience of programmes. There is a need to give attention to the ways in which feedback can be given to students on the outcomes of questionnaire surveys, so that they can feel that this is a productive aspect of quality assurance. During the audit, the team heard many and repeated expressions of concern from students regarding the quality of the learning experience at AIUL.

190 The audit team found that it was too early to make a positive judgement on many aspects of AIUL's quality assurance arrangements because of the very recent introduction of

structures and practices. On the other hand, it found clear evidence of continuing weaknesses and incoherence in those arrangements, poor communication to the level of the programme, together with variability between subject areas in their implementation. There were also a number of serious concerns identified with regard to the student learning experience, and the communication of student views within the quality assurance system was found to be generally inadequate and again variable across subjects. As a consequence, the conclusion of the team was that at present, no confidence can be placed in the soundness of AIUL's management of the quality of its programmes.

The effectiveness of institutional procedures for securing the standards of awards

191 AIUL accepts for admission students with a wide range of ability, with standard entrance requirements which are lower than those conventionally expected in UK higher education. Its recruitment is also truly international, with students from many different countries with differing levels of language competence and familiarity with the expectations of study in higher education. Accordingly, there is testing at entry and there are support systems in place to assist students with language skills and mathematical skills. There is also advice and support available from the Department of Student Services. Nevertheless, it appeared to the audit team that there were substantial challenges to staff and students in some subject areas in bringing the achievement of weaker entrants to degree level performance. The tensions which have resulted from this situation were evident in the symptomatic occurrence of grade inflation, plagiarism, and failure to progress. These difficulties may well be exacerbated by the effect of multiple entry points to programmes, of the presence of occasional students on Study Abroad Programmes with a less developed commitment to their studies, and the custom in some programmes of allowing students to take modules in a non-sequential pattern. There is little doubt that the admissions policies and

multiple points of recruitment that have been adopted by AIUL place additional challenges on the institution with regard to the securing of standards, and that these challenges had yet to be fully recognised or addressed.

192 The audit team found that the effective use of student-related data and statistics was not embedded within AIUL's processes for quality assurance and observed that while some valuable data was gathered and analysed, the institution had not yet clearly established its potential use for evaluation purposes. In particular, the team noted that the progression and achievement data, which could be used for monitoring standards across time, were not in a form useful to staff at the subject level.

193 In the course of the audit, the audit team noted a considerable volume of reports and correspondence with OUVS which had communicated the validating body's concerns regarding quality and standards, and had made recommendations to AIUL. AIUL and the OUVS have been engaged over a prolonged period of time in the resolution of a number of matters related to the effective management of the assessment processes and the methodology used to calculate degree grades for OUVS awards. These discussions have also been related to the more effective control of grade inflation particularly in the business programme areas. This inflation of academic grades has previously been identified by external examiners and by members of academic staff and has led to recommendations by the external examiners for grade reduction within specific assessments in order to safeguard the academic standards of the awards.

194 AIUL adopted the external examiner system as a means of confirming the achievement of academic standards within its awards only since its accreditation by the OUVS in 1999. The audit found that a full recognition of the role of the external examiners and their involvement in the confirmation of academic standards has not yet been fully and consistently demonstrated within the management of assessment practice at AIUL. In particular there are continuing matters of

concern in the business discipline area which are related to the repeated failure of AIUL to ensure that sufficient academic work is made available to external examiners upon which they are able to make a considered and informed judgement on the standards being achieved within the discipline. The external examiners for that substantial part of AIUL's provision had identified a number of other extremely serious concerns related to quality assurance and the securing of academic standards. Even with smaller programmes, where in general, issues relating to quality and standards are less problematic, some institutional-level matters remain unresolved from year to year. On a number of these issues, AIUL has been slow to act or has failed to address issues raised by external examiners in a timely and appropriate way. The poor handling of one particular joint external examiners' report demonstrated that the institution, whatever the quality of individual programme-level responses to reports may be, shows insufficient evidence of being able to make strong and scrupulous use of the reports it receives.

195 AIUL has recently begun to take supportive action to develop a more effective operational management procedure for the handling of its assessment processes. This has included the introduction of moderation boards in specific discipline areas and the introduction of revised assessment criteria and marking guidelines. There remains, however, an inconsistent understanding of rigorous assessment practice requirements at the examinations and moderation board levels. The management of formative feedback to students and the contribution, which this may make to the management of the student learning experience and their understanding of the basis upon which they are being assessed is neither consistently applied nor robustly operated across the campus.

196 The audit therefore identified significant weaknesses with regard to the management of assessment, the proper consideration of external examiners' reports, and the institutional overview of standards. As a consequence, the audit team concluded that,

on the evidence available at the time of the audit, it could have no confidence in the effectiveness of AIUL's management of standards with regard to programmes leading to UK awards validated by OUVS.

The effectiveness of institutional procedures for supporting learning

197 The SED indicated a substantial investment in provision of resources over the last two years, but there is still evidence that these need much improvement to adequately support the curriculum. The audit team was concerned to hear that AIUL did not benchmark the provision of information resources and facilities against other higher education (HE) provision of comparable size, and local managers were not undertaking medium-term planning in the development of resources to meet developing needs of the curriculum. The team heard that AIUL, as a private institution, had relatively limited opportunities for networking within the UK HE sector, and for contacts through the major HE support agencies. There are however links with comparable American agencies which have been made through the corporate University. Overall, the team recognised that there had been an improvement in the resources for supporting the academic programmes, but recommended that these needed to be enhanced through a more co-ordinated approach, benchmarking and medium-term planning.

198 The discipline audit trails (DATs) provided a mixed picture of academic support and guidance provided to students. In some departments staff consistently provided good feedback on assessed work and were readily available for advice, whereas other staff were difficult to find for advice and the feedback on assessed work was of very limited use. The audit team found that while there were pockets of good academic support there was no coherent view across the campus on the support for very different groups of students. The variable quality of feedback on assessed work is a particular concern.

199 In the course of the audit it became clear to the audit team that there were a range of issues to be addressed around effective communication with students, and it appeared that often students found difficulty in contacting the relevant staff or in gaining access to the information that they required. The team found that in the discussions held with the relatively substantial number of students with whom they met, students were very critical of the means by which they could communicate with staff. Staff, however, appeared to have only limited awareness of students' issues regarding communication.

200 The audit team heard many examples of students who had severe problems in accessing financial aid and others who had problems understanding the ramifications of the charges that they would have to pay. The team considered that the processes operated by AIUL for the distribution of financial aid and for the collection of fees and charges were not well managed and better communication with students was required in this area. On the other hand, the Counselling Service within Student Services offers comprehensive and supportive advice to students and is an example of good practice.

201 AIUL acknowledged the challenges arising from the high proportion of part-time staff and the problems experienced in recruiting good quality staff. Students were also concerned that part-time staff sometimes appeared to be unqualified for the task. AIUL was aware of staff who were not performing well and took firm action to deal with this. AIUL has appropriate procedures in place for the appointment, induction and appraisal of staff; nevertheless, it appeared that the recruitment and contractual arrangements in place for part-time staff were causing problems in the quality of the delivery of the curriculum.

202 There is a comprehensive Faculty and Staff Development Policy and an extensive programme of events available to all staff. There appeared to be a substantial increase in the quantity and quality of staff development available, though the take-up of opportunities varied across AIU. The audit team was

encouraged by the level of staff development available and recommended that AIUL further develop and embed the provision across the campus for both academic and administrative staff, including part-time staff.

Outcomes of discipline audit trails

Business Administration

203 The DAT covered BA (Hons) Business Administration award, a programme which constitutes a major part of the provision at AIUL. Having carefully considered a sample of assessed work, the reports provided by external examiners, and a range of documentation provided for the audit team, and following discussions with staff and students, the team was not able to confirm that the standard of achievement was appropriate to the title of the award and its location within the FHEQ.

204 The audit team noted the existence of serious deficiencies in the effective and robust management of the assessment procedures, some of which had been evident since 2002. These included concerns regarding marking and grade inflation, continued inconsistency in the provision of formative assessment feedback to students on their performance, and a similar inconsistency in addressing that feedback to the criteria referenced requirements underpinning assessment. There was a repeated failure to provide external examiners in a timely manner with sufficient evidence upon which a confirmation of academic standards might be based. The external examiners had been unable to confirm awards in 2004 and recruitment to the programme had been suspended by the validating body. AIUL is currently taking action to address these concerns but the team did not find evidence that sufficient change had yet taken place to provide confidence in standards.

205 The audit team also found that the annual monitoring procedure was not yet fully owned and embedded within the work of the Department. There were additional problems identified in the DAT with regard to staff recruitment and support, quality of teaching, student participation, and learning resources. On the basis of the evidence available the team

concluded that the quality of learning opportunities available to students was not sufficient or suitable for a programme of study leading to the BA (Hons) Business Administration award.

Fashion

The DAT covered the following awards: BA Hons Fashion Design, BA Hons Fashion Marketing, BA Hons Fashion Design and Marketing

206 On the basis of discussions with staff and students, examination of assessed work, and consideration of the DSED material, the team concluded that the standard of achievement was appropriate to the title of the award and its location within the FHEQ. Appropriate reference has been made to the expectations of the benchmark statements in this area.

207 The audit team found that effective and regular arrangements for course evaluation were in place, assessment strategies were well designed and there had been a careful and constructive use of external examiners and their reports. Students reported a good level of support and feedback in their studies, and an effective staff-student forum was in place. There had been recent improvements in the learning resources available to students.

208 Internship placement opportunities were a valuable feature and students felt well prepared for their future careers. The audit team concluded that the quality of the learning opportunities offered in the Fashion Department was appropriate to the programmes of study.

The use made by the institution of the Academic Infrastructure

209 The FHEQ is principally embodied in AIUL's development of programme specifications; these are all written in a format approved by the OUVS and also embed the benchmarking statements for the relevant subject. Benchmarking statements were, however, understood variably across the institution.

210 The audit team found that the procedures for assuring that the quality of programmes is aligned with the *Code of practice*, published by the QAA were underdeveloped. A mapping exercise had been carried out at a central level to check for compliance, but the results of this and consequent actions and had not yet been sufficiently addressed, and staff at programme level had variable and limited awareness of the expectations implicit in the *Code*. The involvement of Academic Board in the mapping exercise had been limited, and it is unclear how it would be able to be sure that future policy decisions were in line with the expectations of the *Code*. Similarly, there is little understanding at the level of the programme of other aspects of the Academic Infrastructure, except through the requirements made by OUVS. While there has been a recognition of the Academic Infrastructure at the senior level of AIUL, attention needs to be given to communicating these guidelines and expectations more effectively.

The utility of the SED as an illustration of the institution's capacity to reflect upon its own strengths and limitations, and to act on these to enhance quality and standards

211 The SED gave an overview of the context of AIUL's development as an institution, and outlined the main features of its quality systems. It contained many frankly self critical and reflective comments, but also omitted to address sufficiently some major issues for the institution, and made claims which were not always well-founded. The SED made it clear that the academic structures of the institution were evolving and that many initiatives were of very recent date.

Commentary on the institution's intentions for the enhancement of quality and standards

212 The SED presented a list of varied initiatives which had recently been undertaken within AIUL and which it had identified as contributing to its enhancement strategy. These

included the production of a number of guidance and policy papers, the revision of operational practices related to quality assurance and academic standards management requirements, improvements in the appointment of staff and the agreement and resolution of practices and policies on matters of mutual concern for AIUL and the OUVS. AIUL also now has a newly reconvened Faculty and Staff Development Committee with a broad remit for development. A Learning and Teaching strategy was established in 2004 and an internal periodic review procedure has been recently introduced.

213 The audit team noted that a number of these initiatives were reactive to circumstances, and had occurred in direct response to external requirements, for example from the external examiners, from the recent 2004 OUVS review, previous OUVS revalidation exercises, and from the OUVS annual monitoring commentary. The team found it difficult to identify a clear location and direction for a coherent, incrementally planned, and inclusive approach to the development of an enhancement strategy, one which addressed in a proactive manner the UK quality assurance and academic standards agendas and which also supported the development of the collegial identity of AIUL as an increasingly mature academic institution.

214 The audit team concluded that AIUL approached the strategic issue of enhancement as a series of intermittently related tasks, which were required to be undertaken in response to external demands, rather than as a significant integrational and unifying area of activity able to directly contribute to its ongoing development.

Reliability of information

215 The audit team reviewed a wide variety of published information produced by AIUL, in the form of centrally generated material produced by AIU (Corporate), AIUL prospectuses, programme promotional leaflets, web pages published to the Internet, and internal student and course handbooks. Much of the material reviewed was concerned with the marketing of

programmes and student admissions. Students had found the information provided with regard to their programmes valuable and useful for some courses, less so on others. There had been considerable difficulties experienced by students in the past with regard to information on assessment, but some action had been taken to address this.

216 One major issue was identified by the audit team with regard to information provided by AIUL. Published statements had been made with regard to the conditions for achieving both a US and a UK award. These were inaccurate and had clearly misled students. It is essential that the information given with regard to the requirements applying to the awards which can be obtained on successful completion of study at AIUL is complete, accurate and unambiguous.

Features of good practice

217 The following features of good practice were noted:

- i the quality of support for students offered through the Counselling Service (paragraph 128)
- ii the support provided for a wide range of internships offering professional experience to students (paragraph 124)
- iii the development of templates for the formative assessment of dissertations in the Department of Fashion (paragraph 167)
- iv the staff development days organised by the departments of Fashion and Business Studies (paragraph 111).

Recommendations for action

218 Recommendations for action that is essential:

- i to ensure that the management of standards is fully informed by a rigorous and scrupulous institutional consideration of all external examiners' reports and the provision of adequate and complete responses to these reports (paragraphs 77-81)

- ii to ensure that all American InterContinental University London, and American InterContinental University (Corporate), promotional, marketing and advisory materials relating to the awards available to students on completion of study at AIUL are accurate, complete, unambiguous and do not mislead (paragraphs 176-181).

219 Recommendations for action that is advisable:

- i to clarify and embed further its policies, structures and procedures for the management of quality and standards, thereby providing accountability at programme level and collective responsibility at institutional level (paragraphs 29-34)
- ii to develop a comprehensive and integrated approach to the provision of its student services (paragraphs 37,119, 126, 131-132)
- iii to put in place an effective system for two-way communication with students on all aspects of the student experience on the AIUL campus (paragraphs 96-98, 100,123,129).

220 Recommendations for action that is desirable:

- i to identify relevant functions and purposes for exploiting the student data that it gathers (paragraphs 103-105)
- ii to further extend the positive work of the Faculty and Staff Development Committee in providing professional development opportunities for faculty teams and individuals (paragraphs 110 and 112).

