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**The Quality Assurance Agency
for Higher Education**

Overseas Partnership Audit Report

The University of
Exeter and
Escuela Superior de
Marketing de
Gipuzkoa

INSTITUTIONAL REVIEW DIRECTORATE

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Introduction

1 The Quality Assurance Agency for Higher Education (QAA) is a UK organisation which aims to promote public confidence that the quality of provision and standards of awards in higher education are being safeguarded and enhanced. It provides public information about quality and standards in higher education to meet the needs of students, employers and the funders of higher education. One of QAA's activities is to carry out quality audits of collaborative links between UK higher education institutions and some of their partner organisations in other countries. In the spring and early summer of 2000, QAA audited selected partnership links between UK higher education institutions and institutions in Spain. The purpose of the audits was to provide information on the way in which the UK institutions were maintaining academic standards and quality of education in their partnerships with institutions in Spain.

The process of audit of overseas partnership links

2 In planning these audits of overseas collaborative provision, QAA invited all UK institutions to provide a list of their collaborative links with Spanish partners. On the basis of the information provided on the range and scale of the links, business and management studies were selected as the subject focus for the audit. Each of the UK institutions whose collaborative link had been selected for the audit provided for QAA a *Commentary* describing the way the partnership operated, and commenting on the effectiveness of the means by which the UK institution assured quality and standards in the link. In addition, each institution was asked, as part of its *Commentary*, to make reference to the extent to which the link was representative of its procedures and practice in all its overseas collaborative activity or specific to this link, subject or country. QAA identified six UK institutions which had established arrangements where most or all of the educational provision was delivered through a Spanish partner, and these institutions were visited by small teams of auditors to discuss the arrangements with appropriate staff and to look at relevant documentation.

3 Audit teams visited the Spanish partner institutions to gain further insight into the experience of students and staff, and to supplement the view formed by the team from the institution's *Commentary* and from the UK visit. During each of the visits in Spain, further documentation about the link was made available to the team, and discussions were conducted with key members of staff, lecturers and students. In addition, members of the team, who included subject specialists in business and management, were able to

see facilities and resources available to the students, and examples of students' work. QAA is grateful to the UK institutions and their partners in Spain for the willing cooperation provided to the teams.

4 Institutions were invited, in their *Commentaries*, to make reference to the ways in which their arrangements met the expectations of the Higher Education Quality Council's (HEQC) *Code of Practice for Overseas Collaborative Provision in Higher Education, 2nd edition* (1996) (HEQC's *Code*). HEQC's *Code* contains advice and recommendations about the assurance of quality and standards in overseas partnerships. In the context of these audits, it was used as a reference point by the audit teams, and its contents are reflected in the observations in this report. Some institutions also made reference, in their *Commentaries*, to the ways in which they were working towards implementation of QAA's *Code of practice on the assurance of academic quality and standards in higher education, Section 2: Collaborative provision* (1999) (QAA's *Code*), which takes full effect in August 2000. In the context of these audits, there was no expectation that institutions would necessarily be able to demonstrate that they met the expectations of the latter *Code*.

The context of collaborative provision with Spanish partners

5 Substantial responsibility for the administration of education in Spain is devolved to the 17 autonomous communities that now constitute Spain. Under Spanish legislation passed in 1991, private institutions offering the awards of foreign universities may apply for official government recognition, and the status of 'centre of a foreign university in Spain'. Recognition of institutions is the responsibility of the governments of the autonomous communities. Through a separate process known as 'homologation', students holding qualifications of foreign institutions may apply to the Ministry of Education, Culture and Sports of the central Spanish government for official recognition of their awards (and thus permission to work in the public sector). Current interpretation of Spanish law means that it is very unlikely that an award obtained through study at a non-recognised institution will be homologated.

The background to the partnership

6 This report considers the validation by the University of Exeter (the University) of a four-year programme offered by the Escuela Superior de Marketing de Gipuzkoa (the School) leading to the honours degree of BA in Business Studies and Marketing. The validation was approved by the University's Senate for a period of three years from

October 1997, and approval was also given for students who had been enrolled since 1996 on the School's three-year Diplomado programme to register for the degree programme. All tuition and assessment on the programme is conducted in Spanish. Details of student numbers, provided by the University, are attached as Appendix B to this report.

7 In the *Commentary* provided for the purposes of the audit, the University reported that its partnership with the School had commenced at a time when the University was seeking to develop its profile as a 'Quality European University', and was placing a new emphasis on the development of strategic links with other higher education providers in Europe. These objectives were defined in the document *Into the 21st Century: A Strategy for the next decade*, published in 1995. The *Commentary* also set the partnership within the context of the University's long history of work as a validating authority for UK institutions. A recently approved *Academic Partnerships Strategy 1999-2003* sets out a framework for the University's development of its collaborative provision, both in the UK and overseas. Currently, however, the University's partnership with the School, and its partnership with another business and marketing school in northern Spain, constitute 'the sole overseas institutional validation activities of the University'.

8 The Escuela Superior de Marketing de Gipuzkoa, situated in San Sebastián, is the private, non-profit making educational arm of Gipuzkoa's Club de Marketing (the Club). The Club is a branch of the Federación Española de Marketing, a body of marketing professionals located in several centres throughout Spain. As an educational institution, the School has its own organisational and administrative structure, but is not a separate legal and financial entity. It shares its premises and some facilities with the Club. The Club aims to provide a ready supply of well-qualified entrants to the marketing profession and the School's programmes are designed to meet this aim: the links with local businesses in northern Spain are strong, providing support for student placements and regular contributions to teaching.

9 The audit team members who conducted the UK visit to the University of Exeter were: Ms S J Clark, Dr P J A Findlay and Dr D H Furneaux. The members of the team who visited the Escuela Superior de Marketing de Gipuzkoa were Professor M Bond, Mr G Clark (audit secretary), Ms S J Clark, Professor J Coyne and Dr P J A Findlay. The audit was coordinated for QAA by Ms S J Clark, Assistant Director, Institutional Review Directorate.

Formal arrangements

10 The partnership is governed by a formal *Validation Agreement* (the *Agreement*), signed by both partners in October 1997. Initially for three years, the *Agreement* has since been extended to four years as a result of the University's decision to standardise the review period for all of its validated programmes. The *Commentary* reported that the University had modified the format of its validation agreements since 1997 and that a working party (see below, paragraph 15) was currently reviewing the contents of all agreements in the light of QAA's *Code*. It indicated that the University was conscious of the need to include more information about a range of matters, some general to all validation arrangements and some specific to overseas provision. The audit team concurred with the University's analysis, and noted that there were several areas in which the University was not adhering to HEQC's *Code* (see below, paragraphs 11-12). It had sight of the latest generic validation agreement, drawn up in 1999, which went some way towards addressing these deficiencies. These matters aside, however, the team noted that the formal requirements stipulated in the current *Agreement* were not keeping pace with the realities of the partnership in respect of several matters (see below, paragraphs 22, 24-25, and 33). The University may wish to revise this *Agreement* at an early opportunity, and before the validation review scheduled for 2001 (see below, paragraph 22), so as to ensure that all necessary matters are addressed and the intended basis of operation is reflected more precisely.

11 The *Commentary* acknowledged that, contrary to HEQC's *Code*, the current *Agreement* contained no reference to responsibility or procedures for monitoring the publicity and promotion of the validated programme. The audit team noted that this matter had been addressed in the new generic agreement, and was informed that, in practice, the University's programme coordinators (see below, paragraph 20) reviewed publicity during visits to the School. However, School staff met by the team were not aware of any University requirement for approval of publicity and believed that they were independently responsible for the marketing of the programme. The team noted a statement in the current promotional materials of the School which did not reflect the stated position of the University (see below, paragraph 31). The University will wish to communicate clearly to the School its expectations in respect of publicity, and to ensure that clear procedures for approval and monitoring are in place.

12 The University's policy on certification is to record the name of the partner institution, but not the language of study and assessment, the latter being against the spirit of HEQC's *Code*. The *Commentary* made it clear that the University was intending to

address this matter as it worked towards meeting the precepts of QAA's *Code* and, in so doing, would also be giving attention to its decision to permit the School to issue transcripts of achievement to students. The audit team found unpersuasive the University's comment that it had been 'unrealistic' to impose its own transcript format on the School, on the grounds that transcripts needed to follow the Spanish marking system familiar to prospective employers. The team heard from both the University and the School that the University had taken steps to ensure the accuracy of the transcripts through a process of sampling by the programme coordinators. It was unconvinced, however, that such arrangements were sufficient to justify abrogation by the University of its responsibility, as an awarding body, for issuing information relating to its award as attained by individual students, without putting in place a formal mechanism for verifying the accuracy of all such information. As it takes forward its consideration of how this policy might be modified, the University may also wish to consider including agreement about the format of transcripts within its procedures for approving new validation arrangements, to ensure that the needs of both partners can be satisfied.

Locus of responsibility for quality and standards

13 At the time of the initial validation of the programme, the University located responsibility for its validated provision with a Validation Board, reporting to Senate, and supported by a Validation Office. In 1998, an internal restructuring led to the replacement of the University's six subject-based faculties with three functional faculties, including a Faculty of Academic Partnerships. This Faculty, headed by a Dean of Academic Partnerships supported by an Assistant Registrar, now has responsibility for all academic partnership provision within the University, and has subsumed the authority previously exercised by the Validation Board. It reports to Senate through the University's Teaching Committee. The University's procedures for managing its collaborative provision are published in the Faculty's *Academic Partnerships Handbook* (latest edition October 1999) (the *Handbook*). The *Handbook* includes clear procedures for initial validation and for modifying validated programmes, assessment and examination requirements, the responsibilities of staff involved in validation, and University codes of practice relevant to partner institutions.

14 The *Commentary* stated that it was 'made explicit' in the *Agreement* that responsibility for academic standards rested with the University, and drew attention to the specification, in the *Handbook*, of the ways in which that responsibility was exercised. The *Handbook* describes validation as a 'partnership in

academic development' within which 'the University remains ultimately responsible for quality control, external examining, examination boards, admission to the programme, and seeing that resourcing (including staffing) is adequate'. However, the audit team could find no explicit statement of the University's responsibility for standards in either the *Agreement* with the School or the generic agreement of 1999. It was informed by staff at the University that such responsibility was implicit in the powers of the Board of Examiners. As it works towards meeting the precepts of QAA's *Code*, the University may wish to ensure that its responsibilities in respect of quality and standards are defined clearly in its validation agreements.

15 The *Commentary* reported that, since the approval of its partnership with the School, the University had revised its validation procedures to take account of HEQC's *Code* and that a Teaching Committee working party had been established recently to 'consider the wider implications of the QAA *Code* and compliance regarding the University's collaborative provision'. The audit team was informed that the working party would be addressing a range of matters, including those outlined above. The team noted that the terms of reference of the working party did not in fact reflect this wide-ranging remit, and appeared to be concerned mainly with the internal division of responsibilities for overseeing validated provision. The University may wish to clarify the working party's terms of reference, better to reflect the proposed scope of its work.

The approval process for this partnership link

16 The *Commentary* outlined the development of the partnership. It reported that the steps taken by the University in approving the validation were 'in accordance with its normal validation procedures', but supplemented by 'extensive exploratory work' by the members of staff who became the programme coordinators. The process included consideration of the School's proposed programme first by a Validation Board working party (the membership of which included the coordinators) and then by its Programmes Sub-Committee; a check on the School's academic and financial standing; visits by the coordinators to review the School's resources and staffing establishment; and finally, a report to and approval by Senate. As part of the process, the School was required to submit a definitive programme document, translated into English.

17 The audit team was satisfied that the approval process had taken place in accordance with clear procedures and the decision to validate had been made on the basis of a generally appropriate range of information: further enquiry had been made on matters which were unclear, and conditions of approval had been set and followed up by the Validation Board. The

team noted, however, that the process had not required the University to address several matters of particular relevance to overseas provision, including how an external examiner might operate in Spain, and the implications, for the University's oversight of the programme, of delivery in a foreign language. Given the University's awareness that such matters have posed, subsequently, challenges for the partnership, it will no doubt wish to ensure that they are given systematic attention when considering proposals for overseas collaboration in the future. The University may also wish to consider whether, in the interests of good practice, the membership of working parties established to consider new proposals might be enhanced by the inclusion of participants external to the University. The *Commentary* stated that external comment on such proposals was now required, for both internal and collaborative programmes, as a result of the recommendations of HEQC's quality audit report on the University, published in 1997. The *Handbook* indicated that this welcome development took the form of a submission of two external reports procured by those proposing a new programme - partner institutions in respect of collaborative provision. It appeared to the team, however, that this procedure would not necessarily secure for the University the benefits of an external, independent perspective on proposals for new partnerships, and would prove difficult in practice for overseas partners lacking access to external assessors able to comment on UK academic standards.

18 The *Commentary* reported that, at the time of initial approval, the University had supplied documentation to support the School's application for recognition of the programme from the government of the Basque Country. The audit team was informed that such recognition had still to be achieved, although there was hope of progress in the near future. The students who met the team were clear that they had known from the outset that the programme was not recognised, but they had expected that progress would be more rapid. Their level of concern about the lack of recognition varied according to their plans for future employment: the programme had been recognised by the Federación Española de Marketing, and students emphasised the international currency of the University's award. The University will wish to continue to support the School in its pursuit of government recognition, and may also wish to give consideration to its suggestion that accreditation could be pursued with the relevant professional bodies in the UK.

Quality of learning opportunities and student support

19 The *Commentary* described the University's arrangements for securing the quality of learning

opportunities and student support provided through the programme. The description focused upon its arrangements for quality control, including the work of programme coordinators; upon its procedures for monitoring staff qualifications; and staff development provision.

Liaison with the partner and administration of the link

20 The *Commentary* indicated that the principal mechanisms for continuing liaison between the University and the School, and for quality control, were the programme coordinators: 'University members of staff with expertise in the subject area'. The responsibilities of the coordinators, detailed in the *Handbook*, include considering special cases for admission; reporting on curriculum changes; reporting on the adequacy of resources; meeting students; attending meetings of the Board of Studies; monitoring assessed work; chairing the Board of Examiners; and advising on external examiner appointments. The University has appointed two coordinators to work with the School, who between them visit three times a year. The original coordinators had comprised a subject specialist and a professor of Spanish, both fluent in Spanish, to enable the University to secure the early development of the programme. At the time of the audit visit, new coordinators had been appointed: a subject specialist, fluent in Spanish and experienced in overseas partnerships, from another UK university with which Exeter has regional links, and a professor of marketing from the University's School of Business and Economics, who does not speak Spanish. Although at the time of the audit visit, one of the new coordinators had yet to visit the School, the team saw evidence of regular visits in the past, and it was clear that there was continuing liaison, often via email, and that a significant level of support had been provided by the University. School staff who met the team generally saw the work of the coordinators in terms of communication on administrative and management matters, and on assessment. In view of the significant responsibilities of the coordinators, the University will be conscious that both of its new appointments will require particular support in their roles: the member of staff from another University will need to be able to liaise as appropriate with the University's own departments, and the professor of marketing will need language support to enable him to communicate with his Spanish colleagues, and to participate in the moderation and evaluation of standards. The team heard that the two coordinators would work in tandem, but noted that visits in the past had sometimes been made on an individual basis.

21 The audit team noted that other forms of liaison between the University and the School were also in place, facilitated primarily by the Faculty of Academic

Partnerships. There is regular communication between the School and the Faculty Office, annual visits are undertaken by the Dean, and in May 1999 the Assistant Registrar had visited the School to discuss the new edition of the *Handbook*. Examples of commendable practice include the invitation to the School, as a partner institution, to participate in a quality-related survey for an internal review of the University's administration, and a visit to the School by an officer of the University's Guild of Students, with a view to considering the position and views of students studying at partner institutions. The latter had resulted in an informative report which had been discussed in the Faculty. The team concluded that the University had liaised effectively with, and provided good support for, the School at the level of management and administration. It believed, however, that at the subject level, and in terms of the overall presence of the University at the School, there were matters to which the University would wish to give prompt attention. These are discussed in the paragraphs below.

Monitoring and review

22 The University's requirements for monitoring are outlined in the *Agreement* and detailed in the *Handbook*. According to the *Agreement*, annual reports on the programme are required from the coordinators, University-appointed external examiners, and the School itself. The *Agreement* requires the establishment, by the University, of a joint Board of Studies 'to consider formally the arrangements for the delivery and the development of the programme'. Validated programmes are also subject to periodic review, on a quinquennial basis, and a review of the School's programme is scheduled for summer 2001.

23 The audit team noted that the reports of the coordinators, based on a Faculty template of required information, were informative and relevant, if occasionally somewhat brief, in providing a full annual overview of the partnership. The team was informed that reports were not required on each visit to the School. It was also informed that the annual reports were considered by the Dean, who made recommendations to the Faculty Board as appropriate, but not by the Board itself. Similarly, external examiners' reports were not presented to the Board, although they received wider circulation within the University, with initial responsibility for taking action resting with the Vice-Chancellor. It appeared to the team that the restricted circulation of coordinators' annual reports resulted in the containment of much useful monitoring information within the Faculty, and that responsibility for analysis and action rested solely with the Dean. The University may wish to consider whether its central oversight of the partnership might be strengthened through wider participation in consideration of coordinators' reports. In so doing, it

may also wish to reflect on whether the quality of information available might be enhanced by requiring a formal, continuing record of visits to partner institutions.

24 The audit team was informed by staff at the School that they had sought to comply with the University's requirement for an annual report, and had submitted one report to date. The team noted that the report did not cover all matters which might be expected, but that no formal guidance or template was available in the *Handbook*. It understood that the School had received no briefing on the University's expectations and had received no response to the report, despite the inclusion of specific requests for information. It also observed that the report was not included in the papers formally identified for the audit by the University. The University will wish to ensure that its partner receives clear guidance on its reporting requirements and processes for responding. Within this context, the team noted that School staff appeared to have little knowledge of the University's internal procedures for monitoring its work and not to have been informed, for example, of actions taken in the University as a result of the coordinators' reports. The University will wish to consider ways in which its evaluation of the partnership can be better shared with the School.

25 The *Handbook* includes a *Code of Good Practice* detailing the University's requirements in respect of the operation of Boards of Studies, applicable both to validated programmes and to the University's internal programmes. Boards are required to meet 'not less than termly' and to include student representation. The existence of such a Board to support the University's partnership with the School was confirmed by the *Commentary*. However, the audit team was unable to find evidence that the Board was functioning in practice. No minutes or records of meetings were available and it appeared to the team that relevant discussions had either been subsumed into the annual meetings of the Board of Examiners, or had taken place in general staff meetings. The team concluded that there were as yet no arrangements for regular meetings of the type implied by the *Commentary* and required by the *Handbook*. The team noted that 'unsatisfactory' variability in the operation of Boards of Studies had been drawn to the University's attention in HEQC's quality audit report on its validation arrangements, published in 1993. On the basis of the evidence provided by this partnership, it appeared to the team that this was a matter that continued to require the University's attention.

26 The *Handbook* requires programme coordinators 'to meet students each year and to ensure that student feedback is sought and utilised'. In the absence of the Board of Studies, the audit team noted that meetings with students, including nominated student

representatives, took place during the visits of the coordinators. As there was no formal record of the meetings, the only record of the feedback received was that included in the coordinators' annual reports. It was evident, however, that student satisfaction was covered in the reports, and that the coordinators had also raised matters on behalf of the students, although the most pressing of these had yet to be addressed by the University (see below, paragraph 30). The School has established its own internal student feedback forms for course units, but it was not clear to the team whether the feedback received was reviewed by the University. The team noted that the forms were one of a range of internal quality assurance mechanisms established by the School: other examples included a staff-student committee; written reports by individual teachers on course units; and broader reviews of programme delivery. It was not apparent that the University had sought to engage systematically with these processes - a matter that it may wish to consider as it continues to enhance its own arrangements for quality control.

Curriculum

27 The *Commentary* did not mention the comparability of the curriculum offered in Spain with that of the University's own programmes: the model of validation operated by the University depends on its ability to provide academic support through the coordinators, but does not require close equivalence with programmes offered internally. The audit team noted that the School's programme had a clearly defined philosophy and values which focused upon the capabilities required for entrance to the profession of marketing and international trade. The philosophy is reflected in the learning strategies, which are primarily workbook-driven, each unit having a standard text. In the later part of the programme, students work on projects geared towards applying skills effectively to meet the needs of commercial clients. In the view of the team, this highly applied approach did not include the level of analysis and evaluation that might normally be present in applied programmes at honours degree level in the UK; the curriculum content was also focused less on business and more on marketing than the title of the award might suggest. In their discussions with the team, the coordinators recognised that the programme was distant in character and objectives from any programme offered in the University: indeed, at the time of initial validation the University did not have any substantial provision in marketing. The team was unclear as to how, in the absence of external expertise on the working party that had undertaken the initial validation exercise, the University had been able to assure itself of the appropriateness of the curriculum leading to its award.

28 The *Agreement* and the *Handbook* are explicit that University approval is required for all proposed changes to the validated programme and the *Commentary* reported that any such proposals would be considered by the Board of Studies. The absence of the Board and consequent lack of formal discussion of curriculum matters appeared to the audit team to have contributed to misunderstandings about the School's authority to change the curriculum. The team's comparison of the programme as validated and the programme as delivered suggested that subject units had been deleted, added, and moved between years, and that assessment patterns had changed, without apparent reference to the University. The University will wish to clarify and communicate the extent to which the School is able to modify the validated curriculum, and the procedures for submitting and approving changes.

Learning resources

29 The *Commentary* made no statement about the University's expectations relating to learning resources for the programme, but the audit team saw evidence that the School's resources had been scrutinised by the University as part of the initial validation process: enhancement of resources had been one of the conditions of approval. The programme coordinators are responsible for confirming to the University, in their annual reports, that resources remain appropriate. The team noted that the coordinators had taken this responsibility seriously: several reports commented on the perceived inadequacy of the School's book collection, and one of the new coordinators had informed the University, after his first visit to the School, that this was his main concern. The team concurred with the coordinators' analysis. It observed that the School offered reasonably spacious classroom facilities and that computer provision was both adequate and well-supported, with internet access, although appropriate specialist software did not seem to be available. However, the book collection seen by the team was more limited, and included little material suitable for supporting undergraduate work. No administrative support was provided for student borrowing. The evidence available to the team suggested that the University had not yet been able to secure the necessary action, in response to the coordinators' reports, to ensure that the library provision available to the students met its expectations for study at honours level. The University will wish to give continuing attention to this matter and to monitor progress.

Student information and support

30 The *Commentary* provided limited comment on the provision of University information to the School's students. It reported that all students on validated

programmes had the right to appeal to Senate, that the appeals procedure was published in the *Handbook* (of which the School's administrator has a copy), and that more general University procedures were widely available on the internet. It also stated that the University had recently produced an institution-wide student handbook and that the Faculty would be strengthening its procedures by requiring all partner institutions to include appropriate sections of this handbook in their own documentation for students. The students who met the audit team confirmed that they received almost no information direct from the University: they appeared to have received no material covering regulations, appeals and complaints procedures, and knew very little about the University. They did not know the criteria against which they were being assessed and even those in their final year showed no awareness of the honours classification system. Although they had welcomed the opportunity to speak with the programme coordinators, they were unable to cite any instance when they had received feedback from the University on matters raised by them, and relied on their local tutors and the School administrator to provide the information they required. Some students had been attracted by the possibility of going to the University on exchange or for further study, but were uncertain about the opportunities available to them and frustrated at the perceived lack of information. The team concluded that the Faculty's plans to insist on the provision of University material in partner documentation constituted a welcome, and necessary, development.

31 The *Commentary* reported that 'the visibility and presence of Exeter at (the School) and amongst its students' had been a recurring theme in reports to the University. It confirmed the University's recognition of the need to respond to students' expectations of what a coordinator's report had described as 'their special status accorded by the validation agreement'. The audit team noted that the School's submission document, as originally validated, described students on the programme as having the status of 'fully-fledged' members of the University - a claim repeated in the School's current publicity, in Spanish, which stated that they were 'considered students of the University with full rights'. In fact, as the *Agreement* and *Handbook* make clear, students on validated programmes are not registered students of the University and have more limited entitlements. The team believed that these errors in the School's documentation, apparently undetected by the University, might explain the mismatch between the University's low key approach to provision of information to students and the high expectation of those students. The University will wish to clarify unambiguously the status and entitlements of the School's students.

32 In terms of academic support, students informed the audit team that they received good tutorial support and feedback on their work, and that their tutors were accessible and easy to contact, even though many of them were part-time. Student representatives reported that they were able to meet members of the School's management to raise any matters or concerns. In general, it appeared to the team that students benefited from the small learning community of the School, and the close and regular contact with its key members of staff.

Staffing and staff development

33 The School has a total staffing establishment of 30, four of whom are full-time. All staff, whether full or part-time, are required to attend four staff meetings each year. The School's Director of Studies has responsibility for coordinating the delivery of the curriculum and for staff support and development. The *Commentary* reported that, in accordance with the University's procedures, the CVs of all School staff were provided as part of the submission for validation, and checked by the University. The *Agreement* is clear that proposed amendments to staffing provision, as approved initially, require the University's approval. The audit team noted that the programme coordinators met with staff during their visits, and had reported on staff appointments in their annual reports: the new coordinators who met the team thought that involvement in such appointments might be a part of their role. The team noted, however, that such responsibility was not included in the formal job description of the coordinators, and heard from School staff that they did not need to seek approval except retrospectively, perhaps at two-year intervals. The names of some of the staff who met the team did not appear on the University's staffing list for 1999-2000. It seemed, therefore, that the University did not have in place procedures for the systematic approval and recording of changes in staffing. The team also noted that a high proportion of final year work was taught by recently appointed staff. Given the relatively large number of part-time staff and the possibility of regular changes in the staffing establishment, the University will wish to establish more reliable ways of approving the staff responsible for delivering the programme leading to its award.

34 The *Commentary* reported that the School had in place a full programme of staff development, led by the Director of Studies, with opportunity for staff to attend a range of seminars and courses offered on a regular basis by the Club. The audit team noted that the University had contributed to staff development through its visits to the School, with some direct development work carried out in relation to administration and, more informally, through programme coordinators' discussions with staff. The

Commentary reported that the University was seeking to introduce a peer review system at the School, 'to reflect that which the University has instituted internally'. The team believed that this was an admirable intention, albeit one which might prove difficult to achieve, and should form part of a more general consideration by the University of the ways in which it might enhance its support for the School in relation to staff development.

35 The audit team noted that, as with the students, a repeated theme in reports to the University had been the desire of the School's staff to have closer contact with relevant academic staff at Exeter. Discussions with staff at both the University and the School indicated to the team that although there were some good intentions, little progress had been made in establishing such contact. The team noted that staff at the School had scant knowledge of the University or its academic profile and had had no contact with colleagues teaching similar subject areas in the UK: indeed, some observed that they did not know whether their subject was taught in the University. Some staff expressed a strong wish to know more about the University, and to develop contacts which could be useful for their work and their personal development.

36 In 1999 the Faculty of Academic Partnerships commissioned a feasibility study relating to its partnerships in Spain. The resulting report included 10 recommendations for the development and improvement of the University's partnership with the School, which depended in large measure upon the forging of a closer relationship with the School of Business and Economics. The audit team was informed that, because of difficulties in the latter School and other considerations, only one of the recommendations had been fully supported and implemented. The *Commentary* was frank in acknowledging that there were 'limits in any validation link' to what coordinators could achieve 'without a matching contribution from the internal School', a view with which the team concurred. The *Commentary* emphasised that a new business plan for academic partnerships would seek to provide additional incentives for schools contributing to collaborative work. The team believed that the current absence of a strong link with the School of Business and Economics was a major weakness in the partnership, but that the appointment of the professor of marketing as a coordinator was a positive development. It also believed that the commissioning of the feasibility study had been a welcome initiative by the Faculty. The University will recognise that the recommendations of the study represent the School's aspirations for the future development of the partnership and, in the context of the new business plan, may wish to return to them at the earliest opportunity.

Summary

37 From documentation available to it in the UK, and from its discussions with staff at the University, the audit team considered that the University had in place a variety of mechanisms for the quality control of its validated programmes, and had established good administrative links with the School. The team noted, however, that the University's monitoring processes had identified recurring problems relating to the quality of learning opportunities and student support provided through the partnership, some of which the University had yet to resolve. This view was confirmed by the team's visit to Spain.

Assurance of the standards of awards

38 The *Commentary* described programme coordinators and external examiners as the University's 'two main mechanisms for the direct comparison of, and maintenance of, academic standards' in its collaborative provision. The *Commentary* was frank in acknowledging, however, that an outstanding action from the recommendations of HEQC's 1997 quality audit report was the publication of procedures for setting, comparing, and maintaining the standards of awards associated with collaborative programmes. The lack of action was attributed to an intention 'to use the national benchmarking exercise as the basis for this vetting, maintaining and comparing'. The audit team did not consider this an acceptable explanation, and believed that the University should clarify and publish its procedures without further delay.

Entry requirements

39 The entry requirements for the programme were approved by the University on initial validation. The threshold requirement is a pass in the Spanish equivalent of A-levels (the COU), with preference given to those successfully passing the university entrance examination (the Selectividad). The School also requires applicants to pass its own selection test and interviews. Any applicant not meeting the criteria is referred by the School to the programme coordinators who make a decision, liaising with the Faculty and admissions office in the University as necessary. The *Commentary* reported that the admissions system was monitored informally by the University through the reports of the programme coordinators, and would be monitored formally through the validation review scheduled for 2001. The University may wish to consider whether more stringent requirements in respect of the submission of annual reports by the School might enable it to receive and monitor admissions data on a basis that is both regular and formal.

The assessment of students

40 The *Agreement* is clear that the assessment of students on the programme is 'subject to the general conditions established for the internal programmes of the University', and sets out requirements in respect of the appointment of a Board of Examiners, external examiners, and the organisation of examinations. Although course work and examinations are set and marked entirely by School staff, the University's normal arrangements for the work of external examiners apply. The coordinators also have responsibility for vetting papers and sampling student work, chair meetings of the Board of Examiners at the School, and return the Board's recommendations to the Faculty for processing. The *Commentary* reported that, while there had been some difficulties relating to the provision of information to the external examiner, the May 1999 visit of the Faculty's Assistant Registrar had provided support to the School in understanding the University's requirements, and that there was a 'very high order' of professionalism at the School in relation to the processing of assessment information. The evidence available to the audit team confirmed that assessment arrangements were taking place broadly in accordance with the University's expectations, and that the School was working hard to ensure that all requirements were met. The reports of the programme coordinators and the external examiner confirmed that satisfactory standards had been achieved, with some excellent final year work.

41 However, the audit team identified several areas for concern in the assessment processes. Although the University's *Code of Good Practice* for external examiners, published in the *Handbook*, gives external examiners 'the right to moderate the internal marking', the team saw no evidence that systematic moderation was taking place: it seemed that it was unusual for marks to be altered by the external examiner, who was regarded by the School as an arbitrator in disputes rather than a moderator or adviser on standards. The team was not provided with any record of the Board of Examiners' meetings other than the mark list outcomes: contrary to the requirements of the *Handbook* and the claim in the *Commentary*, it did not appear that these meetings had been minuted or the basis for decisions recorded. The team also believed that the regulatory basis for the judgements of the Board was unclear. The University's rules for final honours classification had been subject to guidance notes which were not consistent, and the grade conversion system was not a commonly agreed standard, but one determined for the purpose of the award. The mark sheets provided for the team showed some final degree results that did not appear to map onto the classification rules: in the absence of minutes of the Board, it was not possible to ascertain whether these cases were the result of

discretion or error. As a result, the team believed that it would be very difficult for the University to demonstrate that the standards achieved were comparable with those of its internal provision in the UK. The University will wish to give swift attention to this matter.

42 HEQC's 1997 quality audit report questioned the wisdom of the University's decision to appoint, as the sole external examiner to the programme, a local academic in Spain without experience of external examining in the UK. The *Commentary* reported that the University had 'taken on board' this concern and that, while it continued to believe that there had been advantages in making such an appointment, it was 'actively seeking' to recruit a subject expert from the UK, fluent in Spanish, to take up appointment in 2000-01. During its visit to the University, the team was informed that the appointment of a named individual from a UK university was now in progress. The team was unable to confirm this information because staff at the School, some four months later, appeared to have no knowledge of the situation. The team saw no reason to doubt the University's claim that it had been well-served by the current external examiner and noted that his reports, translated into English, had led to prompt action where appropriate. The University will wish, nonetheless, to progress without further delay the appointment of an examiner with experience of UK higher education and to ensure that, in future appointments, the basis for comparison of standards is assured.

43 The evidence available to the audit team suggested that there were weaknesses in respect of both of the University's 'main mechanisms' for assuring the standards of the validated programme. At subject level, only one of the original programme coordinators was a business specialist. In addition and more generally, the potential for conflict in the combination of developmental, supportive and judgemental roles that the University requires its programme coordinators to undertake, weakens the reliance that may be placed in the coordinator as guarantor of standards. This matter has been raised in previous audit reports. In the specific case of its partnership with the School, the situation has been exacerbated by the appointment of an external examiner who has no basis for making a comparison with UK awards. Although recent appointments represent a significant improvement, the University must continue to ensure that it establishes a workable basis for comparison and judgement.

44 The audit team noted that the generic validation agreement, published in the *Handbook*, effectively transferred responsibility for arranging and servicing Boards of Examiners, and for briefing external examiners, from the University to the partner institution. A letter from the Assistant Registrar to the School in early 1999 confirmed that the transfer of

responsibility for servicing the Board of Examiners had already taken effect in relation to the School. The University will wish to give very careful consideration, in the light of experience, to whether the extension of authority implied by the new arrangements should apply to programmes delivered overseas, in a foreign language, and whether it would be appropriate to expect the School to fulfil such responsibilities.

Language of tuition and assessment

45 The *Commentary* reported that 'the majority of the programme' was delivered and assessed in Spanish: in practice, Spanish is used throughout, except in English language classes. The audit team's comments on the University's consideration of this matter as part of the initial approval process are provided above (see above, paragraph 17). The *Commentary* was frank in acknowledging that language continued to be 'a particularly challenging aspect of the partnership' and reported that the University had instituted and taken responsibility for translation services to support the work of the new non-Spanish speaking programme coordinator. Discussions with staff at the University indicated to the team that, although these services were included in the Faculty's business plan, it was not yet clear what they would mean in practice. The team observed that, to date, a substantial amount of the necessary translation had been undertaken either by the School, by the coordinators, or informally within the University's language department. In relation to administration, the University had been largely dependent upon the command of English of its Spanish colleagues. The team noted that, notwithstanding the considerable benefits that the two new coordinators would bring to the partnership, there was now no member of staff from the University directly involved with the programme who had a command of Spanish. The University will need to ensure that the continuing challenges posed by the language of tuition and assessment do not impede its ability, as an awarding body, to have confidence in the quality and standards of the validated programme. It will wish to monitor the effectiveness of its arrangements for ensuring that the non-Spanish speaking coordinator is able to carry out his responsibilities.

Summary

46 From the documentation available to it in the UK, and from its discussions with staff at the University, the audit team formed the view that the University had established a procedural framework for assuring the academic standards of the award offered through its partnership with the School, but that there were some continuing difficulties largely relating to matters which had been the subject of comment in previous audit reports. The team's visit to Spain suggested that the

University needed to take swift action to provide further support for the School in understanding its requirements, and to address those matters outstanding from previous reports.

Conclusions

47 The University of Exeter established its partnership with the Escuela Superior de Marketing de Gipuzkoa in 1996, and has validated the School's programme of study, leading to the award of an honours degree in Business Studies and Marketing, since 1997. The University has sought to manage the partnership in accordance with its well-established and clearly documented procedures for the validation of external programmes. Key to its efforts to establish a good working relationship with the School have been its programme coordinators, who have undertaken regular visits to the School, and the Faculty of Academic Partnerships, which has provided continuing administrative support, and has sought to give prominence, within the University, to matters arising from the partnership.

48 It is clear, however, that many areas of the University's arrangements have not worked well in relation to this partnership, either because procedures have not been followed or because they have proved ineffective. There is a need for the University to ensure a shared understanding of its formal requirements relating to publicity, annual reports, curriculum changes, staff appointments, Boards of Studies, and Boards of Examiners. It should also consider ways in which it might do considerably more to enhance the support it provides for the School in relation to academic matters, and to ensure that students are aware of their entitlements and have access to the information that they need. In addition, there is a range of matters arising from the partnership that the University will wish to consider in relation to any future validations of overseas programmes. Its decision to validate in a subject area where, at the time of initial validation, it had limited expertise, and to approve a programme, taught in Spanish, which had aims and objectives which were not directly comparable with those of its own programmes, coupled with its failure to appoint an external examiner able to judge comparability with other UK awards, have made it difficult for the University to assure itself of the equivalence both of the curriculum and of academic standards.

49 The *Commentary* produced by the University for the purposes of the audit provided a well-presented and broadly accurate picture of the partnership, although some statements were rather more positive than was found to be justified. The *Commentary* was

clear-sighted in its recognition of the significant challenges that the partnership had posed for the University and indicated the University's awareness that some difficulties had arisen because it had simply transferred to an overseas context its well-tested arrangements for managing its partnerships with UK institutions, without sufficient reflection on whether some modifications might be necessary. The University will be aware that an ability to identify matters of concern is not a substitute for addressing those matters. It will now wish to build on its own analysis, and take swift action, not only to improve the support provided for the School but also to secure its position in respect of future initiatives overseas. It will not be sufficient for the University to postpone action until its own review of the validated programme, scheduled for summer 2001. In so far as this partnership is representative of the University's approach to managing its overseas collaborative provision, the findings of this audit would support only limited confidence in its arrangements for the stewardship of quality and standards in that provision.

Appendix A*

Commentary on the overseas partnership audit report supplied by the University of Exeter

The University of Exeter welcomes the opportunity to provide a commentary on QAA's report on its Spanish provision.

The context in which the partnership with Escuela Superior de Marketing de Gipuzkoa was established by the University was one in which the formal requirements controlling and underpinning such links were not as well-developed as they are today. In this context the QAA audit team was satisfied that the approval process had taken place in accordance with clear procedures.

In the period since that partnership was established, the University's quality assurance requirements have been developed and refined, as a result of which the University became aware of the need to address more rigorously the comparability of the validated provision at Escuela Superior de Marketing de Gipuzkoa with Exeter's own provision. The University was taking steps to address that need in its University-wide strategy on partnership provision.

However, the University accepts that in this particular case there are serious concerns in the way the partnership has operated. The University was aware of these concerns, and was in the process of considering the best course of action at the time of the audit. The University has since decided that it will not in future enter into the validation of overseas programmes delivered and assessed in a foreign language. With respect to the provision at the Escuela, the University has decided to permit only one further cohort of students to register for the programme and thereafter, following students' completion of the programme, will cease its partnership. The University can assure QAA that it is currently working with the School to develop an exit strategy that will protect the position of the students on the course.

The University welcomed the recognition in the report of the School's provision of good academic support for its students and the level of the University support for the School at the level of management and administration.

**as supplied by the University of Exeter and Escuela Superior de Marketing de Gipuzkoa*

Appendix B*

Student numbers at Escuela Superior de Marketing de Gipuzkoa BA in Business Studies and Marketing

Cohort	Number of students who have graduated
1994-95 to 1997-98	23
1995-96 to 1998-99	19

Cohort	Number of students currently registered
1996-97 to 1999-2000	28
1997-98 to 2000-01	36
1998-99 to 2001-02	31
1999-2000 to 2002-03	36

*as supplied by the University of Exeter and Escuela Superior de Marketing de Gipuzkoa