University of London
External System

NOVEMBER 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.

All QAA's publications are available on our website www.qaa.ac.uk

Contents

Summary

Introduction

A team of auditors from the Quality Assurance Agency for Higher Education (QAA) visited the University of London External System between 14 and 17 November 2005 to carry out an institutional audit. The purpose of the audit was to enquire into the way in which the University exercised its responsibilities for the academic standards and quality of its degrees, through the External System.

To arrive at its conclusions the audit team spoke to members of staff of the University and to students, and read a wide range of documents relating to the way the University 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 resources 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 the University of London External System is that:

- broad confidence can be placed in the soundness of the University's current and likely future management of the quality of its academic programmes and the academic standards of its awards offered through the University of London External System.

Features of good practice

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

- the role of the External and Internal Student Administration Division (EISA) in its administrative support of the student lifecycle

- EISA's proactive role in the enhancement of the external system processes and procedures

- the introduction of an innovative form of student representation by the London School of Hygiene and Tropical Medicine.

Recommendations for action

The audit team recommends that the University of London External System should consider further action in a number of areas to ensure that the academic quality and standards of the awards it offers are maintained. The team advises the External System to:

- review the way the External System Academic Board operates to ensure that it can more effectively and speedily fulfil its role as the committee with collective responsibility for the management of quality and standards of the external programme

- develop agreements with the third-party institutions listed by the University of London to ensure that the interests of the University of London and its students are adequately protected

- establish a strategy for the more effective use of statistical data in the evaluation of standards across the external system as recommended in the previous audit report

- address fully all aspects of the Academic Infrastructure, in particular that programme specifications are completed for all programmes, and that all sections of the *Code of practice for the assurance of academic quality and standards in higher education* (*Code of practice*) are formally considered

- consider the establishment of minimum expectations for the academic guidance and personal support of students in the External System.

National reference points

To provide further evidence to support its findings the audit team also investigated the use made by the External System of the Academic Infrastructure which QAA has developed on behalf of the whole of UK higher education. The Academic Infrastructure is a set of nationally agreed reference points that help define both good practice and academic standards. The findings of the audit suggest that the External System has generally addressed the Academic Infrastructure but still has some work to do to ensure that the all the sections of the *Code* have been appropriately addressed and that all programme specifications are available.

Main report

Main report

1   An institutional audit of the University of London External System (the External System) was undertaken during the week commencing 14 November 2005. The purpose of the audit was to provide public information on the quality of the External System's programmes of study and on the discharge of its responsibility for academic awards.

2   The audit was carried out using a process developed by QAA in partnership with the Higher Education Funding Council for England (HEFCE), the Standing Conference of Principals (SCOP) and Universities UK (UUK), and has been 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.

3   The audit checked the effectiveness of the External System's procedures for establishing and maintaining the standards of its academic awards; for reviewing and enhancing the quality of the programmes of study leading to those awards, and for publishing reliable information. As part of the audit process, according to protocols agreed with HEFCE, SCOP and UUK, the audit included consideration of examples of processes at work at the level of the programme.

Section 1: Introduction: the University of London External System

The institution and its mission

4   This audit addresses provision provided by the University of London External System. The External System is part of the central University of London located at the time of the audit in the University's Senate House. The External System has provided opportunities for external students to gain a University of London award, without the requirement to be in attendance at a College of the University, for nearly 150 years. It operates under the principle, enshrined in the Statutes of the University, that the academic standard of University of London awards is attained irrespective of mode or place of study.

5   All programmes offered by the External System lead to awards of the University of London, the degree awarding authority. The External System operates through a partnership between the central University and the member Colleges. Programmes of study offered by the External System organisation are each academically managed by one or more Colleges. The central University is the registering and awarding body, providing the overarching governance through central committees, and administrative and development support through its External and Internal Student Administration Division (EISA).

6   The External System has expanded significantly since the early 1990s, student numbers rising by almost 40 per cent, and the range of programmes offered has increased fivefold. Currently there are some 34,000 students studying in more than 180 countries, on over 100 programmes, ranging across undergraduate, postgraduate, certificate and diploma awards.

7   The nature of the partnership between the central organisation and the Colleges is reflected in the academic structures in place to manage and oversee the External System's programmes. Colleges are responsible for the academic development, maintenance and review of programmes and for students' progression through those programmes. Centrally there are two senior committees with responsibilities for the External System and its programmes. The External System Lead Colleges Committee (ESLCC) was established by the University Council in 1999 to oversee external provision. In 2002 the Council approved a recommendation that the ESLCC be accorded responsibility for the oversight of all aspects of the academic management of the External System (in particular to ensure the application of quality assurance mechanisms),

and that an External System Academic Board (ESAB) be established under the aegis of the ESLCC to oversee academic policy, standards and quality on behalf of ESLCC.

8   All provision through the External System is provided to students through distance learning supported by a range of support models. The e-learning services have been developed centrally and a system-wide eCampus project was established in 2001 to provide integrated services to new programmes with e-learning components. The eCampus services are being made available progressively to all programmes.

9   The mission of the External System is: 'to promote worldwide a programme of degrees and other awards primarily for students who cannot attend full-time courses at the University of London'.

Collaborative provision - scale and coverage

10   The University does not consider the External System's arrangements to be collaborative provision as there are no partner institutions formally teaching the programmes. However, in addition to the various support arrangements for students provided by the Colleges, other institutions do become involved in providing support, and sometimes direct teaching, for students on the external programmes. Some of these institutions have a formal relationship with the Colleges, or in the case of the Laws Consortium, the institution and the University, while others are operating entirely independently. In some cases there is a Memorandum of Understanding with the independent institutions. The implications of these arrangements for the University are discussed in more detail below (paragraphs 96 to 102).

Background - the information base for the audit

11   The External System was last subject to audit in 1995 by the Higher Education Quality Council (HEQC) and this report was available to the audit team.

12   The External System provided the audit team with a self-evaluation document (SED) which addressed the System rather than the University. The SED included a range of appendices containing further information on the External System, its organisation and procedures, and the team was also provided with a recently published Quality Manual. Four audit trails relating to specific programmes were followed by the team. Documentation for these trails was provided by the Colleges concerned and consisted primarily of pre-existing papers, handbooks and reports. The team was given access to the central University's intranet and to shared drives containing key quality assurance (QA) information.

Audit process

13   In the period leading up to the audit a series of meetings were held between the QAA and the University, during which the nature and scope of the audit process were agreed. Prior to the audit, QAA had undertaken institutional audits of most of the Colleges, therefore, the aim of this audit was to establish how the partnership between the External System and the Colleges operated, and how it safeguarded the integrity of the University of London degree. Following these discussions, the University provided an SED to the audit team in July 2005. In recognition of the fact that all students are remote from the University it was agreed that a student views document would be provided in place of the normal student written submission (SWS). This document was produced by the Audit Steering Group for the External System and resulted from an on-line survey of External System students via the External System website. The audit team is grateful to the Steering Group and the students for their contribution to the audit process. The team visited the University between 4 and 6 October 2005 to conduct discussions with the Vice-Chancellor and his senior colleagues and with student representatives, to enable the team to confirm that it had properly understood the contents of the SED and the student views document respectively, and to extend its understanding of

the management of the quality of learning opportunities and the academic standards of the External System. In advance of the briefing visit the team had agreed to conduct four audit trails relating to particular programmes to assist their understanding of how the system operated at programme level. These trails were:

- BSc and Diploma in Computing and Information Systems (Goldsmiths College)

- BAs in French, German, Italian and Joint Languages (Royal Holloway)

- MSc and Postgraduate Diploma in Human Resource Management (Birkbeck)

- MClinDent (Prosthodontics) (King's College London).

In addition the team followed three documents trails:

- LLB and Diploma in Law (Intercollegiate)

- LLM (University College London and Queen Mary)

- BSc Mathematics and Economics (London School of Economics and Political Science).

14   The audit visit took place between 14 and 17 November 2005. During this visit, the audit team met central staff involved with the management and administration of the external programmes, and staff from the Colleges who were members of the central senior committees and staff who operated the system within the Colleges. The team also consulted the documentation provided. The audit team is grateful to all those who made themselves available to discuss the External System's quality management and academic standards arrangements.

15   The institutional audit team comprised Dr D Furneaux, Dr J Longmore, Professor P Luker, Dr P Steer, auditors, and Dr C Robinson, Audit Secretary. The audit was coordinated for QAA by Ms N J Channon, Head of Operations, Institutional Review, Reviews Group.

Developments since the last audit

16   The last audit of the External System was undertaken by HEQC, in 1995. In this report the External System was commended for nine elements of the QA arrangements and 15 issues were identified as needing further consideration. At the time of the HEQC audit the University was undergoing a fundamental review of its structure and mode of operation, consequently many of the areas for further consideration have been overtaken by the subsequent re-organisation and changes in procedures. Some areas which still have relevance to this audit are recommendations that the External System should:

- encourage greater consistency in study support material

- make the monitoring of School (College) procedures for institutional recognition more effective

- regularly review methods for obtaining student feedback on study support material to determine their effectiveness, and, more generally, consider how it might improve arrangements for obtaining and utilising student feedback (within the financial and administrative parameters off the External System)

- consider whether its present arrangements for the scrutiny and monitoring of local examination centres, particularly in remote areas, are sufficient to meet its requirements.

The team considered the timeliness and effectiveness of actions taken since the last audit and noted that whilst many of the recommendations have been addressed, there were a number that were still outstanding. These matters are covered elsewhere in this report.

Section 2: The audit investigations: institutional processes

The institution's view as expressed in the SED

17   The SED described the External System as a partnership between the Colleges and the central University in which programmes of study offered are each academically managed by one or more Colleges. The central University, as the registering and awarding body, provides the overarching governance through central committees (ESLCC and ESAB), and the business, administrative and development resources through EISA.

18   The Quality Assurance Framework for the External System was described in the SED as one which 'draws on the academic framework of the University of London', the only major difference being that for the External System - awards are made directly by the University and not by the Colleges as is the case for College-based provision. The SED went on to say that 'the standard of the award is assured through the participation of the Colleges, either through an individual ('Lead') College's responsibility for the maintenance and assurance of standards within an individual programme of study or, in the case of the undergraduate Laws programmes, through a consortium of Colleges'.

19   The SED stated that Colleges, whether individually or through consortium arrangements, are responsible for the academic development, maintenance and review of programmes, and for students' progression through those programmes. It went on to say that the processes applied by Colleges for assuring the quality and standards of individual programmes offered through the External System reflect those that are in place for corresponding elements of College-based provision, and that collective responsibility for the assurance of quality and standards is achieved at system-wide level through the ESLCC and the ESAB, and is reinforced at federal level through the academic framework of the University of London as defined in the Ordinances (12-15).

The institution's framework for managing quality and standards, including collaborative provision

20   Until 1999, management of the external provision employed a hybrid of old and new mechanisms, as the academic framework of the University had not been fully articulated to encompass the External System. In 1999, the Council of the University established the ESLCC to oversee all external provision. ESLCC is chaired by the Vice-Chancellor and its membership comprises the heads or nominated senior substitutes from the Colleges that offer programmes through the System. The original remit of ESLCC was to advise Council and the Director of EISA on planning, development and resourcing of the External System and to ensure that QA mechanisms are applied.

21   Council recommended in 2002 that ESLCC be responsible for the oversight of all aspects of the academic management of the External System. In order that ESLCC could be effective in this regard, ESAB was established in 2003 with delegated authority for academic policy, standards and quality. Since 2003, the Laws Consortium has fulfilled its responsibilities through the External Laws Committee (ELC), which reports to ESAB. The Chair of ELC is an ex officio member of ESAB.

22   The principal policies and procedures that apply to the maintenance of quality in the External System are described in a Quality Manual which was approved by ESAB just before the audit visit in October 2005. The Manual covers system-wide policies and centrally-administered processes that support the partnership between the Colleges and the University that forms the External System.

23   The QA of external programmes, as described in the Quality Manual, comprises six stages: the 'bidding process' that leads to full programme approval; the agreement, which is central to making the QA framework work between the College(s) and University; student

and programme management; system-wide matters; systematic reporting, and the review process. Each programme in the External System has a Programme Director in the College and is allocated a Programme Manager from EISA.

24   The SED explained that QA processes often need to be locally adapted to respond to the particular structures in place in individual Colleges. In response to this challenge a number of Quality Assurance Schedules have been drawn up to identify the bodies within the Colleges and the centre that are responsible for making specific decisions about programmes and students. The Schedules were described in the SED as 'working documents that guide the administration of programme and student management' for Colleges and in the central EISA administration. There are plans to add information to the Schedules in three areas in the short term: annual review and monitoring, periodic review and the consideration of external examiners' reports.

25   Assessment of students studying through the External System is carried out by boards of examiners, which are University boards. However, each of these boards is integrated into the academic management structures of the Lead College concerned and the College's QA mechanisms apply. Each College is responsible for aligning with the section of the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice), Section 6: Assessment of students*, published by QAA. The academic structures of the University apply in the case of the Laws Consortium.

26   In the External System the University requires the majority of examiners within a Board to be members of academic staff of the University, or one of its Colleges. Where a programme has a large number of students, examiners are often recruited from outside the Lead College or from outside the University. Examiners from outside the University are designated associate examiners, for which ESAB has agreed an appointment procedure.

27   There are two other aspects of assessment

in the External System that constitute system-wide policy. First, it is regarded as a keystone of External System policy that all examination papers are double-marked. The other aspect relates to the nature of the assessment itself. Owing to the difficulty of guaranteeing security of continuous assessment in large-scale worldwide provision, the External System imposes a limit of 30 per cent on non-examination summative assessment. Occasionally, ESAB may agree a relaxation of this to 40 per cent for some postgraduate programmes, where this can be justified.

28   The University enters into formal relationships with other institutions for the purpose of providing students with additional local support. The nature of these collaborations is discussed in paragraphs 96 to 102. Whatever the relationship with a partner, all summative assessment remains within the control of the University.

29   The audit team found that the framework had been well thought out and has addressed the challenge of enabling the External System to be managed as a partnership between the University and the participant Colleges. EISA is central to maintaining and overseeing the application of the framework, working with ESLCC and ESAB as appropriate. The team identified the proactive role of EISA in the evolution of the External System processes and procedures as a feature of good practice. The team was aware that achieving coherence for the External System had created a number of challenges, some of which had yet to be fully overcome, and it was not able to judge whether or not the framework would cope should the External System expand in the future. While it found the framework to be comprehensive, the team considered that there was considerable scope for improving the timeliness of decision-making and deems it advisable that the University review the way ESAB operates to ensure that it can more effectively and speedily fulfil its role as the committee with collective responsibility for the management of quality and standards of the external programme. Such a review might also

consider the impact of any significant expansion of the External System.

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

30   This area is not specifically addressed in the SED, in part reflecting the specialised nature of the activities being audited. The audit team noted the delegation of academic development to Colleges and, in terms of enhancing the quality of provision, would expect the main thrust to be College based. During the visits to the University and in the documentation provided, the team became aware of several initiatives aimed at enhancing External System processes and the student experience. The team formed the view that a more coordinated and strategic approach to these initiatives, and a way of formally sharing enhancement initiatives at programme level across the External System, would be of benefit to all concerned.

Internal approval, monitoring and review processes

31   Programme approval, monitoring and review constitute the first (the bidding process), fifth (systematic reporting) and sixth (the review process) stages of the QA framework for the External System.

Programme approval

32   In the SED, it was explained that 'new programme development and the modification of existing provision are managed through a bidding process, in which Colleges and consortium generated initiatives are considered by the External System committees'. The bidding process describes a mechanism by which the proposal is assessed in terms of the business case and academic and quality matters. A comprehensive planning blueprint specifies the format of the programme planning document which addresses all the major decisions that are required for academic and operational planning. The business case includes an analysis of the market, specifies how much development funding is sought, and identifies the anticipated costs and income associated with the programme. The planning document specifies the intended learning outcomes, QA arrangements, delivery mechanisms, staffing requirements and staff development needs.

33   Bids are formally considered in two stages. ESAB first considers all system-wide academically related issues, before forwarding bids and ESAB's recommendation to ESLCC, which focuses on strategic and financial considerations. Once a bid has been approved, responsibility for the approval of the programme itself passes to the College(s) concerned. The QA Framework requires that a person of suitable standing, who is external to the University, be appointed early in the programme development process and be involved throughout that process. The QA Manual states that a new programme should not be launched unless programme approval and external assessment have been concluded satisfactorily.

34   In 2003-04 the process of developing programme specifications for all External System programmes began. The QA Manual states that a programme specification will be written and agreed during programme development. It is the College's responsibility to ensure that relevant subject benchmarks are applied to programme design. The SED explained that all new programmes must be properly assigned to the appropriate level(s) of the External System qualifications framework, which is derived directly from *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ), published by QAA (see below, paragraph 60).

35   Each approved programme is subject to an agreement that comprises a number of principal clauses and three schedules. Schedule B of each agreement specifies the allocation of responsibilities between the Lead College, or Consortium, and the External System, in line with the principles of the QA Framework. Specifically, Schedule B identifies all areas of activity and identifies the appropriate bodies in the College and University responsible for that activity.

36   The current approval process is relatively

new, and no programme has gone through the full approval process. However, the External System has identified areas for improvement in the process and has also identified the need to revise the planning blueprint in the light of the revision to the *Code of practice, Section 2.*

37   The audit team found that the planning blueprint to be a comprehensive document and external involvement is important to the process. While the team found some very thorough programme planning documents it also saw examples that were less well developed, although each section of the blueprint had been covered. There would be benefit in the External System ensuring that the best practice seen in the thorough planning documents was encouraged for all approvals.

38   The audit team noted that although it is ESLCC's responsibility to oversee the closure of programmes, the closure of several programmes was an item for information on an ESLCC agenda. The team was assured that a five-year period of notice is always applied. ESLCC may wish to consider whether its role in overseeing the closure of programmes is being adequately fulfilled.

Annual monitoring

39   The SED described how, in 2002-03 the External System introduced a systematic mechanism for the annual review and reporting for each external programme. The formal process begins with an annual review meeting that involves key staff (including the Programme Director and Exam Board Chair) from the College and from EISA (including the Programme Manager). The meeting, to which external examiners are invited, considers statistical information, student feedback, points raised by external examiners and any issues raised by staff. The minutes of the meeting are used by EISA staff as a guide to drafting the Annual Programme Report (APR). When approved by the Programme Director, the APR is submitted to the College and to ESAB for consideration. An appendix to the APR is an action sheet that captures all the actions identified, and allocates responsibility and a target date for response. The Programme

Manager tracks the actions and the responses.

40   After the first cycle of application of APRs, the External System reviewed the strengths and limitations of the process. This review affirmed the effectiveness of the process, but raised concerns about the duplication of effort owing to the parallel application of College processes. For 2005, Royal Holloway and the School of Oriental and African Studies were using an agreed approach that integrated closely with the Colleges' own mechanisms. ESAB has agreed in that it will review the process after the first cycle of application. The audit team formed the view that the APR process is a an important element in the External System's ability to maintain an overview of its awards and would encourage ESAB, as part of its review, to maintain the key elements of the process whilst aiming to reduce unnecessary duplication.

41   The statistics available for producing APRs are limited by the constraints of the current student record system, such that cohort analysis is not possible. The audit team recognised that such data are hard to compile when considering distance-learning students, but nevertheless considered that such analysis would enable the University to better monitor student achievement. The team was told that this would improve when the new student record system (ATLAS) is fully operational. There is little, as yet, by way of student feedback to inform the compilation of the APR. It is not easy to see how the University might capture a holistic view of the student experience in the APR. Apart from these limitations, the audit team found APR to be comprehensive and responsive to issues raised by external examiners. The audit team considered that the suggestion that there should be an opportunity for external examiners to attend APR meetings would be a positive and helpful development.

42   University Ordinances require that Colleges submit an annual report to the University. In parallel with this process, EISA produces an Overall Annual Report (OAR) on the External System which identifies significant issues to be drawn to the attention of the

University. The OAR summarises significant issues raised by external examiners, identifies system-wide or recurring issues from APRs, summarises award statistics by discipline and notes responses to any issues highlighted by Senate the previous year. The OAR, which is also considered by ESAB, is regarded as a crucial document by the External System as a means of maintaining an overview of the System as a whole. The team would concur with this view.

43   In practice, members of ESAB do not see all APRs. The audit team was told that the Chair reads a sample of them, which is sufficient for him to be able to affirm that the OAR is a representative reflection of the issues raised. In the view of the team the thorough and comprehensive summary of APRs that EISA produce in the form of the OAR means that it is reasonable for ESAB not to see all APRs. However, ESAB may wish to consider whether, as its role develops, the importance of APRs may suggest a different approach.

Periodic review

44   Whilst Colleges have always been able to include external programmes in their own periodic review processes, there has, until recently, been no mechanism whereby the College and the External System can review provision jointly. In January 2004, ESAB agreed that periodic programme review would be a joint responsibility between the Lead College/Consortium and EISA. Teaching Quality Information (TQI) guidance on periodic review information was incorporated into the proposal. Since 2004, several joint review models have been piloted. These models include a review of an external programme, where there is no equivalent internal provision, to a broader review at a departmental level, where external provision might only form a part. For consortium-based provision, periodic reviews are centrally administered. Periodic review reports are sent to the Lead College/Consortium and to ESAB for consideration. The University is in the process of evaluating each model.

45   A number of periodic review reports was made available to the audit team. While evincing the different approaches alluded to above, each of the reports was comprehensive in scope and involved fully at least one person external to the University. In the view of the audit team there is much to be gained from a rigorous approach to periodic review, and if subsequent reviews are undertaken with similar rigour to those seen by the team, then the periodic review process will form an effective part of the quality assurance system. Whilst recognising the need to avoid duplication with College processes, the External System may wish to identify key outcomes that it requires from whichever process is adopted to enable it to make comparisons across the System and to identify common themes.

External participation in internal review processes

46   External participation is required in all aspects of approval, monitoring and review of the external provision. External assessment is a requirement of programme approval, where external experts are also used in the process of preparation of learning materials, which is deemed necessary by the External System owing to the focus on distance learning. External examiners are central to the annual monitoring process. In periodic review, externality is also a requirement. The audit team found that external participation was applied rigorously to all internal review processes.

External examiners and their reports

47   The regulations of the University of London external programmes mean that at least one external examiner is appointed for each External System Board of Examiners. Evidence from the trails and discussions with staff indicate that this is now in place, reflecting development since the HEQC report of March 1995. In addition, in line with University policy, intercollegiate examiners may be appointed who have a role similar to that of the external examiner, but with the additional duty of

ensuring that the awards are comparable with those from other Colleges of the University of London. The decision about whether to appoint intercollegiate examiners lies with the Lead College or External Laws Committee, for the Laws Consortium, and therefore varies between programmes.

48   The underlying philosophy of partnership between the University and the Colleges underpins the operation of the external examiner system. External and intercollegiate examiners are nominated using Lead College or Consortium mechanisms, as a consequence the detail of the process does vary, but both are formally appointed by the University. The appointment of external examiners for the External System is subject to extensive and detailed guidelines that properly reflect the QAA *Code of practice*. External examiners receive extensive written guidance on the operation of the External System and its regulations and requirements, and also relevant College and Law Consortium materials. This guidance indicates that they should all receive a copy of the programme specification and a list of learning materials available to the students. All external examiners are expected to work to these detailed regulations for the operation of the Board of Examiners. The assessment of students is subject to both a limited number of University regulations and the local regulations of the individual Colleges. External examiners are given suitable powers and responsibilities under the regulations of the University of London to oversee and report on the assessment of students and the designation of awards. However, external examiners also work within the context of the precedent and policies of the individual Colleges, allowing close alignment with any similar programmes within the Lead Colleges.

49   In November 2002, ESLCC endorsed the present system for the consideration of, and response to, external examiner reports as part of the External System external examining procedures. The SED indicated that the system 'would appear to be bedding in well'. External examiners use a standard format for their reports with suitable sections for comment and also guidance for them on their involvement with University assessment processes. Summaries of external examiners' findings are published on the External System website. The audit team concluded, on the basis of evidence from the trails and the website, that external examiners are given good opportunities to be involved in commenting on the programmes of the External System and that these are generally robustly taken up.

50   All external examiner reports are addressed to the Vice-chancellor of the University of London and then are distributed to the relevant College heads, academic registrar (or equivalent), and director for the programme with a summary of points to note. There is dual reporting system in place that reflects the Lead Colleges' and the Laws Consortium's central role in programme-specific issues and the responsibility of the University for the operation of the External System as a whole. External examiner reports therefore go into the Lead Colleges own systems, which are subject to individual institutional audit, for consideration and response on programme related issues raised by external examiners using established procedures. This helps maintain a strong link between the programme and associated programmes in the Lead College. The Laws Consortium plays a similar role for external examiner reports for undergraduate law. This effective process means that external examiner reports are seen by all the relevant individuals, in line with the recommendations of the last HEQC report.

51   Copies of all external examiner responses are sent to EISA. System-wide issues are considered by ESAB on the advice of EISA and appropriate action undertaken in consultation with the Lead Colleges. In urgent or serious cases, action may be considered by the Chair of ESAB in consultation with the Vice-Chancellor. External examiners also receive a response to their reports concerning system-wide issues from the University. The SED recognised that a single response would be better but indicated that this would cause operational difficulties out

of line with the benefits. While the audit team concluded that the dual reporting line had some merit in ensuring ownership at College and External System levels, the potential for conflicting responses remained a concern. The contents of external examiner comments are summarised and form the basis of an overall annual report for the External System prepared for the Vice-Chancellor, while subject based issues are considered by the established procedures of the Colleges and the Law consortium. The team heard that staff see external examiners as central to the quality system, and the processes in place for gathering external examiner views and responding to them confirm this. The team was told that in future, external examiners will receive a copy of the annual monitoring report.

52   Recent comments from the external examiners, seen as part of the trails, all endorse the academic standards achieved by students on the External System. For all programmes, the Chair of the Board of Examiners has a duty to confirm equivalence between the standard of assessment of External and College-based students. In addition, the process of designation of awards is closely aligned with that for other Lead College students sometimes by the use of different sub-boards of the same overall examination board, and sometimes by external examiners explicitly indicating that standards are the same for the two sets of students. The audit team noted that all external examiners for the programmes sampled in the trails considered that standards were appropriate. The team heard that the main system-wide issues raised by external examiners concerned the late submission of examination scripts, caused by delays in the internal examining processes, and lack of timely accurate information at some examination boards. The SED recognised the weaknesses of the present information management system, which should be addressed by the introduction of the new ATLAS system. The SED explained that the University continues to monitor the operation of the examination centres in 150 countries, and has acted on the recent advice by the Internal Auditor for more spot checks.

It has also recommended that the numbers of examination scripts allocated to individual internal and associate examiners be reviewed.

53   Overall, the audit team concluded that the use of external examiners at the subject level is robust and in line with the precepts of the *Code of practice*. There is also a developing and appropriate process through ESAB for using external reports to oversee the operation of the External System.

External reference points

54   Responsibility for the consideration and use of external reference points, including professional body requirements, reflects the distribution of responsibilities that pertains to all the External System provision. Programme specific matters, including subject benchmarks and most aspects of the FHEQ, are considered by the Colleges while the University of London has overall responsibility for the operation of the External System, working closely with the Colleges. The Laws consortium is directly responsible to the University, although it strongly reflects the subject-based knowledge embodied in the constituent Colleges. Hence, aspects of the operation of the External System with respect to external reference points that are subject-based, including professional bodies, are generally the responsibility of the Lead Colleges. Some sections of the *Code of practice*, like that on external examining or assessment, are reflected in College procedures. Staff are made aware of the implications through the various local processes of the Colleges who are all subject to their own institutional audit. The SED stated that the precepts of the *Code of practice* and the FHEQ have been central to the ongoing development of the External System.

55   As well as subject-based matters largely considered at College level, the *Code of practice* is also relevant to the system-wide aspects of the provision. The audit team heard that ESAB has a central role in considering the academic development of the External System. However, ESAB has not formally considered the *Code of practice* as a whole. The *Code of practice* is not

necessarily an explicit part of the papers produced for ESAB, but staff indicated that it is embodied in the papers presented. It was recognised by staff met by the audit team that this process is generally driven by proactive intervention by EISA. Considerable changes since the last HEQC audit mean that a number of areas of the *Code* are now more rigorously covered than previously, including annual monitoring and review, and student appeals and complaints systems. The SED explained that careers advice has not been a feature of the External System, although this will be reviewed. The University is proactively considering its policy in the light of Special Educational Needs and the Disability Act and the *Code of practice*. This has led in 2004 to a revised Disability Statement, but the SED recognised that further detailed work needs to be done in the context of enquirers, applicants and students with special needs in the context of provision at a distance.

56   The Laws Consortium, which is not an independent institution like the Colleges, is only presently going through a process of confirming its use of the precepts of the *Code of practice* at the subject level and its use of the subject benchmarks. It is also in discussions with the professional bodies for law about their related requirements which, in part, reflect the application of certain aspects of the subject benchmarks.

57   At its September meeting, ESAB was starting the process to consider Section 2 of the *Code of practice*. The 'permission to teach' and 'specified status' arrangements are considered by the External System as a type of collaborative activity and, therefore, as exceptions to the University's general principle of not engaging in collaborative provision (see below, paragraph 102). At present, monitoring and control is largely College or Laws Consortium based within different processes in place and little central oversight which might be expected from the precepts of the *Code of practice*. In the view of the audit team these arrangements, and also those for teaching institutions, would benefit from review

in light of the *Code of practice.* The team heard that this need is recognised within the External System although the Institutions Review Group (IRG), while considering these arrangements in light of the *Code of practice,* has no agreed timescale for reporting.

58   The audit team concluded that while large parts of the *Code of practice* are properly and effectively reflected within the operation of the External System, the claim of the SED that the *Code of practice* is an 'integral part' of the External System is not always fully justified.

59   As subject benchmarks relate solely to the content of programmes, the responsibility for considering them, as the programmes develop, rests with the Lead College or Consortium. The audit team formed the view that the requirement for consideration of subject benchmark statements is embedded in the College and Law Consortium processes.

60   The External System has a Qualification Framework that specifies the types of award available, the generic outcomes associated with the award and the nature and length of the programme and expected entry requirements. Where the awards are mentioned in the FHEQ they are fully consistent with it. However, the External System also has an award designated at level 'G'. It is not in the FHEQ and does not apply in the constituent Colleges of the University, and comprises Advanced Graduate Diplomas and Certificates. So far it has not been used. The level has been designed for graduates or similarly qualified students who do not have the entry requirements for master's programmes. Transition to master's level study may be the outcome of successful completion of an award. In some programmes the Advanced Graduate Diploma may be based on related postgraduate work but with a Pass mark of 40 per cent instead of the 50 per cent for postgraduate modules. The naming of these awards distinguishes them clearly from 'M' level work, however, it is their use, as described in the Quality Manual, as compensation to students who fail to get 50 per cent on the associated postgraduate module which raises concerns about the need for clearly articulated

learning outcomes for each level of credit. The audit team recognise that as yet no awards fall into the category of level 'G', but would recommend that the External System review its guidance on such awards to ensure that they are awarded to mark the achievement of positively defined outcomes in line with the FHEQ.

61   The SED indicated that once programme specifications have been drafted and agreed, using a format that is tailored to the special features of the External System, they are posted on the 'londonexternal' website. At the time of the start of the audit visit, programme specifications were not available on the website for all the programmes presently run by the External System, so implementation of policy in this area is still ongoing after the sector-wide agreed date for the production of programme specifications. Extant programme specifications provide useful information, although with some differences in the level of detail included. The audit team would advise the External System to ensure that programme specifications are available for all its awards.

Programme-level review and accreditation by external agencies

62   As the External System is fully self-funding, it has not been the subject of external reviews in the way that HEFCE-funded provision has been. The External System was specifically excluded from the subject reviews conducted on HEFCE's behalf by QAA. While some subject review reports mention the external provision, that provision itself was not scrutinised by the review.

63   In a few cases, External System programmes are accredited by a professional, statutory or regulatory body along with their internal equivalents. Accreditation engagements and follow up are the responsibility of the Lead College or Consortium concerned. At the time of the audit, the University was still in discussion with the General Council of the Bar concerning the application of the *Subject benchmark statement* for law with respect to the skills acquired by students, given the distance-learning nature of the provision. The discussions had, at

the time of the audit, already been progressing for some appreciable amount of time and the audit team believes that this represents a less than adequate response by the University. The University may also wish to consider whether the difficulties identified by the discussions over the distance-learning nature of the provision may have implications for all current and future programmes offered by the External System.

Student representation at operational and institutional levels

64   The SED emphasised the difficulty of ensuring representation of student views across a highly distributed programme with some 34,000 students in over 180 countries, and noted that, until recently, formal mechanisms for representation had been very limited. The President of the University of London Union (ULU) is a member of ESLCC, and has recently been asked to act as an External System student representative on ESAB. Sabbatical officers who met the audit team recognised the need for more extensive representation of the student voice at both programme and institutional levels. The view was expressed to the team that student representation at ESLCC was limited, but that discussion at ESAB is more student-centred, with extensive consideration of student feedback procedures.

65   At the time of the audit visit, a proposal from ULU for funding to establish virtual mechanisms to secure the views of External System students had been referred to ESLCC. The audit team heard that the proposed hub would allow both the sabbatical officers on the ESAB and internal student representatives on course committees to collect the concerns of the external students. Discussions were at too early a stage for the team to offer any comment on how far this proposal might improve student representation beyond the current arrangements.

66   Students who met the audit team confirmed the current limitations on representation. At postgraduate level, however, the team heard of an innovative approach to student representation at the London School of

Hygiene and Tropical Medicine, where UK-based External students are invited to attend programme committee meetings and to act as a channel for the views of those based overseas, relayed by email. The team noted this innovative form of representation for External students as a feature of good practice.

Feedback from students, graduates and employers

67 The report of the HEQC quality audit drew attention to the need for improved arrangements for collecting and using feedback from students in the External System. The SED stressed that the transition from informal to formal arrangements had been marked in April 2005 by the introduction of a systematic survey of the student experience. This on-line survey was sent to about a quarter of the undergraduate students from a cross-section of programmes and had invited comment on the services and resources provided by the University. Staff from EISA who met the audit team confirmed that this had been a valuable exercise. It has been agreed that there will be regular surveys in the future but it is still unclear as to the frequency, although a statement in the Quality Manual suggests an annual cycle. The team noted that the outcomes of the survey are to be reported to a meeting of ESAB in January 2006 to inform consideration of system-wide issues, and that the full results of the survey and an accompanying action plan will be published in March 2006. It heard from senior staff that consideration was being given to a similar on-line survey for postgraduate students. The team welcomed this development but recognised that it was too early to judge the effectiveness of the on-line survey as a means of gathering regular student feedback.

68 The SED outlined other informal feedback mechanisms that operated at programme level, including discussions with programme directors during their international visits, and the large number of enquiries directed at administrative staff. The 'External Student Responses' confirmed the volume of contact with EISA staff

but provided little evidence of other opportunities for informal feedback. Students who met the audit team offered details of other forms of contact, from a twice-yearly visit by the programme director to a 'Permission to Teach' institution to informal discussions at the annual residential session of one of the postgraduate programmes.

69 The audit team observed that these informal contacts are recorded in annual programme reports. Staff from EISA confirmed that annual programme report meetings offer the opportunity for much discussion of programme-specific feedback, and they expressed the view that postgraduate programmes were leading the way in gathering student feedback. The development of a centrally-produced questionnaire template is planned in conjunction with the Colleges, whose responsibilities for gathering and analysing student feedback are recognised by the University. The team formed the view that this was an area in which further progress will be made as the APR procedures become more established.

70 Following the recent disbanding of the Convocation of the University of London, there has been no association for graduates of the External System. Feedback has been sought from alumni through a survey conducted by the Strategic Marketing Manager, and this has led to the development of an alumni newsletter and association. The audit team noted the imminent appointment of an Alumni Relations Manager with responsibility for collecting feedback from graduates and alumni. Feedback from employers is not sought as part of the quality assurance arrangements of the External System but lies within the curriculum approval procedures of the Colleges.

Progression and completion statistics

71 Data for the annual monitoring procedure is supplied by the student record system of the External System, EARS. A number of annual reports and the SED indicated that EARS can provide only a limited amount of relevant data and this was confirmed to the audit team by meeting with staff from EISA. Moreover, EISA,

while it has this overall data for the provision, does not produce detailed reports from EARS for widespread consideration within the University.

72   The SED reported that the University is working towards implementation of the ATLAS system which will have much greater capability for producing useful data. For instance, presently the record system only indicates if the minimum entry requirements have been met, so the exact nature of the students' qualification on entry is not available. The audit team believe that more detailed information would be useful for a number of reasons, including the monitoring of progression, especially for non-standard entrants who go through special procedures before a decision is made. The SED explained that for external students the University does not keep detailed data on ethnicity or social class, but is taking specialist legal advice in order to inform future plans. Moreover, explicit data on disability has not been kept since it was considered 'culturally inappropriate in some of the countries in which the External System is active'. Data on country of origin is provided for use in the annual reviews which allows the main areas of operation for the individual programmes to be determined. Annual reports also include information on the number of new registrations, which is often commented upon, and data on the time students are taking to complete the programme.

73   The data provided allows annual reports to look at progression issues on a year-by-year basis for each module and the awards given to students including their grades. A summary of degree award statistics, and the Pass list, is reported to ESAB. The similar format of the annual reports permits comparison between different programmes. Issues of acceptability of progression rates are the responsibility of the Lead Colleges and the Laws Consortium through their own local processes. Consideration of number of annual reports including those from the trails, but also examples where pass rates are somewhat lower, show that typically annual reports do not include detailed analysis of even module pass rates by the programme teams.

Coupled with the lack of pertinent data on student enrolment, the audit team concluded that analysis of student progression is limited in its effectiveness. The External System will wish to consider the advisability of making fuller use of the available statistical data in its quality assurance procedures. Moreover, as the SED recognised, the present information system does not provide cohort data which would be useful in considering rates of completion for the chosen award for individual students. However, generally the analysis of the achievement of final awards is more rigorous on a year-on-year basis, but even here there is room for greater analysis of trends.

74   As the SED noted, 'the External System is in an atypical position in relation to the Teaching Quality Information exercise. HEFCE does not fund External students or provision; the University is not required to make HESA returns for External students; and the External System was not included in the HERO TQI website exercise'. Nevertheless, from early 2005 the University has been publishing information useful to students on its 'londonexternal' website. While useful in itself, the information is limited in scope because of the information collection policies of the University and the limitations of the present data processing capabilities. The team considers that there is considerable scope for further information to be made available to students. However, this will only be possible with an full introduction of the ATLAS system which is now delayed and due in 2007.

Assurance of the quality of teaching staff, through staff support and development

75   The evaluation of College mechanisms was outside the scope of this audit. As all academic staff associated with the programme are members of the Colleges, issues relating to appointment, appraisal and reward together with College-based staff support and development are not covered here. There is, however, a focus on staff development in distance learning that is coordinated centrally by EISA.

76   The Distance Education Resource Centre was established in 2001 to provide specialist support for staff developing distance-learning programmes. In 2005, the Centre was relaunched as the Centre for Distance Education (CDE) with a view to facilitating a community of practice and to be more proactive in supporting programme development. CDE is overseen by an advisory board that reports to ESLCC.

77   The Centre responds to the needs of programme teams as required and also organises events. In June 2005, it hosted a two-day workshop on distance education and e-learning, with a variety of speakers from around the University and from other institutions. CDE publishes an electronic newsletter and maintains a website to keep the community informed. CDE also operates a scheme for the recognition and support of Fellows in distance education. At the time of the audit there were eight Fellows and call had been issued for applications targeting relevant aspects of distance learning where there is felt to be a need. The Fellows receive support in a variety of ways, the primary mechanism being buy out from College-based duties to work on an agreed plan. Fellows meet as a fellowship network.

78   In meetings with College-based staff the audit team was told that CDE was a resource greatly appreciated by staff in the Colleges and that it does enable staff from across the constituent Colleges of the University to come together and share good practice.

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

79   The whole of the provision that forms the subject of this audit is distance education, therefore all sections of this report relate to the subject. Distance education presents a number of challenges to providers and to students, challenges that are identified in part B of the *Code of practice, Section 2*. The University has recently noted in an analysis of the precepts by EISA that precepts B5 and B6 present 'significant potential challenges' to the External System' and has noted the need for careful

consideration. The audit team would agree with that view and might wish to suggest that consideration should not be limited to those two precepts.

Learning support resources

80   The External System supports student learning through the provision of specially-designed study materials. The SED emphasised the partnership between the Colleges and the University in terms of the provision of these learning resources. The Colleges provide the academic content and, in some instances, arrange the publication of the study guides, while the University organises print and media procurement for the majority of the learning materials, as well as developing the eCampus to support the Virtual Learning Environment (VLE) (see below, paragraph 85). In response to the audit team's comment on the absence of a learning and teaching strategy for the External System, senior managers emphasised the need to avoid duplication of the teaching and learning strategies that exist within individual Colleges. They explained that the External System is, however, intending to move towards a learning and teaching framework in the future. Plans for this were not sufficiently advanced at the time of the audit visit for the team to be able to comment on their likely effect.

81   Students who met the audit team reported that they valued the efficiency in the dispatch of learning materials, and were generally satisfied with the academic quality of both the study guides and the web-based materials. They did not, however, regard the comment form provided in the student handbook as a valuable feedback mechanism on the quality of learning materials, a view acknowledged in the SED. It was clear to the team that this was an issue that was being addressed through the development of more programme-specific feedback from students. From the available documentation, the team noted that new procedures for ensuring external assessment of all new programmes and learning materials had been approved by ESAB and ESLCC in 2004. According to the Quality

Manual responsibility for monitoring compliance with this new system-wide policy will remain with the Colleges.

82   Student handbooks provide details of the libraries which are available to External students as a means of supplementing their study materials. The audit team noted the variation in arrangements for student access to University of London libraries, including the payment of a fee for reference or borrowing membership of Senate House Library. Senior staff who met the team reported that these matters had been brought to the attention of ESLCC through the annual reporting process and, as a result, the matter was under active discussion between the chair of ESLCC and the Director of Library Services.

The eCampus

83   The SED stated that eCampus services are in the process of being extended to all programmes. While study materials for the majority of programmes are currently provided in a printed form, almost one third of the postgraduate programmes are supported by the VLE. The SED also outlined the background to the development of e-learning services within the External System since 2001. The eCampus offers a public website with programme-specific areas, an on-line student-to-student network, an on-line library and a VLE. The work of CDE supports staff development and the production of e-learning resources. ATLAS is intended to be an integral part of the eCampus, offering the opportunity for interactive access to data for all students and staff within the External System.

84   The provision of these services is monitored by ESLCC, which has responsibility for matching resources to provision. Documents provided by the External System indicated that the development of the eCampus is a strategic priority in terms of supporting the future growth of the External System, and involves the allocation of considerable resources. The audit team was therefore particularly interested to examine the development of the eCampus as an aspect of the quality management responsibilities of ESLCC and its subcommittees.

85   Students who met the audit team commented on the value of the public website, the on-line library and, where relevant, the VLE. There were also positive comments on the quality of the VLE in the small sample of External Student Responses. The team noted that the ESLCC received reports on the progress of the eCampus development. Development of the component services of the eCampus is split between the University of London Computer Centre (ULCC) (for hardware platforms), a team of learning technologists and web technologists (for VLE and web respectively) and a database development team (for ATLAS) within EISA and the University of London Library (ULL) (for the on-line library service). Representatives of ULCC, ULL and EISA meet monthly as a Management Team and report through a Development Forum of Lead College Course Directors to ESLCC. Critical delays in implementing ATLAS had been the subject of an internal audit report which had concluded that there were weaknesses in project management. The team formed the view that ESLCC had been unable to offer sufficient strategic oversight to allow the eCampus to achieve its 'primary goal' of offering fully scaleable services by September 2005.

Academic guidance, support and supervision

86   The External System offers a variety of academic support, ranging from limited guidance through handbooks and examiners' reports to student-tutor interaction through the VLE. Revision classes and residential study weekends in London are available at extra cost. The SED made explicit reference to the diversity of arrangements, noting that 'the level of support varies from programme to programme and this is reflected in the range of student fees'. The audit team also noted that some handbooks specified that 'programme directors cannot engage in active regular advice or tuition' and that additional charges applied to an essay marking scheme for External students within a number of programmes. Students who met the team expressed the view that they would welcome more academic guidance, particularly in the first year of their programme,

although they commented positively on the tutor support for final-year project supervision and for postgraduate study.

87   The audit team also considered academic support and guidance for External students in the light of the revised *Code of practice, Section 2*. The papers of ESAB revealed that this section of the *Code of practice* had been analysed by EISA officers who had advised that the precept regarding 'student access to a named academic contact able to provide feedback on their performance and guidance on their progression' posed significant challenges for the large-scale undergraduate programmes within the External System. This matter was still under consideration at the time of the audit visit, and the team was unable to confirm that this aspect of the *Code of practice* had been addressed effectively.

88   The SED referred to the Colleges' oversight of academic guidance and support in the Permission to Teach and Specified Status institutions, but the arrangements for monitoring the tutorial support offered by other, third-party institutions were less clear. Approximately 60 per cent of all undergraduate students within the External System attend such institutions to gain additional academic guidance, with the 20 most popular institutions providing support for almost 50 per cent of all undergraduates. While the University states unequivocally that it cannot comment on the quality of service or standards of the independent teaching institutions listed in the student handbooks, staff who met the audit team explained they visit a number of these institutions, in one instance in response to a student complaint.

89   The SED confirmed the formal disclaimer of the University regarding these independent institutions, but added that they represent 'a significant feature of the experience of many students'. Students who met the audit team were generally unclear about the status of their local institution in relation to the University of London. Within the relatively small sample of External student written responses there were comments about the variability in the standard of guidance and support offered by independent institutions.

90   The audit team read with interest a discussion paper under consideration by IRG. This paper noted that the use of independent teaching institutions provided student support 'without the cost of developing and implementing quality assurance frameworks'. The team formed the view that, while this position is procedurally correct, the student experience may be impoverished by this lack of oversight by the External System. The University may wish to consider the advisability of establishing minimum expectations for the academic guidance of students in the External System.

Personal support and guidance

91   The SED emphasised that personal support and guidance for distance-learning students is necessarily reliant on electronic and postal communication. Counselling, welfare and accommodation services are not provided, although the University of London Careers Service offers an on-line advice service. Student handbooks include details of provision for those with special needs: requests for special examination arrangements are handled by a Special Examination Services department within EISA. The audit team noted the establishment of a Special Needs Implementation Panel (SNIP) to take more strategic oversight of services for those with special needs and to report annually to ESAB. Students who met the team confirmed that these arrangements were administered effectively by EISA.

92   Generic information about assessment regulations and details of the procedures for mitigating circumstances, appeals and complaints are provided on the public website and in student handbooks. These procedures are handled by the University rather than the Colleges for students within the External System, although students who met the audit team explained that their first point of contact for an academic complaint would be their programme director. Staff within EISA accepted that information on these procedures is rather

dispersed, and assured the team that a review of its transparency and accessibility is planned.

93   The SED provided details of another aspect of student support, the student-to-student network, and considered that its use would increase once the service was integrated with the new student record system (ATLAS). During the audit visit, however, it became apparent that there were significant delays with the implementation of the ATLAS project, (see above, paragraph 74). Students who met the team and those who provided responses for the audit visit questioned the value of the student-to-student network as a support mechanism. Staff of EISA stressed to the team that the network was at an early stage of development, and was still a very limited mechanism for student support.

94   The audit team noted that the ATLAS database was also expected to 'support the entire student lifecycle from first enquiry to graduation'. The team concluded that the major delay in implementing this new student record system would have been more damaging without the efforts of EISA in supporting the student lifecycle, as well as in monitoring and enhancing the effectiveness of this support. The report of the 'Student Service Review Project' provided extensive evidence of the commitment of EISA staff to enhancement of the various stages of the administrative lifecycle of the External student. The recommendations of this review of enquiries, admissions, registration, assessment and graduation procedures were approved by the Senior Management Team of EISA in June 2005. The team noted as a feature of good practice the role of EISA in the administrative support of the student lifecycle.

95   The audit team gained little impression from the SED of academic involvement in the personal support and guidance of students. It was therefore interested to learn that in the case of the postgraduate programme in Clinical Dentistry students had on-line access to a personal tutor. Other postgraduate students who met the team regarded their programme director as the point of contact

for both academic and personal support. At undergraduate level, the team found less evidence of the provision of personal support and guidance. Documentation provided during the visit suggested that the majority of External students regard the University of London as 'remote' and unable to create a sense that they are part of its student community. While the team recognised the considerable financial and organisational challenges implicit in establishing more comprehensive arrangements, the University may wish to consider the advisability of establishing minimum expectations for the personal support of students in the External System.

Collaborative provision

96   It was noted earlier in this report that the University does not normally engage in formal collaborative activity with other organisations apart from two types of relationship: the Permission to Teach status and the Specified Institution Status. There is, in addition, a third type of relationship, called 'the Independent Institution'.

97   The Permission to Teach system is used by only three programmes in the External System: the Diplomas in Computing and Information Systems, Economics, and Law. The arrangement is designed to widen access to these programmes to provide face-to-face teaching for students who do not have standard entry qualifications. Such students, which constitute 16 per cent of all new registrations, are required to study at a designated institution. Students with standard entry qualifications may also study through this route. Institutions wishing to seek Permission to Teach status apply to the appropriate Lead College or Laws Consortium. It is the responsibility of the College or Consortium to inspect the applicant institution against its criteria and to monitor the relationship in keeping with its overall responsibility for programme management. Once granted, Permission to Teach status is awarded for a fixed period after which it has to be renewed, which normally involves re-inspection. A formal Agreement between the

Lead College and the Institution (or in the case of the Laws Consortium, between the University and the Institution) defines the relationship for a specific programme of study only. At the time of the audit, 49 Permission to Teach agreements were in place.

98 Specified Status is awarded to institutions that provide students with access to specialised equipment, tutorial and other support. Attendance at a Specified institution is not compulsory. This relationship is only used by the BSc in Computing and Information Systems, offered by Goldsmiths, where four third-party institutions have Specified Status. As with the Permission to Teach system, there is a process of formal application that will involve an inspection by staff from the College. Specified Status is normally granted for three years, after which re-approval is necessary. Specified institutions are monitored by the College. The relationship is not covered by any agreement, the Specified institution receives only a letter, which might state the conditions under which approval has been granted.

99 Institutions granted Permission to Teach or Specified Status are provided with materials and guidance on all aspects of provision from admission to examination. Advice is given by the External System on all aspects of student support. The College retains control of the programme of study, particularly all facets of summative assessment.

100 Many external students opt to study at a local institution. At the time of the audit, the University stated that it knows of 133 institutions worldwide that are offering support for external students, with a further 140 institutions that are advertising their capacity to teach students studying for an External programme. For some institutions, the External System issues a Memorandum of Understanding, one purpose being to fulfil some requirement of local jurisdictions, the other being to obtain agreement to comply with the University's Code of Practice for Advertising and Promotional Materials. The External System takes the position that these institutions are entirely independent of the University, with whom there is no formal relationship and that it is the students' decision as to whether or not to attend an independent institution. However, the External System does provide lists of independent institutions as a service to students, accompanied by caveats that the listing does not imply recommendation or endorsement.

101 In May 2005, a group of Programme Directors and EISA Staff met to discuss a 'Green Paper' on the future of institutional support for the future. The Green Paper questioned the sustainability of the formal position that the University takes on third-party institutions. Discussion of the paper led to the establishment of the IRG, which first met in July 2005. The remit of the group is to make recommendations to ESAB and ESLCC with respect to collaborative ventures. Its last meeting was scheduled to take place shortly after the audit visit.

102 The Permission to Teach System is the most robust of the relationships the University has with third-party institutions. The audit team found that approval and monitoring took place and the memorandum afforded some protection to the University and the interests of its students. The lack of an agreement for Specified Status institutions, in the view of the team, exposes the University and its students to risk. With respect to independent third-party institutions, notwithstanding the disclaimers issued, the team considered that the listing did imply a recommendation by the University, which was a view endorsed by students. This position has the potential to expose the University to risk to its reputation and its students to the risk of being misled. The External System itself has acknowledged that third-party institutions are using logos without permission. The team therefore considers it advisable that the University develop agreements with the third-party institutions listed by the University of London to ensure that the interests of the University of London and its students are adequately protected. This should be extended to agreements with Specified Status institutions.

Section 3: The audit investigations: published information

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

103 The report of the HEQC continuation audit commented on the need to ensure that responsibility for maintaining the accuracy of promotional material was clearly assigned. In view of this comment, and of the large volume of information produced for students within the External System, the audit team was interested in the arrangements for assuring the quality and accuracy of both on-line and printed material.

104 The SED emphasised the importance of the handbooks as a 'comprehensive resource for students'. It explained that the public website provides generic information and downloadable documents, including student handbooks, newsletters, regulations and examination timetables. The handbooks for all undergraduate programmes and a number of postgraduate programmes are produced by EISA staff and updated annually in consultation with programme directors. Students commented to the audit team on the value both of the student handbooks and the web-based material, and confirmed that they contain information regarding complaints and appeals procedures. At the time of the audit visit, EISA had set up a working group to review the content of the handbooks. It was clear to the team that there is a robust process for monitoring the accuracy and usefulness of these materials.

105 The SED provided no details of the procedures for checking the accuracy of the prospectus, but staff who met the team confirmed that this is the responsibility of the Strategic Marketing Manager in consultation with Colleges. While information produced by the independent teaching institutions is not deemed to be the responsibility of the External System, the Institutions Liaison Manager has responsibility for ensuring that there is no unauthorised use of the University of London logo or misleading claims in their publicity materials. The papers of the IRG suggested increasing difficulty in monitoring compliance with the University's Code of Practice for Advertising and Promotional Materials, although students were generally positive about the accuracy of published information. Students were less positive in their comments on the information provided to help them gauge the required standard, particularly in the absence of feedback on their performance. The team concluded that this was a matter to be addressed by the quality assurance procedures of the Colleges.

Reliability, accuracy and completeness of published information

106 As HEFCE does not fund the External System students, no HESA returns are required for External System students, and the External System was not included in the TQI requirements. The University regards the information provided through this route as being of value to potential students and their funders and therefore decided to publish a set of programme monitoring information equivalent to TQI on the 'londonexternal' website from early 2005. Some adjustments were made to allow for differences between External System and mainstream provision. These include not publishing equal opportunities data on class and ethnicity, or data on disabled students. Both these issues are still under active consideration. The audit team viewed information provided on the web and concluded it reflected the University's intention to provide information of value to potential students and their funders.

Findings

Findings

The effectiveness of institutional procedures for assuring the quality of programmes

107 The University of London External System (the External System) is a partnership between the University of London and those of its Colleges that participate in the system. The quality assuance (QA) framework for the external system operates within the overall framework defined by the University. All academic aspects of the External System are the responsibility of Colleges, while central oversight is maintained by the External System Lead Colleges Committee (ESLCC) and the External System Academic Board (ESAB) which is responsible to ESLCC for academic policy, standards and quality. The External and Internal Student Administration (EISA) division of the University provides central support for the External System as a whole.

108 A Quality Manual approved by ESAB in October 2005 defines the main principles and procedures associated with the management of quality across the External System. The self-evaluation document (SED) and Quality Manual define six distinct stages of quality management: the 'bidding process' that leads to full programme approval; the agreement, which is central to making the QAA framework work between the College(s) and University; student and programme management; system-wide matters; systematic reporting, and the review process.

109 The audit team found that framework enables the External System to be effectively managed with a clear distinction between the roles of the External System and the Colleges. There are many challenges inherent in the system and EISA plays a crucial, proactive role in enhancing the processes and procedures of the External System. While finding the framework to be comprehensive the audit team formed the view that there was considerable scope for improving the timeliness of decision making, especially in the role played by ESAB, and recommends that the University review the

timescale for decision making as well as satisfying itself that the framework could cope with significant expansion.

110 The first stage of programme approval is the 'bidding process' whereby a proposal that is presented in a specified blueprint is presented to ESAB, which considers academic issues before passing onto ESLCC with a recommendation. ESLCC's focus is on the business case and any strategic considerations. Once approved by ESLCC, development of the programme is passed to the College(s) concerned. Launch of a new programme is subject to the satisfactory conclusion of approval with the support of appropriate external experts. Although the approval process is a relatively new introduction, the University has already identified areas for improvement.

111 The audit team found the planning blueprint to be comprehensive and noted that external expertise is used to approve the learning materials to be used on the programme. Although the blueprint itself is comprehensive, it was clear that some programmes have provided a lot of information, whilst others were more cursory. The team considered that the roles of ESABand ESLCC in approving programmes would be enhanced if all proposals followed the good practice shown by the more comprehensive submissions.

112 The University introduced a system for annual review in 2002-03. The process begins with an annual review meeting that involves key staff from EISA and the College(s) concerned. The meeting is informed by a number of sources that include student feedback, external examiners' reports, centrally-provided statistics and issues raised by staff. The minutes of this meeting are used by the Programme Manager in EISA to prepare an Annual Programme Report (APR) for use by the College and ESAB. The Programme Manager checks that actions identified are carried out appropriately. EISA staff produce an Overall Annual Report (OAR), which is a distillation of the key issues from the APRs of all external programmes that is presented to the Vice-Chancellor via Senate.

113 Information system limitations make cohort analysis and the analysis of student progression impossible and there is limited student feedback on which to draw (see below). Notwithstanding these deficiencies, the audit team formed the view that the process itself was comprehensive and responsive.

114 Until recently, there had been no mechanism whereby Colleges and the University could jointly review provision periodically. A number of models have been piloted whereby the periodic review process aligns in some way with a process in the College that delivers the programme. Whatever the model, periodic review reports are considered by the College concerned and by ESAB. All the examples seen by the audit team were thorough and evaluative. To enable ESAB to form a view of the programmes, the External System may wish to consider developing a key set of outcomes required from the periodic review process so that whatever system is used, there will be comparable information available.

115 The University requires the participation of experts external to the University for approval, monitoring and review of all programmes in the External System. The audit team found that external participation was a consistent feature of all reviews.

116 The External system has been exempt from subject reviews conducted by QAA on behalf of the Higher Education Funding Council for England (HEFCE), for no students in the External System are funded by HEFCE. In a few cases, where relevant, external system programmes are accredited by an external agency. Accreditation reports are received and responded to within the College(s) concerned. Recent correspondence between the University and a professional body made available to the audit team, suggested that there might be system-wide considerations that should be considered.

117 The difficulty of representing the views of 34,000 students studying in over 180 countries is acknowledged by the SED. The University has recently begun working with the University of

London Union (ULU) in several ways to address student representation. The ULU President has been a member of ESLCC from the Committee's inception and ESAB changed its membership in 2004 to include a student representative. At the time of the audit, ULU presented a bid for funding to ESAB, which recommended it to ESLCC to create a web-based hub to elicit the views of external students. The proposal was at an early stage and the audit team was not able to form a view as to whether the hub would achieve its intended aims. The team learned of an effective model used for a postgraduate programme whereby UK-based external students act as representatives for all students on the programme and attend programme committee meetings and noted it as a feature of good practice.

118 The need to improve arrangements for collecting and using feedback from external students was highlighted in the HEQC report. In April 2005, a Student Experience Survey was sent to about a quarter of the undergraduate external student population. Although this yielded valuable information, and the need for future surveys had been agreed, staff met by the audit team were unable to confirm when the exercise would be repeated. Other mechanisms for eliciting feedback from students exist, such as in residential sessions, and where External System visit students studying at a third-party institution. Informal feedback is captured in the APR. As the APR process develops, the team considered that it could be used to enable further progress to be made on formalising student feedback.

119 The University has three types of relationship with other institutions involved in supporting external students, two of which, Permission to Teach and Specified Status, the University admits are formal. The other, independent institutions, is not. In all of these, the University retains control of all summative assessment, while the third-party institution provides tuition and support for which the student pays. Permission to Teach status is granted to institutions that satisfy comprehensive criteria for students who lack the normal entry

qualifications and for whom attendance is compulsory. Specified Status is awarded to institutions that satisfy rigorous criteria for students who need access to specialist equipment. In addition, Specified Status institutions provide tutorial and other support.

120 At the time of the visit, the University stated that there were 133 independent institutions known to be offering support for external students with a similar number advertising their ability to support external students. The University chooses to list some independent institutions in its publications, although it states that this listing does not constitute a recommendation. By not having a formal agreement with these institutions, the University believes itself not to be at any risk. The audit team formed a contrary view and advises the University to develop agreements with all institutions that it lists in order to protect the interests of the University and its external students.

121 The findings of the audit confirm that broad confidence can be placed in the soundness of the current and future management of the quality of provision in its External System. The QA framework is sound and the External System is well supported by a dedicated, proactive team in EISA. The University is encouraged to review its processes to enable decisions to be made more quickly, which will become even more important should the External System grow significantly. The University also needs to ensure that it minimises risk to its students and its own reputation through reviewing its relationships with third-party institutions.

The effectiveness of institutional procedures for securing the standards of awards

122 The External System is a partnership between the University of London, the Lead Colleges and the Law Consortium. The SED explained that 'the federal principle of College responsibility is integral to the External System's arrangements for quality'. Fundamental to the assurance of the standards of the awards are the

processes and procedures in place within the constituent Colleges of the University of London, all of whom are subject to individual institutional audits by QAA. These processes promote direct comparison with similar programmes run totally under the auspices of the constituent Colleges of the University. For instance, as the SED described, the 'structure, syllabus and assessment strategy for individual programmes are developed and approved with the Lead College and are reflected in the Programme regulations'. There is similar arrangement for the Laws Consortium, although this body is not a separate entity. The SED went on to state that 'the (external) provision is a centrally organised activity with the award made directly by the University, requiring a level of academic management by the University that is not a feature of the University's provision in the main'. There are General Regulations that 'articulate the principles and policies that have been determined for the External System as a whole, having been considered and agreed by ESAB'. The audit team found that these provide a clear and appropriate framework for maintaining academic standards. While different Colleges have slightly different policies and precedents, suitable levels of consistency are maintained and academic standards are properly assured. Since the last audit there has been a considerable strengthening of the institutional oversight of the External System through the ESLCC and ESAB committees, and the enhanced role of EISA in supporting these committees and the Lead Colleges and the Laws Consortium.

123 External examiners are appointed, briefed and report in a manner that ensures that appropriate information is available both to Colleges, with their emphasis on the academic standards and development and enhancement of individual programmes, and to the University as a whole with an emphasis on system-wide issues. Any such issues, which may not be immediately obvious to all individual Colleges, are monitored and considered through the central processes of the University and are then discussed and implemented through the Colleges. Annual reports and reviews, where the latter have already occurred, show evidence

of consideration of the issues raised by external examiners. External examiner reports seen as part of the trails and on the 'londonexternal' website show that external examiners agree that academic standards are suitably set and maintained.

124 Data limitations in the present management information system mean that the monitoring of standards by statistical means is limited. Moreover the use of existing data could be more thorough, especially in terms of the consideration of trends. However, the annual monitoring reports and periodic reviews, where the latter have occurred, have played a positive role in the consideration of academic standards both on programme and system-wide aspects. The annual reports have used some types of data more comprehensively than others.

125 The audit team found that the mechanisms in place at both the subject level, through the College-based procedures coordinated by the University, and also for the oversight of the External System, are appropriate and ensure the maintenance and enhancement of academic standards.

The institution's use of the Academic Infrastructure

126 The University and the Lead Colleges work in partnership, with the University's QA framework providing 'a blueprint for how the University and the Colleges can together assure the quality and standards of (the) external provision'. The SED indicated that the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice)* and *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ) have been central to the development of its quality assurance mechanisms. Moreover, the SED noted that 'given the further principle that the Colleges subject their external provision to the same checks and balances that are in place in College-based provision, there may be a degree of confidence that the precepts and guidance through the *Code of practice* form an integral part of (the) External provision'.

127 As well as subject-based matters largely considered at College level, the *Code of practice* is also relevant to the system-wide aspects of the provision. Considerable changes since the last HEQC audit mean that a number of areas of the *Code* are now more rigorously covered than previously, including annual monitoring and review, and student appeals and complaints. The audit team heard that ESAB has a central role in considering the academic development of the External System. However, ESAB has not formally considered the *Code of practice* as a whole. At its September meeting, ESAB was starting the process to consider Section 2 of the *Code*. Moreover, some other sections of the *Code* are now under active consideration by the External System, including sections on career planning and student disabilities. Some sections of the *Code*, such as those on external examining or assessment, are reflected in College procedures.

128 At present monitoring or control of the 'Permission to Teach' and 'Specified Status' arrangements is largely College or Laws Consortium based within different processes in place and little central oversight. This is out of line with the precepts of the *Code of practice*. In the view of the audit team these arrangements, and also those for teaching institutions, would benefit from review in light of the *Code of practice*. The team heard that this need is recognised within the External System and that the Institutions Review Group (IRG), is considering these arrangements in light of the *Code of practice*. However, there is currently no agreed timescale for reporting.

129 The audit team concluded that while large parts of the *Code of practice* are properly and effectively reflected within the operation of the External System, the claim of the SED that the *Code of practice* is an 'integral part' of the External System is not always fully justified.

130 As subject benchmarks relate solely to the content of programmes, the responsibility for considering them rests with the Lead College or Consortium. The audit team formed the view that the requirement for consideration of subject benchmark statements is generally embedded in the College and Law Consortium processes.

131 The SED stated that the External System Framework does not 'entirely reflect the FHEQ in all respects'. It went on to state that 'it was agreed that an additional level of qualification would be adopted for the External System'. The decision was based on an earlier principle of awarding postgraduate diplomas and certificates at a level that fell short of the master's degree Pass mark. The External System has adopted an additional G (Graduate) level 'intended to cater for programmes of study beyond the undergraduate degree 'H' level but not having the attributes of the postgraduate 'M' level'. The audit team considered that the development of the 'G' level awards had the potential to be misleading to students, as the FHEQ clearly states that the higher education awards awarded by universities in England are at five levels. This does not include level G. The team was also aware that there could be an interpretation of the guidance for level G which would make it an award for a failure at a higher level. To avoid any confusion, the team would encourage the External System to consider whether there is a clear need for the new level. What has been described could reasonably be expected to fall within the existing level descriptions in the FHEQ.

132 The mechanism for the production of programme specifications and their posting on the 'londonexternal' website has been agreed and is being implemented for all new programmes. However, while the great majority are available, not all programme specifications for existing programmes are agreed and ready for publication. To ensure that all students are receiving comparable information, the audit team would advise the External System to ensure that all programme specifications are available on the website.

The effectiveness of institutional procedures for supporting learning

133 The SED stressed the particular difficulties presented by supporting learning across a large and diverse body of over 34,000 students in more than 180 countries. It provided a useful summary of the range and effectiveness of the External System's procedures for the support of teaching and learning, as well as an indication of the constant efforts by staff within both the External System and the Colleges to refine the relationship between their mutually supportive QA arrangements.

134 There have been significant developments in the management of the External System since the last audit visit. The introduction of more systematic annual monitoring procedures produces a continuous and constructive dialogue between the Colleges and the administrative officers of EISA. Particular emphasis has been placed on the introduction of more robust procedures for the approval of the study materials which form the core element of academic support across the External System. While responsibility for the content of these materials remains firmly vested in the Colleges, the External System now requires additional assurance of external involvement in their approval.

135 Although attention has been paid to the *Code of practice* the audit team noted that the External System is faced with some difficulty in establishing 'student access to a named academic contact able to provide feedback on their performance and guidance on their progression'. Beyond the study guides, academic support, particularly at undergraduate level, remains limited to the handbooks, on-line library access and occasional contact with programme directors. Weekend courses, summer schools and an essay-marking service are optional extras for a number of programmes, offered on payment of additional fees. The introduction of the Virtual Learning Environment (VLE) for a number of, mainly postgraduate, programmes offers more sophisticated academic support with wider interaction between students and tutors. The VLE is still at an early stage but there has been significant investment in the e-learning infrastructure. A central staff development programme is provided by the Centre for Distance Education. Senior managers told the team of plans for major expansion of the VLE as part of a move to the provision of electronic,

academic support services, known collectively as the 'eCampus'. However, the recent growth of the External System appeared to have impeded the timely delivery of the new student record system, a major component of the eCampus. The team formed the view that there is a need for more sustained strategic oversight if the projected eCampus is to develop successfully and offer more extensive academic support services.

136 Personal support and guidance for distance-learning students is necessarily reliant on electronic and postal communication. Counselling, welfare and accommodation services are not provided, although the University of London Careers Service offers an on-line advice service. The level of student support offered within the External System is specified clearly in the student handbooks and appears to be somewhat limited in the majority of undergraduate programmes. A number of the students who provided information about their learning experience spoke of a sense of isolation, particularly during the first year of study. The on-line student-to-student network remains of limited value as a mechanism for student support. However, there is evidence of good practice in the on-line tutorial support of postgraduate students and in the administrative support for all aspects of the student lifecycle provided by staff within EISA. The quality of general information and guidance provided for students through the handbooks and other publications is closely monitored by staff within EISA. The latter is also responsible for the effective procedures for supporting students with special needs and for handling complaints, academic appeals and claims for extenuating circumstances.

137 The majority of students within the External System seek additional support from private teaching institutions. While the Colleges have their own arrangements for the oversight of student support in the small number of institutions with formal Permission to Teach and Specified Status, other third-party institutional relationships are not subject to the QA procedures of the External System. Although

the University emphasises the absence of a formal relationship with such institutions, the audit team formed the strong view that students were confused by their inclusion in listings supplied by the University. This is a matter currently under review within the University. Students would clearly benefit from the establishment of minimum expectations for personal support from all institutions offering the programmes of the External System.

138 The audit team heard from only a limited number of students but gained the impression that the mechanisms for securing student representation are still evolving, with postgraduate programmes leading the way. The University of London Union is supporting the development of better representation of the interests of External students at both programme and institutional levels. Further work remains to be done. The team did not under-estimate the difficulty of establishing more effective mechanisms for student representation in a highly distributed system.

139 The External System has made more progress in the area of student feedback with the recent introduction of a student experience survey. The team had confidence that the administrative staff within EISA will continue to refine arrangements for student representation and feedback, as well as responding in an active manner to learning support issues emerging from the annual monitoring reports. Much of the energy and initiative for promoting quality enhancement within the External System resides within EISA.

140 The audit team met students who were enthusiastic about the academic and administrative services provided by the External System and who valued the flexibility of this form of study very highly. Scrutiny of documentation suggested a more complex range of student responses, especially in terms of student support. The team accepted that distance learning presents particular challenges and noted that the SED had made strictly limited claims about the student experience; in view of both these factors, the team was able to express broad confidence in the External

System's approach to the provision of learning support and study resources.

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

141 The SED was produced by EISA in that officers of the division drafted the document. Subsequently, it has benefited from the input of academic and administrative colleagues from participating Colleges, the central University, and the committees responsible for the academic management of the External System. An Audit Steering Group with members from the Colleges and the central University, as well as an external adviser, oversaw planning and successive drafts. The final version was reported to the University Council and the ESLCC, and circulated throughout the External System.

142 The SED consisted of a main narrative document with six annexes and 24 appendices and, taken together, these provided a substantial data base for the audit team. The main narrative document was more descriptive than self-critical but nonetheless provided a clear and structured account of the External System and represented a sound starting point for the audit.

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

143 This area is not specifically addressed in the SED, in part reflecting the specialised nature of the activities being audited. The audit team noted the delegation of academic development to Colleges and, in terms of enhancing the quality of provision, would expect the main thrust to be College based. During the visits to the University and in the documentation provided the team became aware of several initiatives aimed at enhancing External System processes and the student experience. The team concluded that a more coordinated and strategic approach to these activities, and a way of formally sharing enhancement initiatives at

programme level across the External System, would be of benefit to all concerned.

The reliability of information

144 As HEFCE does not fund the External System students no HESA returns are required for External System students, and the External System was not included in the Higher Education and Research Opportunities Teaching Quality Information (TQI) website exercise. The University regards the information provided through this route as being of value to potential students and their funders and, therefore, decided to publish a set of programme monitoring information equivalent to TQI on the London External website from early 2005. The team concluded that the information provided reflected the intention to provide information of value to potential students and their funders. No inaccuracies were detected.

Features of good practice

145 The following features of good practice were noted:

- EISA's proactive role in the enhancement of the External System's processes and procedures (paragraph 29)

- the introduction of an innovative form of student representation by the London School of Hygiene and Tropical Medicine (paragraph 66)

- the role of EISA in its administrative support of the student lifecycle (paragraph 94).

Recommendations for action

146 Recommendations for action that is advisable:

- review the way the External System Academic Board operates to ensure that it can more effectively and speedily fulfil its role as the committee with collective responsibility for the management of quality and standards of the external programme (paragraphs 29, 57, 58, 61 and 67)

- establish a strategy for the more effective use of statistical data in the evaluation of standards across the External System as recommended in the previous audit report (paragraphs 41, 72 and 74)

- address fully all aspects of the Academic Infrastructure, in particular that programme specifications are completed for all programmes, and that all sections of the *Code of practice* are formally considered (paragraphs 57, 60, 61 and 79)

- consider the establishment of minimum expectations for the academic guidance and personal support of students in the External System (paragraphs 90 and 95).

- develop agreements with the third-party institutions listed by the University of London to ensure that the interests of the University and its students are adequately protected (paragraph 102)

Appendix

The University of London External System's response to the audit report

The University welcomes the positive nature of the audit report and the conclusion that broad confidence can be placed in the quality of programmes and the standards of awards offered through the External System.

The University's External provision is based on the academic leadership and management of the member Colleges of the University, both individually at programme level and collectively within an overarching framework. This audit was the External System's first engagement with the QAA and we are pleased to see that the report acknowledges the significant amount of development and enhancement that has been undertaken in recent years. The recommendations will be helpful to our plans for further enhancement.

We are pleased to note recognition of the good practice of our administrative division in proactively enhancing External System processes and procedures and in supporting the student lifecycle so that the academic excellence of the Colleges can be brought to students worldwide. We are immensely proud of our students, who often study in difficult and demanding circumstances, and believe that this outcome will serve to underpin further their confidence in the quality and standards of their programmes and awards.

The report and its recommendations will be considered by the External System Academic Board. An action plan will be produced, including an outline of action already undertaken. The ESAB is currently reviewing the management of its business and will be well placed to take forward consideration of the efficiency of its own decision making processes, the External System's use of statistical data, the academic infrastructure and the possibility of establishing minimum standards for academic guidance and personal support for students.

We note the report's recommendation concerning the External System's relations with independent teaching institutions. We value our association with other institutions, which has a long tradition, and as global higher education changes we will continue to review and enhance the basis of institutional relations to ensure that best practice is maintained.

We would like to thank the team for its constructive approach and its thorough and thoughtful engagement with the External System's unique provision and organisation.