

Open University

MAY 2005

Preface

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

To do this QAA carries out reviews of individual HE institutions (universities and colleges of HE). In England and Northern Ireland this process is known as institutional audit. QAA operates similar but separate processes in Scotland and Wales. For institutions that have large and complex provision offered through partnerships, QAA conducts collaborative provision audits in addition to institutional audits.

The purpose of collaborative provision audit

Collaborative provision audit shares the aims of institutional audit: 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

Collaborative provision 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 the academic standards of its awards made through collaborative arrangements
- the confidence that can reasonably be placed in the present and likely future capacity of the awarding institution to satisfy itself that the learning opportunities offered to students through its collaborative arrangements are managed effectively and meet its requirements; and
- the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that the institution publishes, (or authorises to be published) about the quality of its programmes offered through collaborative provision that lead to its awards and the standards of those 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

Collaborative provision 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 includes 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

Collaborative provision 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 collaborative provision 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 six weeks before the audit visit
- visits to up to six partner institutions by members of the audit team
- the audit visit, which lasts five days
- the publication of a report on the audit team's judgements and findings 22 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 from the institution and from partners
- talking to students from partner institutions 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 through visits to partners. 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 how institutions are working towards this requirement.

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Summary

Introduction

A team of auditors from the Quality Assurance Agency for Higher Education (QAA) visited the Open University (the University, or OU) from 9 to 13 May 2005 to carry out an audit of the collaborative provision offered by the University. The purpose of the audit was to provide public information on the quality of the programmes of study offered by the University through arrangements with collaborative partners, and on the discharge of the University's responsibility as an awarding body in assuring the academic standard of its awards made through collaborative arrangements.

To arrive at its conclusions the team spoke to members of staff of the University, and read a wide range of documents relating to the way the University manages the academic aspects of its collaborative provision. As part of the audit process, the audit team visited four of the University's collaborative partners where it spoke to students on the University's collaborative programmes and to members of staff of the partner institution.

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

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

The term 'collaborative provision' is taken to mean 'educational provision leading to an award, or to specific credit toward an award, of an awarding institution delivered and/or supported and/or assessed through an arrangement with a partner organisation' (*Code of practice for the assurance of academic quality and standards in higher education: Collaborative provision and flexible and distributed learning (including e-learning)*, 2004, paragraph 13), published by QAA.

In an audit of collaborative provision both academic standards and academic quality are reviewed.

Outcome of the collaborative provision audit

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

- only limited confidence can reasonably be placed in the soundness of the University's present and likely future management of the academic standards of its awards made through collaborative arrangements, and that
- only limited confidence can reasonably be placed in the present and likely future capacity of the University to satisfy itself that the learning opportunities offered to students through its collaborative arrangements are managed effectively and meet its requirements.

Features of good practice

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

- the opportunities for enhancement provided though the curriculum conferences and the OU Validation Services annual conference.

Recommendations for action

The audit team also recommends that the University should consider further action in a number of areas to ensure that the academic quality of programmes and standards of the awards it offers through collaborative arrangements are maintained. The team considers it essential that the University:

- strengthens the means by which it establishes confidence in the security and comparability of the academic standards of its awards provided through accredited partners, and
- implements valid and reliable mechanisms to enable it to have confidence that the quality of learning opportunities and student support provided through all its

accredited partners are managed effectively and meet the University's requirements

and considers it advisable that the University:

- ensures that all local external examiners appointed for courses offered overseas are appropriately independent and have experience of undertaking the delivery and assessment of UK higher education.

National reference points

To provide further evidence to support its findings, the audit team also investigated the use made by the University 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 to define both good practice and academic standards. The audit found that the University was making effective use of the Academic Infrastructure in the context of its collaborative provision.

In due course, the audit process will include a check on the reliability of the teaching quality information (TQI) published by institutions in the format recommended in the Higher Education Funding Council for England's document 03/51, *Information on quality and standards in higher education: Final guidance*. The audit team was satisfied that the information that the University and its partners are publishing currently about the quality of its collaborative programmes and the standards of its awards is reliable, and that the University is making adequate progress to providing TQI data for its collaborative provision.

Main report

Main report

1 An audit of the collaborative provision offered by the Open University (the University, or OU) was undertaken during the period 9 to 13 May 2005. The purpose of the audit was to provide public information on the quality of the programmes of study offered by the University through arrangements with collaborative partners, and on the discharge of the University's responsibility as an awarding body in assuring the academic standard of its awards made through collaborative arrangements.

2 Collaborative provision audit supplements the institutional audit of the University's own provision. The process of collaborative provision audit has been developed by the Quality Assurance Agency for Higher Education (QAA) in partnership with higher education institutions (HEIs) in England. It provides a means for scrutinising the collaborative provision of an HEI with degree-awarding powers (awarding institution) where the collaborative provision was too large or complex to have been included in the institutional audit of the awarding institution. The term 'collaborative provision' is taken to mean 'educational provision leading to an award, or to specific credit toward an award, of an awarding institution delivered and/or supported and/or assessed through an arrangement with a partner organisation' (*Code of practice for the assurance of academic quality and standards in higher education (Code of practice), Section 2: Collaborative provision and flexible and distributed learning (including e-learning)*, published by QAA 2004, paragraph 13).

3 The collaborative provision audit checked the effectiveness of the University's procedures for establishing and maintaining the standards of academic awards through collaborative arrangements; for reviewing and enhancing the quality of the programmes of study offered through collaborative arrangements that lead to those awards; for publishing reliable information about its collaborative provision; and for the discharge of its responsibility as an awarding body. As part of the collaborative audit process, the audit team visited four of the University's collaborative partners.

Section 1: Introduction

The institution and its mission as it relates to collaborative provision

4 The Open University was founded by Royal Charter in 1969 and began teaching students in 1971. It was established specifically and distinctively to provide supported open learning opportunities for students to study with the University from a distance on a part-time basis while continuing with other commitments. Its administrative headquarters are at Walton Hall in Milton Keynes, Buckinghamshire, and it has 13 regional centres located throughout the United Kingdom. It has 55 collaborative partners, 19 of whom are overseas, operating throughout the European Union, Eastern Europe, Switzerland, Slovenia and extending into the Middle and Far East.

5 The University has full degree-awarding powers. Its undergraduate and most of its postgraduate taught study is fully modular, and students register for credit-rated courses (modules), and accumulate credit via completion of courses toward qualifications. About 600 courses, many of which are interdisciplinary, are available across a wide range of subjects. There is an open admission policy for undergraduate taught programmes, and students, the majority of whom are mature and in employment, enter the University with a wide range of study goals and previous educational and general experience. There is an active research community, and the University also offers full-time master's degrees in research methods, and full and part-time external research degrees. An institutional audit of the University by QAA took place in March 2004. The current audit focuses on the University's discharge of its responsibility as an awarding body for awards made in its name through arrangements with collaborative partners.

6 The collaborative provision self-evaluation document (CPSED) prepared for the audit by the University explained that the University categorises its collaborative provision which may lead to an award of the University as follows:

- direct distance teaching
- collaborative distance teaching
- accreditation and validation
- research sponsoring (for research degrees).

The last of these was included in the institutional audit of the University in 2004. The current audit is concerned with the University's management of accreditation and validation of programmes of study leading to the University's awards, and with direct and collaborative distance teaching.

7 The University has some 27 per cent of the UK's part-time higher education students when expressed in full-time equivalents (FTEs), and 35 per cent of UK part-time undergraduate level students. In 2003-04 about 15,400 students were registered for validated awards of the University at accredited institutions, and nearly 24,000 students studied outside the UK through direct and collaborative teaching partnerships.

8 Open University Validation Services (OUVS) was set up in 1992 and provides an external accreditation and validation service, including the validation of programmes in subject areas outside the University's portfolio. OU Worldwide Ltd (OUW) is a separately incorporated company established in 1997 as the international commercial division of the University. It manages the contractual and financial aspects of making the University's learning materials available on an international scale, working with the University's faculties and schools who are responsible for managing the quality and academic standards of this type of provision.

9 At the time of the audit, the University was engaged in a review of academic governance, in particular of the Senate, Academic Board and its substructure. The CPSED anticipated that this review would allow some rationalisation of the management of quality and academic standards through the governance structure.

Mission statement

10 The University, following a major review of its mission and strategic priorities, adopted its current Mission Statement in March 2004:

'The Open University is open to people, places, methods and ideas.

It promotes educational opportunity and social justice by providing high-quality university education to all who wish to realise their ambitions and fulfil their potential.

Through academic research, pedagogic innovation and collaborative partnership it seeks to be a world leader in the design, content and delivery of supported open and distance learning'.

11 This Statement continues to draw on the philosophy and values enunciated at the time of the inauguration of the University in 1969. It also specifically identifies collaborative partnership as a key means of achieving its institutional objectives. It is supported by a set of core values and strategic priorities, detailed in the document OU Futures 2004-08.

Background information

12 The published information available for this collaborative provision audit included:

- statistical data provided by the Higher Education Statistics Agency (HESA), the Higher Education Funding Council for England (HEFCE), Universities and Colleges Admissions Service, Higher Education Research Opportunities and the University
- the information on the University's web site, including its degree prospectuses and course catalogues
- the report of the continuation audit undertaken by QAA in May 1998, published in January 1999
- the report of the institutional audit undertaken by QAA in March 2004
- reports of reviews by QAA of provision at subject level, carried out in the University's partner institutions and published since the 1998 continuation audit
- the report of the collaborative provision audit by the Higher Education Quality Council in February 1996, published in July 1996

- reports of reviews by QAA of the University's overseas collaborative provision, published since the 1998 continuation audit
- report on the University's Foundation Degree provision, published in June 2003.

13 The University and its partners provided QAA with:

- an institutional CPSED
- prospectuses and course catalogues
- documentation associated with each of the four partner institutions visited as part of the audit
- documentation associated with each of the six partner institutions which were the subject of desk studies as part of the audit
- sample professional, statutory and regulatory body (PSRB) reports relating to partner provision
- the University's Corporate Plan, Plans For Change: the University's Strategic Plan for 2002 to 2012
- statistical information, which included a demographic analysis of the collaborative student population, student progress and achievement at course and award level.

14 During the briefing and audit visits, the audit team was given ready access to a range of the University's documents in hard copy and on a CD-ROM accompanying the CPSED. The University also provided the team with a range of documentation relating to partner institutions selected by the audit team for visits and for desk-based studies. The partner institutions visited provided further documentation. The team also had access to, and was given copies of, internal documents and committee minutes relating to partner institutions.

The collaborative provision audit process

15 Following a preliminary meeting at the University in July 2004 between a QAA assistant director and representatives of the University and students, QAA confirmed in September 2004 that four partner visits would be

conducted between the briefing and audit visits. The University provided its CPSED in December 2004. On the basis of the CPSED and other published information, the audit team confirmed the four partner institutions that it would visit. The University provided QAA with briefing documentation in March 2005 for each of these partner institutions.

16 The OU Students' Association (OUSA) did not consider that it was in a position to represent the views of students studying through collaborative partners of the University. It was agreed that student opinion should be canvassed through the partner visits instead.

17 The audit team visited the University from 4 to 6 April 2005 for the purposes of exploring with senior members of staff of the University, members of staff actively involved in collaborative partnerships, student representatives and representatives from partner institutions, matters relating to the management of quality and academic standards in collaborative provision raised by the University's CPSED and other documentation, and ensuring that the team had a clear understanding of the University's approach to collaborative arrangements. At the close of this briefing visit, a programme of meetings for the audit was agreed with the University.

18 The audit team confirmed that in addition to the four partner visits, a further six links were followed through desk-based studies. These represented the University's partnerships overseas as well as another UK partner.

19 Visits to partner institutions followed the briefing visit and took place in the period 7 April to 4 May 2005. During these visits members of the audit team met senior staff, teaching staff and student representatives of the partner institutions. The team is grateful to the staff and students of those partner institutions for their help in understanding the University's arrangements for collaborative provision.

20 The audit visit took place at the University from 9 to 13 May 2005. Meetings were held with groups of staff of the University associated with its collaborative provision and the five desk-based

studies were carried out. The team is grateful to all those staff and students, both of the University and its partners, who participated in meetings.

21 The audit team comprised Dr M Edmunds, Dr R Gadsden, Miss R Pelik, Mr N Pratt, Dr M Wing, auditors, and Dr K Hodgson, audit secretary. The audit was coordinated for QAA by Dr D J Buckingham, Assistant Director.

Developments since the institutional audit of the awarding institution

22 The previous institutional audit took place in March 2004. While none of the features of good practice or points for further consideration relating to the 2004 audit refers directly to collaborative provision, some have an implicit bearing and are addressed later in this report. The report of the 2004 audit noted as features of good practice the University's monitoring of the security of its academic standards; its systematic and comprehensive collection and use of feedback from students; its arrangements for appointing, monitoring and supporting associate lecturers; its proactive stance in giving guidance and support to students; and the third-party monitoring system for research students.

23 The 2004 report identified a number of points for further consideration. These included using the governance review as a means of articulating more clearly the University's approach to assuring and enhancing the quality of provision; reviewing the effectiveness of its procedures for determining whether intended programme learning outcomes will be met through pathways leading to named awards; systematically including external subject expertise in the procedures for approving programmes leading to named awards; considering the effectiveness of its present system for gaining a university-level overview of annual review activity at course and programme levels; and reflecting on the consequences of using different versions of programme specifications for different audiences. In addition, the report identified that it was desirable for the University to consider ensuring that research students have clear information about their financial entitlements.

Section 2: The collaborative audit investigations: the awarding institution's processes for quality management in collaborative provision

The awarding institution's strategic approach to collaborative provision

24 The CPSED confirmed that the University's Mission identifies collaborative partnership as a key means of achieving its objectives in relation to its own curriculum and its delivery, and drew attention to the University's core values and strategic priorities, set out in the document OU Futures 2004-08. It stated that the University aspires to be 'a world-class university with an international presence', and plans to use 'accreditation of institutions and other types of partnership as a means of expanding global reach', but only where the University's criteria for partnership are fully met. The University's priorities are then interpreted by 'middle-tier' academic, pedagogic and enabling plans. These include two strategy documents: Size & Shape: The Curriculum Strategy 2003-2008, and a recently approved international strategy.

25 This audit is concerned with the models of collaboration that the University categorises under the headings of:

- direct distance teaching
- collaborative distance teaching
- accreditation and validation.

26 In direct and collaborative distance teaching arrangements, students are registered as students of the University, on University courses, studying within the University's curriculum for the University's awards. Direct and collaborative teaching partnerships are therefore sometimes also referred to collectively as 'curriculum partnerships'. The University retains quality assurance responsibility in its entirety in such arrangements, this responsibility being discharged through the relevant central academic units of the University.

27 In direct teaching partnerships, the University, not the partner, is responsible for delivery of academic aspects of the programme, while in the collaborative teaching model partners are partly responsible for aspects of tuition and assessment. The CPSED explained that in the case of direct distance teaching 'tutorial support and continuous assessment...are carried out by OU staff', while in collaborative teaching partners have 'delegated responsibility for the appointment and management of associate lecturers'. The choice of whether teaching partnership is direct or collaborative depends on the University's evaluation of the capability of the proposed partner institution to deliver University courses and programmes.

28 The CPSED identified two further 'common variants within the collaborative teaching model'. The first, courses in translation, is where students register and study for a University award, but the course material is provided and teaching takes place in the local language. The second, delegation of responsibility for a particular set of services, is where the partner institution takes some responsibility for aspects of teaching and learning, and assessment. Quality assurance responsibilities, however, remain with the University. While these models do not generally apply to validated provision, nonetheless some or all elements of it may be involved, particularly where the partner institution draws on the University's curriculum content in the development of its programmes.

29 In the accreditation and validation model of collaborative provision, the University's responsibility for the management and oversight of processes to assure the quality and academic standards of provision is discharged through OUVS. Validation is the process whereby the University assures itself that 'the proposed higher education programme is of appropriate quality, the intended learning outcomes are at an appropriate level and the standard set is comparable to similar awards offered throughout UK higher education'. Each programme must be separately validated. Only accredited institutions can offer validated programmes of study. Accreditation is a status achieved by a partner

institution where the University has confirmed to itself that 'the partner has a suitable environment and infrastructure for the development, delivery and quality assurance of validated awards'. Students are registered with the accredited institution and follow programmes of study owned and delivered by the accredited institution but validated by the University. Students are registered with the University by the accredited institution only for the purpose of receiving an award of the University.

The awarding institution's framework for managing the quality of the students' experience and academic standards in collaborative provision

The institutional-level framework

30 The CPSED confirmed that the University 'is responsible for the academic standards of all its awards and the quality of programmes leading to them', and that 'its framework for managing quality and standards is designed to ensure that standards are appropriately set and achieved'. While formal responsibility for the academic standards of all awards lies with the University's Senate, the Academic Board and its committees and subcommittees take forward these responsibilities. In terms of collaborative provision the key committee of the Academic Board is the Curriculum and Awards Board (CAB) to which the Validating Committee (ValC), the Curriculum Partnerships Committee (CuPC) and Awards Committee report. The Quality and Standards Board (QSB) also receives some relevant information from these committees and reports to the Academic Board on those items.

31 The Curriculum and Awards Board (CAB) takes strategic oversight of the University's curricula and awards, and formulates relevant academic policy. It has responsibility for overseeing the review of collaborative provision, confirming review procedures have been followed and for identifying any major issues requiring a university-level response. The CPSED explained that 'major issues which require response at University level' are reported by CAB to the QSB, and through it to the Academic Board.

32 The Quality and Standards Board (QSB) oversees the University's quality assurance framework. The framework for review of courses and awards is set by the Internal Review Committee (a subcommittee of QSB), but not for the review of collaborative partnerships which is overseen by CAB who reports on it to QSB.

33 Validating Committee (ValC) exercises authority on behalf of the University 'for approving and for reviewing accredited institutions, and validating and revalidating programmes'. The CPSED explained that ValC 'is responsible through the Curriculum and Awards Board to the Academic Board for all decisions concerning accreditation and validation'. ValC is charged with responsibility for ensuring that academic standards are comparable 'with awards granted and conferred throughout higher education in the UK', and for the 'approval and monitoring of external examiners for taught courses in respect of accredited institutions'. It is responsible for overseeing the effectiveness of the University's procedures for accreditation and validation. The Committee has substantial external membership, as does CAB. Two key subcommittees of ValC are the Accreditation Working Group, which provides initial scrutiny of proposals for accreditation, and the working group which scrutinises the annual monitoring reports from accredited partners.

34 Curriculum Partnerships Committee (CuPC) is responsible to CAB for 'all regulatory and procedural matters relating to curriculum partnerships' and the institutional management of quality and standards relating to partnerships other than those operating under accreditation and validation. Its key relevant functions include the approval of direct and collaborative teaching partnerships and the evaluation and review of established partnerships.

35 All awards derived from the University's curriculum and which may be taught through direct or collaborative teaching partnerships 'are considered and recommended for approval by the Awards Committee', which is required to 'take cognisance of the University's validated programmes and awards'.

36 Most responsibilities with regard to collaborative provision reside with the Pro-Vice-Chancellor (PVC) (Curriculum and Awards) who has responsibility for the quality and standards of collaborative provision, strategic planning and operational matters. The PVC (Curriculum and Awards) chairs CAB, ValC and CuPC as well as overseeing the work of OUVS. The Director of OUVS is responsible for the 'effective operation of the Validating Committee and working groups', relationships with accredited institutions and the management of the budget of OUVS. OUW Board has oversight of the financial, contractual and commercial aspects of international direct and collaborative teaching partnerships.

37 The CPSED provided a brief update on the ongoing review of governance, and in discussions with senior staff the audit team was informed that the review was now complete. The main relevant changes are a clearer articulation of CAB's responsibilities for setting and monitoring academic standards for all awards and a redefinition of the role of QSB as a quality assurance and enhancement committee. CAB is to be renamed the 'Curriculum, Awards and Validation Committee' which 'would make explicit and reflect the importance of validation activity within the University', with ValC continuing to report to it. The University was of the view that the results of the governance review would have no real impact on the present arrangements for management of academic standards and quality assurance of collaborative provision, a view with which the audit team concurred.

The framework for direct and collaborative teaching provision

38 OUW acts as a first point of contact for enquiries from overseas about the University's courses, materials and methodology. The University's learning materials are commercially available to both individuals and establishments across the world. Many of these relationships only involve the sale or licensing of the University's materials for use by other institutions for their own awards, but where they lead to an award of the University, OUW manages some partnership aspects of overseas

collaborative provision. In all cases, however, the quality and academic standards of provision in these relationships is managed by the University's faculties and schools, with the quality assurance arrangements operating under the standard procedures and structures for quality assurance that apply to the University's own provision. The CPSED explained that OUW partnership managers 'liaise closely with members of academic staff on issues relating to the academic provision'. The audit team formed the view that there is a strong working relationship between the 'home' academic unit and the OUW partnership manager in respect of this type of collaborative arrangement.

39 With direct and collaborative teaching partnerships the University retains responsibility for quality assurance 'in its entirety'. The CPSED stated that 'all students who take OU courses should experience substantially the same teaching materials, learning resources and assessment'. Quality assurance procedures, therefore, are set out in the University's standard documentation, with any specific variations being documented in the operations handbook for each partnership.

40 In direct teaching partnerships students are taught and assessed by University staff. The partner has responsibility for marketing/promotion, registration, fees and the distribution of University course material. All the University's standard monitoring processes apply, including those for gathering and evaluating student feedback and for monitoring performance and achievement. The University is confident that its framework for monitoring the quality of students' learning opportunities in direct teaching is effective, a view with which the audit team would concur.

41 In the case of direct and collaborative teaching partnerships, the University has a lesser role in the direct management and oversight of the students' learning opportunities. Some responsibility for delivery and assessment is delegated to the partner, and staff may be recruited locally, but the overall student experience is still overseen according to standard University procedures. Students are

advised that their first point of contact is the local institution where they are studying.

42 In both direct and collaborative teaching partnerships the CPSED explained that students 'are subject to the same examination/assessment as all other students registered for those courses'. Assessment follows the same process as 'home' OU courses, as set out in the University's Code of Practice for Student Assessment, and in course assessment handbooks. Where responsibility for any aspects of assessment is delegated, it is recorded in the partnership contract and operations handbook. In the case of courses delivered and assessed in languages other than English, local external examiners are appointed who verify aspects of the translation of material. Assessment in the local language is verified by a sample of translated scripts seen by a second UK marker. The effectiveness of procedures and consistency in teaching and assessment is monitored in the same way as all University provision. Distinct course codes are used so that examination and assessment boards are able to monitor student performance and standards in collaborative provision, but the administration of the process is otherwise handled by the University's Assessment, Credit and Awards Office 'exactly the same as for all other courses'.

43 The framework for managing the quality of learning opportunities and security of the academic standards of awards for direct and collaborative teaching partnerships is, therefore, largely built around the University's standard processes, supplemented by additional mechanisms to enable collaborative provision to be distinguished and managed effectively.

The framework for accredited and validated provision

44 OUVS is responsible, on behalf of the University, for the accreditation of institutions and for the validation of accredited partners' programmes of study. Quality assurance of validated programmes is seen primarily as the responsibility of the accredited partner institution, the ability of the partner to undertake the required level of responsibility

having been assessed in the process of accreditation. In some cases, the University will have had experience of working with the partner under the direct and collaborative teaching partnership model and will, therefore, already have some measure of the partner's capacity to accept the delegated authority of accreditation. The requirements for achieving accreditation are set out in the Handbook for Validated Awards (the Handbook). While the University retains ultimate authority for academic standards, there is a very high degree of delegation to accredited partners with programmes being seen by the University as 'owned and delivered' by accredited partners. This level of delegation means that the University expects its accredited partners to take action when issues arise without waiting for it to require or initiate action, although the University has, in the last two or three years, become more proactive in these matters.

45 The framework for accreditation, validation and annual monitoring is set out in the Handbook. The extent to which the learning opportunities available to the student are satisfactory is established both through accreditation of the partner and through validation of the individual programmes. A necessary condition set for accreditation is that partners are able to provide an appropriate learning environment and 'accept collective responsibility for the quality of students' learning experiences'. Accredited institutions are given 'full responsibility for teaching, assessment and further development' of validated programmes, and are regarded by the University as being responsible for the quality of their students' experience. The students' primary relationship is seen to be with the partner. This delegated responsibility is overseen by the University through annual monitoring and formally reconfirmed in institutional review and revalidation.

46 The University has no direct role in the assessment of student achievement on its validated programmes, the accredited partner having full delegated responsibility for the assessment of students. Partners' academic

regulations are considered by the University at accreditation/institutional review, and any programme specific regulations at validation/revalidation. The Handbook specifies the matters which must be covered within the academic regulations. The CPSED explained that 'the Board of Examiners...or equivalent academic authority of an accredited institution is authorised to recommend the conferment of a validated award'.

47 The primary means used by the University for the monitoring of student achievement in relation to the academic standard that it requires of its awards is the reports of the external examiners of the validated programmes. The CPSED, the Handbook, and senior staff who met the audit team confirmed that the University regards external examiners of validated programmes as belonging to the accredited partners, not to the University. Prior to 2001, external examiners of validated programmes only reported directly to the accredited partner, and their reports were available to the University, in due course, as part of annual monitoring. Since 2001, external examiners have also reported directly to the University through OUVS. Instruction and assessment in languages other than English are permitted, subject to a set of stipulated requirements. In such cases the University requires an appropriate pool of bilingual persons. The University's framework for managing academic standards in its collaborative provision does not include a mechanism for comparative overview by the University of student achievement, or for providing comparative data to partners that might aid them in benchmarking student achievement against similar provision in the sector

48 The University has recognised a need to strengthen its oversight of assessment of student achievement in validated provision. The CPSED stated that 'a closer overview and understanding by the University of assessment practices in accredited institutions is one of the areas identified for the first period of accreditation for new institutions', and that, from September 2004, an OUVS partnership

manager will 'observe a sample of assessment boards in newly accredited institutions'.

49 The framework for managing the quality of the learning opportunities available to students and academic standards of awards in accredited partnerships and validated programmes is built upon a substantial degree of authority delegated to the partner. Although the University has recently sought to strengthen this framework, and the plans it has identified to further this, the audit team was not persuaded that the University's framework is yet sufficiently robust and rigorous to enable the University to have full confidence in its effectiveness for assuring the quality of provision and the academic standards of its awards in validated programmes.

The awarding institution's intentions for enhancing the management of its collaborative provision

50 At the time of the audit visit the University was about to publish a revised (2005) edition of the Handbook, and was continuing to evaluate and enhance the effectiveness of CuPC and ValC and their subgroups. It was implementing procedural improvements in areas such as the development of templates to improve the standard of reporting from partners, and had recognised the need to encourage accredited partners to make better use of quantitative data. The audit team considered that the procedural improvements, including the use of the subgroups, were positive moves towards enhancing the University's capacity for the effective management of its collaborative provision.

51 The University provides a variety of formal and informal enhancement opportunities for its partners. CuPC and ValC work to identify appropriate areas for enhancement which are then addressed through the OUVS Annual Conference, curriculum conferences and seminars organised by OUVS and by the University's Centre for Research in Higher Education (CHERI). The network of OUVS accredited institutions provides opportunities for individual staff development through staff

visiting one another's institutions in a variety of capacities, for example, as members or observers of accreditation/validation panels.

52 At the time of the audit visit, ValC had recently initiated a student feedback project with the intention of identifying good practice in accredited partners in student evaluation of validated provision. The audit team considered that while this is a laudable project, good practice in these matters could have been readily identified through greater attention to the systematic use of the annual monitoring process.

53 The audit team learnt from its discussions and visits to partners that the revised accreditation, review and validation processes have been welcomed by accredited partners. While the University offers some appropriate opportunities for enhancement to partners, of which the curriculum conferences and OUVS annual conference are good examples, it appeared to the team that the extent to which the partners avail themselves of these, or other, opportunities is left largely to their discretion.

The awarding institution's internal approval, monitoring and review arrangements for collaborative provision leading to its awards

Direct and collaborative teaching partnerships

Approval

54 Partners in direct and collaborative teaching arrangements are approved through a business appraisal. Direct and collaborative teaching partnerships have to be approved by both the Board of the relevant central academic unit of the University and by CuPC, which recommends approval to CAB. With international partnerships the OUW Board is also involved to assess the financial and contractual issues. University staff considering a direct and collaborative teaching partnership have recourse to advice from the University's Curriculum Partnerships Advisory Service (CPAS) and from OUW, and can draw on a series of Toolkits, available on the web and in hard copy, which provide information about each stage of

the process and each aspect of partnership. A review of collaborative provision resulted in the establishment of CPAS at the end of 2002, the production of guidance materials and a more systematic approach to the development of this area of the University's activity.

55 The teaching materials used within direct and collaborative partnerships are mainly the University's standard course materials developed through its normal internal procedures, with some material being adapted for specific collaborative partners to meet local and cultural needs. Some programmes are offered in translation, in which case the accuracy of the translation is checked through the use of external examiners local to the partner, confirmed as necessary by the University (see also below, paragraph 85).

Annual monitoring

56 Annual monitoring for University courses delivered through direct and collaborative teaching partnerships was introduced in 2003 (for courses delivered in 2002), and the CPSED explained that the process was designed to focus on the 'health' of the partnership. This monitoring has enabled CuPC to take an overview across direct and collaborative teaching partnerships for the first time. A number of queries were raised by this overview, and a report following up on these items was received by CuPC, enabling it to review progress. The first operation of this procedure was evaluated in detail by CuPC. The improvements made for the following cycle included more direct involvement of partners (the 2003 pro formas had been completed solely by partnership managers), and the task of detailed scrutiny was delegated to a subgroup set up for the purpose, reporting to CuPC. The process is seen by CuPC as iterative, and 'designed to inform and add value...to enhance relationship management through obtaining and responding to comments from partners'. The audit team heard that further changes are planned which will seek to align this process with other processes, and to make more explicit any distinctions between the collaborative versions of courses and

mainstream delivery within standard annual course reports and in the reports of external examiners. The use of distinguishing course codes gives the University the ability to conduct extensive comparative analysis of student achievement between different providers.

57 The audit team concluded that the annual review of curriculum partnerships and the follow up of issues reported to CuPC allowed the University to exercise oversight and to identify issues for wider consideration. The process has been established only recently, but had been critically reviewed. Changes have been made which are designed to seek constructive alignment with linked monitoring activities and, in future, further to improve the timing and analysis and briefing of those involved.

Periodic review

58 The review process for individual courses offered through direct and collaborative teaching partnerships is the same review process that is applied to courses offered by the University itself. The CPSED noted that sufficient distinctions are made to enable the University to identify any significant differences in the academic standards achieved or in the student experience, and that this ability for differentiation is being further developed with a separate report form for courses presented in partnership. The periodic review of programmes was introduced by the University for the first time in 2003. All programmes in broad subject groups are reviewed on a six-year cycle. The CPSED explained that this process 'does not specifically or separately address direct and collaborative teaching but does address the effectiveness of the review arrangements as a whole within the area of provision'. Partnerships are based on a fixed-term contract. The audit team was informed that there is no formal review procedure for the partnerships themselves, but that the future of partnerships is discussed by CuPC, OUW and the relevant central academic unit for individual partnerships depending on the partner and the nature of the link. External involvement in such discussions is limited to external membership of CuPC. As a result of such reviews of

partnerships some might be encouraged to consider moving from direct or collaborative teaching to accreditation and validation, and/or might move out of direct teaching to licensing of the University's materials.

Summary

59 Overall, the audit team concluded that the University's procedures for the approval, monitoring and review of the quality and academic standards of collaborative provision leading to its awards offered through direct and collaborative teaching arrangements are appropriate. While the team formed the view that the University could make better use of the information available to it from these partnerships for the purposes of taking a wider institutional-level view of the health and development of such arrangements, it considered that the University's current procedures and the measures being taken to further improve current procedures provided a sound basis for the management of this dimension of its collaborative provision.

Accredited partnerships and validated programmes

Approval and re-approval of accredited partners

60 The CPSED defined accreditation as the process by which partners seeking to offer validated programmes are 'judged by the University, deploying a panel of peers, to meet established principles confirming it can provide a satisfactory environment for the conduct and quality assurance of HE programmes leading to OU validated awards'. It stated that the process, which focuses at institutional level, confirms 'that the partner has a suitable environment and infrastructure for the development, delivery and quality assurance of validated awards' as set out in its Principles for Institutional Approval section of the Handbook, and that the partner has 'the capacity and ability to undertake those quality assurance functions which will be delegated to them by the University'.

61 The accreditation process involves an extended period of preparation, including

advice, guidance and preliminary visits (the advisory visit and the facilitation visit). The CPSED explained that the review of procedures which has taken place since 2001 is intended to make 'the initial and subsequent approval process more iterative and developmental'. Accreditation itself involves the production of a submission document and an accreditation visit by a panel. Guidance is provided to prospective institutions and to panel members in the Handbook. The panel is normally chaired by a member of ValC (who may be a member of the University's staff or may be an external member) and who is, thus, able to speak to the report at ValC which has delegated authority from the University to make decisions about accreditation on behalf of the University.

62 Accreditation is based upon a very high degree of delegated responsibility to the partner institution which, according to the CPSED, includes 'full responsibility for teaching, assessment and further development' of validated programmes. Partners have responsibility for the monitoring, evaluation and quality enhancement of programmes; the establishment, management and conduct of boards of examiners; the engagement, briefing and training of external examiners; the appointment, appraisal and development of staff and for the development of the curriculum. Further delegated authority may be given where ValC has 'confidence in [a partner's] internal quality assurance procedures', although there remains a reporting requirement to OUVS. Additional delegated authority may be granted for the organisation and conduct of programme validation and revalidation, the appraisal of nominations for external examiners and for major amendments to validated programmes. At the time of the audit visit, six partners had delegated authority for validation and revalidation, and two partners had delegated authority for the scrutiny of external examiner nominations.

63 Accreditation of an institution is formally re-approved through institutional review. ValC discusses and endorses the outcomes of institutional reviews. The audit team found that a number of the discussions at ValC recorded ongoing concerns with aspects of the

management of quality at partner institutions, and it was clear to the team that the University was now being more forceful in its response to such shortcomings with, for example, reviews resulting in re-approval of accreditation for periods of less than five years.

64 The CPSED stated that, in revising the Handbook, the institutional review process had been significantly changed to enable the University 'to evaluate more explicitly the effective discharge of key quality assurance functions' by its accredited partners, and that reviews take place at intervals of now not more than five years. The University has also now made it clear that removal of delegated authority, or even of accredited status, can be an outcome of review, and that the 'formal outcome of successful institutional review is re-accreditation and confirmation that delegated authority is being exercised effectively'. The CPSED explained that a rolling programme of institutional reviews under the revised procedures will provide the University with 'more robust evidence and assurance that the significant demands of accreditation are being met', and will 'bring all accredited institutions, new and long-standing, to a clear understanding of the expectations of accreditation' which it believes to be necessary.

65 The constitution of accreditation and institutional review panels was a matter of concern to the audit team. The team noted that during the previous two years, one panel for institutional accreditation consisted of only three members; three panels for institutional review comprised only three members and one panel had only two members. In considering the appropriateness of the composition of panels to make judgements on behalf of the University, the team noted panels with no current members of the University, panels that drew heavily on staff of accredited institutions, and an instance of a panel having majority representation from institutions who are themselves accredited partners. While the team recognised the developmental value of engaging members of accredited partner institutions in the processes of accreditation and review, it questioned the

soundness of such significant deployment of members of institutions who are themselves accredited by the University in panels that are making accreditation judgements on behalf of the University.

66 The extent to which the wider academic community within the University is willing to be involved in accreditation and validation was unclear to the team. ValC noted in 2002 that the proposal for the 'vast majority of OUVS events to be chaired by an OU colleague' did not receive its full support. Concern was expressed at ValC about the 'lack of transparency about how panels are convened', and it was clear from the minutes of meetings that other suggestions for obtaining greater ownership by academic staff of the work of OUVS were not progressed. Overall, the team questioned whether the composition of approval and review panels was consistently appropriate for making the judgement, on behalf of the University, to approve or re-approve institutional accreditation.

67 The CPSED acknowledged that a limitation of the University's model of accreditation related to institutions seeking 'closer academic partnership', and the audit team heard from representatives of accredited partners that they would look to other validating partners where they wanted greater academic and subject level support than currently provided by the University's accreditation model. The team noted that the 2003 QAA report on the University's partnership with Kolding K bmandsskole expressed concerns about the limited discipline-level contact between the partner and a relevant academic unit within the University, and recommended consideration of 'a greater level of subject-based liaison'. The University specifically rejected this, reporting to ValC in October 2004 that 'there is no intention to increase academic oversight by subject experts at the OU...as this is inconsistent with accreditation'. The team also noted that matter of subject level engagement was raised by OUVS in its Unit Plan, April 2004 where it states that the OUVS is 'severely impeded' in its ability to respond to demands for the validation of

Foundation Degrees by 'assumptions...that best practice in higher education partnerships with further education is characterised by very close academic partnership and close quality assurance oversight by the awarding institution' and that its work is likely 'soon to be marginalised'. OUVS observes that 'it can only make a strong contribution if the University decides to move' towards 'a different approach to working with the further education sector'.

Programme approval

68 Programmes offered through an accredited institution that lead to an award of the University are approved through validation. Validation is defined in the CPSED as the process 'by which an accredited institution proposes a programme of study for approval', and culminates in a 'judgement by a panel of peers about whether or not a proposed programme of study for a validated award meets the requirements of that award'. The *Handbook* provides detailed information on the process to both accredited institutions and to members of validation panels. It explains that a validation panel 'makes decisions on behalf of Validating Committee, which are reported to the Committee at its next meeting', and 'will therefore include advisers, external to OUVS and the institution'. There is no requirement for a panel to include a member of academic staff of the University. Partnership managers assemble panels drawing on their database of contacts and, although they try to involve a member of the University's academic staff, the audit team was told that the links with faculties of the University were limited.

69 The decisions of validation panels are reported to ValC. OUVS arranges for a formal letter of approval to be issued. Partnership managers are responsible for ensuring that any conditions for approval have been met, and will seek the guidance of the validation panel before conditions are signed off. Recommendations are followed up as part of annual monitoring. Programme validations and revalidations are reported to ValC. The audit team was told that ValC would pick up matters arising from validation reports but did not seek

a systematic overview of such matters. The team studied minutes of meetings of ValC, and noted that the Committee had identified the difficulty of evaluating an institution's progress with recommendations in annual monitoring, and its reliance on the partnership managers to identify issues that should be followed up. The team considered that a process of formal reporting to ValC that an institution had met all recommendations was lacking.

Annual monitoring of validated programmes

70 The University's annual monitoring requirements of validated programmes consists of an institutional commentary, an executive summary, the annual programme monitoring report (AMR) pro formas and copies of the external examiners' reports and the responses provided to them. This information is reviewed by the partnership manager who completes a pro forma summarising key points and identifying any matters from the previous year which have not been addressed. The subgroup of ValC undertaking the scrutiny of annual monitoring reports considers this information from all partners during a dedicated whole-day event. This outcome of this event is the finalisation of the individual partnership managers' summary pro formas and an overall summary of themes and observations that is submitted to ValC and sent, together with the individual pro formas, to accredited partners. This process was operated for the first time in 2003. Prior to that only a selection of annual monitoring reports was scrutinised by ValC.

71 The cycle for programmes operating to the standard academic year is for annual monitoring to have passed through a partners' own quality assurance procedures in time for the report pro forma, as required by the University, to be submitted to it for 15 December. Reports are then reviewed by the partnership manager in OUVS and considered by the scrutiny subgroup of ValC in February. The report of that group is considered by ValC in March, after which individual institutions receive their partnership managers' pro formas and feedback. It was reported to the audit team that this feedback was inevitably quite long in

coming, thus limiting the ability of partners to take timely action. The University explained that any changes to annual monitoring policy for the coming cycle are usually notified in August. This timing of notification of procedural change was reported by partners who met the team to be a source of frustration to them, and to hinder their ability to operate the quality assurance requirements of accreditation.

72 The 2004 overview commentary resulting from scrutiny by the subgroup of ValC noted important sections missing in a number of reports, variability in quality, limited reporting on student feedback with limited critical reflection and resultant plans. Nevertheless, the subgroup felt able to express 'overall confidence that standards were upheld'. The 2005 overview commentary noted that 'all reports met the standards required' and 'showed an improvement' over the previous year. Even so, some reports were noted as still having sections missing, with variability in the reporting of student feedback, wide variation in the statistical sections and overall variation within institutions on a programme-by-programme basis. It was noted that the pro forma 'did not at present ask institutions to set out how it had responded to points raised in the previous review...to ensure...the quality loop...could be completed'. The commentary again draws attention to late and inadequate external examiners' reports and, while the University was 'urged to continue to support partner institutions' in obtaining satisfactory reports, it is clear that the problem is seen to be primarily that of the partner and not of the University. The subgroup, however, again confirmed 'overall confidence that standards were upheld'. While the audit team was told that partnership managers are responsible for identifying and chasing actions not taken, and, reportedly, 'just keep chasing', there is no formal reporting of the completion of recommended or outstanding action to ValC, or a mechanism through which the University maintains oversight of the progress of actions and the closure of quality loops. It appeared to the team that because accreditation delegates such substantial responsibility for quality assurance to partners, the University has limited sanctions available to it

beyond recourse to the triggering of a revalidation or institutional review.

73 The CPSED recorded that 'the general standard of annual monitoring by accredited institutions, the organisation of the arrangements for their scrutiny, and the effectiveness of Validating Committee involvement have all improved in 2003-04'. The view was expressed to the audit team by senior staff of the University that the University had come to accept that the nature of the evidence that it was relying upon was not sufficiently robust and secure, and that it had, therefore, moved to make it more robust.

74 The CPSED stated that accreditation 'delegates to accredited institutions the quality assurance associated with monitoring programmes of study', and that the role of the University is to ensure that partners 'are carrying out these activities with positive results, and to identify from their reports any good practice or quality issues which might have wider relevance...to accredited partners'. The CPSED acknowledged that its review of annual monitoring in 2001-02 concluded that the 'activity was not fully effective'. In due course the University produced the revised Handbook. While the audit team considered that the changes introduced in this revision were helpful, it questioned the effectiveness of the action taken by the University on some serious shortcomings it had identified, shortcomings which were reiterated in 2002 by a QAA overseas audit of the University's partnership link with an accredited partner. The University informed the team that 'the annual monitoring process was revised immediately as part of the action on the QAA overseas audit', and 'a letter and guidance material was sent to all accredited institutions advising them of the new process and requirements'. Nevertheless, the team noted the slow response to action by some accredited partners, and the apparent inability of the University to ensure urgent action by partners in such cases. For example, the team noted many instances in partnership managers' reports on annual monitoring where issues were recorded as having been raised in

previous annual reports, and instances where it was observed that no action has been reported in the programme pro forma or institutional summary about serious issues. The identification of the same matters in successive annual reports does not appear to result in action by the University, and failure to take action does not appear to have consequences for the partner. Whether this reflects a dislocation between the actual monitoring being undertaken by a partner and the recording of it on the University's pro forma or a failure by the partner to monitor, it is nevertheless unsatisfactory, and does not reliably enable the University to assure itself that academic standards are being maintained and that the quality of students' learning opportunities continue to meet its expectations for the validated programme.

75 In 2004, CAB received for the first time a report combining commentary on the annual monitoring of accredited partnerships and that carried out for direct and collaborative teaching partnerships. This report describes processes and comments on the organisation of them, thus confirming administrative process and procedural matters. It does not, however, attempt to draw out themes or to comment on the overall effectiveness of the processes in enabling the University to assure itself about the academic standards and the quality of the learning opportunities in its collaborative provision. The audit team considered the combined report to be an interesting development that has yet to find its full potential for allowing the University to take an annual overview of the health of its collaborative activity as a whole.

Periodic programme review

76 Periodic review of programmes is the process of revalidation by which programmes offered by accredited partners are re-approved. The process is structured to review the design and delivery of the programme, and involves the production of a critical reflection and revised full programme documentation, and culminates in a visit and a judgment by a panel of external peers. Re-approval may be for the full term of

five years or for a lesser period, and may be with or without conditions and recommendations. In exceptional cases approval may be withdrawn. A recently revised process, which is being piloted with a number of partners, places greater emphasis on development over time rather than on a single event.

77 In initial approval of a validated programme, the University is able to withhold approval until conditions are met. Once a validated programme is established, however, it is less easy to suspend registration of new students, and it was clear to the audit team that conditions for re-approval have not always met in a timely fashion. The team's study of the minutes of ValC showed that failure to meet re-approval conditions is not routinely reported to that Committee.

Summary

78 In its CPSED the University expressed its confidence that the accreditation process was robust and rigorous, and provided it with the necessary information to be confident in its accredited partners' ability to meet and sustain the requirements of accreditation. This view was reiterated to the audit team in meetings with representatives of the University and of accredited partners during the visits. The University has, nonetheless, sought to strengthen its procedures and to make a series of changes, some of which were yet to be implemented or still under development at the time of the audit visit. In so doing, the University has gone some way towards recognising that partners are likely to require a higher level of monitoring and support following accreditation than has hitherto been the case. The team considered that this ran counter to the stated principle of accreditation as a process which confirms a partner's ability fully to meet the requirements of accreditation and the substantial level of delegated authority that accreditation carries. The team formed the view that the University's model of accreditation has not enabled the University reliably to ensure that its partners can sustain the requirements of accreditation. The team recognised that the University has made a series

of changes so as to increase the level of information it receives to enable it to monitor its partnerships more actively and effectively than once it did, but, in raising the extent of post-accreditation monitoring, is in effect moving away from the underlying principle that its model of accreditation provides it with the necessary information to be confident in its accredited partners' ability to meet and sustain the requirements of accreditation.

79 In illustrating the move toward 'a closer overview and understanding by the University of assessment practices in accredited institutions, the CPSED noted that the University is 'managing two cases of accredited institutions outside the UK context, where the gap between our expectations and their practice has raised concern'. While it is important that such gaps are identified, their emergence raises doubt about the robustness of the initial accreditation judgement and the confidence placed in that judgment by the University. These cases suggested to the audit team that either there never was a shared understanding of the expectations of the University by the partners - in which case accreditation should not have been approved - or that gaps between the University's expectations and a partner's practice can develop after the criteria for accreditation have been fully satisfied.

80 Notwithstanding the procedural changes that have been made to the University's model of accreditation since its establishment in 1992, there appeared to the audit team to be a tension between the underlying principle of the model and the reference in the CPSED to 'evidence from our own processes that different kinds of accredited partners require different kinds of support and oversight'. The team also considered there to be some tension between delegated 'authority for taking action to tackle issues raised through' monitoring, given by the University to its accredited partners, and the information that the University legitimately requires to assure itself about quality of provision and academic standards of awards made in its name. The team would encourage the University to consider if it, too, sees these tensions.

81 Accreditation is built upon peer review. While the engagement of independent external experts in matters of authority or delegated authority to assure quality and academic standards is a cornerstone of UK higher education, the audit team was not persuaded that the way in which peer review is being utilised in the University's approach to accreditation is fully appropriate. Considering the significance of the decisions made by an accreditation panel on behalf of the University, it is critically important that panels represent an appropriate level of current and independent experience of UK higher education, and have a good understanding of the way in which the broader higher education agenda is developing and safeguarding the quality and academic standards of higher education provision in the UK. The team considered that the University's own academic staff are under-represented on panels, many of which drew heavily on staff of accredited institutions for their membership. The University may wish to reflect upon the merit of making a distinction between the engagement of members of partner institutions in a developmental role in the accreditation process and their engagement on accreditation panels as independent external experts and advisers to the University.

82 The audit team acknowledged the extent to which the University had sought to rectify the serious shortcomings in accreditation and validation that had been identified by the University itself and by external audit and review events. It saw the evidence that the University has begun to be more robust in its response to concerns arising from accreditation and validation procedures, and is exercising its right to initiate early review and suspend delegated authority when necessary. The team formed the view, however, that in giving a very high level of delegated authority to its partners, the University has not always been able to discharge its own responsibilities for securing the academic standards of its awards and for assuring the quality of the learning opportunities available to students through validated programmes delivered by its accredited partners. The report of the QAA review of the partnership with Kolding

Købmandsskole noted strong reservations about monitoring and oversight of the provision by the University, and made a judgement of 'only a limited confidence in the University's stewardship of the quality and standards of its validated awards'. The current audit team was not persuaded that changes made by the University since that judgement are sufficient to justify a higher level of confidence.

External participation in internal review processes for collaborative provision

83 In direct and collaborative teaching arrangements an external member of CuPC is involved in both partner approval and review, while partner and programme approval and review with accredited partners are predicated on peer review. The use of external input is extensive and a fundamental part of the approach of the University to accreditation. The University is prepared to validate programmes in academic areas it does not itself provide and, in such cases, relies substantially upon external peers to provide the subject expertise to underpin the validation decision. External members of panels are drawn from current and former members of UK HEIs and from accredited partners of the University. The audit team was not persuaded, however, that all external members of panels were fully 'external' or sufficiently independent in view of their previous involvement with the University. The team's view of the use made by the University of external participation in its approval, monitoring and review processes in the management of its collaborative activity has been set out in paragraphs 54 to 82 above.

External examiners and their reports in collaborative provision

Direct and collaborative teaching partnerships

84 For courses within the University's curriculum delivered by direct and collaborative teaching, the role of external examiners is defined in the document, *The Role of External Examiners at the Open University*, and is the

same as for the courses delivered to students who are studying for the University's awards delivered through the supported open learning mode. The external examining processes for courses delivered through direct and collaborative teaching partnerships are the same as those delivered by open supported learning. The report of QAA's 2004 institutional audit found these to be effective. The current audit team found from its examination of documentation relating to a sample of direct and collaborative teaching partnerships that the external examining process was operating in accordance with the processes laid down, and was able to endorse the finding of the 2004 audit that the process was effective.

85 Where courses are delivered in translation, a local external examiner is appointed who undertakes duties on behalf of the University and advises the UK Examinations and Assessment Board (EAB). The role of the local external examiner is laid down in the OUW Operations Handbook which is customised for each partner. Their duties include the reviewing of borderline pass/fail scripts and reading and confirming to the UK EAB that the translated course materials and assessments are meeting the same standards as in the UK. Local external examiners are nominated by the partner institution and approved by the relevant school board of the University and by the PVC (Curriculum and Awards). The nominee should have academic expertise and experience appropriate to the level of the course being examined and be appropriately fluently bilingual. While the University's external examiners are required to have appropriate expertise and experience to maintain academic standards in the context of UK higher education, local external examiners' experience of UK higher education can be satisfied solely through the possession of a UK award completed overseas; they are not necessarily required to have experience of delivering and assessing in UK higher education. The audit team also noted that, in some cases, local external examiners might not be appropriately independent, as it found that some local examiners had been employed by the University

as associate lecturers. While the external examining process for direct and collaborative teaching partnerships is generally robust, the University is advised to ensure that all local external examiners appointed for courses offered overseas are appropriately independent and have experience of undertaking the delivery and assessment of UK higher education.

Accredited partnerships and validated programmes

86 In the case of accreditation and validation, the accredited partner nominates the external examiners for the validated programmes who must meet the rigorous criteria set out in the Handbook. The University approves the accredited partner's nominees after seeking the advice of three expert referees, and the nominees are then appointed by the academic board of the partner institution. The audit team found evidence in a limited number of cases of accredited institutions' external examiner nominations being rejected by the University, and formed the view that the process by which the University approved the appointment of external examiners for validated programmes was rigorous. Where an accredited institution has further delegated powers for the appointment of external examiners, the Handbook stipulates that 'nominations are then sent to three external appraisers who have been agreed with OUVS. The majority agreement of the three appraisers is required, following which the OUVS is informed in writing...and OUVS then approves the nominees on behalf of the University'.

87 It was made clear to the audit team by senior staff of both the University and of accredited institutions that the external examiners are seen as operating on behalf of the accredited institution rather than on behalf of the University. The 2004 version of the Handbook specifies that external examiners are required to 'make a report annually to the Academic Board of the accredited institution, to be copied simultaneously to the Open University, on the conduct of the assessments just concluded and on the standards being set and achieved'. It also stipulates that external examiners of validated programmes should

report to the University on any matters of serious concern arising from the assessments which put at risk the standards of the University's award.

88 The CPSED explained that accredited institutions were expected to brief external examiners on their role and responsibilities as soon as possible after taking office, preferably by visiting the accredited institution to meet staff and students. The Handbook defines clearly the areas on which the external examiner must be briefed by accredited partner institutions. The CPSED noted that following an event for representatives from accredited institutions on external examining, OUVS was considering offering a generic induction programme and briefing materials. The University is moving toward explicitly approving the briefing materials of accredited partner institutions for external examiners, noting that for new partners this would take place during the early period of accreditation and for existing partners at institutional review.

89 External examiners' reports are expected to conform to a template whose format and content is defined in the Handbook. The template requires examiners to comment on the structure, organisation, design, marking and fairness of all assessments. Reports are addressed to the academic board of the accredited institution and, since 2001, also to the Vice-Chancellor of the University. Partnership managers read all external examiners' reports within their portfolio. The Handbook specifies that accredited institutions are expected to ensure that reports of external examiners are received, are formally considered, that appropriate action is taken, and that external examiners receive a response setting out action taken following receipt of reports.

90 External examiners' reports are considered by the accredited institution's academic board as part of its annual monitoring procedures to ensure that the validated programme meets its stated objectives. Annual monitoring starts at the course report level, which includes a summary of the issues in the external examiners' report and the programme team's responses. Partner institutions are required to

produce an AMR for the University which includes, as appendices, the external examiners' reports together with the accredited partner's responses. The partnership manager produces a pro forma response to the AMR, and both the AMR and the pro forma response are scrutinised by the subgroup of ValC to ensure that issues raised by external examiners have been resolved. Where serious issues are raised by the report of an external examiner, the partnership manager is expected immediately to engage in discussion with the partner institution as to how the issue is being resolved.

91 The June 2003 report of QAA's audit of the University's partnership link with Kolding Købmandsskole concluded that 'while recognising that the University had recently taken steps to strengthen the external examiner's role at the College, the [audit] team could not be confident that the examiners' work had facilitated a careful monitoring of standards over the period of the validation thus far'. The CPSED explained that the University had taken action on many areas identified in the report, but it robustly defended its accreditation model that assumes a direct relationship between the external examiner and the accredited institution. The June 2004 report of QAA's enhancement-led institutional review (ELIR) of an accredited partner also identified a number of weaknesses relating to the external examining process, including the way in which course teams respond to serious issues raised by external examiners, the need to provide a more reliable appraisal of external examiner reports, and the need to ensure that the college receives satisfactory and timely external examiner reports.

92 The University's annual monitoring of validated programmes reviews external examiners' reports and the accredited institution's responses on an individual basis, and the subgroup of ValC comments on general issues which emerge from the review. In the annual monitoring for 2003-04 the subgroup's report noted that a limited number of external examiners' reports had not been received in time to be included in the annual review, and that for inadequate reports the University would support the partner in requesting that the

report be resubmitted. The University does not produce an overview of the external examiners' reports for validated programmes.

93 The audit team considered at length whether the use of external examiners and their reports for validated programmes was sufficiently strong and scrupulous and reflected the precepts of the *Code of practice*, published by QAA, the team's concern being whether the University had retained sufficient responsibility for the functions of external examiners of validated programmes by delegating much of the responsibility to the accredited institutions. The extent of the delegation was confirmed by the University and the partner institutions visited by the team who all stated that external examiners of validated programmes are examiners of the accredited partner, not of the University. The team noted that the University had strengthened a number of processes in its framework for the management of academic standards in the recent past to allow it to have more control of the external examining process for validated programmes. The team found evidence that immediate action had been taken by the University to ensure the proper resolution of a significant issue relating to standards which was raised by externals at an examination board and in their subsequent reports, and was able to conclude that in a serious situation, where standards are perceived as being at risk, the University has the power to respond immediately to the concerns of external examiners. On balance, the team concluded that the University had strengthened its link with external examiners of validated programmes sufficiently to retain the ultimate responsibility for their functions, and that external examiners and their reports contributed sufficiently to the University's capacity to be confident of the security of the academic standard of its awards achieved through validated programmes. The University is strongly encouraged, however, to consider how it might further strengthen its direct links with external examiners, for example, by ensuring that all external examiners' reports are produced in a timely manner and to an appropriate standard, and by taking an

overview of external examiners' reports to identify common issues and to assist the work of the scrutiny subgroup of ValC.

The use made of external reference points in collaborative provision

94 The Handbook makes clear that accredited partners are expected to demonstrate knowledge and understanding of the Academic Infrastructure in their institutional quality assurance arrangements, programme submissions and delivery. The University's accreditation process requires partner institutions to demonstrate that they are benchmarking their quality assurance arrangements to accepted good practice in UK higher education, including the Academic Infrastructure. The audit team found that some partner institutions took responsibility for engagement with the Academic Infrastructure for themselves while others looked to the University to provide guidance. Workshops and seminars have been offered for partners on aspects of the Academic Infrastructure.

95 The University has mapped its institutional policies and procedures against each section of the *Code of practice*, published by QAA, and statements about the alignment demonstrated by this mapping have been reported to QSB. The CPSED explained that, while the *Code* is used 'to inform institutional processes for the approval and review of collaborative provision', the precepts of the *Code* are embedded in University policies and processes, and are not necessarily drawn to the attention of institutions in direct and collaborative teaching partnership arrangements. All accredited institutions were required to submit a mapping of their own policies and procedures against the *Code* by December 2004. At the time of the audit visit the analysis of the outcomes of this mapping by partner institutions had not been completed, but the team was informed that the outcomes would be reviewed in detail through institutional reviews over the next few years.

96 The University has its own levels and awards framework that sets out the various awards of the University, from undergraduate certificates

through to higher doctorates, including single credit-bearing courses. The 2004 institutional audit of the University verified that University's framework is consistent with *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ), published by QAA, and the *Credit Guidelines for HE qualifications* jointly prepared by four regional credit associations and consortia. Accredited institutions propose programmes for validation for an award from the University's framework and, where appropriate, ValC considers proposals for new awards and makes recommendations to CAB for their entry onto the framework.

97 Programme specifications became a formal requirement for validation and revalidation from 2003. The University's programme specification template, which requires reference to subject benchmark statements, must be used by accredited institutions when submitting programmes for validation. While programme specifications have been required for new or reviewed programmes since 2003, the University has not made it a requirement for programme specifications to be implemented before the programme is reviewed. At the time of the audit visit a sample check by OUVS indicated that nine out of 250 programme specifications had not yet been produced, and the last one was not due to be completed until the programme review in the academic year 2006-07. The Handbook defines the contents of programme specifications in some detail, and an exemplar is provided for guidance. The Handbook states that the programme specification should be included in the programme handbook, but it must be capable of being separately presented to readers who do not receive the programme handbook. External examiners are required to comment in their reports on the quality of knowledge and skills demonstrated by students in the light of the relevant subject benchmark statement, and of the FHEQ (or the *Scottish Credit and Qualifications Framework* where appropriate).

98 The audit team's discussions with the staff of the accredited partner institutions that it visited indicated a high awareness of the Academic Infrastructure and a willingness to

ensure that proper account is taken of its requirements and guidance. OUVS has recognised that small institutions, those with a small proportion of their work in higher education, and overseas institutions, have special problems in using the Academic Infrastructure in an effective way, and has made significant efforts to provide support in such cases. The University is reviewing the outcomes of a mapping exercise that accredited institutions carried out against the *Code of practice*, published by QAA. The team would encourage the University to review partners' engagement with the Academic Infrastructure on a more regular basis, perhaps as part of the annual monitoring process. Overall, the team was able to conclude that the Academic Infrastructure is being properly addressed by the University and its accredited institutions.

Review and accreditation by external agencies of programmes leading to the awarding institution's awards offered through collaborative provision

99 A wide range of the University's collaborative provision has been subject to review by QAA, including the quality audit of overseas collaborative links, reviews at subject level and of Foundation Degree provision, and the ELIR of an accredited partner. The audit team was told that the University considers institutional-level reports on its collaborative partners, and seeks to monitor its accredited partner's response to QAA through annual monitoring at subject level; but the team found the evidence for this was sparse. It was explained that it is important for OUVS to receive copies of action plans arising from subject reviews of validated provision and of accredited partners reporting on all their engagements with QAA. This seemed to the team to be a matter of record-keeping rather than of active oversight and monitoring by the University of partner's action plans resulting from these external reviews. The University does not seek to take an overview of themes and issues emerging from QAA engagements with its accredited partners, arguing that there is no benefit to be gained from looking across accredited provision as partners are all so different.

100 At institutional level, QAA reports in respect of accredited partners of the University have included judgements of limited confidence in academic standards, in one case in respect of 'the University's stewardship of the quality and standards of its validated awards', and in another in respect of the partner institution's 'procedures for the present and likely future management of the academic standards of its provision'. In the former case, the response by the University to the recommendations of the report was considered in detail by ValC and by QSB, CAB and the Academic Board, with ValC noting from its discussions that 'the key issue emerging from the report is the perceived insufficient evidence that OUVS requires' from its accredited partners. The OUVS Unit Plan for 2004-05 noted that the report had given 'added impetus to reviews and changes that were already in train'. The latter case was, however, only 'noted' by ValC. The audit team was told that the response was made at the level of OUVS and, indeed, found no response to the implications of the recommendations of the report in the proceedings of university-level committees, or any comment made upon the action plan prepared by the accredited partner institution. The University explained that in cases of QAA's direct engagement with accredited institutions, ValC has only 'noted' the institutions' action plans because although the University keeps an overview on such matters the accreditation model places the responsibility for action on the accredited institution. The team was told that the Academic Board knows when serious issues arise from external engagements, and it appears that this case did not fall into that category, despite earlier evidence of shortcomings at subject level. The team noted that, in several cases, concerns that formed the basis of 'limited confidence' or 'no confidence' judgements in QAA reports had been identified by the University in earlier annual monitoring reports, but the University appeared to have no effective mechanisms to enable it to ensure that timely remedial action was taken by partners to address or rectify identified shortcomings. In one case of a judgement of limited confidence the report

identified repeated concerns, and observed that 'the follow-up mechanisms in place (for the Validating Committee and OUVS) to address any action planning for improvement were less than effective'. The current audit team would concur with this observation.

101 At subject level, QAA reports have included judgements of 'no confidence' in validated programmes in Law (March 2002) and in Building and Surveying (December 2003) and 'limited confidence' in Sociology and Anthropology (January 2004). The quality management and enhancement (QME) aspect of a subject review reports has been graded as 'significant improvement could be made' in validated programmes for Nursing (May 2000) and Biosciences and Subjects Allied to Medicine (May 2000). A number of subject review reports of validated programmes identify shortcomings in the provision of learning resources, staffing issues and other concerns likely to impact upon the quality of the learning opportunities available to students. The University emphasised to the audit team that the majority of external reviews at subject level have resulted in positive judgements, pointing out that, in one accredited partner, one of the 'no confidence' and one of the 'limited confidence' judgements noted above should be seen in the context of eight 'confidence' judgements in the same period. While recognising that the majority of external reviews of validated programmes have had positive outcomes, the team considered that the evidence of negative outcomes indicated that the University's process of accreditation does not reliably enable the University to assure itself that its partner institutions are able to deliver the level of responsibility delegated to them. It also indicated to the team that the processes of validation, revalidation and annual monitoring do not reliably enable the University to assure itself that programmes continue to be of an appropriate academic standard after validation, or that the quality of the learning opportunities offered by validated programmes is reliably maintained.

102 The CPSED provided only limited information on how the University engages with the outcomes of PSRB accreditation and

review. It noted that some PSRB activity takes place, and that 'account is taken of these activities in subsequent OUVS engagements with the accredited institution'. The audit team was informed that the outcomes of PSRB activity with accredited partners was not reviewed by the University, and that the University did not seek to draw any lessons from, or take an overview of, such engagements by its partners.

103 The University does not maintain a systematic overview of the outcomes of review and accreditation of validated programmes by external agencies. It does not analyse or take action on the reports of such events in a way that suggests that it takes responsibility for responding to the critical comments made by external agencies that bear upon its stewardship of the academic standards of its awards made through validated programmes, or on its ultimate responsibility for assuring the quality of learning opportunities offered by those programmes. The audit team concluded that the level of engagement of the University with review and accreditation by external agencies of its validated programmes did not give the University the capacity to ensure that such reviews would make a positive contribution to its management of the quality and academic standards of its validated provision.

Student representation in collaborative provision

104 The University's Student Charter applies to all students on direct and collaborative teaching arrangements but not to students on validated programmes of study in accredited institutions. There is, however, an expectation expressed in the Handbook that accredited institutions have arrangements in place to ensure that students have an opportunity to comment on their experience, and that accredited partners have a culture that ensures that students will be listened to and given an appropriate response. The University allows for variation in representative arrangements in both its direct and collaborative teaching partnerships and accredited institutions in order to accommodate local practices and procedures. Arrangements for representation in

direct and collaborative teaching partnerships are specified and agreed at the time the partnership is set up. In the case of accredited institutions, the arrangements for representation is considered initially in the accreditation process. The Handbook states that an institutional review panel will normally meet student representatives to discuss, inter alia, 'student representation within the committee structures and opportunities to feedback to staff'. The team noted with interest that one accredited institution had invited its students to make a written submission to its institutional review panel.

105 Complaints and appeals are initially dealt with by the relevant accredited partner or curriculum partner, with students only accessing the University's procedures when the partner's procedures have been exhausted. The University has acknowledged that accredited institutions are dealing with an increasing number of complaints, and that there is a need to provide them with guidance on this matter. Students are informed of their rights in this respect through their accredited institution's programme handbook, and through the OUVS Student Handbook (or the OUW variant) that is provided to all students.

106 The CPSED did not take a view on the effectiveness of the arrangements for managing student representation, but the view generally expressed by University staff and staff of partner institutions who met the audit which team was that this was a problematic area had not been fully resolved by previous efforts and initiatives. Students who met the team expressed general satisfaction with the way they were consulted by their accredited institutions, and with their institutions' responses to this consultation. Generally, however, students had little knowledge as to how their views were made known beyond their accredited institution to the University, or of any University response to these views.

107 The University's policy of allowing for local variation is an appropriate acknowledgement that different partners can secure appropriate arrangements for student representation in different ways in accordance with local practices and traditions. The audit team

considered, however, from its study of the available documentation, that the extent to which the suitability of these arrangements is examined during the accreditation, annual monitoring and institutional review was variable. While there are several examples of good practice by partner institutions in student representation, the University does not have the information to allow it to be sure that there are adequate arrangements for student representation in all cases. The University might consider the merit of giving more specific guidance on its expectations for student representation to support consistency in the approach taken by panels and partnership managers in approval and review processes.

Feedback from students, graduates and employers

108 The arrangements for gathering and using feedback from students studying through direct and collaborative teaching partnerships are agreed at the time the partnership is set up, with the local partner in some instances being responsible for gathering and responding to feedback. These arrangements, however, are not defined in either the formal agreements or operations handbooks. The CPSED explained that the mechanism for feedback may be a standard survey, delivered and analysed by the University's Student Research Centre, or may be initiated and analysed by the partner institution, particularly where students are taught and assessed in a language other than English. In either case, the findings are referred back to the relevant academic unit of the University for incorporation in normal review processes. The CPSED noted that in 2003, for the first time, the annual review of curriculum partnerships included a specific question on the use of student feedback, which 'enabled us to gain a better oversight at institutional level of the range of practice in place and the key findings'.

109 In respect of accredited institutions, the Handbook makes clear that the University expects these institutions to be responsible for gathering, analysing and responding to student feedback, and in order to become accredited a partner

institution must be able to demonstrate that it has an appropriate system for carrying this out. The details of these arrangements vary from one accredited partner to another, accommodating differences in local practices and processes, as a result of which there is a wide range of interpretations by partner institutions of the meaning and nature of student feedback; the level and coverage of its analysis and reflection, and the ways in which it is used to bring about improvements in the provision. The University does not define a minimum expectation. A suggested student feedback questionnaire was circulated to accredited institutions some time ago, but the audit team was given to understand that its use was variable. The use made by accredited institutions of their feedback arrangements is monitored through the annual monitoring process.

110 The CPSED made little reference to feedback from graduates and employers, other than to point out that an accreditation panel 'would expect to see evidence including the account taken of teacher, student, graduate, employer, external examiner and external peer feedback' to support a claim that a partner institution has in place systems for regular monitoring and review. The audit team recognised that many of the students engaged in collaborative arrangements would be studying part-time, and that informal feedback could be expected to come from their employers. The University might, nevertheless, wish to reflect on how more formal feedback from employers, and feedback from graduated students on the extent to which their experience of might have impacted upon their employment and employability, could be used more effectively to enhance the provision.

111 The audit team discussed aspects of student feedback with staff and students of the accredited institutions that it visited. All of these institutions had mechanisms in place for gathering student feedback. The students who met the team were generally satisfied with the ways in which they were invited to give feedback and with the mechanisms for taking action on

their feedback. In each case, the feedback and response cycle was contained within the accredited institution, and engaged with the University only at the point of reporting outcomes into the annual monitoring process.

112 The CPSED noted that the reporting of the outcomes from student feedback into annual monitoring 'has tended to be weak', and over the past two years the University has 'included a focus on this area of reporting' in its feedback to accredited institutions. The effective use of student feedback in the management of the quality of provision has been an area of concern to the University for some time, and despite attempts to improve the position, including repeated encouragement by partnership managers in the commentaries on annual monitoring to their accredited institutions, is still very variable. The need to improve the quality of student feedback has been signalled by ValC, and a project to promote more consistently effective use of student feedback has recently begun with a request to partners to identify and report good practice. This is not the first attempt by the University to initiate improvements in the use of student feedback. The audit team formed the view that if the current initiative is to succeed where others have failed, the University may need to do more than offer guidance or workshops and seminars on expectations and good practice to partner institutions to take up, or not, as they choose. Analysis, and reflection upon the analysis, of student feedback are important inputs to the management of the quality of provision, but the University does not reliably have good management information from its accredited institutions derived from student feedback. The team would encourage the University, in its student feedback project, not only to address matters of good practice in feedback but also take the opportunity to strengthen the ways in which it is able to make effective and consistent use of the outcomes of student feedback in satisfying itself of the quality of programmes that lead to its awards.

Student admission, progression, completion and assessment information for collaborative provision

113 For students who are registered on courses delivered through direct or collaborative teaching partnerships, data on students are collected from the partner institution. The information required is the same as for other directly registered OU students, and the University's student records system is used to record registrations, assignment grades and achievement. This use of the University's student records system enables comparisons of results to be made across all of the University's directly registered students, including those studying through direct and collaborative teaching partnerships.

114 For accredited provision, students are registered with the accredited institution, which in turn registers its students for the awards of the University, and provides the University with data on student registrations, continuations and completions at programme level. An administrative audit process has been piloted for accredited institutions, including an assessment of admissions and records procedures and arrangements. It is intended that the administrative audit will take place alongside each new accreditation process and each institutional review from 2004-05 onwards.

115 Progression and retention is monitored and evaluated by the accredited institution and reported to the University through the annual monitoring process. The Handbook gives guidance on the statistics to be provided in annual programme reports, covering target numbers, applications, enrolments, entry qualifications, progression and retention, resits and repeats, classifications and destinations. In addition, an annual letter is sent out before annual monitoring commences giving any additional guidance. For the session 2003-04 this additional guidance included the need to gather complete sets of statistics and to critically analyse these data in the context of the institution. In the annual report, programme teams are required to comment on their statistics, with the suggestions given of comparisons with previous

years, whether there is room for improvement, and how they fit with the institution's mission. Annual monitoring reports are read by the partnership managers who produce a commentary on their particular institutions using a pro forma that includes a section on the statistical analysis. The audit team noted that number of the pro forma commentaries reported a lack of complete statistics and an insufficiently critical analysis of the available data.

116 The audit team concluded that the analysis of completion and progression statistics for direct and collaborative teaching arrangements was effective at the course level, and enabled the University to make comparisons to be made with students engaged with its own provision. For accredited institutions, however, despite specific attention being paid to this area by OUVS, annual student statistics were in some cases not complete and were not always critically analysed. The University does not produce any overview of the progression and completion statistics provided by its accredited institutions. The team formed the view that variation in the completeness and analysis of these data was denying the University useful information on the health of its validated programmes, and that the lack of an overview of these data across the range of validated programmes inhibited the University's ability to promote good practice.

Assurance of the quality of teaching staff in collaborative provision; appointment, appraisal, support and development

Direct and collaborative teaching partnerships

117 In the case of direct teaching partnerships, the University ordinarily provides all tuition support, and tutors are directly employed by the University. Arrangements for appointment, monitoring, induction, support, training and development are similar to those for staff who teach the University's own courses. These arrangements were previously reviewed as part of the 2004 institutional audit of the University.

118 In the case of collaborative partnerships, the partner nominates associate lecturers for approval by the University according to normal University criteria. The University is involved directly in the monitoring, induction and support of these staff. Partners in more mature collaborative teaching arrangements may appoint and monitor staff. In such cases, the audit team was informed that the University provides a full job specification for partner staff. The University maintains oversight of the quality of staff through a variety of means including the monitoring of staff assessment, and the analysis of student cohort performance profiles at award boards. Staff of the partner institutions are invited to attend curriculum conferences and other briefings. The team considered that staff appointment, monitoring and support in the case of direct and collaborative partnerships is soundly managed.

Accredited partnerships and validated programmes

119 The CPSED noted that accredited institutions are expected 'to demonstrate their capacity to take delegated authority for...the appointment, appraisal and development of staff who teach on validated programmes' as a prerequisite for institutional accreditation, and that 'their ability to take this responsibility is the subject of scrutiny at accreditation and institutional review'. Additionally, the Handbook stipulates that during the validation and revalidation of programmes, strategies for teaching and learning support, the appropriateness of staff, staffing levels and staff appraisal mechanisms are examined. The CPSED noted that all staff 'must be appropriately qualified and experienced' and that they must 'demonstrate a shared understanding of the learning outcomes of a programme'. The team formed the view that these processes are generally effective in assuring the suitability of staff and staffing levels, and the appropriateness of partner policies and procedures associated with staff appointment, appraisal, development and support.

120 As part of the annual monitoring process accredited institutions review staffing and staff development matters. This review is informed by

the comments of external examiners. Accredited institutions are also expected to provide OUVS with the curricula vitae (CVs) of new staff. The audit team found that the CVs were, in general, provided to the University for new staff, but related commentary on staff turnover was not always apparent in the annual monitoring documentation. Although review of the CVs did not appear to be a requirement, the team heard that, in practice, partnership managers will examine CVs and raise any associated concerns through the annual monitoring process or at programme revalidation. Where evidence was available within annual monitoring reports, the team found that partnership managers generally addressed unresolved staffing issues within their commentary. The team noted that a number of recent QAA audits or reviews of accredited institutions and validated programmes had commented on staffing issues.

121 A particular strength of the University is its provision of staff development opportunities for accredited partners. Partners receive regular updates on significant national academic quality developments, including changes to the *Code of practice*, published by QAA, and the evolving teaching quality information (TQI) requirements. An OUVS website is available to staff of partner institutions and, although the use made of this varied from partner to partner, several staff of partner institutions who met the audit team commented that they found this website a useful resource. Seminars and workshops are generally provided either by OUVS or CHERI, and the team noted in particular the opportunities for enhancement provided through the curriculum conferences and the OUVS annual conference. The team learnt that there is good attendance by staff of partner institutions at seminars and conferences, and noted that these events were seen by them as valuable staff development opportunities.

Assurance of the quality of distributed and distance methods delivered through an arrangement with a partner

122 Under the direct and collaborative teaching models, the University delivers programmes through distance methods. In these models of

collaboration, the University takes responsibility for validating and developing the programme, provides all teaching materials, and manages assessment and examination arrangements. The partner undertakes local activities including marketing programmes, and providing student advice, support and guidance. Additionally, in the case of collaborative distance-learning arrangements, the partner also employs tutor or workplace assessors directly to deliver tutorials and mark continuous assessment, and may also offer University materials in translation. The efficacy of these arrangements has been discussed elsewhere within this report.

123 In a few instances, programmes validated to accredited partners are delivered by distance methods. In such cases, partners assume responsibility for developing, delivering and assessing provision. The Handbook has recently been supplemented with guidance for accredited institutions wishing to offer this kind of programme. Given that validated distance-learning programmes offered by accredited partners are a recent development, this audit did not examine such provision in any detail, and offers no comment on the appropriateness of the quality assurance arrangements.

Learning support resources for students in collaborative provision

124 Students studying in direct and collaborative teaching arrangements are registered as students of the University and, as such, have access to the University's electronic resources and course materials. In the case of students following validated programmes, the University expects the accredited institutions to be responsible for the provision of learning support resources, and the accreditation process includes a check that the partner institution can provide an appropriate learning environment for study at higher education level. Each accreditation, institutional review and validation event should include a meeting or tour to review resources and facilities, at which the adequacy of the facilities to support programmes should be tested in accordance with guidance given in the Handbook for

Validated Awards. The level and continuing appropriateness of the resources is monitored through the annual monitoring process and by the partnership managers.

125 The accreditation, institutional review and validation reports seen by the audit team generally had a section confirming that the panel 'toured' the learning resources and found the resources to be satisfactory. Some members of ValC who met the audit team expressed reservations about the effectiveness of this method of evaluating the adequacy of learning resources, and considered that there was a need to check with students that suitable resources are, and have been, available to them on a continuing basis. In the light of these comments, the University might wish to reflect upon whether its approach to the initial approval of learning support resources is sufficiently systematic and gives appropriate attention to forward planning. Students who met the team during the visits to accredited partners were generally satisfied with the level of resources provided for them.

126 The annual monitoring pro forma does not require a direct commentary on learning support resources. The University expects partners to report on changes on such resources, including inadequacies in provision, as a part of their general reflections in the annual monitoring process, but few had done so in the reports seen by the audit team. Partnership managers and external examiners are also expected to report on any problems arising with learning resources, but unless their attention is brought to such matters by the partners' staff or students it is difficult to see how they would become aware of difficulties in this area. The audit team considered that the University's capacity to maintain an effective oversight of its validated programmes would benefit from a more systematic process for the interim monitoring of the resources available to support learning between review and revalidation events, and a more structured process for evaluating the suitability of learning support resources at initial approval and validation. In cases where aspects of the provision are considered not to be satisfactory, there appear to be no formal

sanctions that the University can apply short of early review or withdrawal of approval, although the University explained that 'where appropriate OUVS makes a judgement about applying sanctions in proportion to the problem'. The team formed the view that a defined scale of measures to be taken when problems are identified would complement a more systematic monitoring process, and would be of help to partnership managers in ensuring that there is timely corrective action.

Academic guidance and personal support for students in collaborative provision

127 Academic guidance and personal support for students in direct teaching arrangements are provided by University staff. Guidance and support in collaborative teaching arrangements are frequently provided by staff of the partner institution, and where programmes are delivered in a language other than English this is always the case. These staff are recruited by the partner to an agreed person specification. Their performance in matters of academic guidance is monitored by the relevant central academic unit of the University through the University's normal statistical monitoring of students' performance, in the same way that the University monitors the performance of staff supporting its own courses. The adequacy of personal support to students is monitored through the annual monitoring process. From its study of the available documentation, the audit team found the monitoring by the University of academic guidance in direct and collaborative teaching arrangements to be effective. The monitoring of the personal support, however, appeared to be given rather less attention, and was dependant on the variable quality of reporting in the annual monitoring process for curriculum partners.

128 Accredited institutions are charged with responsibility for the academic support and guidance of students on validated programmes. As part of the accreditation process, the partner institution must demonstrate that it has an appropriate system for student guidance and

support covering arrangements for student induction, the role of the personal tutor, careers guidance at programme and institutional level, counselling and student welfare, support for students with disabilities, financial advice and support, and support for students undertaking placements. The exact form of these arrangements varies between partners due to different local traditions and expectations. They are tested in review and validation processes, and monitored through the annual monitoring process.

129 The reports of institutional review and revalidation events indicated that matters of academic guidance and personal support were frequently dealt with by ensuring the students were satisfied with the provision. The audit team found little evidence that systems or practices relating to academic guidance and support were explored with the staff of the accredited institution. The lack of reporting on the quality of academic guidance and personal support as part of the annual monitoring exercise has not been the subject of comment by the scrutiny subgroup of ValC. The University emphasised to the team that, in its model of accreditation, it holds the accredited institution accountable for these aspects of the student experience, and responsible for taking timely corrective action as necessary. The University appears to rely on the influence of partnership managers to identify any unsatisfactory situations and deal with them as appropriate. The team considered that the University's capacity to maintain an effective oversight of its validated programmes would benefit from a more systematic process for interim monitoring between review and revalidation events.

Section 3: The audit investigations: published information

The experience of students in collaborative provision of the published information available to them

130 In the case of direct and collaborative teaching partnerships, the methods used by the

University for assuring the quality of materials provided to students are largely the same as for those programmes provided directly by the University. These processes were found to be effective in QAA's 2004 institutional audit. A variety of materials is provided, including those related to promotion and marketing of programmes, learning materials and student guidance. All students have access to the on-line student handbook. The CPSED explained that large and cross-faculty partnerships provide their own handbooks which are checked by the University before publication. Programme specifications are required for programmes delivered through direct or collaborative teaching partnerships. Student transcripts and certificates are issued by the University in a form consistent with those produced for its own awards gained through its own courses.

131 Where programmes are offered in translation, the collaborative partner translates a variety of materials including learning materials and the student handbooks. The locally appointed external examiner has a role in reporting on the accuracy of translations. The audit team noted from the minutes of CuPC that the University is introducing a process whereby it can confirm that locally produced promotional material is accurately translated. The team heard that programme specifications are not provided in translation, and suggests that doing so would be of benefit to students in relevant collaborative teaching arrangements.

132 In accreditation and validation, the University has a number of means whereby it seeks to ensure that accredited partners provide appropriate and reliable published information on its relationship with the University, and on the validated programmes that it offers. The University provides partners with a standard text that describes accreditation and validation intended for use in promotional material. Any variation to this form of words is subject to approval by the University through OUVS. Publicity materials are scrutinised by the panel during programme validation and revalidation events, and the audit team was told by partnership managers that they check websites on an ad hoc basis to confirm the accuracy of

marketing material. To address the task of assuring the veracity of material produced in languages other than English, the University has recruited staff with the necessary language skills to review such materials. The recently introduced administrative audit (see above, paragraph 114), to be undertaken prior to accreditation and review, encompasses a review of marketing and promotional materials. Students who met the team during the visits to accredited partners expressed the view that, overall, the publicity material that they had seen was fair and accurate.

133 The University provides the Student's Guide To Studying On A Programme Validated By The Open University to accredited partners for distribution to students on validated programmes. The audit team considered this to be a helpful guide to the nature of the relationship between the University and the partner, and noted that the guide clearly laid out the opportunities for students to appeal directly the University. Most students who met the team during the visits to accredited partners had a general awareness of the role of the University in the design, development and quality assurance of their programme of study.

134 The University expects programme handbooks to be available to all students on validated programmes. The Handbook for Validated Awards specifies that programme handbooks should be provided for the panel at validation or revalidation events, and that a definitive version of those handbooks should be lodged with OUVS. The University provides a programme handbook specification for the use of programme teams preparing for validation or revalidation. Regulations relating to the programme of study are approved by the University during accreditation and are additionally made available to students. Students who met the audit team during the visits to accredited partners reported that the programme handbook and associated material were found to be helpful and informative, and that regulations had been made available.

135 The CPSED stated that the University has the expectation that all validated programmes will provide programme specifications, and

provides partners with a template for this purpose. Programme specifications are being produced on a rolling basis, and all programmes validated or revalidated since 2003 are required to provide specifications as part of the validation or revalidation process. Although not all programmes had programme specifications at the time of the audit visit, in the light of the clear requirement to provide specifications for all programmes and the imminence of scheduled reviews for validated programmes currently without specifications, the audit team considered that the University was taking appropriate steps to ensure provision of programme specifications for validated programmes.

136 All certificates are issued by the University. These comply with the guidance given in the *Code of practice*, published by QAA, relating to collaborative provision. There is an obligation on partners to issue transcripts to each student at a number of prescribed stages throughout their studies. The transcripts are provided under arrangements agreed at institutional approval or review, and the University provides a full and helpful template for transcripts in the Handbook. The provision by partners of accurate and complete transcripts is one of the aspects of collaborative arrangements that is to be confirmed as part of the recently introduced administrative audits.

137 On the basis of its study of the University's systems for assuring the quality of information supplied to students, of sampling documentation provided to students, and of hearing the views of students, the audit team concluded that the University has appropriate mechanisms to assure the provision of accurate, clear and useful information to students on validated programmes.

Reliability, accuracy and completeness of published information on collaborative provision leading to the awarding institution's awards

138 The audit process included a check on progress towards meeting the requirements of HEFCE's document 03/51, *Information on quality*

and standards in higher education: Final guidance. The policy for the provision of data and information by accredited partners was approved at University level by ValC, which has determined that in the case of accredited partners, qualitative TQI information for all partners should be provided. All accredited partners are now required to submit summaries of external examiners' reports, and the University will provide summaries of programme revalidation reports. These summaries were in the process of being placed on the TQI website at the time of the audit visit. Partners with their own area of the TQI website are responsible for maintaining the associated TQI, but are required to submit any material to posted on the web to the University for prior approval. In the case of quantitative TQI data, any data provided is that as submitted as part of the University's HESA data set. The data format is the same as that for the University's own courses, provision of which was found to be satisfactorily addressed in QAA's 2004 institutional audit of the University. Based on the evidence seen during the current audit, the audit team formed the view that the University was making appropriate progress towards providing TQI data as specified in HEFCE 03/51.

Findings

Findings of the collaborative provision audit

139 An audit of the collaborative provision offered by the Open University (the University or OU) was undertaken during the period 9 to 13 May 2005. The purpose of the audit was to provide public information on the quality of the programmes of study offered by the University through arrangements with collaborative partners, and on the discharge of the University's responsibility as an awarding body in assuring the academic standard of its awards made through collaborative arrangements. As part of the collaborative audit process, the audit team visited four of the University's collaborative partners. This section of the report summarises the findings of the audit. It concludes by identifying features of good practice that emerged during the audit, and making recommendations to the University for action to enhance current practice in its collaborative arrangements.

The effectiveness of the implementation of the awarding institution's approach to managing its collaborative provision

140 The University aspires to be a 'world-class university with an international presence', and it identifies collaborative partnership as a key means of achieving its mission. Two 'middle-tier' strategies of the University, its curriculum strategy, 2003 to 2008, and a recently approved international strategy, include strategic aspects of collaborative activity, but the University does not articulate a separate specific strategy for collaborative provision. Rather, it responds to approaches from potential collaborative partners and assesses their capabilities for engaging successfully with the University through one of its partnership models.

141 The University defines three models of collaborative partnership which are the subject of this audit: accreditation and validation; direct distance teaching; and collaborative distance teaching. In direct teaching partnerships students are taught at the partner institution by University staff, while in collaborative teaching

partnerships partners are wholly or partly responsible for aspects of tuition and assessment of the University's curriculum. In both cases the students are registered as students of the University on University courses for named awards of the University.

142 Accreditation is the process by which the University approves a partner institution as having a 'suitable environment and infrastructure for the development, delivery and quality assurance' of validated programmes leading to awards of the University. Validation is the process of confirming that a programme offered by an accredited institution is 'of appropriate quality, the intended learning outcomes are at an appropriate level, and the standards set is comparable with similar awards offered throughout UK higher education'. Students on validated programmes are registered with the accredited partner institution, and are registered with the University by the partner only for the purpose of receiving an award of the University.

143 The University's approach to managing its collaborative provision therefore differs significantly between its models of partnership. The direct and collaborative teaching partnership models are characterised by a limited amount of delegated authority to the partners, a close alignment between the learning opportunities offered through the collaborative provision and those offered through the University's own courses, and a strong working relationship between the partner and University's own academic units in the management of the quality and academic standards of the collaborative provision. The accreditation and validation model is characterised by a high level of authority delegated to the accredited partner for the delivery, support and assessment of the partner's own programmes leading to an award of the University. Management of the quality and academic standards of validated provision is seen principally as the responsibility of the partner institution, the capacity of the partner to undertake these responsibilities being formally assessed by the University at initial

accreditation and formally re-confirmed at institutional review. The University expects its accredited partners to identify issues relating to the management of quality and academic standards and take appropriate action without the University requiring or initiating action.

144 Overall, the audit team found that the University was managing the direct and collaborative teaching partnership models of collaborative provision effectively. The accreditation and validation model is built upon a very high level of authority delegated to the accredited partner institution. Although the University has recently sought to strengthen the extent to which it monitors validated programmes, and has identified plans to develop this further, the team found that the implementation of the University's approach to this model of collaborative provision was not yet sufficiently robust and rigorous to enable the University be fully confident of effective management of the quality of provision offered by accredited partners, or of the academic standards of its awards gained through that provision.

The effectiveness of the awarding institution's procedures for assuring the quality of educational provision in its collaborative provision

145 The University retains responsibility for quality assurance in its direct and collaborative teaching partnership provision, using its standard procedures in the same way as it does for its own provision. The 2004 institutional audit found these procedures worked effectively for the University's own provision, and the findings of this collaborative provision audit suggest that the University's procedures for assuring the quality of collaborative provision that is provided through direct and collaborative teaching arrangements are equally effective. The audit team's concerns about the University's procedures for assuring the quality of educational provision focus entirely on accreditation and validation arrangements.

146 Accreditation is based on the partner institution being able to demonstrate, through the accreditation process, that it meets the

University's criteria for providing 'a satisfactory environment for the conduct and quality assurance' of programmes leading to awards of the University. If accreditation is achieved, the partner institution is given delegated authority and 'full responsibility for teaching, assessment, and further development' of validated programmes. The audit team considered that this model for assigning substantial delegated authority was not entirely consistent with the view expressed by the University that 'different kinds of partners require different levels of support and oversight'.

147 The University explained that it was taking action in the management of two accredited partnerships 'where the gap between our expectations and their [assessment] practice has raised concerns'. While acknowledging that the University has identified these concerns and is acting on them, the audit team considered that the identification of a post-accreditation 'gap' cast further doubt on the robustness of the initial accreditation judgement, and on the confidence placed in that judgment by the University. There is a significant body of evidence to indicate that the University's accreditation model for assigning a substantial level of managerial and operational authority by the University to a partner institution is not sufficiently robust in practice reliably to ensure that accredited partners meet, and continue to meet, the high level of responsibility for quality management with which they are charged. The University argued that the body of positive evidence indicated the robustness of the model, but the team took the view that a model that is able to assure quality in many, but not all, cases is not a robust quality assurance model.

148 Accreditation is built upon peer review. In view of the significance of the decisions made by an accreditation panel on behalf of the University, it is critically important that panels represent an appropriate level of current and independent experience of UK higher education, and have a good understanding of the way in which the broader higher education agenda is developing and safeguarding the quality and academic standards of higher education provision in the UK. The team

considered that the University's own academic staff are under-represented on accreditation panels, which draw heavily upon representation from institutions who are themselves accredited partners. The University may wish to reflect upon the merit of making a distinction between the engagement of members of partner institutions in a developmental role in the accreditation process and their engagement on accreditation panels as independent external experts and advisers to the University.

149 The University is implementing procedural changes in accreditation and validation that the audit team considered to be positive moves towards enhancing the University's capacity for the effective management of its collaborative provision. In many of the procedural changes the University has sought to increase the level of information it receives in monitoring the quality and academic standards of validated programmes. In doing so, it was the team's view that the University is implicitly recognising that the substantial responsibility assigned to partners by its model of accreditation does not sit entirely comfortably with its own responsibility as the awarding body. In recent measures taken by the University to strengthen its annual monitoring of validated programmes offered by accredited partners, the University has gone some way towards recognising that partners are likely to require a higher level of monitoring and support following accreditation than has hitherto been the case, but this runs counter to the model of accreditation as a process that confirms a partner's ability to accept fully the substantial level of delegated authority that accreditation carries. The team saw some tensions within the University's model of accreditation, and would encourage the University to consider if it, too, sees these tensions.

150 Senior staff of the University expressed to the audit team the view that the University accepted that the nature of the evidence that it was relying upon in monitoring accredited partners' management of the quality of validated provision was not sufficiently robust and secure, and that it had, therefore, moved to make it more robust. The team acknowledged the extent to which the University had sought

to rectify shortcomings in accreditation and validation that had been identified by the University itself and by external audit and review events. The team remained concerned, however, by the apparent inability of the University to ensure urgent action by partners to some serious shortcomings that the University had itself identified, and which were variously reflected in the reports of QAA audits and reviews at institutional and subject levels. The team noted many instances in partnership managers' reports on annual monitoring where issues were recorded as having been raised in previous annual reports, and instances where it was observed that no action has been reported on serious matters relating to quality and standards of the provision. The identification of the same matters in successive annual reports does not appear to result in action by the University, and failure to take action does not appear to have consequences for the partner. Because accreditation delegates such substantial responsibility for quality assurance to partners, the University has limited sanctions available to it beyond recourse to the triggering of a revalidation or institutional review, and the team considered that the University might see merit in defining a scale of measures short of such major sanctions for partnership managers to apply in a timely manner when problems are identified. Whatever the underlying cause, failure to take corrective action on problems despite their continuing identification is unsatisfactory, and does not give confidence in the effectiveness of the University's procedures for assuring the quality of educational provision offered through the validated programmes provided by accredited partners.

151 The report of QAA's 2002 audit of the University's partnership with Kolding K bmandsskole noted that 'the audit team was not entirely convinced that monitoring mechanisms currently in place permit the University to have sufficient level of confidence that the quality of learning opportunities and student support provided in the partner institution is satisfactory', and that the University may not have the necessary structures and procedures to 'provide it with a firm grasp on

information relating to the nature and quality of the provision in accredited institutions'. A conclusion of that report was that the University's arrangements at the time of the audit were not sufficiently robust to enable the University 'to have the necessary level of confidence that if problems arose with quality or standards it would quickly be made aware of them'. A recurring question that the current audit team posed for itself was the extent to which developments in the University's procedures for assuring the quality of provision in accreditation and validation arrangements would make the comments and conclusions of the 2002 audit of a partnership link no longer valid. While noting the procedural changes in the processes of accreditation, validation and monitoring that the University has made since 2002, the team was not convinced that these were yet sufficient to guarantee that the findings of an audit of the University's link with an accredited partner would not now reach conclusions similar to those of the 2002 audit. As noted above (paragraph 145), the team found the University's procedures for assuring the quality of direct and collaborative teaching arrangements to be effective, and it emphasises that its concerns about the University's procedures for assuring the quality of educational provision focus on the accreditation and validation arrangements. Nevertheless, an audit of collaborative provision requires an overall judgement on the capacity of the University to manage its collaborative arrangements effectively, without distinguishing between the type or nature of its portfolio of collaborative arrangements. The team therefore concluded that only limited confidence can reasonably be placed in the present and likely future capacity of the University to satisfy itself that the learning opportunities offered to students through its collaborative arrangements are managed effectively and meet its requirements.

The effectiveness of the awarding institution's procedures for safeguarding the standards of its awards gained through collaborative provision

152 In the case of courses delivered through direct and collaborative teaching partnerships,

the processes of the assessment of student achievement, and the monitoring of that assessment by external examiners, are the same as those operated for the University's own open supported learning. Statistics on progression and achievement for students studying through direct or collaborative teaching partnerships are collected and analysed in the same way as for other registered students of the University. A range of statistical data is produced at course level, and comparisons of results are made with the University's own students as part of the annual course monitoring process. The audit team considered that for direct and collaborative partnership the process for the evaluation of student statistics provided an effective mechanism for maintaining the academic standards of courses.

153 Where courses are taught and assessed in translation, a local bilingual external examiner is appointed. The audit team noted that it was possible for the only UK higher education experience of the local external examiner to be as a student on a UK award that might have been studied outside the UK, and for OU associate lecturers to be regarded as suitable for such an appointment. The team questioned whether the University's criteria for the appointment of local examiners for courses in a language other than English were sufficient to ensure that all local external examiners are appropriately independent and have an experience of undertaking the delivery and assessment of UK higher education that allows them to make an expert judgement on the standards of materials in translation. Apart from this, the team was able to conclude that the University has effective procedures for safeguarding the standards of its awards gained through direct and collaborative teaching arrangements.

154 The audit team's concerns about the University's procedures for assuring the quality of educational provision focus principally on accreditation and validation arrangements. Accredited partners nominate the external examiners for their validated programmes. The University approves the accredited partner's nominees after seeking the advice of three expert referees, and the nominees are then

appointed by the academic board of the partner institution. Some accredited institutions have been given further delegated powers by the University for the appointment of external examiners without the need to seek the University's approval of nominees, in which case the University requires evidence that the nomination has been scrutinised by three independent assessors. The University and its accredited institutions regard the external examiners as operating on behalf of the accredited institutions rather than on behalf of the University. External examiners are required to report back to the accredited institution and to the Vice-Chancellor of the University on student performance and the academic standards that they achieve. The Handbook for Validated Awards also stipulates that external examiners of validated programmes should report to the University on any matters of serious concern arising from the assessments which put at risk the standards of the University's award.

155 External examiners' reports and the responses to them form part of the annual programme monitoring process. Partnership managers are able to take immediate action on any issues relating to academic standards without waiting for these issues to be processed through formal annual monitoring procedure, but the University does not take an overview of external examiners' reports on validated programmes. The audit team concluded, on balance, that the University had strengthened its link with external examiners sufficiently to discharge its responsibility as the awarding institution for ensuring that external examiners contribute effectively to the maintenance of academic standards of validated programmes. However, the University is encouraged to consider how it might further strengthen its direct links with external examiners, for example, by ensuring that all external examiners' reports for validated programmes are produced in a timely manner and to a suitable standard, and by taking an overview of matters raised in external examiners' reports in order to identify common issues that the University could usefully address at institutional level to inform the enhancement of its collaborative provision.

156 A wide range of the University's collaborative provision has been subject to audit and review by QAA, including overseas collaborative links, reviews of validated programmes at subject level, reviews of Foundation Degree provision and the enhancement-led institutional review of an accredited partner institution. The University does not seek to take an overview of themes and issues in respect of the academic standards of its awards emerging from QAA engagements with its accredited partners.

157 QAA subject-level reviews at a particular accredited partner identified weaknesses in the procedures for external examining in reports in three successive years from 2002. In the 2004 external review of that accredited partner, the review team expressed 'serious reservations about the implementation of the procedures for external examining', and came to a judgement of limited confidence in the partner's procedures for the management of the academic standards of its provision. Despite these clear messages about potential weaknesses in the security of academic awards made in its name, the University has applied no sanctions to ensure that the delegated authority conferred by accreditation is soundly held, and, indeed, continues to recognise the additional delegated powers that it awarded to that accredited partner in 2002 to operate its own validation events.

158 The audit team considered that the body of evidence indicated that the University's procedures for safeguarding the standards of its awards gained through its accreditation and validation model of collaborative arrangements are not fully effective. As noted above (paragraph 153), the team was able to conclude that the University has effective procedures for safeguarding the standards of its awards gained through direct and collaborative teaching arrangements. Nevertheless, an audit of collaborative provision requires an overall judgement on the capacity of the University to manage its collaborative arrangements effectively, without distinguishing between type or nature of its portfolio of collaborative arrangements. The team therefore concluded that only limited confidence can reasonably be

placed in the soundness of the University's present and likely future management of the academic standards of its awards made through collaborative arrangements.

The awarding institution's use of the Academic Infrastructure in the context of its collaborative provision

159 Accredited institutions are expected to have knowledge and understanding of the Academic Infrastructure, and the accreditation process requires them to demonstrate that they are benchmarking their quality assurance arrangements to the Academic Infrastructure and other accepted good practice in UK higher education. The University has mapped its own institutional policies and procedures against each section of the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice)*, published by QAA, and requested its accredited institutions to submit a mapping of their own policies and procedures against the *Code* by December 2004. At the time of the audit visit the analysis of the outcomes of this mapping by partner institutions had not been completed, but the team was informed that the outcomes would be reviewed in detail through institutional reviews over the next few years. The audit team concluded that the University had given all sections of the *Code* proper consideration, and was in the process of ensuring that partner institutions had also done so.

160 The University has its own levels and awards framework, and accredited institutions propose programmes for validation for an award from that framework. The 2004 institutional audit of the University found that the University's levels and awards framework was consistent with *The framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ)*, published by QAA. The programme validation process is used to check that validated programmes conform to the University's levels and awards framework, and the audit team concluded that the process was sufficiently robust to do so effectively.

161 Programme specifications for validation and revalidation of programmes have been required since 2003. The programme specification template requires reference to subject benchmark statements. External examiners are expected to comment in their reports on the quality of knowledge and skills demonstrated by students in the light of the relevant subject benchmark statement, and of the FHEQ (or the *Scottish Credit and Qualifications Framework* where appropriate).

162 In its discussions with the staff of the accredited institutions the audit team found a good understanding of the Academic Infrastructure and a willingness to ensure that proper account is taken of its requirements and guidance. The Open University Validation Services (OUVS) has recognised that some partner institutions were relatively unfamiliar with the use of Academic Infrastructure, and has made significant efforts to provide them with additional support and guidance. Overall, the audit team found that the University is making effective use of the Academic Infrastructure in the context of its collaborative provision.

The utility of the CPSED as an illustration of the awarding institution's capacity to reflect upon its own strengths and limitations in collaborative provision, and to act on these to enhance quality and safeguard academic standards

163 The audit team found the collaborative provision self-evaluation document (CPSED) to be a clear descriptive document that went to some length to explain carefully the various models of collaborative provision supported by the University. It made a significant contribution to the team's understanding of the different models of collaboration, and of the arrangements that the University has put in place for the maintenance and enhancement of quality and standards of its collaborative provision. While it provided some illustration of reflection on operational matters, there was a lack of reflection at a more strategic and institutional level. Overall,

the team found the CPSED to be a fair illustration of the University's capacity to reflect on its own strengths and limitations in its approach to collaborative provision.

Commentary on the institution's intentions for the enhancement of its management of quality and academic standards in its collaborative provision

164 The University reviews its practices and processes through the Curriculum Partnerships Committee and through the Validating Committee. At the time of the audit visit the University was piloting a 'staged' accreditation process designed to provide greater support and guidance to institutions wishing to achieve accredited status. It was implementing procedural changes to bring about improvements in such matters as the standard of reporting from partners, and the use of quantitative data, and was in the process of capturing these in a revised (2005) edition of the Handbook for Validated Awards. The audit team considered that the procedural improvements, including the use of scrutiny subgroups, were positive moves towards enhancing the University's capacity for the effective management of its collaborative provision.

165 The University provides a variety of enhancement opportunities for its partner institutions such as the OUVS Annual Conference, curriculum conferences, seminars organised by OUVS and by the University's Centre for Research in Higher Education (CHERI), and more informal opportunities based on the OUVS Network. Partners are free to avail themselves of these and other opportunities as they deem necessary to fulfil their responsibility to enhance their provision. Opportunities for individual staff development are available through staff visiting one another's partner institutions in a variety of capacities, for example, as members of accreditation or validation panels. The University expects enhancement activity to be reported and identified through the annual monitoring process. The audit team saw few examples of

such reporting in papers coming forward to the relevant University committees, although it discussed with staff of accredited partners interesting examples of enhancement which had not been identified by the annual monitoring process. The team formed the view that the University provided good opportunities for enhancing practice, but the extent to which the partners avail themselves of these opportunities is left largely to their discretion. Overall, the team considered that the enhancement of the quality of the provision offered through collaborative arrangements would benefit from a more proactive approach from the University.

Reliability of information provided by the awarding institution on its collaborative provision

166 A wide range of published materials associated with the University's collaborative programmes is provided, including marketing and publicity materials, learning resources, student guidance and student handbooks. Some of this material is provided directly by the University; other material is provided by partners. In the latter case, where appropriate, the University provides guidance on the style, format and content of the materials, and has systematic approval processes in place to confirm the reliability of information that is provided. Where material is provided in translation, the University has put in place suitable mechanisms to confirm the accuracy of the material.

167 The University has well-developed plans in place to provide the teaching quality information (TQI) set defined in HEFCE's document 03/51, *Information on quality and standards in higher education: Final guidance*, and has mapped current collaborative provision against these requirements. The audit team was satisfied that the information that the University and its partners are publishing currently about the quality of its programmes and the standards of its awards is reliable, and that the University is making adequate progress to providing TQI data for its collaborative provision.

Features of good practice

168 Of the features of good practice noted in the course of the collaborative provision audit, the audit team noted in particular:

- i the opportunities for enhancement provided through the curriculum conferences and the OUVS annual conference (paragraphs 53, 121).

Recommendations

169 It is essential that the University:

- i strengthens the means by which it establishes confidence in the security and comparability of the academic standards of its awards provided through accredited partners (paragraphs 65, 66, 71, 74, 81, 82, 92, 93, 100, 103, 116)
- ii implements valid and reliable mechanisms to enable it to have confidence that the quality of learning opportunities and student support provided through all its accredited partners are managed effectively and meet the University's requirements (paragraphs 65, 66, 67, 69, 71, 72, 74, 79, 81, 82, 103, 107, 125, 126, 129)

and advisable that the University:

- iii ensures that all local external examiners appointed for courses offered overseas are appropriately independent and have experience of undertaking the delivery and assessment of UK higher education (paragraph 85).

Appendix

The Open University's response to the collaborative provision audit report

We are pleased that our arrangements for direct and collaborative teaching have been deemed effective, but very disappointed that arrangements for accredited and validated provision, despite the progress acknowledged in the QAA report, are still seen as needing further development to gain a verdict of full confidence. We endorse the positive statements made about our accredited and validated provision managed through OUVS, in particular: that our external examiner approval process is rigorous (paragraph 86), the strength of our staff development systems (paragraph 121), that QAA framework academic infrastructure issues have been properly addressed (paragraph 98), and that the series of changes we have made has resulted in an information flow which enables us to monitor partnerships more actively and effectively (paragraph 78).

As part of our programme of continuous improvement to OUVS services we have already taken further action since the audit visit. This includes developing the academic audit role through which faculty staff will increase their involvement in QA-related processes on validated programmes. The academic governance review, now nearing completion, has involved us in revising the terms of reference of key committees and ensuring that there is greater oversight of performance across the University's validated provision and more systematic oversight of progress on review outcomes and conditions. We already have a first draft of an action plan, as required by QAA, which will respond to all other issues raised in the report. We note and endorse the next stage whereby QAA approves our action plan, since it is clearly important both for the OU and more widely that confidence in the OU's collaborative and validated provision is maintained.

