FINAL INTERNAL AUDIT REPORT 2017/18

PROGRAMME DEVELOPMENT AUDIT

Opinion and Recommendation Classification

A Full level of assurance can be given to the adequacy and effectiveness of systems of internal control for Programme Development at the time of our audit and limited to the scope. Full assurance is defined as, “There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.

As a result of our audit, the following recommendation has been raised.

<table>
<thead>
<tr>
<th>Recommendation Type</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority One</td>
<td>-</td>
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<tr>
<td>Priority Two</td>
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</tr>
<tr>
<td>Priority Three</td>
<td>2</td>
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</tbody>
</table>

Audit Sponsor – Professor David Bolton
INTRODUCTION

1.1. The University’s academic policies and processes are the framework through which City manage the quality and standards of educational provision that leads to our credit or award. Senate has ultimate responsibility for academic policy and process and Student and Academic Services supports this function. At School level, Boards of Studies have responsibility for the quality and standards of programmes within their respective areas.

1.2. Programme Approval, including Programme Amendment, is the University’s formal process for reviewing and approving new programme proposals and proposals for making substantial amendments to existing programmes. The process involves various staff from across the University and external advisers who, as subject specialists, provide objective and external scrutiny of the programme content.

1.3. Stage 1 of the process considers an outline proposal of the programme with information about the market and competitors, proposed mode of delivery and budget. The main focus is the strategic fit of the proposal with the School and University plans. Other considerations include market viability, space and timetabling requirements, academic standards and quality matters, and financial viability. Stage 1 proposals are initially approved by the School Programme Approval and Review Committee (PARC), and subsequently by the University Programme Approval Committee (UPAC). UPAC is advisory to the Deputy President and Provost, who has delegated authority from Senate for programme approval.

1.4. Following Stage 1 approval, an External Adviser is appointed to give, in a written report, objective and independent assurance of the quality and standard of the proposed provision and to provide:

- high level insight into the discipline area being considered; and
- comparability with similar nationwide provision.

1.5. At Stage 2, the School PARC gives close scrutiny to programme content, including external views. Other considerations include external reference points, practical issues (placements, staffing), employability, admissions criteria, accreditation of prior experiential learning (APEL) and Learning, Teaching and Assessment (L,T&A). At this stage the first sign-off of student-facing programme documentation (specs and handbook) takes place.

1.6. Approval of a Programme by a School PARC or the UPAC is mostly given subject to conditions and recommendations. The responses to these conditions and recommendations which are made by:

- the School PARCs, are documented in the updated Stages 1 and 2 Programme Approval Forms that are submitted to UPAC.
- the Stage 1 UPAC, are documented in the Stage 2 Programme Approval Forms.
- the Stage 2 UPAC, are provided to Student and Academic Services together with the updated supported documentation. These are considered by the Chair of the Stage 2 UPAC meeting who, if satisfied, signs the Programme Approval off.

1.7. The programme/significant amendment approval process is managed by Student and Academic Services. Their staff are available to programme developers to explain the processes and procedures to be undertaken to approve new programmes or significant amendments, and can provide support with preparation of documentation and liaising with other relevant Professional Services (LEaD, Timetabling, Library, IS). Programme developers are also advised to involve:

- School Quality Staff (Officers /Registrars), who can provide full details of School-based considerations of proposals and how this is managed and may also be able to support the preparation of documentation.
- The Associate Dean (Education) as Chair of PARC, who can offer advice.
- LEaD staff, who can provide full support for the designing and developing of programmes and modules

1.8. During 2016-17, a revised process for programme/significant amendment approvals was piloted in Cass. The revised process:

- removed the involvement of the School PARC from both stages of the process (with changes made to normal UPAC membership as a result); and
- required the External Adviser to attend, instead of submitting a report to, the Stage 2 UPAC meeting at which the programme was being considered so that they were available to offer their views directly to the UPAC meeting and answer any questions that the members of UPAC might have had.

1.9. Having assessed the outcome of the piloted approval process, we understand that the May 2018 meeting of Senate is to be asked to approve a revised Programme Approval process which will:

- remove the involvement of the School PARC only from Stage 1 of the current process, but retain its involvement at Stage 2;
- require the Stage 1 Programme Approval Form to be signed off by the Dean of the School in addition to the Associate Dean (Education), as Chair of PARC, and the Programme Director;
- require the External Adviser to submit their written report to the Stage 2 PARC, but not also attend the meeting, and to attend the Stage 2 UPAC, and
- require the Programme Team to attend both UPAC meetings,

AUDIT SCOPE AND APPROACH

2.1 The audit approach was to develop an assessment of risks and management controls operating within each area of the scope.

2.2 The audit included the following areas:

- Proposal and Specification;
- Resource assessment; and
- Approval.

2.3 The scope reviewed compliance with Stage 1 and Stage 2 of the Programme Development Process.

2.4 During 2015-16 and 2016-17, 25 new programmes and five programmes that underwent substantial amendment, were approved. The assessment of the controls in operation over Programme Development was made by reviewing a sample of six new programmes and two substantial amendments:

i. New Programmes

- PG Cert Legal Leadership – Cass Business School;
- BA English – School of Arts and Social Sciences;
- BA History – School of Arts and Social Sciences;
- Nursing Associate Programme – School of Health Sciences;
- BSc Health and Social Care – School of Health Sciences; and
- MSc Data Science – School of Mathematics, Computer Science and Engineering.
ii. Significant Amendments

- UG Restructure – Cass Business School; and
- UG Engineering – School of Mathematics, Computer Science and Engineering.

2.5 No City Law School Programmes were included in the audit sample as there had been no recent new Programmes developed nor substantial amendments made to existing Programmes.

EXECUTIVE SUMMARY

3.1 Areas of Good Practice Identified

- **Guidance and templates** – Guidance on Programme Approval and Programme Amendment is published in the Quality Manual available on City’s website. Templates for Stage 1 and Stage 2 Programme Approval Forms and for Programme and Module Specifications are also available in the Quality Manual. The Guidance and Templates help ensure consistency of approach and completeness of detailed documentation.

- **Market research and resource requirements** – The Programme Approval Forms require details of the market research carried out to establish the demand, and the financial, staffing, space, library and information services resources required, for the proposed programme to be stated and signed off.

- **Approval** – In a two Stage process, each Programme Approval Form is first scrutinised by the respective School’s Programme Approval and Review Committee (PARC), except for those Programmes which were piloting a revised process, and secondly by the University Programme Approval Committee (UPAC). Each committee approved the Programmes subject to conditions which had to be met before the proposed Programme could move on to the next stage or receive final approval. The Chair of the Stage 2 UPAC gives final approval to the Programme once satisfied that all the set conditions have been met.

- **External Advisers** – at the conclusion of Stage 1 of the approval process, an external adviser is engaged to scrutinise the proposed Programme and to provide objective and independent assurance of the quality and standard of provision.

3.2 Key Issues Identified

- **Composition of PARCs and UPAC** – Though the Terms of Reference for the Schools' PARCs and the UPACs set out who is required to be members of the Committees, they do not make provision for the quorum required for the meeting to proceed (UPAC only) nor the protocol for selecting a substitute Chair if the designated Chair is unable to attend. Most of the PARC and UPAC meetings in our audit sample were not attended by the full complement of members and, on two occasions the designated Chair of the Stage 1 UPAC meeting was not present.

- **Completeness of Programme Approval Forms** – In the two instances in the sample which were approved using the piloted process, some of the information that was required to be included in the Stage 2 Programme Approval form submitted to UPAC was missing. However, it had not been made a condition of the UPAC approval that the missing information be completed.
## DETAILED RECOMMENDATIONS

### 4.1 Composition of PARCs and UPAC

#### Rationale

Though the Terms of Reference for the Schools’ Programme Approval and Review Committees (PARC) and the University Programme Approval Committees (UPAC) set out who is required to be members of the Committees, they do not make reference to:

- the quorum of members required to be present for the meeting to proceed (UPAC only); and
- a protocol for selecting a substitute Chair if the designated Chair is unable to attend.

PARCs, however, are sub-committees of Schools’ Boards of Studies. There are Standing Orders for Boards of Studies and their Sub-Committees which sets the quorum for a meeting at 50% of the members. In the case of an in-quorate meeting, the meeting may be reconvened on a reasonable period of notice of no less than a week.

Our review of the minutes of the PARC and UPAC meetings for the programmes in our audit sample confirmed the practical difficulty of arranging these meetings when all the required members can attend:

- In only two out of eight Stage 2 UPAC meetings was there a full composition of the committee present as set out in the UPAC Terms of Reference. In all other Stage 2 UPAC meetings either one or more of the School academic staff members, the Student Union Vice president or the representative from LEaD was not present.
- At one of the Stage 1 PARC (BA English), only three out of a maximum of eight members were present, making the meeting inquorate. The meeting was not reconvened for a later date.
- At two Stage 1 UPAC meetings, the Deputy President, who is the designated Chair of the meeting, was not able to attend.

There is a risk of an adequate level of scrutiny of the quality and strategic-fit of Programme Development proposals if the number of members attending PARC and UPAC meetings to review the proposals is either too few or does not represent sufficient different perspectives. This could lead to a diminished quality of programmes delivered by the University.

#### Recommendation

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<tr>
<th>Recommendation</th>
<th>Priority</th>
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<tr>
<td>The Terms of Reference for the Schools’ Programme Approval and Review Committees and the University Programme Approval Committees should be reviewed to ensure that:</td>
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<tr>
<td>a. state the quorum of members required to be present at meetings for the meeting to take place (UPAC only);</td>
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<td>b. require members who are unable to attend a meeting to submit their written comments on the proposal to the meeting (UPAC only); and</td>
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<tr>
<td>c. set out the protocol for appointing a substitute Chair if the designated Chair is unable to attend a meeting.</td>
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#### Management Response

*PARC: Student and Academic Services will work with the Governance Team on addressing point c – the protocol for appointing a substitute Chair.*
UPAC: UPAC is an advisory group to the Deputy President and Provost who has delegated authority from Senate, and it does not have formal decision-making powers within the academic governance structure. A quorum is therefore not formally required for the Deputy President and Provost to take decisions. Student and Academic Services will work with the Deputy President and Provost to document the operational arrangements for UPAC to address points a-c of the recommendation. This will be completed as part of the current review of the programme approval process.

<table>
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<tr>
<th>Target Date</th>
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<tbody>
<tr>
<td>June 2018</td>
<td>Academic Development &amp; Quality Officer, Assistant Registrar (Quality and Academic Development)</td>
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</table>
### Completeness of Programme Approval Forms

#### Rationale

Information required to be documented on Programme Approval Forms includes:

- the sign-off of the financial, space, library and information services resource requirements by the respective departments; and
- the names of the intended leaders of each of the Modules included in the Programme.

This information was present for all the Programmes included in the audit sample except for two instances:

- In the Stage 2 Programme Approval Form for the Cass UG Restructure Programme, the sign-off of the Library resource requirements was shown as “to follow”. The Head of Library Academic Services confirmed to us that the approval was given verbally once funds had been approved but no written confirmation was given.
- In the Stage 2 Programme Approval Form for the Cass PG Cert Legal Leadership Programme, the names of the intended module leaders were shown as “TBC”.

In neither case were the omissions noted by the UPAC nor was the completion of the outstanding information made a condition for UPAC approval.

Both Programmes had been approved through the piloted approval process which removed the involvement of a School PARC from each stage of the current approval process. It is possible that, had the Programme Approval Forms been scrutinised by a PARC, the omissions would have been noted and completion of the information prior to submitting the Form to UPAC made a condition of the PARC proposal. The continued involvement of the School PARC at Stage 2, as is being proposed, will re-instate the scrutiny they provide over the detail contained in the Programme Approval Form.

We understand, however, that it is often the case that the names of Module Leaders are not known at the time of preparing the Programme Approval Forms and that the completion of their names does not result in a condition of their approval by the PARC. The guidance on the Programme Approval (Stage 2) form template does not make it clear that this information is not an essential requirement for the Programme to be approved.

The absence of sign-offs of the resource requirements for proposed or amended Programmes could result in Programmes being approved, and students enrolling on them, for which there are insufficient resources and academic staff available.

<table>
<thead>
<tr>
<th>Recommendations</th>
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</tr>
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<tbody>
<tr>
<td>a. On all occasions that information or required sign-offs are missing from Programme Approval Forms, the PARC or UPAC should make it a condition of their approval that the missing information is completed and the sign-offs obtained.</td>
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</tr>
<tr>
<td>b. The guidance on the Programme Approval (Stage 2) form template should indicate that the names of the staff who are likely to be the Module Leader should be provided, if known.</td>
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#### Management Response

a. Student and Academic Services has implemented a checklist system to systematically identify any gaps in information and sign-offs for UPAC, which can then be reflected in approval conditions. This will also be provided to PARC Secretaries to support PARCs in undertaking equivalent checks at School level.
b. Student and Academic Services will include this in the updated guidance arising from the current review of programme approval.

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Assurance Definitions and Priority Levels

In order to assist management in using our reports:

a) We categorise our **opinions** according to our assessment of the controls in place and the level of compliance with these controls.

<table>
<thead>
<tr>
<th><strong>Full Assurance</strong></th>
<th>There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.</th>
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<tr>
<td><strong>Substantial Assurance</strong></td>
<td>While there is a basically sound system, there are weaknesses which put some of the system objectives at risk, and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.</td>
</tr>
<tr>
<td><strong>Limited Assurance</strong></td>
<td>Weaknesses in the system of controls are such as to put the system objectives at risk, and/or the level of non-compliance puts the system objectives at risk.</td>
</tr>
<tr>
<td><strong>No Assurance</strong></td>
<td>Control is generally weak, leaving the system open to significant error or abuse, and/or significant non-compliance with basic controls leaves the system open to error or abuse.</td>
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</table>

b) We categorise our **recommendations** according to their level of priority.

<table>
<thead>
<tr>
<th><strong>Priority 1</strong></th>
<th>Critical business risk not being adequately addressed; weaknesses in key business control; substantial non-conformance with regulations and accepted standards.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Priority 2</strong></td>
<td>Important business issues to be addressed; improvement area; inadequate risk identification or reduction; non-conformance with regulations.</td>
</tr>
<tr>
<td><strong>Priority 3</strong></td>
<td>Minor non-conformances with the business management system; other business issues to be addressed, good working practices.</td>
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</tbody>
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