

Academic Standards Committee – Friday 14 February 2014

QAA Consultation: Strengthening the quality assurance of UK transnational education

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1. Background

The QAA is currently undertaking a consultation exercise on future arrangements for TNE. The consultation – which opened on the 16 December 2013 and closes on the 10 March 2014 – has been set up to investigate what is needed to strengthen the quality assurance of TNE.

The higher education sector representative bodies have been asked by BIS to ‘give serious consideration to the assurance of the quality of TNE’, while QAA and the IU have been given the task of consulting the higher education sector on ‘what is needed to strengthen the quality assurance of TNE’ (HM Government Industrial Strategy: International Education: Global Growth and Prosperity, July 2013).

This strategy identified three key drivers for reviewing TNE quality assurance:

- ‘The growth in demand for TNE has made it even more important that the UK is able to maintain and demonstrate the quality of its education exports.’
- ‘The global growth in UK TNE provision, particularly different models of in-country delivery and the need to comply with local regulatory frameworks, presents increasing assurance complexity and risk.’
- Whilst (assurance of the quality of TNE) is the responsibility of each individual institution, failure to do so has the potential to impact negatively on every institution.’

2. Purpose of the paper

The University’s draft response to the QAA consultation is attached. This has been prepared by the Head of the Academic Collaborations Office in association with the VP (Internationalisation), VP (Learning & Teaching) and the Senate Office. The draft was considered by the Internationalisation Steering Group at its meeting on 4 February, which supported the proposed response.

The consultation document is available at:

www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/transnational-education-consultation.aspx

Each question asks for an indication of the extent of our agreement with a particular statement (Strongly Agree to Strongly Disagree). The proposed response is highlighted in **yellow**.

We are also invited to provide additional comments and these are shown in *italicised* text.

The Head of the Academic Collaborations Office will be attending a consultation briefing event in Glasgow on 22 February. The consultation will close on 10 March 2014.

Action Requested

ASC is invited to note and to contribute to the draft response.

QAA Consultation: Strengthening the quality assurance of UK transnational education

Consultation questions

Starting point

Question 1 (There is a 300 word limit.)

Given the current context, and looking ahead, do you agree that the quality assurance of UK TNE needs to be strengthened?

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

This is a bit of a sweeping statement. The current context and expansion of TNE do not in themselves provide justification for the strengthening of the quality assurance of TNE. We are not aware of any international perception of the quality of UK HE being doubtful or at risk. Yes, there have been one or two isolated cases but that does not mean that there is an issue or crisis across the whole sector. Internal quality assurance of UK TNE should operate very much in the same way as non TNE provision. In addition, Chapter B10 of the QAA Quality Code has only just come fully in to effect and institutions will have developed and further strengthened their internal quality assurance and enhancement processes to respond to it. Consequently, where is the evidence to support the case that the quality assurance of UK TNE needs to be strengthened?

Objectives and risk

Question 2 (There is a 500 word limit.)

Please indicate the extent of your agreement with the objectives identified for the quality assurance of UK TNE (paragraph 7).

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments, including whether you think there are any different objectives.

Question 3 (There is a 500 word limit.)

Please indicate the extent of your agreement with the risk outcomes identified for the quality assurance of UK TNE (paragraph 8).

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments, including whether you think there are any different risk outcomes.

We do not see that the visibility (or otherwise) of UK regulation is a realistic factor. If, as we argue below, external scrutiny of TNE is very largely normalised within ELIR, then that should provide sufficient badging. What builds confidence in the UK HE brand is the provision of good education, not the visibility of the QAA. The QAA can raise its profile in other ways without imposing an additional layer of quality assurance.

Student engagement

Question 4 (There is a 500 word limit.)

Please indicate the extent of your agreement with the following statement:

The quality assurance of UK TNE should include the UK approach to student engagement as far as practicable.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments, including views on priorities for different aspects of student engagement, given the practical difficulties in some countries.

There can be practical difficulties but, as paragraph 13 states, 'the quality assurance of UK TNE should include the UK approach to student engagement as far as practicable'. There should also be more emphasis on the enhancements that can arise from engaging students in QA processes.

The role of other QAA processes

Question 5 (There is a 300 word limit.)

Please indicate the extent of your agreement with the following statement:

The TNE process should be flexible in its application, so as to vary the intensity or frequency of scrutiny according to the perceived risk attached to specific TNE provision.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

Any TNE process should engage with existing review processes and the Concerns procedure 'so as to complement their stronger points' and to minimise the burden on institutions.

In devising a system that will be implemented across the UK, consideration needs to be given to the different approaches to institutional review in different parts of the UK. The ELIR process in Scotland has more of an enhancement-led approach.

The information base

Question 6 (There is a 500 word limit.)

Please indicate the extent of your agreement with the indicative minimum dataset that might need to be maintained by institutions for quality assurance planning purposes (Figure 4).

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

Please give your comments, especially regarding the practicalities of maintaining this dataset and whether any different items should be included.

Whilst agreeing with the above statement, as much of the data as possible should be collected through HESA. To capture the required data might necessitate a reconfiguration or revision of the existing HESA data set and offshore records.

There is no indication of the frequency that the dataset will be collected. If it is annual and HESA data is not used this could be a considerable, additional burden for institutions.

However, this needs thinking through. Given the expansion of TNE, should HESA categories be revisited? Are they still appropriate/ fit for purpose? For example, students may be registered at both institutions but only be located at one.

The 'Award Level' needs to take account of the SCQF in addition to the FHEQ

The note in parenthesis relating to distance learning requires further explanation – why would distance learning programmes be grouped by country?

The risk-based element

Question 7 (There is a 500 word limit.)

Please indicate the extent of your agreement with the following statement:

Risk-based analysis for the quality assurance of TNE should focus on how and where TNE activity is being undertaken, rather than mainly attaching risk to an institution.

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

Please give your comments, including any view on the indicative risk parameters (Figure 5).

However, an institution's track record cannot be ignored nor can its track record with TNE.

Whatever the model of external quality for TNE, it requires the application of some intelligence and should not be assessment resulting from running a computer-model.

However, if lack of a track record in TNE counted as a parameter for judging risk, it could be a disincentive to starting up in TNE if it meant that you could have an early external review of activity. This may not in itself be a bad thing but could stall development of TNE.

Specific comments on Figure 5

- The use of the term 'parameters' is confusing in this context
- It is not clear what is meant by 'Extent of relevant QAA publication activity'. If this mean Institutional Review reports then better to say so
- We believe that information on the 'Complexity of regulation in relevant country for UK overseas operation' should be compiled by the QAA and not by each institution. There is a role for the International Unit possibly through the much fan-fared HEGlobal Integrated Advisory Service to collate this information (or the QAA working with their international partners listed in Figure 2). Undertaking such a role would fulfill the following aim of the HEGlobal initiative 'amend current services, and develop new services, as required to meet the needs of UK HEIs'
- Information provided to QAA by institution – 'effectiveness' of monitoring arrangements and 'adequacy' of resourcing. These could be subjective. Other information to be provided is on the whole factual and quantitative.

Desk-based analysis

Question 8 (There is a 300 word limit.)

Do you agree that the review of some TNE provision could be completed solely through desk-based analysis if the provision were assessed as low risk?

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

Please give your comments.

However, desk based analysis might not pick up on the enhancement agenda – promoting 'high quality or innovative provision.

We note the use of 'some TNE provision' without qualification or clarification.

Review visits

Question 9 (There is a 300 word limit.)

Do you agree that the review of some TNE provision could be completed solely in the UK (that is, without visiting the provision overseas)?

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

Please give your comments.

Modern communications should allow the QAA or reviewers to do anything they need to from the main campus and developing procedures to do this should be the priority. Review panels do not or rarely travel to anything other than the main campus of an institution in the UK so why should they go to a campus in Singapore or China.

Our TNE provision is offered in partnership with an in-country university. As a Russell Group university, we are working with partners of equivalent standing within their country (eg in China, we are working with universities in the 985 group). Our TNE partners deliver 50% of the programmes and the joint programmes are based on the partner's campus. There is no consideration given in the consultation document. The proposal for in country visits could be seen as a very colonial approach and extremely damaging to our partnerships.

Reviewers and review teams

Question 10 (There is a 500 word limit.)

Please indicate the extent of your agreement with the following statements relating to the composition of review teams:

Greater use should be made of international reviewers and those with specialist expertise.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Teams should include a student reviewer (subject to the context in specific countries).

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

There should be a higher level of participation from QAA's counterpart organisations.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

The first statement on the use 'of international reviewers and those with specialist expertise' conflates two issues. We do not believe that there would be benefit in including an international reviewer per se but it would be appropriate to draw on those with specialist experience of TNE (rather than expertise in), which might include an international reviewer (eg from Australia.)

We believe that teams should include a student reviewer and without the caveat 'subject to the context in specific countries'. All reviewers, including a student reviewer, can be briefed on the context in specific countries but it should not be a reason for excluding a student reviewer.

Paragraph 39 - 'All will have received QAA's training for at least one of the institutional review processes, and they are selected for overseas reviews on the basis of expressions of interest, which include details of any particularly relevant expertise they are able to offer. ... There is no additional

training specific to overseas review'. We believe all reviewers should, as a minimum, receive some training on TNE.

It would seem sensible to draw on the in-country experience and knowledge of QAA's counterpart organisations and would be willing for them to participate as observers but not as full member of the review team.

Paragraph 39 - 'All will have received QAA's training for at least one of the institutional review processes, and they are selected for overseas reviews on the basis of expressions of interest, which include details of any particularly relevant expertise they are able to offer. ... There is no additional training specific to overseas review'.

Review outcomes

Question 11 (There is a 500 word limit.)

Please indicate the extent of your agreement with the following statement:

Review reports on TNE provision should contain some form of judgement (that is, they should not just make recommendations and highlight positive features).

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

Please give your comments, especially on whether any judgement should relate to the whole of an institution's TNE activity or be restricted in scope to some part of its activity.

The inclusion of a judgment or not will depend on the process and it is not entirely clear what is being proposed.

For the reasons given in paragraph 44, overseas review reports should continue to restrict themselves to making recommendations and highlighting positive features. They should not 'lead to a judgement concerning any individual institution's capacity for providing TNE'

At the individual institution level, reviewers might only be sampling TNE provision of one institution (if they have extensive provision in a number of countries) and be reviewing the entire provision of another (if it has limited TNE provision and only in one country). Is it feasible to reach a judgement on an equitable basis given this disproportion in activity?

The judgement options presented in paragraph 45 are too narrow. The judgment in the ELIR is an 'overarching judgement on the current and likely future effectiveness of the institution's arrangements for managing academic standards and enhancing the quality of the student learning experience'. Does the country in which the TNE provision is offered matter or is the institution's ability to manage TNE effectively more important (ie regardless of the country)?

Question 12 (There is a 500 word limit.)

Please indicate the extent of your agreement with the idea of introducing a 'badge' system in relation to the quality assurance of TNE.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

We cannot see how a 'badge' system could work given the challenges highlighted in relation to making judgements (see response to Question 11).

Review outputs

Question 13 (There is a 300 word limit.)

Please indicate the extent of your agreement with the proposed range of outputs from the TNE quality assurance process (paragraphs 47-48).

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments, including whether you think the range of outputs should be different.

The value of an annual report is difficult to gauge at this time. Will there be a sufficient level of activity to warrant an annual report?

Links with institutional review

Question 14 (There is a 500 word limit.)

Please indicate the extent of your agreement with the idea of having institutional review processes focus more explicitly on TNE (paragraphs 50-51).

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

One of the key requirements of collaborative work is that students have an equivalent experience regardless of format or location. If TNE review is not normalised within Institutional Review processes, but is carried out by a different method and people, the equivalence of the student experience is much harder to assess. So, institutional reviews should address TNE but not as a separate entity but as a normal part of institutional provision; In addition, TNE provision should not be more explicit but proportional to overall provision. This may require some operational changes to the

reviews, such as additional time; an additional reviewer, more sophisticated methods for engaging with staff and students undertaking TNE, etc. This level of time/effort/engagement would not be required at institutions with much lower levels of TNE.

Question 15 (There is a 300 word limit.)

Please indicate the extent of your agreement with the proposition that overseas branch campus operations should have their own institutional review, separate from that of the responsible institution in the UK.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments.

We do not think there should be separate reviews for branch campuses - institutional reviews judge 'the effectiveness of the University's management of academic standards, and of the assurance and enhancement of the student learning experience, both currently and in the future'. Branch campuses (whether in the UK or overseas) will be an extension of practices and procedures at the home campus (with some localisation as required).

Funding principles

Question 16 (There is a 500 word limit.)

Please indicate the extent of your agreement with the following statements relating to the funding principles for strengthening the quality assurance of TNE (paragraph 55).

Every institution should make a base-level contribution.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Institutions with TNE provision should make a proportionate contribution.

STRONGLY AGREE
AGREE
NEITHER AGREE NOR DISAGREE
DISAGREE
STRONGLY DISAGREE

Please give your comments, including any alternative suggestions for possible funding mechanisms.

If the review TNE provision is done as part of the institutional review process, the costs should not be different from current levels in terms of distribution across institutions. However, if overall costs were to increase as a result reviewing TNE provision then institutions with large TNE activity should incur more costs in supporting the review process.

Question 17 (There is a 500 word limit.)

Please provide any other comments on strengthening the quality assurance of TNE.