



Quality Assurance of Cross-border Higher Education Project

UK Country Report

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Introduction

Overview

1.1 This report deals with UK cross-border higher education (CBHE), also called transnational education or TNE,¹ and has been prepared by the UK Quality Assurance Agency for Higher Education (QAA), the independent body entrusted with monitoring, and advising on, standards and quality in UK higher education.²

1.2 The report is divided into the following five chapters:

- Chapter 1: UK cross-border higher education
- Chapter 2: The national regulatory context
- Chapter 3: Criteria and guidelines for the quality assurance of cross-border higher education
- Chapter 4: Main obstacles and challenges for cross-border higher education and its quality assurance
- Chapter 5: Examples of good practice.

1.3 Chapter 1 provides an overview of UK higher education provision overseas, its place within UK higher education, its main providers, its different forms and main countries of delivery. CBHE is an integral and expanding part of UK higher education provision, and the growth in demand for it is predicted to continue. The number of students engaged in UK CBHE now exceeds the number of international students in the UK, and in terms of student numbers CBHE is one of the principal areas of growth for UK higher education. CBHE now plays an integral part in the internationalisation strategies of most UK providers, and in government policies.

1.4 The UK government recognises the importance of CBHE to the export economy. In July 2013, as part of a broader UK Government industrial strategy, the Department for Business, Innovation and Skills (BIS) published a strategy for international education setting out a number of priority areas of work that capitalise on the UK's reputation for quality.³ One of these priority areas is to make it possible for international students 'to access a wide choice of UK education in their own countries, and do so with confidence that they are getting a quality product and a recognised qualification.' The BIS international education strategy is dealt with in more detail in Chapter 2, which provides an overview of the national regulatory and strategic context for CBHE and its quality assurance.

1.5 Chapter 3 covers the current approach taken by QAA to the external quality assurance of CBHE. In addition, through the use of case studies, this chapter looks at the approaches taken by two different professional, statutory and regulatory bodies (PSRBs). PSRBs set the standards for and regulate the entry into particular professions, and are authorised to accredit, approve or recognise programmes leading to professional qualifications for which they may have a statutory or regulatory responsibility.

1.6 Following a public consultation with the UK higher education sector on strengthening the quality assurance of CBHE, QAA is currently working with representatives from the sector to implement a new methodology for quality assuring CBHE. This work is

¹ In the UK 'cross-border higher education' is more commonly referred to as 'transnational education' (TNE). This is the expression used most recently by government and QAA's own policy documents. When quoting from these documents reference to TNE will be maintained throughout this report, and should be intended as referring to CBHE.

² Further information available at: www.qaa.ac.uk.

³ *International education strategy: global growth and prosperity* (BIS, 2013), available at: www.gov.uk/government/publications/international-education-strategy-global-growth-and-prosperity.

based on the action plan resulting from the consultation analysis.⁴ The consultation process was jointly managed by QAA and the UK Higher Education International Unit, a sector body that initiates and carries out projects and activities to support and develop UK universities' international activities.⁵ An account of the key issues addressed in the consultation is given in Chapter 4, which looks at the main challenges for CBHE and its quality assurance.

1.7 Chapter 5 (which concludes the report) outlines examples of good practice that QAA has identified in relation to the quality assurance of CBHE. These are based on QAA's own experience and on interviews with higher education providers and other relevant organisations undertaken specifically for this report.

Methodology used to produce the report

1.8 This report draws primarily on policy documents, legislation, and other publicly available information. The latter includes data on UK CBHE published by the Higher Education Statistics Agency and a wide range of information pertaining to the main players involved in assuring the quality of UK CBHE. Documentary sources have been supplemented by interviews with seven key stakeholders (four higher education providers, two PSRBs, and a representative sector body) with the aim of identifying both challenges and examples of good practice in relation to the provision and quality assurance of CBHE.

1.9 For the purpose of the interviews, the providers (Ashridge Business School, the University of Hertfordshire, Middlesex University, and the University of Strathclyde) were selected to reflect the public and private sectors, and different types of CBHE provision in different regions of the world. The individuals interviewed were chosen because they held senior positions in their institutions with responsibility for quality assurance of CBHE, taking into account additional relevant experience. For instance, one had experience of CBHE as a QAA reviewer, some had direct experience of their institution's review by QAA in the context of CBHE, and some had contributed to the development of reference points or guidance documents relating to CBHE as members of QAA advisory groups.

1.10 The PSRBs selected were the General Pharmaceutical Council (GPhC) and the Institution of Engineering and Technology (IET), both of which have experience of accreditation of CBHE programmes. While both act as regulators of their respective professions, the GPhC is a statutory body since regulation of the pharmacy profession is a legal requirement in the UK. Again, the profile of the interviewees was considered, taking into account, for instance, their experience of working with other PSRBs, or with QAA, or their participation in sector-wide debates about the quality assurance of CBHE. An interview was also conducted with the Higher Education Academy (HEA), which is a national body concerned with enhancing the quality of learning and teaching. On behalf of the sector, the HEA manages the UK Professional Standards Framework for teaching and supporting learning in higher education.⁶

1.11 Chapters 1-3 are based mainly on publicly available information, while chapters 4 and 5 draw mainly on QAA's own experience and the interviews. The interviews with the PSRBs and the HEA have also been used to prepare summaries of their work in relation to CBHE; these are presented in Chapter 3.

⁴ *Strengthening the quality assurance of UK transnational education* (QAA, 2013) available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2804. The final report, *Strengthening the quality assurance of UK transnational education - consultation report* (QAA, 2014), is available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2739.

⁵ Further information available at: www.international.ac.uk.

⁶ *UK Professional Standards Framework* (UKPSF) (HEA, 2011), available at: www.heacademy.ac.uk/professional-recognition/uk-professional-standards-framework-ukpsf.

Chapter 1: UK cross-border higher education

The landscape of UK cross-border higher education

2.1 In the UK official data about exported CBHE is collected by the Higher Education Statistics Agency (HESA), the national agency for the collection, analysis and publication of quantitative data about higher education.⁷ One of the HESA data collection streams is the Aggregate Offshore Record which reports annually the number of students studying for UK qualifications overseas by institution, country of study, level of study, and type of arrangement. However, reporting is limited to publicly funded higher education providers that are recognised by government as legally entitled to award degrees (see Chapter 2). Private providers with degree awarding powers are not covered by the Aggregate Offshore Record.⁸

2.2 The latest HESA data,⁹ referring to the academic year 2012-13, reveal that there were 598,925 students studying for a UK award outside of the UK, compared to 571,010 in 2011-12, an increase of five per cent. The total number of students studying for a UK award in the UK stood at 2,340,275 in 2012-13, a decrease of six per cent from 2011-12. In comparison the number of international students studying at UK higher education providers in the UK was 425,260 in 2012-13, a decrease of two per cent from the previous year. Of those students studying on UK CBHE in 2012-13, 13 per cent were studying within the EU and 87 per cent were studying outside the EU (the same percentages as in 2011-12). The vast majority (80 per cent) study at undergraduate level.

2.3 The time series from 2008-9 (see Figure 1), when HESA began collecting the Aggregate Offshore Record, shows a 54 per cent increase of students studying on UK CBHE programmes over this period, against the backdrop of a roughly constant number of students studying for UK awards in the UK, and a 15 per cent increase of international students studying in the UK.¹⁰ However, HESA advises that this increase of UK CBHE should be interpreted with caution, since in 2011-12, after a clarification in the coverage of the Aggregate Offshore Record, several institutions started returning previously unreported students. The clarification regarded specifically those students registered with an overseas partner for an award validated by the UK institution (see Type 4 on page 5).¹¹

⁷ All publicly funded degree-awarding bodies are required to report to HESA. A small number of private degree-awarding bodies also do so on a voluntary basis.

⁸ The full set of data collected by HESA is not publicly available; however, bespoke data sets can be purchased. QAA purchases the Aggregate Offshore Record for internal quality assurance planning purposes. The HESA data provided in this chapter refer to data publicly made available by HESA, or that HESA has agreed to share for the purpose of the Quality Assurance of Cross-Border Higher Education Project.

⁹ HESA latest online statistics, available at: www.hesa.ac.uk/free-statistics.

¹⁰ Over this period, the number of students studying on UK CBHE within the EU has increased by 15 per cent (from 66,815 to 77,240), while the number of students studying on UK CBHE outside the EU has increased by 62 per cent (from 321,325 to 521,685).

¹¹ Statistical First Release 197 - Student Enrolments and Qualifications (HESA), available at: www.hesa.ac.uk/sfr197.

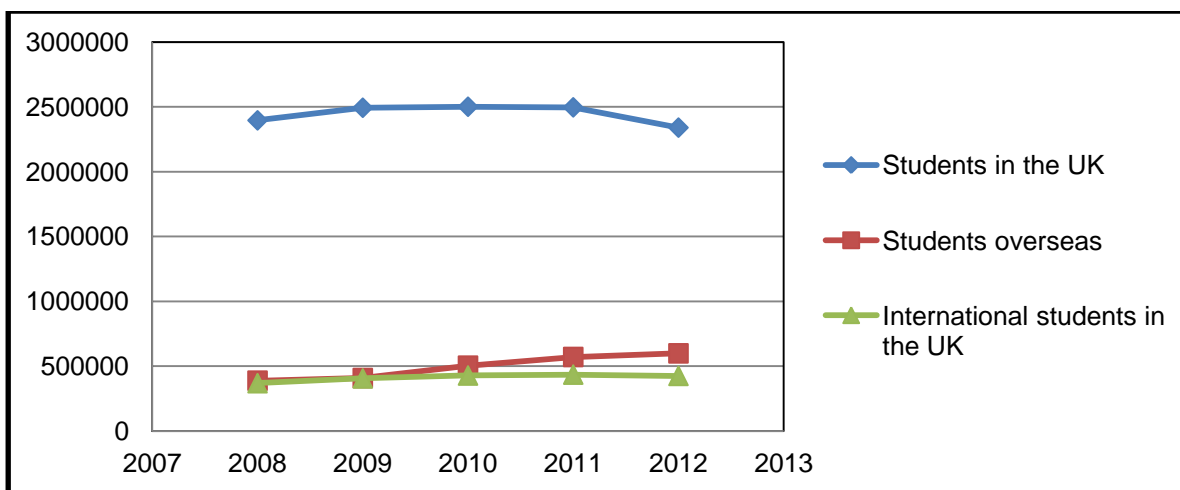


Figure 1: Growth of UK CBHE

Main types of UK cross-border provision

2.4 HESA collects and reports enrolment data in UK CBHE according to four main types of arrangement, listed in Table 1.

Type 1	Registered at UK institution - studying overseas for UK higher education institution award at overseas campus of UK institution
Type 2	Registered at UK institution - studying overseas for UK higher education institution award other than at an overseas campus of UK institution
Type 3	Registered at UK institution - distance, flexible and distributed learning for UK higher education institution award where the location of the student is known to be overseas
Type 4	Registered at overseas partner organisation - studying overseas for an award of the UK institution

2.5 Type 1 indicates students are studying at an overseas branch campus. In 2012-13 there were 17,525 students registered in this category. Examples of providers whose branch campuses have recently been reviewed by QAA are the University of Nottingham in China (2012), and Heriot-Watt University and Middlesex University in Dubai (2013).¹²

2.6 Type 2 indicates students are registered directly with a UK provider and are studying at an overseas partner institution. Traditionally Type 2 was associated with franchising although it is now more broadly used to include jointly delivered programmes. In 2012-13 there were 103,795 students registered in this category. The University of Greenwich and Staffordshire University, with their range of partnership agreements in several countries, are two of the main providers.¹³

2.7 Type 3 indicates students are studying by distance learning. In 2012-13 there were 123,635 students registered in this category, which includes for example the University of London's international programmes, the Open University and the University of Liverpool's online programmes.

¹² QAA Review of Overseas Provision, available at: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/review-of-overseas-provision.

¹³ University of Greenwich 2012 Collaborative Register (January 2013), available at: www2.gre.ac.uk/_data/assets/pdf_file/0004/802984/Collaborative-Register-for-Web-May-2013.pdf and Staffordshire University International Partnerships, available at: www.staffs.ac.uk/partnerships/international.

2.8 Type 4 indicates students are studying for the award of a UK provider and are registered with a partner institution, thereby distinguishing them from Type 2 above. Validation arrangements are classified as Type 4. In 2012-13 there were around 353,375 students registered in this category, with the numbers dominated by Oxford Brookes University through its partnership with the Association of Chartered Certified Accountants (ACCA) (see Information box 1). The Open University and the University of Wales also deliver a large amount of CBHE of this type.

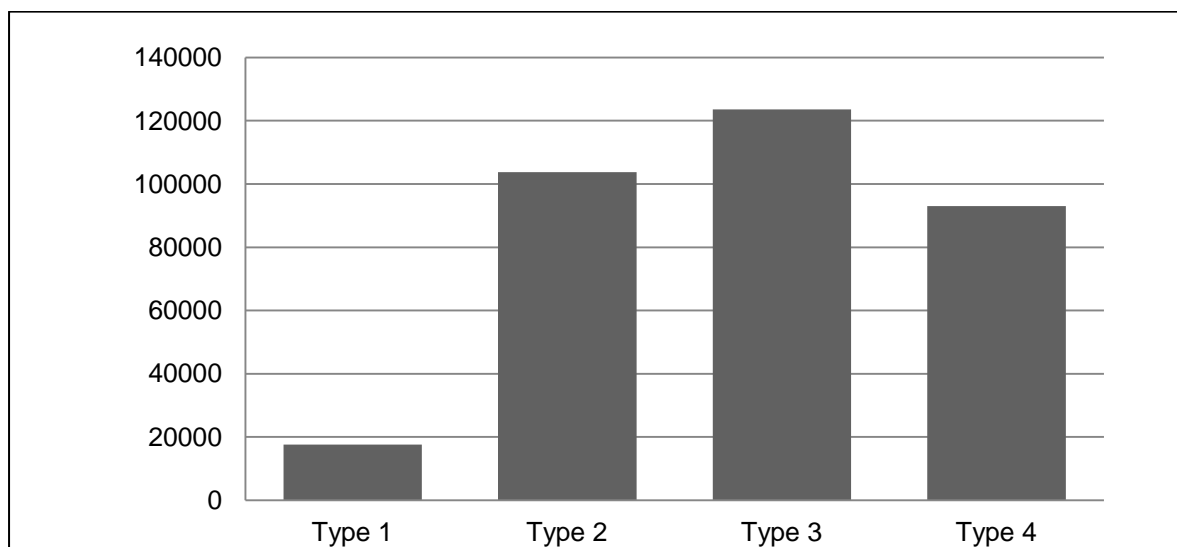


Figure 2: Students number by type (without Oxford Brookes).

2.9 Figure 2 illustrates the mix of CBHE being delivered by UK degree-awarding bodies. Branch campuses, while often having the highest profile in public debates about cross-border provision, only makes up a small part of UK CBHE. Partnerships and distance learning account for far greater numbers of students (even with the exclusion the Oxford Brookes/ACCA arrangement).

University of London
The Open University
Heriot-Watt University
The University of Liverpool
The University of Greenwich
The University of Wales ¹⁴
Staffordshire University
Coventry University
The University of Nottingham

Main providers of UK cross-border provision

2.10 Approximately 75 per cent of the 168 UK degree-awarding bodies deliver some form of CBHE, including providers from all four countries of the UK. The top 10 providers (see Table 2) account for 75 per cent of all students studying for UK awards overseas.

¹⁴ In October 2011 the governing bodies of the University of Wales, Swansea Metropolitan University and the University of Wales: Trinity Saint David made a commitment to merge under the Charter of the University of Wales: Trinity Saint David. The University of Wales consequently resolved to exit from all of the existing collaborative partnerships based on its validation model. The University will permit existing students at all stages of their studies to continue until completion of their current programme.

It should also be noted that 43.7 per cent of the total number of UK CBHE students are registered on a single global programme, jointly developed through a partnership between Oxford Brookes University and ACCA (see Information box 1).

2.11 From Table 2, it is also possible to gain an impression of the diversity of UK CBHE. The top 10 providers include universities that focus on different types of arrangement: branch campus (The University of Nottingham); partnerships (Coventry University, Staffordshire University, The University of Greenwich and The University of Wales); and distance learning (University of London and The Open University). Heriot-Watt University and The University of Liverpool have significant operations involving more than one type of arrangement.

Oxford Brookes University and the Association of Chartered Certified Accountants

Oxford Brookes University, in partnership with ACCA, offers a BSc (Hons) Applied Accounting by distance learning through its Faculty of Business. According to this strategic arrangement students who are registered for a qualification of the ACCA are automatically registered with Oxford Brookes for its bachelor's degree, unless they choose to opt out at the time of initial registration. In 2012 there were approximately 260,000 registered students on this programme worldwide. Upon successful completion of the ACCA qualification, which is developed by ACCA and assessed jointly by ACCA and Oxford Brookes, students can obtain the Oxford Brookes' degree by passing a research project designed and assessed solely by Oxford Brookes. Students have 10 years to complete the project after having obtained the ACCA qualification. The Oxford Brookes partnership with ACCA was the subject of a case study as part of the QAA review of UK CBHE in China in 2012.¹⁵

Information box 1.

Main receiving countries of UK cross-border provision

Table 3: Top 10 countries for UKBHE (in terms of student numbers 2012-13)

Malaysia
Singapore
People's Republic of China
Pakistan
Hong Kong (special administrative region of China)
Nigeria
Ghana
United Arab Emirates
Republic of Ireland
Trinidad and Tobago

2.12 UK CBHE is delivered in a large number of countries spread across every continent. The top 10 countries in terms of student numbers, listed in Table 3, account for 45 per cent of the total UK CBHE provision. Almost half of all CBHE students are based in Asia, with Malaysia and Singapore accounting for almost 20 per cent of the total.

2.13 Some of the top 10 countries are popular locations for CBHE globally, such as China and the growing higher education hubs of Malaysia, Singapore, Hong Kong, and the

¹⁵ *Review of transnational education in Mainland China 2012* (QAA, 2013), available at: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/review-of-overseas-provision/review-of-transnational-education-in-mainland-china-2012.

United Arab Emirates (UAE). The popularity of other countries, including Ireland, Ghana, Nigeria, Pakistan and Trinidad and Tobago is more due to their historical links with the UK.

2.14 Although HESA Type 4 (which covers the Oxford Brookes/ACCA arrangement) accounts for the majority of CBHE student numbers in most of the top 10 countries, different types of CBHE provision are dominant in different countries. This can often be attributed to different host countries' regulatory contexts and strategic approaches to imported provision.

The importance of the local context

2.15 The predominance of different types of cross-border provision in different host countries can be attributed to different regulatory contexts and rationale for importing foreign provision. For instance, the UAE perceives CBHE primarily as a way to develop the skilled work force needed to support a knowledge-based economy, and to create a higher education hub based on the attraction of quality foreign providers. China's main priority in importing foreign provision is instead to improve and modernise its education system and build local academic capacity through knowledge transfer from foreign partners.

2.16 These two different perspectives, outlined in a recent British Council study on the impact of CBHE on host countries¹⁶ as well as in the two most recent QAA reviews of UK CBHE in China and the UAE,¹⁷ contribute to explain why the branch campus is the dominant model of foreign provision in the UAE and collaborative partnerships the dominant model in China. To encourage knowledge transfer China's regulations for establishing foreign provision in the country include the requirement for foreign providers to partner with local institutions. The UAE instead aims to achieve its ambitions through facilitating the provision of foreign education that is as close as possible to that offered at providers' home campus, thereby discouraging collaborative partnerships in favour of branch campuses.

2.17 A further example is provided by Trinidad and Tobago, the focus of QAA's review of CBHE provision in 2014-15. Distance and blended learning is seen as an integral part of the country's strategy for human resource development and widening participation in further and higher education, and it indeed represents a significant proportion of total UK CBHE provision in Trinidad and Tobago.¹⁸

¹⁶ *The Shape of Things to Come 2* (British Council 2013), available at:

www.britishcouncil.org/education/ihe/knowledge-centre/transnational-education/the-shape-of-things-to-come-2.

¹⁷ Further information available at: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/review-of-overseas-provision.

¹⁸ *Policy on Tertiary Education, Technical Vocational Education and Training and Lifelong Learning* (Ministry of Science Technology And Tertiary Education, 2010), available at: www.stte.gov.tt/MediaCentre/Publications.aspx.

Chapter 2: The national regulatory context

The national framework

3.1 In the UK higher education policy is determined by each of the four nations of England, Northern Ireland, Scotland, and Wales. In the context of this devolved system, there is no general legislation governing higher education. However, the power to award UK degrees is regulated by law. Only those institutions that have been granted degree awarding powers by either a Royal Charter, Act of Parliament, or by the Privy Council (a formal body of advisers to the Queen) are recognised by the UK national authorities as legally authorised to award higher education degrees.¹⁹ Higher education providers with the power to award UK degrees are known as Recognised Bodies, and a full list is published by the Department of Business, Innovation and Skills (BIS), the government department with responsibility for higher education.²⁰

3.2 Degree-awarding bodies are officially recognised but not owned by the state. Even though most receive public funding from the respective funding bodies for England, Wales, Scotland and Northern Ireland, they are autonomous and self-governing institutions. Once granted degree awarding powers they are free to award their own degrees and qualifications, and they are also free to deliver their programmes outside of the UK. In particular, degree-awarding bodies wishing to engage in CBHE do not have to seek prior approval from UK authorities to operate outside the UK, and qualifications and degrees awarded to students studying on CBHE programmes are recognised in the UK as being equivalent to those awarded for programmes delivered in the UK. Note that this is not necessarily the case for professional accreditation purposes (see paragraphs 3.8 and 3.9).

3.3 The autonomy of degree-awarding bodies also means that they retain the ultimate responsibility for the academic standards and quality of the degrees and qualifications they award. This responsibility extends to all provision, regardless of where or how it is delivered. The national funding councils have statutory obligation to ensure that the higher education they fund is of good quality.²¹ They meet this obligation by contracting QAA to review and report on how effectively higher education providers fulfil their individual responsibilities for standards and quality.

The Quality Assurance Agency for Higher Education

3.4 QAA was established in 1997 to provide a single quality assurance service for UK higher education. It has a UK-wide remit that covers England, Scotland, Wales and Northern Ireland. QAA is an independent organisation and a registered charity. It is funded by subscriptions from higher education providers and by contracts with the higher education funding councils.

3.5 QAA's mission is to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world.²² To achieve its mission it works together with the higher education sector to develop reference points and guidance which

¹⁹ Degree-awarding powers and criteria for university title (BIS) available at: www.gov.uk/recognised-uk-degrees#degree-awarding-powers-and-criteria-for-university-title.

²⁰ There are around 160 providers in the UK that are permitted to award degrees and are recognised by the UK national authorities. All universities and some higher education colleges are Recognised Bodies; a list of Recognised Bodies is available at: www.gov.uk/check-a-university-is-officially-recognised/overview.

²¹ *Further and Higher Education Act 1992*, available at: www.legislation.gov.uk/ukpga/1992/13/contents and *Further and Higher Education (Scotland) Act 1992*, available at: www.legislation.gov.uk/ukpga/1992/37/contents.

²² *QAA Strategy 2014-17*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2788.

are used by all UK higher education providers; it undertakes reviews of higher education providers to check to whether they meet the UK expectations set out in those reference points; and it publishes reports detailing the findings of those reviews.

3.6 QAA's review activity extends beyond publicly funded providers to private providers, including those wishing to recruit international students needing a visa to enter the UK. It also covers UK higher education provision overseas. Students studying on UK CBHE programmes are not publicly subsidised and UK providers are not allowed to use public funding to finance their CBHE provision. However, QAA has reviewed UK overseas provision since its inception. Chapter 3 provides a description of QAA's current approach to CBHE, while Chapter 4 outlines the outcomes of a recent consultation with the sector which will inform QAA's future approach to quality assuring CBHE.

3.7 QAA does not undertake programme accreditation. In the UK higher education programmes are not externally accredited, except in some cases for professional licensing purposes. Professional accreditation is the remit of the relevant professional, statutory and regulatory bodies (PSRBs), such as the General Medical Council for doctors and the Engineering Council for engineers.

Professional, statutory and regulatory bodies

3.8 The cross-border provision of UK higher education providers may also come under the purview of PSRBs. PSRBs represent a very diverse group of bodies, including a large number of professional bodies, regulators and those with statutory authority over a profession or group of professionals. PSRBs may provide membership services, hold registers of professionals, and undertake accreditation, validation, and recognition of programmes.²³ For certain professions accreditation may be a legal requirement, allowing graduates to practise as a professional in their field; while for other professions it may be a voluntary exercise aimed at demonstrating the relevance of specific programmes to business and industrial needs and professional standards.²⁴ Where degree-awarding bodies choose to offer programmes which fulfil the requirements of a PSRB, the relevant PSRB will influence the design of academic programmes, and may even be involved in the approval, monitoring and review of programmes. However, the responsibility for the academic standards remains with the degree-awarding body which is awarding the academic qualification.²⁵

3.9 Some PSRBs accredit or recognise higher education programmes overseas, including UK CBHE, allowing professional recognition or registration for individuals to practise in the UK. Others make separate arrangements for non-UK graduates who wish to practise in the UK, including signing international mutual recognition agreements.²⁶ Some PSRBs are required to comply with relevant European legislation on the mutual recognition of professional qualifications.²⁷ Not all PSRBs accredit CBHE programmes, and those who do adopt different approaches. Typically, however, in order to be able to deliver a PSRB accredited programme overseas UK providers must seek prior approval from the relevant

²³ *Explanatory statement on PSRBs in HE* (Higher Education Better Regulation Group, 2011), available at: [www.hebetterregulation.ac.uk/OURWORK/Pages/Professional,StatutoryandregulatoryBodies\(PSRBs\).aspx](http://www.hebetterregulation.ac.uk/OURWORK/Pages/Professional,StatutoryandregulatoryBodies(PSRBs).aspx).

²⁴ For instance, accreditation from the General Medical Council or the General Pharmaceutical Council is a statutory requirement for programmes in medicine and pharmacy respectively, while accreditation from the Engineering Council or the British Psychological Society is not required by law but provides a mark of assurance that a programme meets the standards set by the engineering or psychology profession.

²⁵ *The UK Quality Code for Higher Education, Part A: Setting and maintaining academic standards*, available at: www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/quality-code-part-a.

²⁶ See the international accords coordinated by the International Engineering Alliance, such as the Washington Accord, available at www.ieagreements.org.

²⁷ In particular the *EC Directive (2005/36/EC)* on the recognition of professional qualifications, available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2005L0036:20110324:EN:PDF>.

accrediting PSRB. Chapter 3 offers an overview of the approach to accrediting programmes delivered overseas adopted by two UK PSRBs.

The UK Government's new international education strategy

3.10 As illustrated in Chapter 1, CBHE is a growth area for UK higher education providers, which is expected to continue. This is reflected in their internationalisation strategies. Many more providers are looking to complement strategies for international student recruitment to the UK with strategies for programme and institutional mobility so as to reach international students in their own home country, or nearby region.²⁸

3.11 The importance of CBHE has been recognised in the Government strategy, *International Education: Global Growth and Prosperity*, published by BIS in July 2013.²⁹ This sets out a number of priority areas of work to capitalise on the UK reputation for quality education in the context of the increasing globalisation of education. It places emphasis on both supporting the UK sector's effort to attract more international students to the UK and supporting the development of UK cross-border provision, including through strengthening its quality assurance. One of the strategy's priority areas is to make it possible for international students 'to access a wide choice of UK education in their own countries, and do so with confidence that they are getting a quality product and a recognised qualification.'

3.12 Specifically, the strategy acknowledges that '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', which makes it 'even more important that the UK is able to maintain and demonstrate the quality of its education exports.' Recognising that the failure of individual providers to fulfil their responsibility for the quality and standards of their overseas provision has the potential to impact on the reputation of UK higher education as a whole, BIS asked the higher education sector representative bodies 'to give serious consideration to the assurance of the quality of TNE.' As a first step, QAA and the UK Higher Education International Unit³⁰ were asked to consult the sector on what is needed to strengthen the quality assurance of CBHE, proposing 'possible models and mechanisms to demonstrate the commitment of individual UK TNE providers to high quality provision and the protection of the UK sector's high reputation.'

3.13 QAA and the UK Higher Education International Unit consulted with the sector during winter 2013-14 and the consultation report was published in May 2014.³¹ Analysis of the consultation results has helped to shape plans for the methodology to be adopted for the quality assurance of UK CBHE. Specific plans are now being developed by an Implementation Group with representation from higher education providers across the four nations and from other interested parties. These plans will be based on a number of fixed principles which have been distilled from the consultation. An account of the key issues

²⁸ See *A Guide to UK higher education and partnerships for overseas universities* (UK Higher Education International Unit 2013), available at: www.international.ac.uk/media/2346832/guide-to-uk-he-and-partnerships_web_final.pdf. See also *Horizon Scanning: what will higher education look like in 2020?* (UK Higher Education International Unit 2013), available at:

www.international.ac.uk/media/2423997/horizonscanningreportfinalprint.pdf.

²⁹ *International education strategy: global growth and prosperity* (BIS, 2013), available at:

www.gov.uk/government/publications/international-education-strategy-global-growth-and-prosperity.

³⁰ The International Unit is the central observatory and intelligence unit on higher education internationalisation and policy developments for UK higher education institutions. It is funded by Universities UK and Guild HE (the two representative bodies for higher education in the UK), the national funding councils for England, Wales and Scotland, the Northern Ireland Department for Employment and Learning, as well as the Higher Education Academy and QAA.

³¹ www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2739.

addressed by the consultation and its outcomes is provided in Chapter 4, which focuses on the quality assurance challenges associated with the growth of UK CBHE.

Funding implications

3.14 In the UK there is no public funding for the provision of CBHE and higher education providers cannot use public funding for the operation of CBHE. There is also no cap on the fees that can be charged to CBHE students (unlike the position for UK and other European students), and students cannot access loans through the Student Loans Company.

3.15 As mentioned previously, QAA's remit includes UK CBHE provision. QAA's core activity is funded from two principal sources: subscriptions paid by individual higher education providers and contracts with the higher education funding councils or government departments. Both sources have contributed to the funding of overseas reviews. To date, overseas review activity has, on average, comprised one overseas visit per year, covering a range of provision in the destination country or region (see Chapter 3, paragraphs 4.1-4.2).

3.16 Any strengthening of the quality assurance of UK CBHE will have resource implications and consequent funding implications. The recent consultation explored the degree of support for two propositions that were not mutually exclusive: that every higher education provider should make a base-level contribution and that those with CBHE provision should make a proportionate contribution. No clear consensus emerged from the consultation responses received, with arguments advanced in favour of and against both propositions, and with a two-part tariff mechanism also a possibility. Following the consultation QAA will now draw up a funding proposal for the quality assurance of CBHE based on a clear estimate of its likely cost (see also Chapter 4, paragraph 5.9).

Inbound cross-border higher education

3.17 It is an offence in the UK for any organisation to offer a qualification which could be taken to be that of a UK higher education provider, without having been recognised either as a degree-awarding body by the UK authorities, or as entitled to provide programmes leading to the awards of a UK degree-awarding body.³² However, it is not an offence for overseas organisations to offer their own awards in the UK, as long as they make it clear that they are not UK qualifications and that accreditation or quality assurance is from overseas.

3.18 Foreign higher education providers wishing to operate in the UK must notify BIS, and have to comply with relevant legislation. In addition, if they wish to recruit students from outside the European Economic Area they must undergo successful review by QAA as a necessary requirement to obtain the licence from the UK Home Office to sponsor students needing a visa.³³ For all other purposes, foreign higher education providers operating in the UK are subject to their own country's quality assurance and/or accreditation requirements.

³² In the UK, institutions that do not have the power to award their own degrees may provide full courses which lead to a degree of a recognised body. These are known as 'listed bodies'. BIS maintains a database of all UK listed bodies, available at: www.gov.uk/recognised-uk-degrees#listed-bodies.

³³ Further information available at: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/educational-oversight.

Chapter 3: Criteria and guidelines for the quality assurance of cross-border higher education

QAA's approach to cross-border higher education

4.1 QAA's institutional review processes look at the complete range of a provider's higher education provision, and therefore also cover CBHE.³⁴ However, this area of activity is not the main focus of institutional reviews, where scrutiny is limited to the documentation of policies and procedures in place for establishing and managing CBHE. In order to look at how these policies and procedures are implemented by providers, and also to gain a better understanding of the experience of students studying on CBHE programmes, QAA supplements institutional reviews by carrying out dedicated reviews of CBHE involving visits to overseas delivery sites of UK providers. Given the volume of UK CBHE activity, in terms of the number of providers involved, the geographical spread of activity and the variety of types of arrangements, visiting each provider's overseas provision as part of its own institutional review would be a costly exercise. In order to mitigate costs QAA currently conducts review of UK overseas provision on a country-by-country basis, reviewing different providers' provision in a single country (or geographical area) during the same overseas trip.

4.2 Each year a country with significant UK CBHE provision is selected and a number of delivery sites are identified for review to be representative of activity in the destination country. For example, over the past five years QAA has reviewed UK provision in India (2009-10), Malaysia (2010-11), Singapore (2011-12), China (2012-13), and the UAE (2013-14), and a review of provision in the Caribbean (2014-15) is currently under way. QAA's approach to CBHE review is tailored to the country in which provision is located and the type of provision being covered. Therefore the review of CBHE in China was predominantly a review of collaborative partnerships, the UAE review focused on branch campus provision, and the review in the Caribbean will focus on distance learning approaches. However, every CBHE review typically follows four key stages.

4.3 The first stage is an analysis of available data on UK CBHE in the selected country for review, starting from the HESA Aggregate Offshore Record (see Chapter 1) and including any available data from the host country. These data may be supplemented by surveying UK higher education providers to gain a more detailed understanding of their activity in the country selected for review. HESA data helps identify large-scale providers by broad type of arrangement, but does not give a breakdown of student numbers at particular partner institutions, or on particular programmes at a branch campus or partner institution. It is this level of detail that is needed to select a significant sample of provision for review, and that is collected by QAA in preparation for each round of CBHE review.

4.4 Initial data analysis is followed by detailed desk-based analysis of standard information sets obtained from each UK provider selected for review. These are comprised of existing documentation, such as policy documents, internal reports, programme information, and minutes of meetings. Providers are not required to produce a detailed self-evaluation document along the lines of that requested for institutional review. The information sets should help review teams obtain a clear view of each provider's strategies and policies for the establishment and quality assurance of their CBHE provision and how these are implemented for the specific overseas activity under review. The principal reference point used in desk-based analysis is *Chapter B10: Managing higher education*

³⁴ Higher Education Review is the review method for higher education institutions in England and Northern Ireland from 2013-14; Higher Education Review: Wales is the review method for providers of higher education in Wales from 2014-15; Enhancement-led Institutional Review is the review method for higher education institutions in Scotland. More details about QAA's institutional review processes are available at: www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education.

provision with others of the UK Quality Code for Higher Education (Quality Code). The Quality Code is covered in more detail in paragraphs 4.11-4.18.

4.5 The desk-based studies are undertaken with a view to identifying specific issues to be pursued during the review visits, the third stage of the process. Review visits give an opportunity to follow up on identified issues and to look more directly at the student experience and how the overseas activity is operated and managed in practice. The visits involve meetings with UK and locally based staff (senior management, academic, and administrative), and with students. Overseas review visits to a particular institution typically last between one to two days, depending on the extent of the provision being reviewed. For instance, full branch campuses offering a multiplicity of programmes across different disciplinary areas are typically reviewed over two days. Smaller-scale provision, involving delivery of a single or a few programmes would not normally entail a visit longer than one day.

4.6 As with all QAA review processes, overseas reviews are undertaken by peer reviewers. Site visits to specific overseas provision typically involve a team of two reviewers and one QAA officer. However the total number of reviewers involved in the overseas visit varies according to the requirements of the overall review schedule. In assembling overseas review teams, QAA draws on the pool of peer reviewers that it uses for reviews conducted in the UK. Reviewers are selected on the basis of expressions of interest, and taking into account any relevant expertise they are able to offer, such as knowledge of or work experience in the review destination country or region. While student reviewers are part of review teams for UK based institutional reviews, they have not yet been used in the review of CBHE.

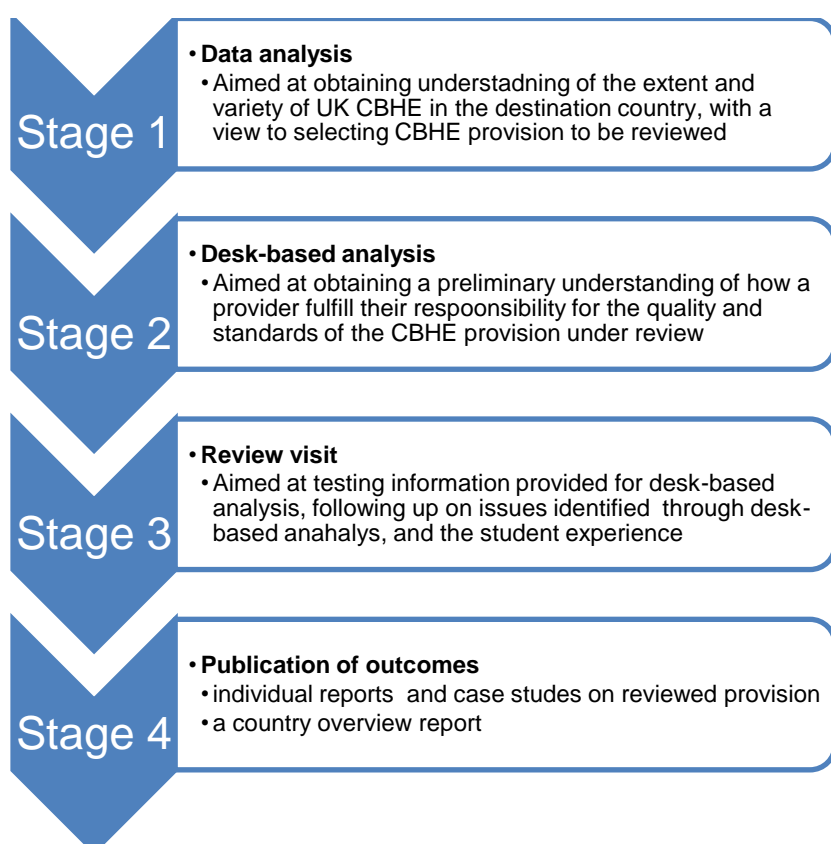


Figure 3: The four stages of CBHE review.

4.7 Increasingly, representatives from the relevant overseas agency join QAA reviews teams in the capacity of observer. This is normal practice where QAA has a memorandum of understanding with the particular agency involved. In conducting overseas reviews QAA seeks to liaise closely at every stage of the process with the host country's quality assurance agency. They may assist by providing data or other information and by briefing the review team about the local regulatory and higher education systems. During the review visit, they may provide helpful clarification, including on any cultural issues encountered. They may also be involved in the later stage of the process by checking reports for any factual inaccuracies, prior to publication.

4.8 The output from overseas reviews currently includes:

- individual review reports on the specific CBHE arrangements reviewed
- case studies centred on aspects of selected CBHE provision or particular themes
- an update on the provision covered in previous country review (if applicable)
- an overview report on UK CBHE in the destination country.

4.9 Since overseas review reports are based on the scrutiny of just one or a few examples of provision, they do not lead to a formal judgement concerning an individual provider's capacity for managing CBHE but restrict themselves to making recommendations and highlighting positive features. Note that this is in contrast to institutional reviews in the UK which are holistic processes that lead to summative judgements. The overview report outlines the extent of UK CBHE provision operating in the destination country for the review, and draws on the individual review reports and case studies to highlight the key themes emerging from the review.

4.10 Annex 1 summarises the key differences between institutional review and CBHE review processes. Looking at how these processes can be more closely aligned was one of the action points resulting from the public consultation with the sector. The outcomes of the consultation are discussed more fully in Chapter 4.

The Quality Code and Chapter B10

4.11 QAA review processes check that higher education providers fulfil their responsibility for quality and standards against the expectations set out in the Quality Code.³⁵ The Quality Code is the definitive reference point for all UK higher education providers. It makes clear what higher education providers are required to do, what they can expect of each other, and what the general public can expect of them. It covers all four nations of the UK and all providers of UK higher education operating overseas, protecting the interests of all students, regardless of where or how they are studying.

4.12 The Quality Code is a single document with three interrelated parts. *Part A: Setting and maintaining academic standards* explains how academic standards are set and maintained for higher education qualifications in the UK. *Part B: Assuring and enhancing academic quality* is concerned with assuring and enhancing academic quality, focusing on different aspects of higher education provision, such as admissions, student support and student engagement, teaching and learning, and provision delivered with others (including CBHE provision). *Part C: Information about higher education provision* sets out general principles regarding the information that higher education providers produce about the higher education programmes and learning opportunities they offer (see Figure 4).

³⁵ *The UK Quality Code for Higher Education* (QAA), available at: www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code.

4.13 Each Chapter of the Quality Code contains one or more Expectations, which express the key principles that the higher education community has identified as essential for the assurance of academic standards and quality within the area covered by the Chapter. It is these Expectations that review teams refer to during institutional reviews. Expectations are supported by a series of Indicators of sound practice. These Indicators are not prescriptive, but intended to help providers reflect on the sort of things they might need to do to demonstrate they are meeting the relevant Expectation. Expectations and Indicators are further supported by explanatory notes that give more information and examples of how the Expectation or Indicators may be interpreted in practice.

The UK Quality Code for Higher Education

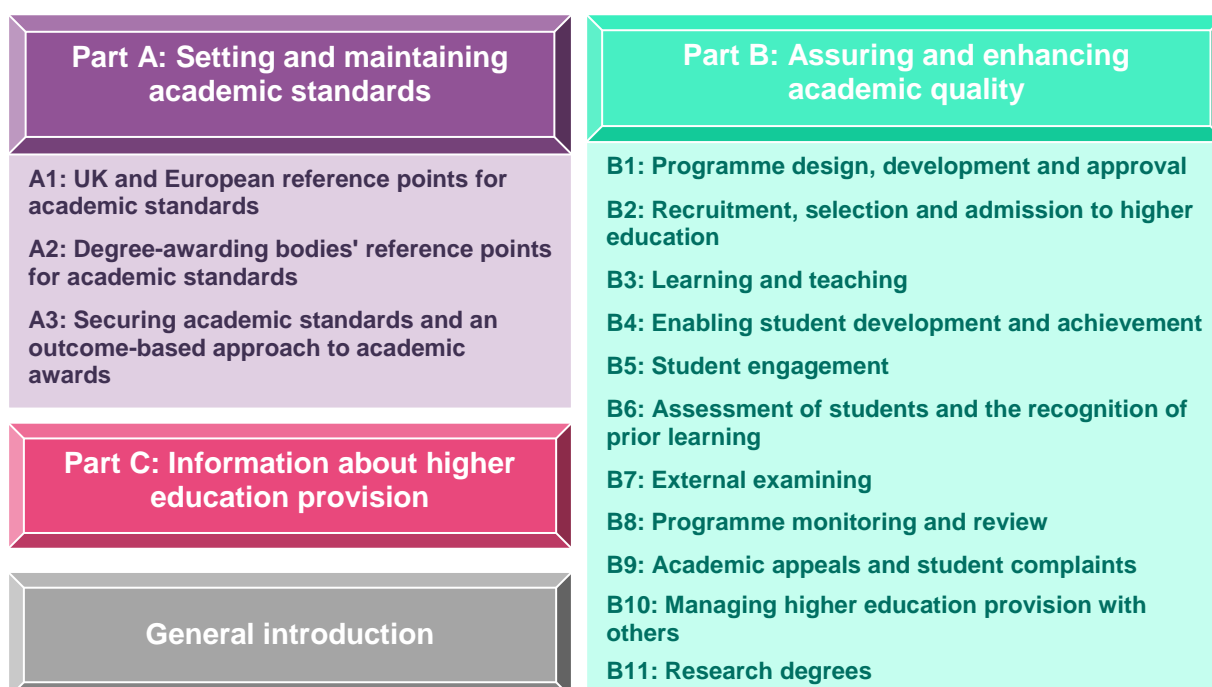


Figure 4: The UK Quality Code for Higher Education.

4.14 Providers of CBHE are required to meet all the expectations set out in the Quality Code, and the review of CBHE uses the whole Quality Code as a guidance and reference point. However CBHE also falls under the specific scope of *Chapter B10: Managing higher education provision with others*.³⁶ Chapter B10 focuses on 'the management of all learning opportunities leading, or contributing to the award of academic credit or a qualification, that are delivered, assessed or supported through an arrangement with one or more organisations other than the degree-awarding body.' These arrangements may include a broad range of types of CBHE provision, such as franchised and validated programmes, joint, double or multiple awards, and branch campuses.

4.15 Recognising the variety of different arrangements involving the delivery of higher education with others, Chapter B10 does not recommend a 'one size fits all' approach to the development, approval and management of such arrangements. It rather encourages providers 'to develop and approve a range of different practices and procedures that are

³⁶ *Chapter B10: Managing higher education provision with others*, available at: www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=170.

tailored and proportionate to the risks of the collaboration they are planning.' Chapter B10 therefore recommends that degree-awarding bodies adopt a proportional and risk-based approach to the implementation of its key Expectation and its Indicators.

4.16 Ensuring that robust processes are in place to secure the quality of student learning opportunities, irrespective of where or how these take place, is central to this Chapter of the Quality Code. The fundamental principle underpinning the Expectation of Chapter B10 is that the degree-awarding body has ultimate responsibility for academic standards and the quality of learning opportunities, regardless of where these opportunities are delivered and who provides them. In particular, degree-awarding bodies are responsible for assuring themselves that the Expectations of the Quality Code are met and that its Indicators of sound practice have been considered by those directly delivering or supporting learning opportunities.

4.17 The Indicators of Chapter B10 are grouped into a number of thematic clusters looking at different aspects of establishing and managing arrangements for delivering learning opportunities with others. These include:

- strategy and governance
- developing, agreeing and managing arrangements to deliver learning opportunities with others
- responsibility for, and equivalence of, academic standards
- quality assurance
- information for students and delivery organisations, support providers or partners
- certificates and records of study.

4.18 These thematic clusters are reflected in the structure of the CBHE review reports, and CBHE review teams refer closely to the Indicators in Chapter B10 when undertaking desk-based analysis and the review visits. Annex 2 provides a list of the Expectation and Indicators of Chapter B10.

Role of international guidelines on national approaches to quality assurance of cross-border higher education

4.19 QAA's approach to CBHE is informed by international guidelines. In the spirit of the OECD/UNESCO Guidelines for Quality Provision of CBHE, QAA takes a proactive role in international developments relating to standards and quality in a number of ways. These include membership in existing regional and international networks of quality assurance agencies, and establishing strategic links with partner agencies worldwide, especially in key hosting countries of UK CBHE.³⁷ Indeed this form of engagement is central to QAA's own international strategy.³⁸

4.20 QAA is a founding member of the European Association for Quality Assurance in Higher Education (ENQA), and underwent its latest ENQA review in 2013. QAA was found to be fully compliant with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and was commended for a wide range of activity, including its international approach and the way it reviews UK higher education delivered overseas.³⁹ QAA is also a full member of the International Network for Quality Assurance Agencies in

³⁷ *Guidelines for Quality Provision in Cross-border Higher Education* (OECD/UNESCO, 2005), available at: www.oecd-ilibrary.org/education/guidelines-for-quality-provision-in-cross-border-higher-education_9789264055155-en-fr. See recommendations b) and c) of the *Guidelines for quality assurance and accreditation bodies*.

³⁸ www.qaa.ac.uk/about-us/international

³⁹ *ENQA Panel report on QAA* (2013), available at: www.enqa.eu/wp-content/uploads/2014/01/QAA-review-report-FIN2.pdf (p.59).

Higher Education (INQAAHE) and in 2014 was confirmed to be aligned and fully compliant with the INQAAHE Guidelines of Good Practice.⁴⁰

4.21 As confirmed by interviews conducted for this report, UK higher education providers typically rely on the alignment of QAA policies and procedures with international guidelines and standards as a means of ensuring their own compliance with international reference points. As stated by one interviewee, 'international references points, such as the ESG and OECD Guidelines, are not referred to directly; they would be seen to be embodied in the national ones.' 'We rely on the Quality Code, which has been cross-referenced to the ESG, to take into account the European reference points' affirmed another interviewee.

4.22 In addition to participating in international networks QAA has developed links with several agencies around the world through bilateral strategic partnerships.⁴¹ Key areas of cooperation typically revolve around enhancing mutual understanding of each other's quality assurance systems and approaches, information exchange and intelligence sharing, as well as collaboration in projects and activities, including CBHE review. As mentioned above, and in line with the OECD/UNESCO Guidelines, when reviewing CBHE, QAA liaises regularly with counterpart agencies in the destination country of review as a way to 'facilitate the process of assuring the quality of programmes delivered across borders and institutions operating across borders while respecting the quality assurance and accreditation systems of the receiving countries.'⁴²

Professional, Statutory, and Regulatory Bodies

4.23 As noted in Chapter 2, the overseas provision of programmes leading to a professional or vocational qualification also comes under the purview of professional, statutory and regulatory bodies. Not all PSRBs currently accredit overseas provision, and those who do adopt different approaches to the accreditation of CBHE programmes. This section outlines the approaches adopted by two PSRBs, the General Pharmaceutical Council (GPhC) and the Institution of Engineering and Technology (IET). The CBHE related work of the Higher Education Academy (HEA), the professional body promoting excellence in higher education, is also summarised.

The General Pharmaceutical Council

4.24 The GPhC was established by the Pharmacy Order 2010 as the statutory regulator for the pharmacy profession in the UK. Its functions include the regulation of education and training leading to registration as a pharmacist and pharmacy technician, which it fulfils through course accreditation.

4.25 The initial education and training for pharmacists in the UK comprises a four-year MPharm degree, the first two years of which can be delivered overseas.⁴³ GPhC establishes that a UK provider can deliver a 2+2 MPharm degree delivered partially overseas only if the UK MPharm degree is fully accredited.⁴⁴ Where the course is delivered through collaborative

⁴⁰ Further information available at: www.qaa.ac.uk/en/Newsroom/Pages/QAA-INQAAHE-Guidelines.aspx.

⁴¹ Further information available at: www.qaa.ac.uk/about-us/international/international-partners.

⁴² OECD/UNESCO *Guidelines for quality assurance and accreditation bodies*, recommendation c).

⁴³ No more than two years can be delivered overseas because of the EC Directive (2005/36/EC) which requires that to be recognised in Europe pharmacy programmes must be studied mainly in the European Community (in practice this means not less than a half of their total duration), <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2005L0036:20110324:EN:PDF> (see article 3.1c).

⁴⁴ An MPharm degree provider may hold provisional accreditation or full accreditation. Provisional accreditation refers to when a university is planning to provide an MPharm degree for the first time and is working through the steps of accreditation process towards full accreditation. The process lasts seven years, with three preparatory years before being able to enrol students on the programme, and full accreditation obtained with the

partnership, the overseas partner must also be legally established and entitled to deliver higher education courses. In any case, the UK provider remains responsible for the academic standards of its MPharm degree and for ensuring that 'overall the academic student experience is equivalent to that of MPharm degree students in the UK.'⁴⁵ There are currently five UK universities offering an MPharm course that is delivered in part overseas, all in Malaysia.⁴⁶

4.26 GPhC's approach to the accreditation of MPharm degrees delivered partially overseas is to transplant overseas the same process used for the accreditation of UK delivered programmes. This typically involves submission of a self-assessment document supported by documentary evidence, followed by an accreditation visit by an accreditation team, culminating in a formal accreditation decision in the form of a published report. A full reaccreditation visit takes place six years after the previous accreditation, with an interim visit after three years.⁴⁷

4.27 The accreditation process of 2+2 MPharm degrees allows for a certain degree of flexibility to accommodate local variations, such as around the qualifications and profile of teaching staff. It also looks at additional evidence, including the arrangements between the UK provider and its overseas delivery partner, the legal status of the overseas institution in the operating country, and the local law to ensure full understanding of what is locally expected of students (for example in Malaysia there are requirements relating to the Malaysian language and the study of Islam).

4.28 While the initial accreditation of a 2+2 MPharm degree is done separately, its reaccreditation is harmonised with the reaccreditation cycle of its parent MPharm degree delivered in the UK. The outcomes of accreditation for the first two years of a 2+2 MPharm degree delivered in part overseas are however kept separate from the outcomes of accreditation for the parent MPharm degree delivered wholly in the UK. This ensures that overseas activity is not detrimental to home students.

4.29 When undertaking accreditation of programmes delivered overseas GPhC seeks to make links with its equivalent organisation to ensure that they are made aware of GPhC activity in their country. GPhC also takes into account the quality assurance outcomes of other regulatory bodies, including QAA, whose institutional review processes GPhC sees as complementary to their own subject specific ones.

4.30 GPhC's accreditation follows its own set of standards. In developing them GPhC takes into account other national and international reference points, such the Quality Code and the OECD/UNESCO guidelines. Chapter B10 is referred to on a regular basis when accrediting overseas delivered programmes.

The Institution of Engineering and Technology

4.31 The Institution of Engineering and Technology (IET) is a licensed institution of the Engineering Council, the UK regulatory body for the engineering profession. The Engineering Council sets and maintains the standards for the engineering profession, and sets the overall requirements for accreditation. It licenses professional engineering institutions to undertake the accreditation within these requirements and maintains the

graduation of the first cohort of students. See www.pharmacyregulation.org/education/approval-courses and www.pharmacyregulation.org/sites/default/files/GPhC%20Accreditation%20Methodology.pdf (page 12).

⁴⁵ www.pharmacyregulation.org/sites/default/files/GPhC%20Accreditation%20Methodology%20-%202%2B2%20MPharm%20degrees.pdf.

⁴⁶ www.pharmacyregulation.org/education/pharmacist/mpharm-22.

⁴⁷ www.pharmacyregulation.org/sites/default/files/GPhC%20Accreditation%20Methodology%20-%202%2B2%20MPharm%20degrees.pdf.

registers of accredited or approved programmes. Licensed institutions interpret these requirements as appropriate for the discipline of Engineering they work in.⁴⁸

4.32 The IET has developed its own procedures to implement the standards and regulations set by the Engineering Council. These procedures apply to programmes delivered both in the UK and overseas, which includes CBHE programmes and those delivered by foreign providers. IET procedures state that programme accreditation is specific to the programme's location of delivery. Programmes are normally accredited at locations that have had a successful visit by an IET accreditation team. IET has offices in India and China that support its accreditation activities.

4.33 IET's process for the accreditation of programmes consists of the submission of a self-evaluation document and supporting documents, an accreditation visit, and the publication of a final report establishing whether to accredit the programme and for how long. Reports are not made publically available; however, IET does publish on its website which programmes are accredited and in which locations these can be delivered.

4.34 The IET accredits different types of CBHE provision, including programmes delivered totally overseas either at branch campuses (for example at the University of Nottingham Malaysia campus), or through partnership arrangements (for example the joint programme delivered by Queen Mary, University of London and Beijing University of Posts and Telecommunications in China). IET do not separately accredit programmes delivered through 2+2 arrangements where the final two years of the programme are delivered in the UK, provided the final two years are part of an IET accredited programme. For 2+1 arrangements, where only the final year is delivered in the UK, a small scale overseas inspection is undertaken to feeder providers.

4.35 Programme accreditation and professional registration with the Engineering Council are not compulsory, but represent a formal recognition that graduates from accredited programmes meet the standards of knowledge, understanding and competence set by the Engineering Council.⁴⁹ Increasingly employers, both in the UK and internationally, require graduation from an accredited programme as a minimum qualification. The Engineering Council is signatory to three international mutual recognition agreements with overseas engineering organisations, the Washington Accord, Sydney Accord and Dublin Accord.⁵⁰ Although these accords provide mutual recognition of accredited academic programmes, they do not facilitate the accreditation and recognition of CBHE programmes. The accords in fact apply only to 'accreditations conducted by signatories within their respective national or territorial boundaries.'⁵¹

⁴⁸ Further information is available at: www.engc.org.uk/about-us/our-partners/professional-engineering-institutions.

⁴⁹ These standards are detailed in the UK Standard for Professional Engineering Competence, which QAA has since 2006 adopted as the subject benchmark statement for engineering, thereby assisting in reducing the regulatory burden on higher education providers. The Accreditation of Higher Education Programmes (ENGC, 2014) is available at: www.engc.org.uk/accreditation/information-for-universities.aspx and the *Subject Benchmark Statement: Engineering* (QAA, 2010) is available at: www.qaa.ac.uk/en/Publications/Documents/Subject-benchmark-statement-Engineering-pdf.

⁵⁰ The accords are coordinated by the International Engineering Alliance of which the Engineering Council is a member. Further information available at: www.ieagreements.org.

⁵¹ International Engineering Alliance: Educational Accords (IEA, 2014), available at: www.ieagreements.org/policies-and-procedures.cfm. See also the paper from Ian Harrison and Kay Bond, 'Transnational education and engineering accreditation', in *Engineering Education* vol 7, issue 2 (2012), available at: <http://journals.heacademy.ac.uk/doi/pdf/10.11120/ened.2012.07020024>.

The Higher Education Academy

4.36 The Higher Education Academy (HEA) is the professional body promoting excellence in learning and teaching in higher education in the UK. Jointly owned by Universities UK and GuildHE (the two representative bodies for higher education in the UK), the HEA helps higher education providers to enhance their learning and teaching provision through a range of initiatives. These include the accreditation of teaching and continuing professional development schemes and the rewarding of excellence in teaching. The HEA has developed, with and on behalf of the sector, the UK Professional Standards Framework,⁵² a comprehensive set of professional standards and guidelines supporting teaching quality and the student learning experience, which forms the basis for its professional recognition schemes and accreditation of teaching courses. From 2014-15 the HEA's enhancement work will be focussed on four distinct work streams related to curriculum design; innovative pedagogies; student transitions; and staff transitions. Within each work stream a wide range of resources including toolkits, frameworks and research will be made available to support the institutions, departments, individuals and the sector as a whole.

4.37 A research and practice network has been established to facilitate engagement across the sector on CBHE issues, with a specific view to identifying and developing mechanisms to enhance the student and teaching experience on CBHE programmes. This network includes more than 100 practitioners from across the UK and one of its live projects is the preparation of a good practice guide for learning and teaching in CBHE. Recent published research from the HEA also includes two reports focusing respectively on representation and engagement of students on CBHE programmes (undertaken by the National Union of Students), and the ways in which UK higher education providers can ensure teaching excellence and an equitable student learning experience in CBHE provision.⁵³ Its current research is exploring how international student mobility and international higher education develop employability skills and generate positive impact in the form of graduate employment outcomes.

4.38 The work on CBHE is encompassed within the HEA's recently published Internationalising Higher Education Framework. The framework was specifically developed with and for the sector to assist in 'promoting a high quality, equitable and global learning experience for all students studying UK programmes, irrespective of their geographical location or background.'⁵⁴

⁵² Further information available at: www.heacademy.ac.uk/professional-recognition/uk-professional-standards-framework-ukpsf.

⁵³ Further information available at: www.heacademy.ac.uk/about/news/7937.

⁵⁴ Further information available at: www.heacademy.ac.uk/resources/detail/internationalisation/InternationalisingHEframework.

Chapter 4: Main obstacles and challenges for cross-border higher education and its quality assurance

5.1 Against a backdrop of predicted growth in the demand for UK CBHE, the consultation Strengthening the quality assurance of UK transnational education was launched in December 2013, prompting what is an ongoing debate with the higher education sector about the challenges entailed (see Chapter 2). The first section of this chapter gives an overview of the consultation results, focusing on some of the thornier issues it unearthed. The second section, drawing on the main points distilled from the interviews with CBHE providers and other organisations (in connection with the preparation of the current report), offers an insight into the challenges faced by higher education providers.

Challenges for QAA identified from the consultation

The challenge of dealing with expansion

5.2 CBHE is developing quickly and takes on diverse forms with a level of risk that varies from country to country, from one CBHE model to another, and according to how the provision is managed by the UK provider. Both geographical and cultural distance can make managing CBHE more difficult than managing provision in the UK. Introducing a risk-based element into the quality assurance process for CBHE (as proposed by BIS in its International Education Strategy)⁵⁵ is a way of directing attention and resource to where they appear to be most needed, anticipating problems that may be developing with a view to early prevention. It is important, however, to concentrate attention in quality assurance not just on activity that appears to be most risky, but also on showcasing good examples so as to improve the practice of others and have a positive impact on the reputation of UK CBHE in general.

5.3 The term 'risk-based' has turned out to be an obstacle in itself, since a focus on provision perceived as risky, based on a risk-based approach, could lead those observing the process to conclude that any CBHE provision receiving external scrutiny from QAA must be a bad risk. In this context the main challenge is that of striking the balance between attention to risk and the prevention of problems on the one hand, and opportunities for quality enhancement and the demonstration of good practice on the other. Or, as one of the PSRBs interviewed for this report put it, 'the UK is one of the big volume sellers [of CBHE], and there are a lot of countries - it's a question of how much resource and time balanced against risk and reputation that we have to oversee what is going on in the name of UK HE.'

The risk-based question: a selection of responses

'Providers with a good track record and which concentrate on the types of provision which carry less risk, should not receive the same scrutiny as providers with weaker track records, either through lack of experience, previous failings, or because of the type of provision they have chosen to undertake.'

'Any provision can be managed well or badly, so that low-risk activity can be managed badly, but might escape review under a risk-based analysis.'

'Such an approach would work against the promotion of enhancement and dissemination of good practice in UK TNE since the focus would be on poor practice.'

'If scrutiny is linked to risk then reputational damage may be done to institutions simply through the conduct of external quality assurance.'

⁵⁵ The BIS International Education Strategy indicated that the consultation should include in its proposals 'a significantly strengthened risk-based element to focus resource and attention where they are most needed.'

The challenge of efficiently using resources

5.4 From the standpoint of cost, it makes sense to tackle the quality assurance of TNE from the UK to the extent that this can be effective. Within a given budget, greater coverage of provision is likely to be achieved through greater reliance on desk-based analysis, combined with video-telephony. The responses to the consultation revealed a high level of agreement with the idea that the review of low-risk CBHE provision in particular could be completed solely through desk-based analysis and in the UK. However, overseas visits were still perceived by many respondents as necessary to gain a full picture of how arrangements for the management of CBHE are implemented in practice, as well as to pursue issues related to the student learning experience. Such visits were also regarded as important to give visibility to UK quality assurance processes for the benefit of foreign governments and regulatory bodies. On this issue, responses from overseas quality assurance agencies were unanimous in their view that country visits are essential to give a complete and accurate picture. The challenge remains of finding the most efficient and effective way to undertake overseas visits, while also using desk-based analysis whenever possible.⁵⁶

5.5 A related issue is the extent to which the quality assurance of CBHE can be integrated within institutional review processes carried out in the UK. A strong view from the consultation was that institutional review should remain a holistic process and embrace CBHE proportionately. In that way, an assessment of the management of CBHE provision would be reflected in the summative judgements reached by institutional review teams. However, there was also recognition that institutional review processes might not have the capacity to deal with CBHE and would need to be modified to include longer review visits and larger review teams, especially for institutions with significant CBHE. In particular, including visits to overseas delivery sites as part of institutional review would pose again the resource challenge that QAA has so far addressed by containing costs through country-based reviews. Nevertheless, there was a clear message that overseas review and institutional review should be complementary processes and closely aligned, with improved linkages between their respective review schedules, reports and recommendations.

The challenge of improving the information base

5.6 One of the main challenges where CBHE is concerned is that there is not enough information about 'what is going on in the name of UK HE'. Some data is available from the HESA Aggregate Offshore Record, and this is supplemented by survey data supplied by higher education providers to QAA for the target country or region selected for review (see Chapter 1 and Chapter 3). However the HESA data and the information from QAA surveys do not, together, provide a complete picture. The HESA data are collected routinely on an annual basis and are worldwide in scope, but limited in detail; the QAA surveys are conducted only as and when needed for particular country reviews.⁵⁷ Chapter B10 of the Quality Code anticipates that higher education providers will maintain records of their CBHE arrangements where these are subject to a formal agreement with a partner. However, such records do not follow any prescribed format and do not lend themselves to analysis across providers.

⁵⁶ A challenge related to the desk-based analysis element of CBHE review, which was raised in one of the interviews for the project, is that of fine-tuning the information sets that providers are required to submit for analysis in order to avoid burdening them more than necessary.

⁵⁷ Information may also be obtained by QAA from its counterpart organisations in other countries, but this is subject to the existence of agreements covering information sharing, and to the counterpart organisation routinely collecting data about imported CBHE.

The information question: a selection of responses

'Makes complete sense - we have to have sound data on the scale of TNE and at the moment we don't.'

'There is an urgent need for this data set, providing it is public information and a useful resource for all higher education providers.'

'Rather than have this collated from two different sources, the HESA data collection could be expanded to incorporate the additional elements.'

'One possible approach would be to abolish the Aggregate Offshore Record and require institutions to record a full student record for all students registered with them, and include a primary location of study.'

5.7 There was clear recognition in the responses to the consultation of the need to gather better information on UK CBHE: in particular, that there should be regular collection of data on CBHE at both provider and programme level. But there is likely to be much less agreement on how this might be achieved, which will be an obstacle to making fast progress

The challenge of involving students

5.8 The consultation also considered the extent to which attention to local cultural norms should influence the nature and extent of student engagement in the quality assurance of CBHE, including whether there should be a student reviewer in review teams. Some respondents were very clear in their support for the adoption of the UK approach to student engagement, cautioning against a system 'that offered different options in different cultural contexts as it could be perceived to have a lack of parity/equality/fairness' and because maintaining consistency across reviews was important. Others were concerned that the UK would 'come across as somewhat imperialistic - the imposition of British views and values on overseas activities.' On the whole, however, respondents recognised that there was likely to be some need to set the UK approach to student engagement in the cultural context of the country in which the CBHE provision was located, and that this would require some flexibility, on a case-by-case basis, as to the exact form that student engagement should take.

The challenge of implementing a new approach

The outcomes of the consultation were presented as a set of principles, which are fixed and set the limits for the shape of the new methodology to be introduced. These principles also set the parameters for the work of the Implementation Group which has been established, with representation from the sector, to take forward the operational detail. Key tasks for the Group are to develop institutional data-reporting in relation to CBHE (involving clarification of data definitions), and to establish how the relationship between institutional review and CBHE review should be taken forward. Two additional tasks are to consider the suitability of separate institutional reviews for branch campuses and to review country overview reports in terms of their content and target audience.

Outcomes of the consultation on strengthening the quality assurance of UK TNE

Links with institutional review processes

- The CBHE and institutional review processes should be complementary and closely aligned processes.
- There should be improved linkages between the reports and recommendations of CBHE review and institutional review processes.
- CBHE reviews should not lead to summative judgements.

Risk-based element

- The CBHE review process needs to be flexible and take cognisance of risk in selecting provision for review.
- The selection criteria should give equal weight to opportunities for quality enhancement and the demonstration of good practice.
- Emphasis should be placed on transparency in the selection process.

Information base

- An improved database should be developed on UK CBHE, which would form the basis of planning quality assurance activity.
- The data collection process should avoid duplication of effort by institutions.

Desk-based analysis

- Desk-based analysis is an essential preliminary step in the quality assurance of CBHE.
- The detailed analysis of documentation should be undertaken by reviewers.

Overseas visits

- The CBHE review process should include an overseas visit.
- Visits should be used to highlight excellent provision just as much as to investigate provision where potential risks have been indicated.

Student engagement

- The quality assurance of TNE should include the UK approach to student engagement unless there are compelling reasons not to do so.
- While there should be no requirement, at this time, for TNE review teams to include a student reviewer, the opportunity should be open to students, with the clear objective of expanding the use of student reviewers over time.

Composition of review teams

- There should be no requirement for teams to include any specific category of reviewer - student, international specialist, or other specialist. The main criterion for inclusion in a review team should be appropriateness for the review.
- QAA's counterpart organisations overseas should not be members of review teams: their role should be limited to giving advice, or observing the process.

Funding arrangements

- The funding question should not drive the design of the CBHE quality assurance process: the exact funding arrangements should be a secondary issue.

The issue of funding

5.9 Finally, returning to the issue of funding, the consultation sought only to establish basic principles, setting out two propositions: that every institution should make a base-level contribution, and that institutions with TNE provision should make a proportionate contribution. While a proportionate approach would take into account that some institutions have little or no CBHE; a base-level contribution would reflect the fact that the review of CBHE benefits all providers by safeguarding the reputation of UK higher education as a whole. Of course the two approaches are not mutually exclusive, and a two-part tariff mechanism is also a possibility. There will now be more detailed work to cost the process, leading to a specific proposal for the funding mechanism. Whatever the mechanism eventually proposed, it is essential that it is both transparent and simple to operate. It seems likely that it will involve some adaptation of the existing subscription model, which does not currently reflect CBHE provision. As one respondent to the consultation put it:

This will not be a popular proposal: I cannot think of any alternative funding mechanism. Not reviewing [CBHE] is not an option, so the funding needs to be found from somewhere.

Challenges for providers identified from the interviews

The challenge of reconciling cultural differences

5.10 An obstacle identified in all of the interviews was cultural difference, arising from both a lack of familiarity of partner institutions with UK higher education and its quality assurance system, and a lack of familiarity of UK providers with the host country's regulatory context and local customs. This is seen as a challenge for the implementation of established UK quality assurance processes, for the quality of teaching and learning in CBHE, and for the sustainability of CBHE arrangements.

5.11 The point was made that partners may struggle to understand the complexities of the UK approach to quality assurance. For instance, as stated by one interviewee, some partners 'may find the use of external examiners and the idea that assessment is approved at programme level as an infringement on faculty freedom, as bureaucracy, and so on'; while other partners, 'in particular those operating in systems more dependent on national approvals than the UK', may find it hard to appreciate how it is possible to reconcile institutional autonomy with rigorous quality assurance.

5.12 The centrality of student engagement for UK quality assurance was also identified as an aspect not always fully appreciated by overseas partners. More generally, 'ensuring that partners understand what it means to deliver UK provision, in terms of both standards and the structures that need to be put in place to support students and staff, and how these relate the Quality Code, is a challenge.' It was indicated that failing to address and mediate between these different perspectives could potentially lead to difficulties in implementing important elements of UK quality assurance.

5.13 UK providers reported facing similar challenges in getting to grips with the complexities of the local regulatory systems in which they operate, and keeping abreast of changes. Lack of understanding or awareness of local requirements for institutional and programme approval was said to lead to unnecessary delays in establishing CBHE arrangements. This was compounded by the need to rely on local partners in order to obtain information on local regulatory requirements and liaise with local regulators. As confirmed by all the providers interviewed, this is a dynamic with which they were not always at ease. For instance, as observed by one interviewee:

It is difficult because it is the partner's responsibility to have the course accredited locally in order that they can deliver it, but often we have more experience of understanding and working with regulatory authorities, and a lot of the time it might be easier if we were able to go direct to the authorities to support the partner. But I think it is important that the partner has the relationship because they are the ones that need to meet the demands of their regulatory bodies rather than us...although it could be helpful for us sometimes to forge a more direct relationship.

5.14 The lack of familiarity on the part of UK staff with local academic and broader cultural customs, together with the lack of familiarity of locally employed staff with UK approaches to teaching and learning, was also highlighted as a challenge to the smooth operation of CBHE arrangements. In this context, the HEA identified as important 'ensuring an equitable student learning experience in transnational arrangements.' However, this was not seen by the HEA as a requirement to replicate the same teaching and learning experience as in the UK, rather as the need to adapt programmes and teaching methods to the local context so as to enable students to achieve their learning needs.

5.15 There was a clear view that QAA and organisations such as the UK Higher Education International Unit and the British Council had an important role to play in promoting an understanding of UK quality assurance internationally through their respective relationships with overseas bodies, and in providing an information service to the sector on the regulatory frameworks and developments in CBHE host countries. The HEA is also responding to sector demands by assisting UK providers and their overseas partners by offering staff development programmes aimed at enhancing student learning and teacher development in CBHE.

5.16 These sorts of cultural differences, sometimes compounded by language problems, were generally perceived to be greater outside Europe, where common policy frameworks, such as those established through the Bologna process (for example, the European Standards and Guidelines and the QF-EHEA) and European Commission directives (for example the 2005/36 Directive on the recognition of professional qualifications) are seen to facilitate cooperation. However, working within Europe was not always perceived as being less challenging, since different European countries have developed their quality systems in different ways and at different speeds, whereas some non-European countries are very familiar with the UK higher education system and operate in the English language. For example in some East-Asian countries a number of institutions have partnerships with multiple UK providers, and there may be historical links with the UK.

The challenge of geography

5.17 Geographical distance, as well a cultural distance, was also regarded as an obstacle. As one provider explained:

Working at a distance brings challenges in that you have to find mechanisms of working effectively with partners who are geographically removed and in different time zones to you. We have invested a lot in videoconferencing. While it does not compensate for visiting, it means that you can have quick catch-up meetings with people, and set up a quick meeting to talk about a specific issue.

The challenge of capacity

5.18 Another resource-related challenge identified by providers related to the internal capacity required to establish and manage CBHE arrangements. Adequate and specialist resources are needed for setting up these arrangements, which is 'time consuming' and requires 'appropriate due-diligence enquiries' to be undertaken so as to identify the different

risks involved: academic, financial, legal, reputational, and so on. Similarly, appropriate resources are needed for maintaining oversight of arrangements once they are established, for example through regular internal reviews. Training of staff working with partners, such as link tutors, as well as the partners themselves, was unanimously seen as crucial, but as having obvious resources implications. 'Capacity is a challenge. We may have to say goodbye to a partner in order to be able to develop in another area.'

5.19 Capacity may also be affected by UK providers' own organisational structures. For instance, one interviewee stressed the importance of collaboration within institutions between those with responsibility for the establishment and promotion of CBHE arrangements and those responsible for their quality assurance. 'If you divide up the responsibility for establishment and promotion of partnerships from the quality assurance, you can get a situation where you build institutional conflict between those who are trying to get things done and those perceived as trying to stop them.'

The challenge of regulation

5.20 The differences between regulations applying in the host and home countries are often perceived as obstacles to establishing CBHE arrangements. The complexity of local procedures for institutional and programme approval, already touched upon, may dissuade institutions from engaging in CBHE arrangements in specific countries: 'China is just too complex for us, in terms of Government approval and so on, so we avoid it'. Challenges to the recognition of CBHE qualifications are also regarded as an impediment to developing CBHE arrangements. Particular reference was made in interviews to issues related to the recognition of CBHE qualifications delivered through private providers, such as in Greece, or through distance learning, where China was given as the example.

5.21 Immigration and visa regulation, and specifically the eligibility to work in the UK, were also mentioned in interviews as representing a challenge for providers delivering programmes overseas, in particular for programmes which lead to professional registration. When students start a programme accredited by a UK PSRB, there may be no problem with obtaining a visa and working in the UK, but this may change during their programme of study as particular occupations may come and go from the 'shortage occupation list'. As one PSRB put forward, 'Providers are recommended to be transparent and honest about the state of government policy at any point, and be very clear that it is beyond their control.'

5.22 The varied approaches taken by PSRBs to the accreditation of programmes delivered overseas were also mentioned as a challenge, in particular the reluctance of certain PSRBs to accredit CBHE programmes. As mentioned in interviews: 'PSRBs don't yet fully understand CBHE; they are just starting to get a grip on CBHE' and 'PSRBs have different requirements in relation to whether you can extend recognition to different countries or even across campuses'.

5.23 A related challenge is posed by the variability of accreditation between home and host countries' professional bodies. As it has been highlighted in a recent study of CBHE and engineering education, this variability requires:

to have a single set of processes that are capable of addressing the multiple requirements of these separate accreditation bodies, while at the same time maintaining the programme in an undifferentiated form, complying with the rules and regulations of the university, and being true to its educational ethos.⁵⁸

⁵⁸ Ian Harrison and Kay Bond: 'Transnational education and engineering accreditation', in *Engineering Education* vol 7, issue 2, 2012, p 27, available at: <http://journals.heacademy.ac.uk/doi/pdf/10.11120/ened.2012.07020024>.

Chapter 5: Examples of good practice

Good practice for regulators

QAA: Consulting with the sector and other stakeholders

6.1 Consultation with the higher education sector and other stakeholders with an interest in higher education is an integral part of the way QAA works as it develops quality assurance processes and reference points. QAA recognises that it is not able to develop these without input from within the sector, where there exists a large amount of expertise. Consulting publicly therefore provides the sector with the opportunity to help shape the processes and reference points for quality assurance of UK higher education.

6.2 The development of the Quality Code saw the largest consultation exercise in recent years. Each Chapter or Part of the Quality Code was developed by QAA working with an advisory group of practitioners and students, including representatives with expertise in European and international developments in higher education. The work of the advisory groups was further supported by public consultation with the higher education sector and other stakeholders with an interest in higher education. Consultation typically involves public surveys and events. This consultative process helped create a set of reference points which is very much owned by the sector, as well as developing a pool of expertise that can be drawn upon for future work.

6.3 As highlighted in different sections of this report QAA has also consulted with the sector and interested stakeholders on the principles for the strengthening of the quality assurance of CBHE. Some of the complex issues addressed in this consultation have been explored in Chapter 4. The consultation process generated a wide response from the UK higher education sector, and responses were also received from stakeholders outside the UK. QAA is continuing to consult publicly on issues relating to CBHE. For instance, it is currently working with an advisory group composed of representatives drawn from the sector on the development of guidance related to the quality assurance of joint and double/multiple degrees.

6.4 QAA views this participative approach as key to ensure that its quality assurance processes and the reference points it develops and maintains, including those for CBHE, are informed by the expertise dispersed within the sector, therefore contributing both to create ownership and spread good practice across the sector.

QAA: Collaboration with quality assurance bodies overseas

6.5 In addition to its membership and participation in international quality assurance networks,⁵⁹ QAA has developed strategic links with several agencies around the world, in particular in countries with a significant amount of UK CBHE.⁶⁰ Key areas of cooperation typically revolves around enhancing mutual understanding of each other's quality assurance systems and approaches, information exchange and intelligence sharing, as well as collaboration in projects and activities, including CBHE review.

6.6 As mentioned in Chapter 3, in conducting overseas reviews QAA seeks to liaise closely at every stage of the process with the host country's quality assurance agency. The cooperation with Dubai's Knowledge and Human Development Authority (KHDA) as part of the 2013-14 review of CBHE in the United Arab Emirates (UAE) is a particular example of good practice. In May 2013 QAA and KHDA signed a Memorandum of Agreement, pledging

⁵⁹ Further information available at: www.qaa.ac.uk/about-us/international and in Chapter 2.

⁶⁰ Further information available at: www.qaa.ac.uk/about-us/international/international-partners.

to work together to enhance external quality assurance and improve the quality of higher education in both jurisdictions. As a first step the two agencies considered collaborating in the quality assurance review of UK campuses in Dubai, as part of a QAA review of UK CBHE in the UAE. KHDA supported the review process in a number of ways: providing data they collect about UK providers operating in the free zones of Dubai; briefing the QAA review team about the higher education system and the regulatory context of Dubai and the UAE; offering support to the logistical arrangements for the overseas review visit; providing an input to the review visits' agendas; observing the review visits helping clarifying issues as they were raised; checking reports for any factual inaccuracies prior to publication; and coordinating a media communication strategy after the publication of the review outcomes.

6.7 The close cooperation with KHDA was key to the successful undertaking of the UAE review, and it also represents an example of how strategic partnerships between quality assurance agencies can be made to work in practice. Another example is the partnership with the Council for Private Education (CPE) in Singapore, with whom QAA signed a Memorandum of Understanding in 2012. Since signing the Memorandum QAA and CPE hold regular meetings at both strategic level, between the Chief Executives of the two organisations, and operational level, focusing on specific areas of work. QAA and CPE are currently exploring the feasibility of undertaking a joint survey of the experience of students studying on UK higher education programmes delivered in partnership with private providers in Singapore.

6.8 Cooperation in undertaking the Erasmus Mundus funded QACHE project is also a good example of how quality assurance agencies and networks of agencies can work together to improve the quality assurance of CBHE.

GPhC: Monitoring the impact of students transition to the UK

6.9 GPhC currently accredits only 2+2 MPharm degrees where the first two years are delivered at the partner institution and the last two years at the UK awarding body (see Chapter 3). GPhC has put processes in place to monitor the impact of the students' transition to the UK on both the students and the UK provider. GPhC would normally send two reviewers to meet students in small groups to discuss how they have been managed through the transition and their experience of studying in the UK. Reviewers also discuss with members of staff about their experience of having a cohort of students transplanted into years three and four of an MPharm degree, and whether there have been any learning style challenges or any logistical challenges. GPhC's next step is to undertake an analysis of the learning outcomes and student experience of all 2+2 students on MPharm degrees so as to get a national picture.

GPhC: training and updating overseas partners of UK providers

6.10 GPhC runs annual training and development days for schools of pharmacy in the UK to keep them up to date with accreditation issues. As good practice it does the same overseas so that 2+2 partner organisations and staff at branch campuses don't lose out, also taking the opportunity to give UK higher education updates.

IET: accreditation database and management system

6.11 The IET has introduced a bespoke accreditation management system that allows providers to manage their accreditation activities online. ADAMS (short for Accreditation Database and Management System) is a browser-based system that does not require any installation and can be securely accessed from any location where there is access to the internet.

6.12 Universities can use ADAMS to initiate requests, complete submissions, view guidance, track the progress of their requests, communicate with IET staff and accreditors, and view the next tasks required to achieve and maintain their accreditation status, irrespective of location. Guidance is provided at point of data request on how key terms, such as module, course, and programme may vary for different providers and in different countries. ADAMS checks the submission for completeness before accreditors review it.

6.13 All documentation and data is retained after an accreditation activity and can be updated at any time. This means that the accreditation process can be treated as an on-going project, reducing the effort required to submit data once every 5 years. IET is also currently working with one provider to use ADAMS to submit information about programmes running in three different countries using just one submission. Previously it has done this for two locations (for example, the University of Nottingham UK and Malaysia campuses).

Good practice for providers

Middlesex University: A central office for managing and developing partnerships

6.14 Middlesex University has established a Centre for Academic Partnerships responsible for developing and supporting its portfolio of partnerships.⁶¹ Its role is to manage academic partnerships, particularly from the non-academic side. In addition to its function as the central repository for data collection about partners it coordinates staff development activities for academic and administrative staff at partner institutions, including holding away days for partners as a way to facilitate the sharing of good practices and the identification of common challenges.

6.15 Working closely with Schools and the Academic Quality Service, the Centre for Academic Partnerships facilitates the University's management of partnerships. In particular, it enables the University to work consistently across its partnerships, for instance by having a system in place that enable those working with partners within the institutions to understand what their roles are, and formalising key roles such as link tutors. Link tutors play a pivotal role in ensuring the effectiveness of collaborative partnerships, including by directly providing guidance and training to partner staff.

University of Hertfordshire: Targeted support for collaborative partners

6.16 The University of Hertfordshire adopts a targeted approach to support the academic quality of its larger and more complex collaborative partners. Quality Liaison Managers are appointed for partners with large and cross-University provision to support the Centre for Academic Quality Assurance and Schools in ensuring consistency of approach across different programmes at the partner and enhancing the quality of the provision.

6.17 A Director of Studies has been specifically appointed by the University for one of its largest partners, INTI University College (INTI), in Malaysia.⁶² The Director of Studies is based at INTI to ensure better support of the academic quality of the portfolio of University programmes delivered across a number of INTI campuses in Malaysia, including supporting INTI staff associated with the delivery of the programmes, and the 2,500 University of Hertfordshire students on all the INTI campuses.

6.18 These staff are perceived as key by the University in supporting these large partners to understand the University (its culture, regulations, processes, and so on) and the

⁶¹ Further information available at: www.mdx.ac.uk/about-us/academic-partnerships.

⁶² Further information available at: <http://newinti.edu.my/main/about-inti>.

UK higher education culture. The University also sponsors up to two members of staff from each of its collaborative partners to attend an annual Partners' Conference. These conferences foster the development of a University of Hertfordshire community amongst its partners, facilitate the sharing of good practices, and provide to all its partners a better understanding of the University and the higher education culture in the UK.

Ashridge: a risk-based due diligence process

6.19 Ashridge Business School (Ashridge) takes into account a number of risk factors as part of the due diligence it undertakes to assess the viability and desirability of entering in a particular partnership. Specific consideration is given to the risks to the student and to Ashridge associated with a possible disruption of delivery. This consideration has an impact on deciding whether to consider validating a degree designed by a perspective partner or to franchise Ashridge's own degrees.

6.20 Therefore, unless a prospective partner has a strong reputation for quality, typically demonstrated through international business school accreditation as well as national standing, Ashridge would not opt to validate a degree designed by them, because of the risks involved, including those for teach-out arrangements. Ashridge would normally opt to establish franchise arrangements, since it feels that if something goes wrong (for example due to political instability) it would be easier for them to do a teach-out, using distance provision for example.

6.21 As part of its due diligence processes Ashridge also takes into account the familiarity of the perspective partner with UK higher education. In this way it is able to plan training programmes for partners before starting to operate, and therefore reduce problems due to cultural and academic difference while the partnership is already operating.

University of Strathclyde: a coordinated approach to global programme delivery

6.22 Strathclyde Business School (SBS) has established bases around the world, with MBA international centres in nine locations spread across eight countries in Europe, Asia and the Middle East. From these bases it offers a single MBA programme designed to be delivered internationally on a part-time basis. Its campuses in Dubai and Abu Dhabi were reviewed as part the 2013-14 QAA review of TNE in the UAE.⁶³

6.23 A single MBA Unit has been created to oversee the strategic direction and management of all aspects, both academic and operational, of the Strathclyde MBA (in all its pathways; full-time, part-time, flexible, offshore and executive). The MBA programme at SBS has therefore become a faculty rather than a departmental degree, which has contributed to the effective global organisation of the MBA programme.

6.24 In relation to academic matters, subject coordinators have global responsibility for their subject across all delivery modes. This role enables consistency in content and pedagogical approach globally. It involves management of a faculty teaching team, and of local counsellors who run tutorials at its international centres. Subject coordinators ensure that local counsellors are fully briefed, and that there are regular meetings with the faculty teaching team, and therefore that there is reasonable commonality of approaches amongst local counsellors.

6.25 Subject coordinators also manage the assessment for the MBA unit. Much marking is distributed, with local counsellors undertaking first marking of most assignments as well as

⁶³ *Review of UK Transnational Education in the United Arab Emirates: University of Strathclyde*, available at: www.qaa.ac.uk/en/ReviewsAndReports/Pages/TNE-Review-UAE-2014.aspx.

feeding back to students. However, subject coordinators ensure that assessments are set centrally and there is a system for second marking by central academics which provide internal verification of local counsellors' marking and feedback. They report to the Examinations Board including on marking consistency across centres. The Examination Board works across all Strathclyde MBA pathways, enabling comparability of academic standards.

Annex 1

	Institutional reviews	Review of CBHE
Scope	Overseas provision is looked at in the context of the whole provision of an institution. When applicable, a small sample of CBHE arrangements is considered as part of the review, but no visit to overseas delivery sites is included.	Focuses specifically on CBHE arrangements, including visits to overseas delivery sites. Undertaken on a country by country basis, looking at a sample of UK CBHE in the country selected for review.
Cycle	Every institution is reviewed on a cyclical basis, which typically varies between four to six years.	Reviews are undertaken approximately on an annual basis, focusing on a specific country each year. An institution may be reviewed in consecutive years
Outcomes	The final report contains summative judgements, in addition to recommendations and features of good practice.	The final report does not contain a summative judgement, but it includes recommendations and features of good practice. An additional report is produced providing an overview of UK CBHE in the country selected for review, and highlighting the main themes arising from the review visits.
Action plan	Following the review report, institutions are required to outline an action plan addressing the recommendations of the review team.	Institutions are not required to develop an action plan addressing the recommendations of the review team. However, recommendations made in the context of overseas review are taken into account during the institutional review process.
Review teams	Review teams include student reviewers, and, in Scotland, an international reviewer. The size of the review teams may vary according to the extent of the provision being reviewed. A team may include as much as six reviewers and a QAA officer.	A review team typically includes two reviewers and a QAA officer. Multiple teams may be sent to the country being focused on The size of the review teams may vary according to the extent of the reviewed provision.
Reference points	Institutions are reviewed against the Quality Code.	Institutions are reviewed against the Quality Code, with a specific focus on <i>Chapter B10: Managing higher education provision with others</i> .
Information base	Institutions submit a detailed self-evaluation document along with supporting evidence.	Institutions do not submit a self-evaluation document, but only existent documents providing evidence of how CBHE provision is quality assured, with a focus on the specific arrangements selected for review.

Annex 2

<i>Chapter B10: Expectation and Indicators of sound practice</i>	
Expectation	Degree-awarding bodies take ultimate responsibility for academic standards and the quality of learning opportunities, irrespective of where these are delivered or who provides them. Arrangements for delivering learning opportunities with organisations other than the degree-awarding body are implemented securely and managed effectively.
Strategy and Governance	
Indicator 1	A strategic approach to delivering learning opportunities with others is adopted. Appropriate levels of resources (including staff) are committed to the activities to that the necessary oversight is sustained.
Indicator 2	Governance arrangements at appropriate levels are in place for all learning opportunities which are not directly provided by the degree-awarding body. Arrangements for learning to be delivered, or support to be provided, are developed, agreed and managed in accordance with the formally stated policies and procedures of the degree-awarding body.
Indicator 3	Policies and procedures ensure that there are adequate safeguards against financial impropriety or conflicts of interest that might compromise academic standards or the quality of learning opportunities. Consideration of the business case is conducted separately from approval of the academic proposal.
Indicator 4	Degree-awarding bodies that engage with other authorised awarding bodies to provide a programme of study leading to a joint academic award satisfy themselves that they have the legal capacity to do so.
Developing, agreeing and managing arrangements to deliver learning opportunities with others	
Indicator 5	The risks of each arrangement to deliver learning opportunities with others are assessed at the outset and reviewed subsequently on a periodic basis. Appropriate and proportionate safeguards to manage the risks of the various arrangements are determined and put in place.
Indicator 6	Appropriate and proportionate due diligence procedures are determined for each proposed arrangement for delivering learning opportunities with an organisation other than the degree-awarding body. They are conducted periodically to check the capacity the other organisation to continue to fulfil its designated role in the arrangement.
Indicator 7	There is a written and legally binding agreement, or other document, setting out the rights and obligations of the parties, which is regularly monitored and reviewed. It is signed by the authorised representatives of the degree-awarding body (or higher education provider without degree-awarding powers arranging provision by a third party) and by the delivery organisation, support provider or partner(s) before the relevant activity commences.
Indicator 8	Degree-awarding bodies take responsibility for ensuring that they retain proper control of the academic standards of awards where learning opportunities are delivered with others. No serial

	arrangements are undertaken without the express written permission of the degree-awarding body which retains oversight of what is being done in its name.
Indicator 9	Degree-awarding bodies retain responsibility for ensuring that students admitted to a programme who wish to complete it under their awarding authority can do so in the event that a delivery organisation or support provider or partner withdraws from an arrangement or that the degree-awarding body decides to terminate an arrangement.
Indicator 10	All higher education providers maintain records (by type and category) of all arrangements for delivering learning opportunities with others that are subject to a formal agreement.
Responsibility for, and equivalence of, academic standards	
Indicator 11	Degree-awarding bodies are responsible for the academic standards of all credit and qualifications granted in their name. This responsibility is never delegated. Therefore, degree-awarding bodies ensure that the standards of any of their awards involving learning opportunities delivered by others are equivalent to the standards set for other awards that they confer at the same level. They are also consistent with UK national requirements
Indicator 12	When making arrangements to deliver a programme with others, degree-awarding bodies fulfil the requirements of any professional, statutory and regulatory body (PSRB) that has approved or recognised the programme or award, in relation to aspects of its delivery and any associated formal agreements. The status of the programme or award in respect of PSRB recognition is made clear to prospective students.
Quality assurance	
Indicator 13	Degree-awarding bodies approve module(s) and programmes delivered through an arrangement with another delivery organisation, support provider or partner through processes that are at least as rigorous, secure and open to scrutiny as those for assuring quality and academic standards for programmes directly provided by the degree awarding body.
Indicator 14	Degree-awarding bodies clarify which organisation is responsible for admitting and registering a student to modules or programmes delivered with others, and ensure that admissions are consistent with their own admissions policies
Indicator 15	Degree-awarding bodies ensure that delivery organisations involved in the assessment of students understand and follow the assessment requirements approved by the degree-awarding body for the components or programmes being assessed in order to maintain its academic standards. In the case of joint, dual/double and multiple awards or for study abroad and student exchanges, degree-awarding bodies agree with their partners on the division of assessment responsibilities and the assessment regulations and requirements which apply.
Indicator 16	Degree-awarding bodies retain ultimate responsibility for the appointment, briefing and functions of external examiners. The external examining procedures for awards where learning opportunities are delivered with others are consistent with the degree awarding

	body's approved practices.
Indicator 17	Degree-awarding bodies ensure that modules and programmes offered through other delivery organisations, support providers or partners are monitored and reviewed through procedures that are consistent with, or comparable to, those used for modules or programmes provided directly by them.
Information for students and delivery organisations, support providers or partners	
Indicator 18	Degree-awarding bodies ensure that they have effective control over the accuracy of all public information, publicity and promotional activity relating to learning opportunities delivered with others which lead to their awards. Information is produced for prospective and current students which is fit for purpose, accessible and trustworthy. Delivery organisations or support providers are provided with all information necessary for the effective delivery of the learning or support.
Certificates and records of study	
Indicator 19	When degree-awarding bodies make arrangements for the delivery of learning opportunities with others, they ensure that they retain authority for awarding certificates and issuing detailed records of study in relation to student achievement. The certificate and/or record of academic achievement states the principal language of instruction and/or assessment where this is not English. Subject to any overriding statutory or other legal provision in any relevant jurisdiction, the certificate and/or the record of achievement records the name and location of any other higher education provider involved in the delivery of the programme of study. Where information relating to the language of study or to the name and location of the delivery organisation or partner is recorded on the record of achievement only, the certificate refers to the existence of this formal record.