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Joint UUK/GuildHE/QAA Consultation on the future quality enhancement of UK higher education transnational education

Information about you

Q1 Name:

Q2 Role:

Q3 Institution/organisation:

Q4 Do you deliver TNE?

Q4a If yes, number of TNE students:

Q5 Nation:

Q6 I am responding:

- on behalf of my university
- as an individual
- on behalf of my organisation (not a University)

Section 1: Guiding principles

The joint UUK/GuildHE/QAA working group agreed with the merits of adopting a UK-wide approach to quality enhancement of TNE and identified 11 UK-wide principles that should underpin any approach to quality enhancement of TNE.

Any effective system should:

- be UK-wide
- apply to all degree-awarding bodies who engage in TNE
- be valid for all types of TNE
- be cost-efficient
- be flexible and responsive
- minimise the burden to institutions, avoiding duplication of course or institutional review and aligning with the review processes of professional, statutory and regulatory bodies (PSRBs), where relevant and appropriate
- have the student experience at its heart
- ensure equivalence of student experience and student outcomes between TNE and UK-based students
- retain international trust and maintain the reputation of the UK's quality assurance approach
- be enhancement-led
- be informed by robust metrics where available and align with UK data-informed approaches where possible.

Question 7

To what extent do you agree that any quality enhancement system of TNE should retain a UK-wide approach?

strongly agree agree neither agree nor disagree disagree strongly disagree

Strongly agree

In order to maintain the reputation of the UK as a whole we strongly agree that there should be a UK-wide approach to the quality assurance and enhancement of TNE. However, Wales is strongly in favour of Model 2. Therefore, if model 1 is selected across the UK as a whole, we will seek to implement an alternative approach to oversight of TNE.

This is because, while we are supportive of a UK-wide model, we think it is essential to have a robust approach to TNE, given the risk that this provision presents.

Question 8

To what extent do you agree that a quality enhancement system of UK TNE should be underpinned by the 11 guiding principles outlined above? Please give your comments if you think that additional or different principles should be taken into account.

strongly agree agree neither agree nor disagree disagree strongly disagree

Disagree

We are broadly content with the principles. However, HEFCW's view is that the approach to TNE should be underpinned by an additional principle to 'enable institutions to assure themselves regarding the quality of their approach'. This is particularly important in light of the reputational impact of any issues regarding TNE, and in the context of the need to provide assurance to overseas governments, authorities and students regarding the quality of UK TNE.

Section 2: Models for the continued improvement and quality enhancement of UK TNE

The working group reviewed practice and expectations in other countries and considered a range of potential approaches. It concluded by developing two models, which were endorsed by the UUK Board for consultation. In summary, Model 1 suggests reaffirming existing quality enhancement arrangements, identifying and applying additional measures where and when necessary; and Model 2 suggests establishing a programme of regular in-country quality enhancement activity to complement existing national mechanisms.

Both models align fully with existing quality assessment and assurance arrangements in the UK nations, including those UK-wide elements that apply to all provision (such as the Quality Code for Higher Education) and both build on established principles such as avoidance of duplication. Each of the national systems in the UK makes use of information and data, and therefore would embrace further information and data on TNE as it becomes available. Neither model precludes other actions such as the development of guidance and advice for TNE providers and international engagement with overseas quality assurance bodies and regulators.

Both models are not mutually exclusive, and elements of one or the other could be retained in a combined approach depending on the results of the consultation.

Model 1: Reaffirming institutional and national enhancement arrangements

This model is based on the principle that existing national quality assurance and enhancement mechanisms are comprehensive and look at the total provision of higher education providers, including their TNE provision. It therefore places reliance on existing national quality assurance and enhancement mechanisms for both home and overseas provision. This model also allows the possibility for the sector, through agreed governance arrangements, of identifying where it may be advisable to engage in further enhancement activity in specific circumstances, for example, to get a better understanding of the quality enhancement mechanisms in place in emerging locations.

Key operational features of this proposed approach are:

- reliance on existing national quality assurance and enhancement mechanisms for both home and overseas provision
- identification of cases where it may be advisable to engage in further enhancement activity in specific circumstances, such as in-country visits or thematic reviews.

The governance arrangements will allow the sector to identify where future context-specific and proportionate measures are required. These could include:

- development of specific guidance to support the delivery and quality assurance and enhancement of TNE
- commissioned enhancement activity of TNE provision (either as a standalone activity of a specific TNE arrangement or as part of a voluntary wider institutional enhancement activity), through a methodology to be developed.

Question 9

To what extent do you agree that it will be possible to rely on existing national quality assurance and enhancement mechanisms, without complementary regular in-country reviews, in order to strengthen the international reputation of UK higher education TNE?

strongly agree agree neither agree nor disagree disagree strongly disagree

Strongly disagree

The current approach does not include overseas visit as a standard part of the methodology. HEFCW's Quality Assessment Committee has advised us that these visits are essential in terms of maintaining effective oversight of TNE arrangements. Our view is that the adoption of Model 1 will undermine the reputation of the UK as a whole in relation to TNE. Should Model 1 be the model selected as a result of this consultation, HEFCW will pursue the concept of overseas reviews separately. However, it would be better to achieve this within a UK-wide approach.

We do agree that it would be important to be able to engage in additional review activity where appropriate, eg via thematic review and the potential to visit provision where there are concerns about quality. We also agree that it is important to consider a range of data, including encouraging HESA to expand the data collected through the aggregate offshore record.

Question 10

What additional measures, if any, could complement existing national quality enhancement mechanism to underpin a robust and internationally-trusted quality enhancement approach to UK TNE?

As noted in Question 9 above, we believe that overseas visits are an essential part of a robust and internationally-trusted approach to TNE.

Governance of Model 1

Under this model, there could be an added reliance on UK-wide sector-led oversight to ensure that existing national quality enhancement mechanisms remain fit-for-purpose for TNE and decide on any additional measures needed to complement existing mechanisms. This would take place in communication with, and respecting decisions taken by, the respective funders and regulators in each of the nations.

Question 11

Do you agree that there should be UK-wide sector-led oversight to ensure that existing national quality enhancement arrangements are, and remain, fit-for-purpose for TNE? Please comment on whether a new or existing body would be appropriate to fulfil this role.

yes no

Yes

Our view is that there should be UK-wide sector-led oversight to ensure that quality enhancement arrangements remain fit for purpose. Our view is that the QAA needs to play a central role in this, and should take a lead in the oversight of TNE.

It would be helpful for the UKSCQA to consider UK-wide approaches, but it would not be appropriate for the Committee to consider, or provide advice on, any outcomes resulting from these approaches – that should rest with the QAA and relevant parties (in Wales, HEFCW would wish to be involved where any issues were identified). The Committee's focus should be the provision of advice solely on methodology of approaches.

Funding mechanism of Model 1

Under this model, there would be no initial added costs to providers except those linked to internal quality enhancement processes.

When a specific measure is deemed necessary collectively - to strengthen the quality of the educational experience vis-à-vis domestic or overseas stakeholders (such as an ad hoc country visit or specific guidance) - the sector, through its representative bodies, would require costing and pricing from the organisation or organisations selected to apply that specific measure. The source of funding would need to be decided collectively by the sector in consultation with funders and regulators in the four nations. A cost-sharing model could be envisaged depending on the specific measure to be applied.

Question 12

To what extent do you agree that the costing of any eventual additional quality enhancement measure should be decided collectively by the sector on a case-by-case basis, and request an external organisation to cost and price those additional measures?

strongly agree agree neither agree nor disagree disagree strongly disagree

Strongly disagree

We think that TNE visits should be carried out as a matter of course, and therefore do not agree with the funding mechanism for Model 1.

2B - Model 2: Regular in-country quality enhancement

The second model is for regular in-country quality enhancement activity to complement existing national approaches in the UK in a similar way to which QAA's in-country reviews traditionally have done.

The key operational features of this proposed model are to:

- increase geographical and institutional coverage with more than one in country review per year
- operate on the basis of a rolling programme of TNE quality enhancement activity, specifying locations for in-country activity and type of quality enhancement activity
- retain a peer-review focus aimed at identifying good practice and areas of improvement to be shared across the sector
- streamline information requirements focusing on the expectations of the Quality Code, the enhancement of the student experience, and the use of data to inform internal quality enhancement processes
- engage with host countries' national quality assurance agencies, through information-sharing and joint review activity.

Question 13

To what extent do you agree a regular programme of in-country quality enhancement activity is needed in order to strengthen the international reputation of UK higher education TNE?

strongly agree agree neither agree nor disagree disagree strongly disagree

Strongly agree.

TNE has the potential to result in extensive reputational damage should it be found to be of poor quality. We therefore strongly agree that a programme of overseas visits should be maintained, and extended to three countries per year. As noted above, our QAC have advised that it is essential to maintain a programme of overseas visits. In addition, the ENQA review of the QAA included an outcome regarding TNE as follows: 'Working with international partners to seek improvements in the regulatory framework for UK TNE provision is included in the current strategy of QAA. The panel urges QAA to intensify its activity with respect to TNE reviews overseas and to strengthen its oversight of collaborative provision arrangements, in order to better protect students' interests to receive quality higher education and at the same time to safeguard the reputation of UK provision overseas.' It would be irresponsible to ignore this recommendation. Our view is that overseas visits should therefore be a core part of TNE oversight.

UK TNE is offered in over 200 locations worldwide, therefore a range of coverage is necessary to offer more than nominal enhancement. Based on three in-country reviews per year, with each looking at 10 TNE arrangements, over the course of an indicative five-year period, it would be possible to look at approximately:

- 150 TNE arrangements and about 100 unique providers
- at least one TNE arrangement for smaller providers with a maximum of three for large providers
- 15 different locations, covering established TNE countries/regions together with a sample of emerging and smaller host locations.

Question 14

Do you agree that three countries/regions is an appropriate number of locations to be selected for quality enhancement activity normally each year? If not, please indicate in your comments the number of locations that you would consider optimal.

strongly agree agree neither agree nor disagree disagree strongly disagree

Agree

Our view is that the selection of three countries/ regions per year represents an intensification of the QAA activity with regards to overseas reviews, and as such appears to be appropriate in terms of balancing oversight and cost. It also addresses the ENQA recommendation to the QAA. However, we do not have a strong view regarding the specific number of countries/ regions that should be visited.

Governance of Model 2

In this scenario, the in-country quality enhancement process could be supported by an advisory board of experts from the sector which, ensuring external oversight and sector ownership of the process, would be consulted, at least annually, on the rolling programme of TNE quality enhancement activity

and locations. This would take place in communication with, and respecting decisions taken by, the respective funders and regulators in each of the nations.

Question 15

If in-country reviews were retained, would there be a need for additional external oversight of the in-country review programme? Please comment on whether a new or existing body would be appropriate to fulfil this role.

yes no

Yes

There would be need for external oversight of in-country reviews. Our view is that the reviews should be carried out by the QAA. The UKSCQA could advise on the programme of countries to be visited, but should not be put in the position to comment on reviews other than regarding any changes needed to the methodology.

Funding mechanism of Model 2

This model is for regular in-country quality enhancement of UK TNE to be part of a voluntary QAA TNE membership scheme. Membership of the scheme would demonstrate the commitment of a provider to the external quality enhancement of its TNE. Membership could be associated with a mark or statement that the provider is covered by the scheme.

The costs of running the scheme would be shared across all UK HE providers buying into it. Possible funding models could include a 'flat' fee for all providers buying into the scheme or differential fee bands depending, for instance, on student numbers, number of TNE arrangements, or number locations of provision.

Question 16

To what extent do you agree that regular in-country quality enhancement of TNE should be a voluntary QAA membership service?

strongly agree agree neither agree nor disagree disagree strongly disagree

Neither agree nor disagree

We have no strong views regarding how the reviews are funded.

Question 17

How do you think providers buying into the proposed voluntary QAA TNE membership scheme should be charged?

through a flat fee where all providers pay the same
 through differential fees where providers pay different amounts depending on specific factors

Neither agree nor disagree

We have no strong views regarding how providers should be charged. We would be content to contribute to the costs of reviews provided the other UK funding/ regulatory bodies did so as well.

Question 18

If differential fees were charged, which of the following parameters should be considered to determine different fee bands? Please rate in order of importance, with 1 being the most important.

- TNE student numbers number of TNE arrangements number of countries of delivery other
Please give your comments

We have no strong views regarding how providers should be charged. We would be content to contribute to the costs of reviews provided the other UK funding/ regulatory bodies did so as well.

Question 19

Taking the example of three locations being selected for quality enhancement activity each year - each involving three peer-reviewers and a QAA Officer, and assuming that a significant majority of all degree-awarding bodies with TNE provision buy into the scheme - the annual fee per provider might range between £2,500 and £5,000. Would you agree that this is a reasonable and acceptable fee range for the service?

- strongly agree agree neither agree nor disagree disagree strongly disagree

Strongly agree

We think that this cost is low in the context of institutional budgets, and therefore should not provide a barrier to implementing a programme of visits, particularly in light of the income that institutions gain from TNE, and in light of the potential impact on reputation should quality issues arise regarding this provision.

Question 20

To what extent do you agree that buying into this model of TNE quality enhancement should be associated with a mark or statement signifying the provider's commitment to enhancement of the quality of its TNE provision?

- strongly agree agree neither agree nor disagree disagree strongly disagree

Neither agree nor disagree

We do not have strong views on this question. It might be difficult to warrant a mark for TNE providers given that visits would be undertaken on the basis of sampling, which could make it difficult to justify a mark for each institution. It would be helpful to engage with the QAA to agree how oversight of TNE might best be promoted.