

THE QUALITY ASSURANCE OF TRANSNATIONAL EDUCATION: A UK PERSPECTIVE

Fabrizio Trifiro

*International Manager, The Quality Assurance Agency for Higher Education
E-mail: f.trifiro@qaa.ac.uk*

Abstract

This paper outlines QAA's approach to quality assuring transnational education (TNE) – defined as higher education provision delivered in countries different from that where the awarding body is based – and offers an account of its most recent and forthcoming TNE review activity. It will conclude with a consideration of some of the key challenges for the quality assurance of TNE from a provider's perspective, offering advice on how best these challenges can be addressed based on QAA's experience of quality assuring TNE.

Keywords: *QAA (UK), Transnational Education (TNE), inter-agency cooperation, Ireland, Hong Kong.*

Introduction

TNE is a significant and growing part for UK higher education. Over the years QAA has had to develop its quality assurance processes and its reference points in order to ensure that its approach to TNE remain fit for purpose to safeguard the standards and improve the quality of UK higher education delivered overseas. This paper outlines the key features of QAA's approach to TNE, and it will report on the two most recent TNE review activities in Ireland and Hong Kong. The paper will also share some of the lessons learned with regard to the quality assurance of TNE based on QAA's over 20 years' experience in quality assuring TNE. The first section will set the context providing an overview of the UK TNE landscape.

The UK TNE landscape

TNE is an integral and expanding part of UK higher education provision. Over 80% of the approximately 160 UK DABs are engaged in some form or another of TNE, either through distance learning, partnerships, or branch campus arrangements. Significantly this provision is delivered across the continents, as illustrated in figure 1, taken from the Higher Education Statistics Agency (HESA), the UK national agency collecting HE data.

TNE now also represents the main area of growth in UK HE in terms of student numbers, as illustrated by figure 2 below. The latest HESA data for the academic year 2016/17 show that while the total number of students studying on higher education programmes in the UK (2,317,880) has declined by approximately 7.5% over the past five years, and the number of international students studying in the UK has remained roughly constant (442,375), the number of students studying on higher education programmes outside of the UK has witnessed more than a 40% increase over the same period, now largely exceeding the number of international students in the UK (709,323 students).

II. Internal Quality Assurance in HEIs

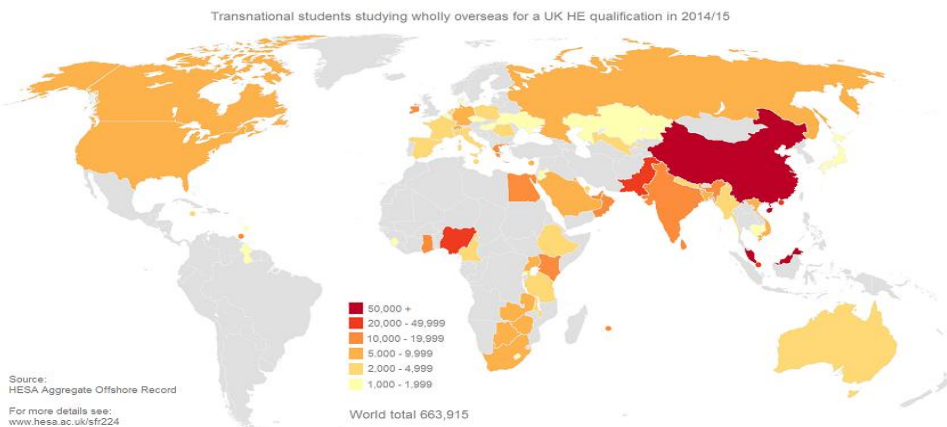


Figure 1.

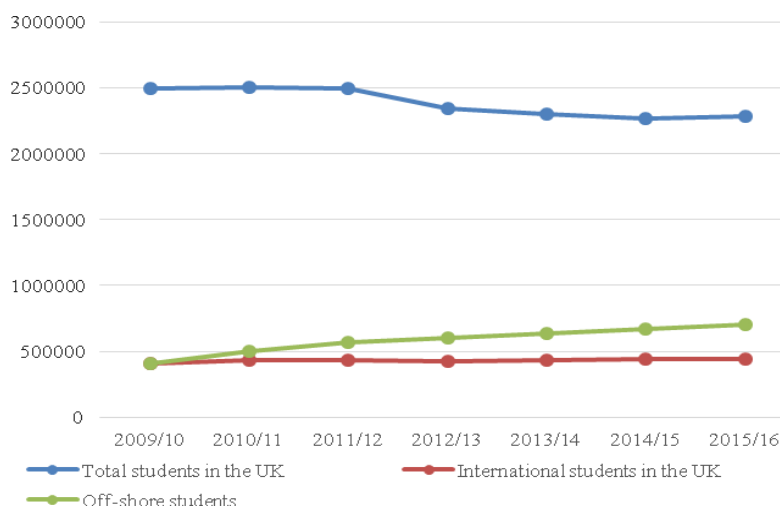


Figure 2. (Data source: HESA)

In terms of host countries of UK TNE the vast majority of TNE students is located in Asia. As illustrated in figure 3, China is now the second largest host country, after Malaysia, and growing faster than any other country. China is also by far the main sending country of international students in the UK, and it has been calculated that over 50 % of Chinese students coming to study in the UK arrive through TNE arrangements; namely, they start their programme of study in China and then they spend a period of their study in the UK (HEFCE 2014).

QAA over the years has had to develop processes that could ensure that its oversight of UK TNE remains effective and efficient in the context of this extended and growing TNE provision. Two ways in which QAA has tried to do so, as I will show in the next chapter, is by adopting a country-based approach and by strengthening cooperation with host countries' quality assurance agencies.

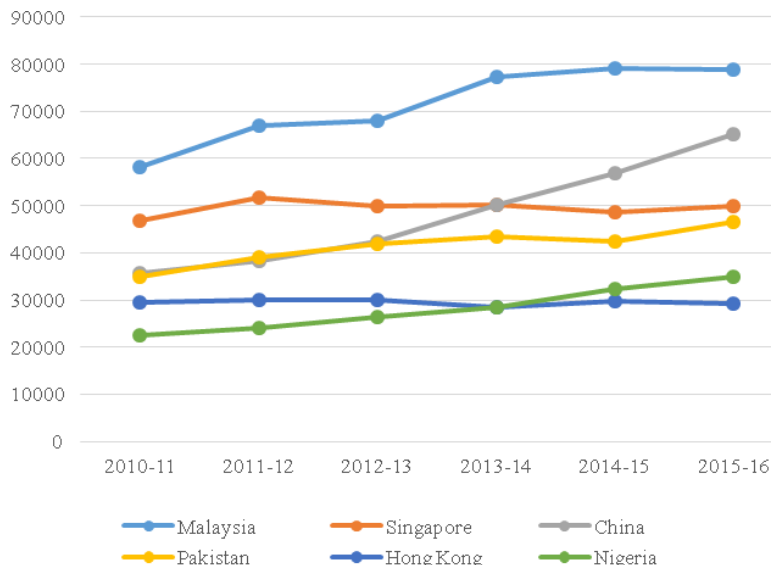


Figure 3. (Data source: HESA)

The QAA approach to TNE

QAA has always quality assured UK TNE as part of its mission to safeguard the standards and improve the quality of UK HE wherever this is delivered. QAA looks at UK TNE in two main ways: through its institutional reviews of UK providers and through a dedicated in-country TNE review process looking at delivery sites overseas.

QAA's institutional reviews are comprehensive processes looking at the complete range of a provider's higher education provision, including its overseas delivery. However, the focus on TNE in the context of institutional reviews can only be limited to the documentation of providers' policies and processes, and how these comply with the relevant section of the UK Quality Code, *Chapter B10: Managing higher education provision with others*. It would not be viable for review teams to look at TNE delivery sites as part of a provider's institutional review.

For this reason QAA has traditionally complemented its institutional reviews with a dedicated TNE review process which includes visits to overseas delivery sites of UK providers. This review process is aimed at addressing those aspects that institutional reviews are less suited to meeting, in particular testing the implementation of policies and processes for safeguarding standards and enhancing quality of TNE provision, and getting an understanding of the TNE student experience. It is also aimed at maximising the efficiency and effectiveness of overseeing UK TNE in the context of the volume and spread of UK TNE highlighted above.

QAA has traditionally adopted a country-based approach, whereby, on approximately an annual basis, a country with significant UK TNE or of strategic importance for UK HE is selected, and UK TNE provision there is looked at by a review team, including through visits to a sample of delivery sites. This is more efficient and practical than sending review teams to different parts of the world several times a year to look at different TNE arrangements as part of providers' institutional reviews. Over the past few years, for example, QAA has reviewed UK TNE in India (2009), Malaysia (2010), Singapore (2011), China (2012), United Arab Emirates (2013), the Caribbean (2014) Greece and Cyprus (2015), Ireland (2017), and Hong Kong (Special Administrative Region of the People Republic of China) (2018).

A country-based approach also allows QAA's review teams to get an in-depth understanding of the specific features and challenges involved in operating in particular countries, since different countries have different policies and systems for higher education and TNE which will affect TNE provision in different ways. It is important to ensure an informed assessment of TNE arrangements in the context of their particular operating environments and to gain useful insights that could benefit all providers operating in that country.

In addition, a country-based approach allows QAA to establish stronger links with the host country quality assurance bodies and to explore systematic ways in which to cooperate with them to improve the efficiency and effectiveness of its TNE review process. When undertaking in-country reviews of TNE, QAA regularly seeks to liaise with the local regulatory authorities and QA agencies with a particular view to sharing information, data and intelligence and exploring ways in which it might be possible to coordinate review activity of UK TNE to lessen the burden on TNE providers, and on themselves.

Engaging strategically with partner agencies in UK TNE host countries is indeed a high priority for QAA. The volume and spread of UK TNE requires QAA to seek cooperation with host country agencies to facilitate its quality assurance. In quality assuring UK TNE QAA regularly seek to cooperate with host country agencies, to rely on their intelligence and information, and avoid regulatory gaps and overlaps, striving to lessen any unnecessary burden on TNE providers as well on quality assurance agencies themselves.

QAA seeks to strengthen cross-border cooperation in the quality assurance of TNE both at bilateral level, through a number of strategic partnerships with agencies in key host countries for UK TNE, such as China and Hong Kong, Malaysia, Singapore, and Dubai, and at multilateral level, engaging with key international networks. These include established networks such as the European Association for Quality Assurance in Higher Education (ENQA), The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the Asia-Pacific Quality Network (APQN), and more recent international initiatives such as the Quality Beyond Boundaries Group (QBBG) and the Cross-Border Quality Assurance Network (CBQAN), specifically aimed at strengthen cooperation in the quality assurance of TNE amongst key sending and receiving countries of TNE. QAA international engagement also includes high profile international projects, such as the Quality Assurance of Cross-Border Higher Education project (QACHE), which led to the development of the QACHE Toolkit for quality assurance agencies, *Cooperation in Cross-Border Higher Education*.

The next section looks at QAA's most recent and forthcoming TNE review activity.

QAA recent and forthcoming TNE review activity

TNE Ireland 2017

The most recent TNE Review looked at UK TNE provision in the Republic of Ireland (henceforth Ireland). Ireland is the second largest host country for UK HE provision in Europe, taking also into account distance learning. It has also been tipped by some as a potential destination for UK universities to open an EU outpost in the aftermath of Brexit. At the same time, national policy developments in Ireland have seen the recent development of an international education strategy and reforms to prevent the abuse of student immigration, which impose limits on the extent to which UK providers can grow their TNE provision in Ireland. Through this TNE Review exercise QAA aimed to respond to possible concerns raised by local stakeholders about the quality and nature of UK TNE arrangements, while supporting the growth of quality TNE provision in the context of Brexit and national policy developments in Ireland. This TNE Review exercise also embodied the commitment made by both QAA and Quality and Qualifications Ireland (QQI) to strengthen inter-agency cooperation in the quality assurance of TNE, through regular sharing of data, information, intelligence and good practice.

Another motivation was that of implementing commitments that QAA and QQI have made towards inter-agency cooperation in the quality assurance of cross-border education, both as part of their bilateral memorandum of understanding and multilateral initiatives. The latter includes the Quality Assurance of Cross-Border Higher Education (QACHE) project led by the European Association for Quality Assurance in Higher Education (ENQA), which issued practical advice to quality assurance agencies on ways in which cross-border cooperation in quality assurance can be strengthened.

The cooperation between QAA and QQI can be seen as a practical example of implementation of some of the advice contained in the QACHE toolkit for quality assurance agencies, *Cooperation in Cross-Border Higher Education*. QQI shared valuable information, data and intelligence about the local operating framework and UK TNE providers at critical stages of the review process. This contributed to selecting the sample of TNE arrangements to be looked at, identifying areas of inquiry, and briefing the review team about the Irish higher education and quality assurance system. At the same time, QQI's close involvement in the TNE Review process has been valued by QAA, as it is developing its approach to quality assuring the growing outbound Irish TNE. This close cooperation between the two agencies has contributed, not only in developing reciprocal understanding, but also in strengthening reciprocal trust in each other's higher education and quality assurance systems.

Looking at the key findings of the TNE review exercise, QAA's reports found that the geographical and cultural proximity of Ireland made it easier for UK providers and their Irish partners to have robust processes for quality assurance, and that UK universities and their Irish partners have created flexible opportunities that cater for skills needs not currently met by local providers. Generally it is possible to say that UK TNE in Ireland has demonstrated to be student centred, being responsive to the needs of students, both in terms of programme content, addressing local market needs, and in type of delivery, such as part-time and block-teaching meeting the needs of mature learners seeking to up-skills and progress in their career.

TNE Hong Kong 2018

Hong Kong is the 5th largest location for UK TNE, and has traditionally been of strategic importance for UK HE. The majority of registered /exempted in Hong Kong come from the UK. The last time UK TNE in Hong Kong was reviewed by QAA was in 2007. It was therefore important to return to Hong Kong to ensure that the quality and standards of UK providers in a key strategic location was maintained. Another key rationale for selecting Hong Kong as destination for review was the possibility of taking inter-agency cooperation to another level.

QAA and the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) have a long standing partnership, and both are members of QBBG and CBQAN and committed to strengthen cross-border cooperation to facilitate the QA of TNE. As part of the QAA review of UK TNE in Hong Kong the two agencies have carried out joint-review activity.

HKCAAVQ runs a voluntary accreditation scheme for non-local programmes. An accredited non-local programme enjoys a similar status as an accredited local programme, its qualification can be placed on the Qualifications Register and recognised under the Hong Kong Qualification Framework, and its students enjoy financial assistance provided by the Government. As part of the review of UK TNE in Hong Kong QAA shared reviewers with HKCAAVQ as part of a couple of HKCAAVQ accreditation exercises of UK programmes. The reviewers acted both as HKCAAVQ accreditation panel members and QAA reviewers, implementing both processes. This allowed QAA and HKCAAVQ not only to lessen the information burden on providers, as they could rely on one single set of requested information and single review visit, but also to benchmark processes and standards through their concrete implementation. On this basis QAA's peer reviewers were able to establish that HKCAAVQ's

accreditation decisions can be trusted and relied upon by the QAA for UK quality assurance purposes. This means that QAA won't need to review UK provision accredited by HKCAAVQ in the future.

Looking at the key findings of the TNE Review exercise overall, the TNE review exercise found that UK TNE provision offered in Hong Kong is generally both relevant to the local market and employment needs, and meets the expectations of the UK Quality Code. Processes for the management of TNE in Hong Kong are generally well developed, ensuring that standards and quality are equivalent to similar provision delivered in the UK. Many of the local partners also have well developed quality assurance systems used for both their own awards and those made by non-local degree-awarding bodies. Partnering with multiple local and non-local degree-awarding bodies, many have extensive experience of managing collaborative provision of a scale and complexity that can exceed that of some UK providers operating in Hong Kong.

Lessons learned from TNE Review

Providers face a number of key challenges in ensuring the standards and quality of their degrees delivered overseas and in partnership with other institutions. Two of such challenges have to do with cultural and geographical distance.

Cultural differences require providers wishing to operate successfully in cross-border partnerships to ensure they understand each other's traditions and approaches to teaching and learning and quality assurance, as well as reaching a shared understanding about the nature of the partnership, including its rationale and expectations. It is of crucial importance that partners get to understand where each other comes from and where they aim to go toward through the partnership from the start. In order to achieve this, it is very useful for TNE providers to induct their staff (both administrative and academic) about local partners' culture and operating environments as well as inducting local partners' staff about their approach to and expectations about teaching and learning and quality assurance.

Geographical distance is clearly an important challenge, which can affect the quality and effectiveness of communication between partners and with the students, as well as the provision of services. It is important for TNE providers to strive to minimise the impact of geographical distance on the every day to day management of the partnership and student life. In this context new information technologies have great potential to ensure regular communication between partners and with students and enhance the quality of the student experience by ensuring they can access both academic and other support services. It is also important for TNE providers that their staff are prepared to travel, to ensure regularity of communication, monitoring, and support.

The TNE staff experience is something that TNE providers need to give proper thought when developing TNE arrangements, since, depending on the model of TNE adopted, their success will crucially depend on the availability of both administrative and academic staff availability to regularly travel to the partner institutions. This has significant implications for academic staff in particular, who might be required to travel more often and for longer period, and who might therefore see TNE commitments as additional to their duties and possibly conflicting with career progression aspirations, such as undertaking research, as well as impacting on family commitments and life-work balance. Proper recognition of these challenges will need to be incorporated in any staffing model from the start. In addition, the development and management of TNE arrangements require adequate and specialist staff capacity, for instance to undertake due diligence in all its dimensions, legal, financial, and academic, and keep regular oversight of TNE partnership to maintain and improve their quality. Institutions again need to plan staff resources and capacity from the start.

Another key challenge relates to the student experience. Providers need to ensure TNE students are able to access key academic and extra-academic support services, including the

awarding body's own e-library resources and career advice for instance; and they also need to have procedures in place to collect and respond to students' views. Another challenge is that of ensuring that the experience of TNE students is comparable to that of students studying at the home campus. Recognising that the experience of TNE students cannot possibly be similar or comparable in many aspects to that of students studying in a different country and very different circumstances, from a quality assurance perspective, what is essential is that the experience of TNE students enable them to achieve the standards expected from them at the end of their programme of study. While this will require that students have access to the same set of essential services as home campus based students, and are exposed to same or very similar styles of teaching, and curriculum, it is also important to recognise the different local contexts in which students are pursuing their studies, in order to have realistic expectations about the comparability of the students experience, develop viable and sustainable strategies to achieve those expectations, and importantly adapt the programme of study to ensure that it remains relevant to students who are studying and will pursue their careers in very different contexts. The key challenge here is to strike the right balance between similarity of contents and approaches and their contextualisation to meet different student and competence needs.

In this context it is opportune to reflect on the role that external quality assurance agencies play in facilitating or hindering the development of TNE programmes relevant to the local social and economic contexts by means of their regulatory requirements. Often quality assurance agencies, from both sending and host countries, with the intention of safeguarding the student experience, might put in place too stringent requirements, such as for example that only programmes delivered at the home campus can be delivered overseas, which limits the extent to which providers can develop and offer programmes more suited to the local needs of students, societies, and markets. This might impact negatively the experience of TNE students by contributing to their alienation and disengagement from the content of their programme of study.

The need for undertaking due diligence has already been referred to. Thorough planning before engaging in any TNE provision is essential for the development of successful TNE arrangements. It is important for providers to get their TNE provision right from the start, limiting the risks to incur in unforeseen problems and challenges that can not only affect the viability and quality of the partnership but also the reputation of the partners. This is also related to the need for providers to have clear strategies at institutional level for their TNE provision, ensuring that it is aligned with the broader institutional strategies, vision and mission, and related to this the need to have a central oversight for all TNE provision to ensure a strategic and coordinated approach to TNE across the institution.

A further challenge related to the need for a thorough due diligence is represented by the diversity of regulatory frameworks in different countries. It is essential when developing and running TNE to have a sound understanding of the local operating environment, and to keep abreast of regulatory changes, which might affect the sustainability or desirability of particular TNE arrangements.

In this context quality assurance agencies can play a key role in facilitating the growth of quality and relevant TNE provision and its quality assurance, by regularly sharing information about each other's developing requirements, and strengthening cooperation with a specific view to avoiding eventual regulatory gaps and unnecessary regulatory overlaps. Recent projects and international indicatives, such as QACHE, QBBG and CBQAN, point in this direction. Indeed, it is possible to observe an emerging shared view amongst quality assurance agencies. It is essential to cooperate across borders in order to fully harness the opportunities that TNE offers for meeting demands for quality and relevant higher education provision, and that agencies should act as facilitators, rather than *inhibitors*, of quality and relevant cross-border provision.