



**QAA**



# **Strengthening the quality assurance of UK transnational education**

**Consultation  
December 2013**

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## Strengthening the quality assurance of UK TNE

This consultation is jointly managed by the Quality Assurance Agency for Higher Education (QAA) and the UK Higher Education International Unit (the IU).

QAA works to safeguard quality and standards in UK universities and colleges, so that students have the best possible learning experience regardless of whether they study in the UK or in other countries. Key areas of activity include:

- conducting reviews of UK higher education providers
- publishing reference points and guidance for the higher education sector
- participating in policy debates in the UK and internationally
- encouraging student engagement with academic quality and standards.

See more at [www.qaa.ac.uk/AboutUs/Pages/default.aspx](http://www.qaa.ac.uk/AboutUs/Pages/default.aspx).

The IU works to support the development and sustainability of the UK higher education sector's influence and competitiveness in a global environment. Key areas of activity include:

- providing market intelligence to identify opportunities
- building the capacity of the sector to capture international opportunities
- representing the sector internationally
- shaping international and European policy.

See more at [www.international.ac.uk/about/what-we-do.aspx#sthash.TssSbe9e.dpuf](http://www.international.ac.uk/about/what-we-do.aspx#sthash.TssSbe9e.dpuf).

Preparation of this consultation document was undertaken by a working group and overseen by a steering group. Each group comprised representatives from QAA, the IU, Guild HE, the Higher Educational Funding Council for England (HEFCE) and the Department for Business, Innovation and Skills (BIS), in the capacity of observer.

Organisation	Steering Group	Working Group
QAA (Chair)	Anthony McClaran: Chief Executive	Stephen Jackson: Director of Reviews
QAA	Stephen Jackson: Director of Reviews	Jane Holt: Assistant Director Reviews Group
The IU	Joanna Newman: Director	Raegan Hiles: Policy Adviser
Guild HE	Andy Westwood: Chief Executive	Helen Bowles: Deputy Chief Executive Officer
HEFCE	Heather Fry: Director (Education, Participation and Students)	Tish Bourke: Higher Education Policy Adviser
BIS (Observer)	Bev Thomas: Deputy Director for Higher Education Access and Quality	Mary Degg: Senior Policy Adviser Higher Education Directorate

Ahead of publication, the consultation document was circulated in draft to the following:

- Department for Employment and Learning, Northern Ireland
- Higher Education Funding Council for Wales
- National Union of Students
- Scottish Funding Council
- Teaching, Quality and the Student Experience Committee of HEFCE.

## Background to the consultation

Transnational education (TNE) is the provision of education for students based in a country other than the one in which the awarding institution is located. For the purposes of this consultation, TNE is used in the context of higher education providers that are degree-awarding bodies, including 'alternative' providers.

The higher education sector representative bodies have been asked by BIS to 'give serious consideration to the assurance of the quality of TNE', while QAA and the IU have been given the task of consulting the higher education sector on 'what is needed to strengthen the quality assurance of TNE' (HM Government Industrial Strategy: *International Education: Global Growth and Prosperity*, July 2013).<sup>1</sup>

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

'The growth in demand for TNE has made it even more important that the UK is able to maintain and demonstrate the quality of its education exports.'

'The global growth in UK TNE provision, particularly different models of in-country delivery and the need to comply with local regulatory frameworks, presents increasing assurance complexity and risk.'

'Whilst [assurance of the quality of TNE] is the responsibility of each individual institution, failure to do so has the potential to impact negatively on every institution.'

In addition, the strategy indicated that the consultation would include in its proposals 'a significantly strengthened risk-based element to focus resource and attention where they are most needed'.

While this is a strategy for England, the economic opportunities it identifies for TNE and the drivers for strengthening quality assurance apply equally to all nations of the UK. Students engaged in TNE attach value to the UK educational brand and a British educational experience; knowledge of individual UK institutions, with a few exceptions, can be limited in many overseas countries. It is acknowledged that under the devolved system of higher education, there is flexibility in the operation of institutional review processes in different parts of the UK so as to reflect variations in national educational policies. However, the processes are all aligned to the UK Quality Code for Higher Education (the Quality Code), which is the definitive reference point for all UK higher education providers.<sup>2</sup> Of particular relevance to the management of TNE is *Chapter B10: Managing higher education provision with others*. Additionally, QAA's overseas reviews (formerly overseas audits) have always been applied to the TNE of institutions across the whole of the UK.

Therefore the consultation is framed in terms of a UK-wide approach to the quality assurance of UK TNE.

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<sup>1</sup> The International Education Strategy, available at [www.gov.uk/government/publications/international-education-strategy-global-growth-and-prosperity](http://www.gov.uk/government/publications/international-education-strategy-global-growth-and-prosperity).

<sup>2</sup> The UK Quality Code for Higher Education, available at [www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/default.aspx](http://www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/default.aspx).

## Administration of the consultation

The basic question underlying this consultation is: What is needed to strengthen the quality assurance of TNE?

The consultation deals with some quite complex issues, and at various points throughout the document you are invited to comment in response to specific questions. These are also listed in full at the end of the document.

We hope the questions will provoke discussion and generate a wide response from the UK higher education sector: from institutions, students, and individuals. Responses are also welcome from other organisations or individuals with an interest in the quality assurance of UK TNE, including government departments or quality assurance agencies outside the UK.

The consultation opens on 16 December 2013 and will remain open for 12 weeks, closing on 10 March 2014.

Briefing events about the consultation are arranged as follows:

- London 4 February 2014
- Cardiff 17 February 2014
- Glasgow 21 February 2014.

[For further details please visit our website.](#)

To make your response, please use our online survey, available at:  
[www.surveymonkey.com/s/tne\\_consultation](http://www.surveymonkey.com/s/tne_consultation).

From institutions we would like to receive a single institutional response from a respondent nominated to complete the survey on behalf of the institution. Any other organisation wishing to respond as an organisation should similarly nominate a respondent to complete the survey on its behalf. Individuals belonging to institutions or organisations may also separately respond, but must indicate at the start of the survey that they are doing so as individuals and not on behalf of their institution or organisation. We also want to avoid receiving partly completed surveys, so all questions are compulsory, but the addition of comments is optional. There is also a word limit for the comments relating to each question (either 300 or 500 words) as specified in the list of questions at the end of the document.

Following analysis of the consultation responses, QAA will publish an overview of the planned process for the quality assurance of UK TNE by 31 May 2014. This will be followed by a prospective review programme, commencing from 2014-15.

## Consultation

### Approach to the quality assurance of TNE

#### Starting point

1 The UK is a leading TNE exporter with 75 per cent of UK awarding institutions now engaged in TNE in over 200 countries. In 2011-12, some 570,000 students were studying overseas on programmes leading to UK awards - more than the number of international students (including those from the European Union) studying in the UK (435,000).<sup>3</sup> The growth in demand for UK TNE is predicted to continue.

2 In relation to the quality assurance of TNE, QAA has been conducting overseas reviews since 1997. These take a contemporaneous look at the management of provision by individual awarding institutions, focusing on a destination country chosen for the review. They do not lead to summative judgements on individual institutions. Recent review activity is shown in Figure 1.

Figure 1: QAA's overseas review activity

2009	Audit of overseas provision, India <a href="http://www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Audits-overseas-India.aspx">www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Audits-overseas-India.aspx</a>
2010	Audit of overseas provision, Malaysia <a href="http://www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Audits-overseas-provision-Malaysia.aspx">www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Audits-overseas-provision-Malaysia.aspx</a>
2011	Audit of overseas provision, Singapore <a href="http://www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Singapore.aspx">www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/Singapore.aspx</a>
2012	Review of UK TNE in China <a href="http://www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/China-2012.aspx">www.qaa.ac.uk/InstitutionReports/types-of-review/overseas/Pages/China-2012.aspx</a>
Ongoing	Review of UK TNE in the United Arab Emirates (focus on Dubai) Review of UK TNE in the Caribbean (focus on Trinidad and Tobago)

3 The review process entails visits to a number of 'delivery' sites, which are selected either to be representative of activity in the destination country, or according to a thematic approach. For instance, the 2012 review in China embraced a wide range of TNE models and covered all UK providers there through desk-based analysis, with a significant proportion followed up by a site visit. The ongoing review in the United Arab Emirates is more thematic, concentrating on the branch operations of UK awarding institutions.

4 Overseas reviews involve cooperation between QAA and its counterpart organisations in the destination countries, and in recent years this has included their representatives being more directly involved in review visits as observers. Since 2009, the published output from overseas reviews has comprised a country overview report, individual review reports on the selected providers, institutional case studies, and a follow-up report on provision covered by any previous review in the relevant country.

<sup>3</sup> HESA statistics 2011-12, available at [www.hesa.ac.uk/](http://www.hesa.ac.uk/). Note that the total number of TNE students includes around 250,000 reported by Oxford Brookes University in relation to its partnership with the Association of Chartered Certified Accountants (ACCA).

5 In this consultation there is no presumption that overseas reviews in their present form will be continued. Neither is there a presumption that a strictly institution-by-institution approach should be adopted. The main consideration is to meet the objectives for assuring the quality of TNE against the backdrop of the 'increasing assurance complexity and risk' to which the international education strategy refers. Nevertheless, it remains likely that the quality assurance of TNE will involve some in-country elements, and any future approach will be able to draw on the lessons learned from overseas reviews.

#### Question 1

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

#### Objectives and risk

6 UK TNE takes a wide variety of forms in many different countries whose own educational landscapes differ widely from one another and from the UK. The risks associated with TNE provision, which is necessarily remote from the awarding institution, are therefore likely to be different in nature and generally greater in magnitude than those associated with educational provision in the UK. Responsibility for the quality of UK TNE rests with the UK higher education sector and in the first instance with the awarding institution.

7 Any process for the quality assurance of TNE needs both to meet relevant objectives and to recognise the particular risks associated with TNE. Objectives centre on providing public assurance, protecting the interests of students, and securing the reputation of UK higher education. Individual objectives are distinguished as follows:

- to provide public assurance about the quality and standards of UK TNE programmes
- to protect the interests of students studying on UK TNE programmes
- to secure and enhance the reputation of UK higher education qualifications offered in other countries
- to respond rapidly to issues that may put at risk the academic standards of UK TNE programmes
- to promote enhancement of the quality of UK TNE provision
- to monitor developments in TNE provision and maintain an up to date record of UK activity for quality assurance planning purposes.

8 In considering risk, four risk outcomes are identified: these are the things to be guarded against. Two relate to the quality of TNE provision and two relate to the perception and understanding in other countries of the UK quality assurance system.

- Academic standards and quality: TNE provision may not meet the academic standards, or deliver the quality of education, required of such provision in the UK.

- Reputational damage: poor standards and/or quality of one provider can reflect adversely on other UK providers (even if there is no evidence to suggest that the other providers are of poor quality).
- Visibility of UK regulation: overseas countries may doubt the rigour of quality assurance by QAA because it is not seen to devote enough systematic attention to looking at TNE. The implication is that QAA needs a level of profile and visibility overseas sufficient to instil confidence in both the quality assurance system and UK TNE provision.
- Misconceptions about UK systems: fundamental aspects of the UK quality assurance system may not be properly understood overseas, particularly the autonomy of awarding institutions and the absence of a national or state accreditation system (such as that operating in the USA and in other countries). Too many misconceptions about the UK system may lead to a poor perception of UK TNE.

9 The level of risk varies from country to country, from one TNE model to another, and according to how the TNE provision is managed by the provider. This suggests that a risk-based element would be useful to guide the allocation of resources in the quality assurance process. This approach mirrors the risk-based approach suggested in the UK Quality Code (*Chapter B10: Managing higher education provision with others*) as a way of mitigating the risks to institutions of their commissioning, developing and managing higher education provision with others. How a risk-based element might be introduced into the quality assurance process is considered in paragraphs 25-29.

10 The risk of misconceptions about the UK quality assurance system tarnishing the perception of TNE can also be mitigated by activity outside the sphere of formal quality assurance processes. Discussions between QAA and its counterpart organisations in other countries and meetings with relevant overseas government departments can be very helpful in explaining how UK higher education is organised and regulated. Such interaction also goes some way to improving the visibility of UK quality assurance in other countries. QAA has memoranda of understanding with agencies in a number of countries where there is significant UK TNE, as shown in Figure 2, and has regular discussions with counterpart organisations in other countries too.

Figure 2: QAA's international partners

CDGDC China	China Academic Degrees and Graduate Development Centre (available on request)
HKCAAVQ Hong Kong	Hong Kong Council for Accreditation of Academic & Vocational Qualifications <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/HKCAAVQ.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/HKCAAVQ.pdf</a>
CPE Singapore	Council for Private Education <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/MoU%20CPE.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/MoU%20CPE.pdf</a>
KHDA Dubai, UAE	Knowledge and Human Development Authority <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/MoA_KHDA_13.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/MoA_KHDA_13.pdf</a>
MQA Malaysia	Malaysian Qualifications Agency (available on request)
NIAD-UE Japan	National Institution for Academic Degrees and University Evaluation <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/NIADUE.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/NIADUE.pdf</a>
QQI Ireland	Quality and Qualifications Ireland <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/MoU_QQI_13.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/MoU_QQI_13.pdf</a>
TEQSA Australia	Tertiary Education Quality and Standards Agency <a href="http://www.qaa.ac.uk/AboutUs/corporate/Documents/memorandum-cooperation-TEQSA.pdf">www.qaa.ac.uk/AboutUs/corporate/Documents/memorandum-cooperation-TEQSA.pdf</a>



**Question 2**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 3**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Student engagement**

11 Student engagement is all about involving and empowering students in the process of shaping the student learning experience. Students play a key role in quality assurance in the UK, both in the institutions where they are studying and in QAA review processes, where student views form part of the evidence considered and students are members of review teams. The Quality Code, which is the key reference point for these review processes, devotes a full chapter to the subject of student engagement. More generally, the student voice, picked up through surveys and student representations systems, is critical to the quality assurance of programmes delivered in the UK, as it illuminates qualitative elements that may not be evident from other data.

12 Where TNE is concerned, local cultural norms will influence the nature and extent of student engagement, and previously overseas reviews have dealt with this topic in some detail. The concept of students as partners is not as familiar in many other countries as it is in the UK, so the involvement of students in the quality assurance of TNE programmes, or as student reviewers, may be difficult, or even inappropriate, in terms of local expectations. To date, the opportunity to be a QAA student reviewer has been feasible only for students based in the UK, with the requirement for prior training being an important consideration.

13 The quality assurance of UK TNE should include the UK approach to student engagement as far as practicable, but the specific limitations posed in different countries must be recognised. It is essential that the process of quality assuring TNE is accepted and respected in the location where the provision is being delivered.

#### Question 4

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

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

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

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

#### The role of other QAA processes

14 In looking at how to strengthen the quality assurance of TNE, the role of other current QAA processes conducted from the UK needs to be considered, specifically the role of institutional review processes (listed below) and the Concerns procedure.

- England: Higher Education Review
- Northern Ireland: Higher Education Review
- Scotland: Enhancement-led Institutional Review
- Wales: Institutional Review (Higher Education Review (Wales) from 2014-15).

15 The institutional review processes are wide-ranging and look at how well individual institutions, in providing higher education, fulfil their responsibilities for standards, quality and information.<sup>4</sup> They are comprehensive in the sense that over a period of time all the relevant institutions are reviewed and each review involves consideration of the complete range of an institution's higher education provision. While this means that TNE is included in these processes, it is not their main focus, so the processes are not sufficiently equipped to deal with issues specifically relevant to TNE. Since reviews are conducted in the UK, this means that for TNE the processes are inevitably better placed to review procedures as documented rather than as implemented. For each institution, reviews, though regular, are fairly infrequent relative to the likely developments in TNE between one review and the next.

16 The Concerns procedure is used for investigating systemic or procedural problems to do with standards, quality and information in relation to providers of UK higher education.<sup>5</sup> It is designed as a reactive process, undertaking investigations without being tied to a schedule. It can also trigger investigation of related systemic problems in other countries. However, it does not explore developing issues that might lead to concerns in the future. A separate protocol operates in Scotland, though its purpose is essentially the same.<sup>6</sup>

<sup>4</sup> *Higher Education Review: A handbook for providers*, available at [www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/HER-handbook-13.aspx](http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/HER-handbook-13.aspx).

*Enhancement-led Institutional Review: Handbook*, available at [www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/ELIR-handbook-3.aspx](http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/ELIR-handbook-3.aspx).

*Institutional Review (Wales) Handbook*, available at [www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/IR-Wales-handbook-2012.aspx](http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/IR-Wales-handbook-2012.aspx).

<sup>5</sup> [www.qaa.ac.uk/Complaints/concerns/Pages/default.aspx](http://www.qaa.ac.uk/Complaints/concerns/Pages/default.aspx)

<sup>6</sup> [www.qaa.ac.uk/Scotland/AboutUs/Pages/Complaints-in-Scottish-higher-education.aspx](http://www.qaa.ac.uk/Scotland/AboutUs/Pages/Complaints-in-Scottish-higher-education.aspx)

17 An assessment of how well these other QAA processes meet the individual objectives proposed for the quality assurance of TNE is given in Figure 3. From this assessment it is clear that they can only partially fulfil the objectives. This implies the need for a quality assurance process that would concentrate on the objectives that the other processes are less well able to meet. In that case it would:

- provide assurance to a public that is outside the UK and protect the interests of students who are also outside the UK
- focus on the collective reputation of UK TNE
- promote enhancement of the quality of UK TNE provision
- monitor developments in TNE provision and maintain an up to date record of UK activity for quality assurance planning purposes.

Figure 3: Other QAA processes

To what extent do they meet the objectives for quality assurance of TNE?

Institutional review processes	Concerns procedure or protocol
Objective 1: Provide public assurance on quality and standards	
Limited <ul style="list-style-type: none"> <li>• Broad remit: TNE not main focus</li> <li>• No country perspective</li> </ul>	Partial <ul style="list-style-type: none"> <li>• Report published if concern upheld</li> <li>• Useful adjunct to other processes</li> </ul>
Objective 2: Protect interests of TNE students	
Limited <ul style="list-style-type: none"> <li>• Broad remit: TNE not main focus</li> <li>• Little TNE student engagement</li> <li>• No country perspective</li> </ul>	Partial <ul style="list-style-type: none"> <li>• Key objective of process</li> <li>• TNE students can raise concerns</li> </ul>
Objective 3: Secure and enhance reputation of UK HE	
Limited <ul style="list-style-type: none"> <li>• Focus on single institution, not on collective reputation of UK TNE</li> <li>• No country perspective</li> </ul>	Partial <ul style="list-style-type: none"> <li>• Reactive process: good when triggered, poor when not</li> </ul>
Objective 4: Respond rapidly to identified concerns	
Poor <ul style="list-style-type: none"> <li>• Scheduled process, relatively infrequent</li> </ul>	Good <ul style="list-style-type: none"> <li>• Process not tied by schedule</li> <li>• Deals with issues in timely manner</li> <li>• Investigations may be extended from one country to other countries</li> </ul>
Objective 5: Promote enhancement of quality of TNE provision	
Limited <ul style="list-style-type: none"> <li>• Broad remit: TNE not main focus</li> <li>• No country perspective</li> </ul>	Partial <ul style="list-style-type: none"> <li>• Not a prime objective of process</li> <li>• Deals mainly in remedial action</li> </ul>
Objective 6: Monitor developments in TNE provision and maintain a record of activity	
Poor <ul style="list-style-type: none"> <li>• Scheduled process, relatively infrequent</li> </ul>	Not applicable <ul style="list-style-type: none"> <li>• Not an objective of the process</li> </ul>

18 A process devised to meet these refined objectives should be sympathetic to the work of other processes, and should be flexible in its application so as to vary the intensity or frequency of scrutiny according to the perceived risk attached to specific TNE provision. It therefore seems likely that the process will be comprised of a number of building blocks that can be fitted together in different ways according to the provision under review.

19 The TNE process would engage with institutional review processes and the Concerns procedure so as to complement their stronger points in relation to TNE. There would be no reason to reinvent the Concerns procedure, although it may be necessary to give it a higher profile overseas. The possibility of some adaptation of institutional review to increase its scrutiny of TNE is considered in paragraphs 49-52.

#### **Question 5**

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

## **Building blocks for the quality assurance of TNE**

### **The information base**

20 In order to assure the quality of UK TNE it is necessary to have an up to date picture of what UK TNE activity there is, and where it is. Some information is available from the Higher Education Statistics Agency (HESA), based on the annual aggregate offshore record, and this has been supplemented by survey data provided by institutions to QAA, but restricted in scope to the next target country or region for an overseas review.

21 Currently, HESA collects data from higher education institutions on the number of students (undergraduate and postgraduate) studying for their awards in different countries, classified according to the level of study. The numbers can also be analysed according to whether students are registered directly with the UK institution or with a partner institution, and whether they are studying at a branch campus, through a collaborative arrangement or by distance learning. The data do not extend to the numbers of students studying at particular branches or links or on particular programmes at a branch or link. It is this level of detail that needs to be filled in by QAA in preparation for each overseas review. Alternative providers with degree awarding powers are not covered by the annual aggregate offshore record, though they are included in QAA surveys.

22 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. While information may also be obtained by QAA from its counterpart organisations in other countries, this is subject to the existence of agreements covering information sharing, so the information obtained is patchy. At any given time,

therefore, the 'worldview' of UK TNE is currently restricted to what can be interpreted from the annual HESA data.

23 The Quality Code (*Chapter B10: Managing higher education provision with others*) anticipates that higher education providers will maintain records of their TNE 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 institutions. The Quality Code also explains that individual reputations and public confidence in UK higher education depend in part on a willingness to be open and informative about such activities.

24 A range of data, sufficient to underpin the quality assurance of TNE, needs to be collected in a common format on a regular basis. In the medium term, this might involve modification to the data collected by HESA in the annual aggregate offshore record. In the shorter term it might require a comprehensive survey of TNE. An indication of the minimum dataset that might need to be maintained by institutions for quality assurance planning purposes is given in Figure 4.

Figure 4: Indicative minimum dataset

The indicative minimum dataset supplements the HESA annual aggregate offshore record with further details about the TNE providers and the programmes being delivered. It is similar to the records that institutions keep themselves.

Data required	
For each UK institution	<p><b>Type of TNE activity</b> (as categorised by HESA)</p> <ul style="list-style-type: none"> <li>• Overseas branch of UK awarding institution</li> <li>• Overseas partnership: students registered at UK institution</li> <li>• Overseas partnership: students registered at partner organisation</li> <li>• Distance learning (may involve in-country support centre)</li> </ul>
For each type of TNE activity	<p><b>TNE provider information</b></p> <ul style="list-style-type: none"> <li>• Name (weblink) and location (town, country)</li> <li>• Date of first student intake (to establish start date for TNE activity)</li> </ul>
For each TNE provider	<p><b>TNE programme information</b></p> <ul style="list-style-type: none"> <li>• Programme name</li> <li>• Award level (according to FHEQ levels 4-8)</li> <li>• Award type (single, joint, double or multiple)</li> <li>• Subject area (according to JACS: A, B, C, and so on)</li> <li>• Student numbers</li> </ul> <p>(Note that programmes delivered by distance learning without the involvement of an in-country support centre would be grouped by country, and listed separately.)</p>

**Question 6**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**The risk-based element**

25 The consideration of risk in other QAA review processes focuses on the past performance of an institution as a principal indicator (based on the judgements, recommendations and features of good practice contained in previous review reports). In the case of TNE, an institution's track record in managing its collaborative arrangements would be most relevant. Account is also taken of institutional strategies and reflective analysis, as well as information derived from environmental scanning. However, a mainly retrospective and institution-centred approach may not be suitable for TNE, which is developing quickly and takes on diverse forms.

26 While the track record of an institution may still have a bearing on any risk-based analysis of TNE, other risks may be country-specific, or specific to the form that TNE takes. This shifts the focus from risks being attached to institutions towards risks being attached to how and where TNE activity is being undertaken. It also shifts the focus of analysis to the future, so that the risk-based element of quality assurance is used as a way of anticipating problems that may be developing with a view to early prevention.

27 The application of a risk-based approach to the quality assurance of TNE would require certain risk parameters to be identified. These should be fairly simple, based on readily available information, and used as a guide to the extent of quality assurance activity, not as the driver of an inflexible process. The approach would evolve over time as available information improved and experience in risk assessment was gained.

28 Previous overseas overview reports, produced by QAA since 2009, have highlighted important factors for institutions to focus on when establishing and operating TNE provision. These include the type of TNE, the stage which the provision has reached in its development, the context in which it operates and the way in which it is managed by the responsible UK institution. The factors provide a basis for the indicative risk parameters given in Figure 5.

Figure 5: Indicative risk parameters

Parameters for risk outcomes associated with TNE provision		Parameters for risk outcomes associated with quality assurance	
Information compiled by QAA from statistics, surveys and published reports			
Initial analysis (all UK TNE)	<ul style="list-style-type: none"> <li>UK institution's experience of operating in relevant country</li> <li>UK institution's experience of providing TNE in other countries</li> <li>UK institution's quality assurance track record</li> <li>Duration of relationship with overseas partner or other link</li> <li>Student numbers on relevant TNE programmes</li> <li>Rate of growth in student numbers</li> </ul>	<ul style="list-style-type: none"> <li>Interval since last QAA review visit in relevant country</li> <li>Interval since last QAA institutional review report on relevant institutions</li> <li>Extent of relevant QAA publication activity</li> <li>QAA's relationship with counterpart organisations in relevant country and any issues raised</li> <li>Deployment of Concerns procedure in relevant country</li> </ul>	
Information provided to QAA by UK institutions from extant documentation			
Detailed analysis (selected TNE provision)	<ul style="list-style-type: none"> <li>Complexity of regulation in relevant country for UK overseas operation</li> <li>Frequency of contact between UK institution and overseas operation</li> <li>Effectiveness of UK institution's monitoring of overseas operation</li> <li>Adequacy of UK institution's resourcing of TNE provision</li> <li>Staffing model for programme delivery</li> <li>Training and support for overseas staff</li> <li>Proportion and level of programme delivered in UK</li> <li>UK institution's involvement in:                             <ul style="list-style-type: none"> <li>student admissions</li> <li>programme delivery</li> <li>assessment</li> </ul> </li> <li>English language requirements and support arrangements (if applicable)</li> <li>Student performance data</li> <li>Student satisfaction data</li> </ul>	<ul style="list-style-type: none"> <li>Accreditation or recognition by overseas quality assurance agencies</li> <li>Accreditation or recognition by either UK or global accreditation bodies</li> </ul> <p>(Note: QAA may also have access to relevant reports through its information-sharing agreements)</p>	

29 Any risk-based element to the quality assurance of TNE needs to be applied with care. This is because:

- the purpose is to understand better the nature of risks associated with TNE activity, to mitigate them where possible, and to encourage good practice; the object is not to instil such a fear of risk-taking that healthy innovation is stifled
- the intention is to have a few, easily measurable, parameters that can be used as a guide to where additional quality assurance effort may be helpful; the object is not to develop a complex risk model that entails burdensome collection of information
- it is important to concentrate attention in quality assurance not just on activity that appears to be most risky, but also on showcasing good examples of UK TNE, so as to improve the practice of others and have a positive impact on the reputation of UK TNE in general
- a lack of overseas visibility of UK quality assurance has been identified as a risk in itself, and this risk may be increased if risk-based factors always tend to direct resources away from overseas visits on grounds of their relatively high cost; a balance needs to be drawn between cost-effectiveness and the need for the quality assurance process to be seen in action.

#### Question 7

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

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

STRONGLY AGREE

AGREE

NEITHER AGREE NOR DISAGREE

DISAGREE

STRONGLY DISAGREE

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

### Desk-based analysis

#### Initial analysis

30 Desk-based analysis offers a potentially cost-effective way of tackling some aspects of the quality assurance of TNE without the expense of travelling. The starting point would be the information base (Figure 4), supplemented by any available published reports and input from the organisations with which QAA has information-sharing agreements. (In using this latter information, QAA necessarily takes into account that concepts of standards and quality in other countries may not be the same as in the UK.) The initial analysis by QAA would help it keep abreast of TNE developments over time: it would show where UK TNE was growing, or in decline; and it would highlight trends in types of activity and changes in the activities of individual institutions.

31 Combined with the application of simple risk parameters (Figure 5), the initial analysis would inform decisions about the scale and scope of planned review activity; for example, whether it should focus on a particular country, on a specific type of provision, or on some other theme, and which review activity might require an overseas visit and which



could be conducted from the UK. To give an illustration, it might be decided to look at online distance-learning provision and to do this mainly from the UK.

32 This process of regularly analysing information, applying risk parameters, and planning review activity, lends itself to the publication by QAA of a prospective review programme for TNE and its underlying rationale. This might be published annually, covering the plans for the next two or three years. An indicative programme of work is given in Figure 6.

Figure 6: Indicative programme of work

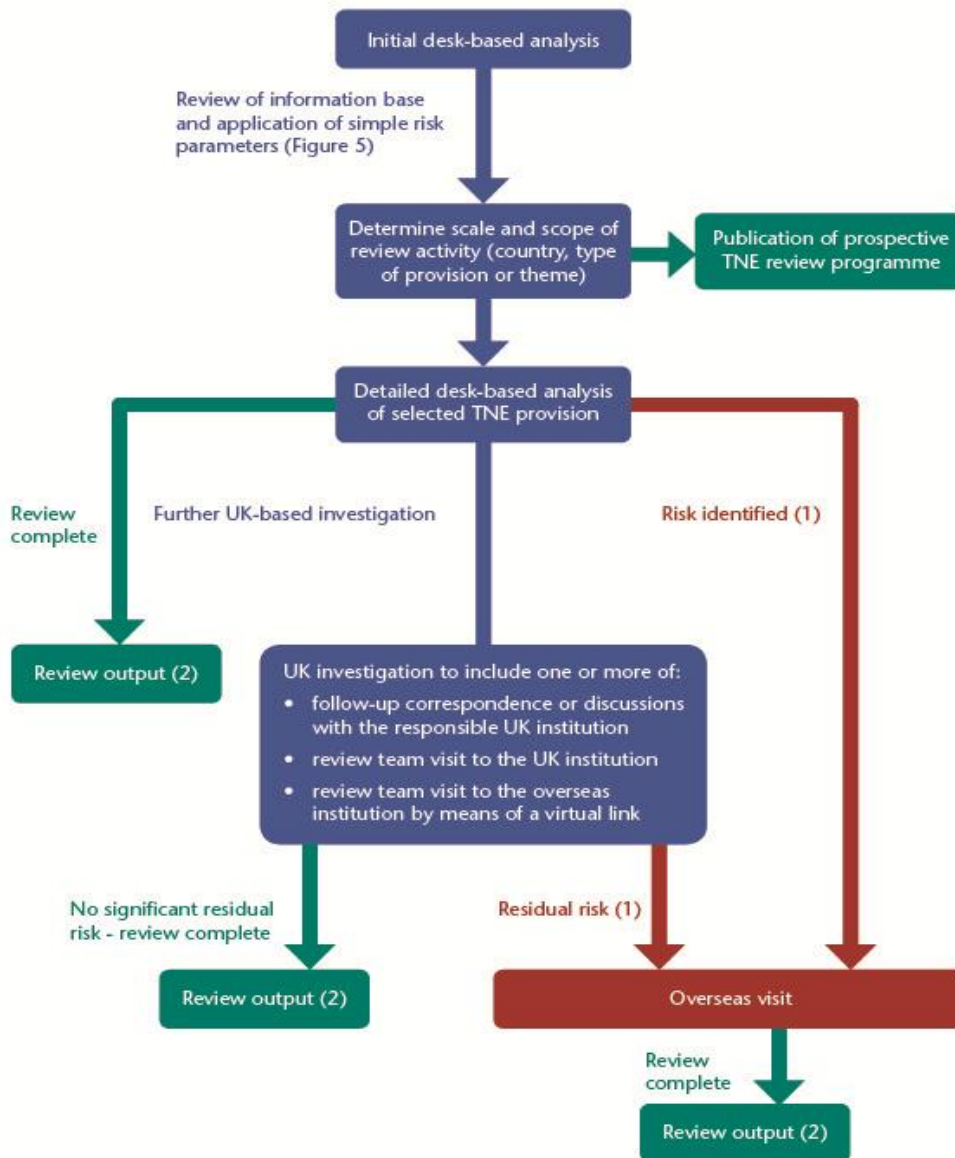
Planned activity	
Year 1	<ul style="list-style-type: none"> <li>• Desk-based analysis of the latest worldwide survey of UK TNE, published reports and information from counterpart organisations</li> <li>• Overseas review visit to country/region [A]                             <ul style="list-style-type: none"> <li>– rapid increase in UK TNE provision in [A]</li> </ul> </li> <li>• Thematic project, for example 'new provision and due diligence' (may involve desk-based work and some UK/overseas visits)</li> </ul>
Year 2	<ul style="list-style-type: none"> <li>• Desk-based analysis of the latest worldwide survey of UK TNE, published reports and information from counterpart organisations</li> <li>• Overseas review visit to country/region [B]                             <ul style="list-style-type: none"> <li>– issues raised by QAA's in-country counterpart organisation</li> <li>– several years since QAA's last review visit to [B]</li> </ul> </li> <li>• Thematic project, for example 'higher education alternative providers and UK TNE' (may involve desk-based work and some UK/overseas visits)</li> </ul>
Year 3	<ul style="list-style-type: none"> <li>• Desk-based analysis of the latest worldwide survey of UK TNE, published reports and information from counterpart organisations</li> <li>• Overseas review visit to country/region [C]                             <ul style="list-style-type: none"> <li>– recent change in regulatory environment in [C]</li> </ul> </li> <li>• Thematic project, for example 'joint or double awards' (may involve desk-based work and some UK/overseas visits)</li> </ul>

### Detailed analysis

33 The initial analysis for planning purposes would lead on to a more detailed desk-based analysis of the selected TNE provision in the review programme. This would be based on relevant extant documentation made available by the relevant UK institution. It would be undertaken by members of a review team with the risk parameters (Figure 5) being used as a reference point. This desk-based work might be sufficient in itself to complete the review, or indicate a need for further investigation.

34 There was an increased use of desk-based analysis in the 2012 overseas review in China, which helped to achieve greater coverage of provision, although it was not used in conjunction with risk parameters. A flow diagram showing how these two elements might operate together is given in Figure 7.

Figure 7: TNE quality assurance process



- 1 Risk to one or more of:
  - academic standards and quality
  - reputational damage
  - visibility of UK regulation
  - misconceptions about UK systems.
- 2 Review outputs include one or more of:
  - individual review reports on specific provision
  - case studies on selected provision or themes
  - update on the previous country review
  - country overview report
  - annual report on quality assurance of UK TNE.

**Question 8**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Review visits**

35 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. If there are still points to be clarified following the desk-based analysis, then one or more of the options given below could be adopted to progress or complete the review.

- Follow-up correspondence or discussions with the responsible UK institution.
- Review-team visit to the UK institution.
- Review-team visit to the overseas institution by means of a virtual link.

36 If after this stage there appears to be no significant residual risk associated with the provision, there would be no necessity to see it firsthand through an overseas visit, and the review of the provision would therefore be completed in the UK. On the other hand, the review of some TNE provision will entail an overseas visit on the grounds of residual risk.

37 However, the need to look more closely at potentially risky TNE provision is only one reason for an overseas visit. Other reasons are related to enhancing the collective reputation of UK TNE, by raising the profile of UK quality assurance in other countries and by exemplifying high quality, or innovative, provision. A review leading to positive outcomes might achieve both of these strands very well, but the use of a case study is another possible option.

38 Overseas visits are costly: in order to mitigate costs visits may be combined so that those needed in a single country or geographic area are undertaken during the same overseas trip. As mentioned in paragraph 29, there is a balance to be drawn between cost-effectiveness and the visibility of the TNE quality assurance process in other countries.

**Question 9**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

## Reviewers and review teams

39 In assembling overseas review teams, QAA draws on the pool of peer reviewers that it uses for reviews conducted in the UK. All will have received QAA's training for at least one of the institutional review processes, and they are selected for overseas reviews on the basis of expressions of interest, which include details of any particularly relevant expertise they are able to offer. Potential reviewers are checked for conflicts of interest, and those selected are given briefings tailored to the country for the overseas visit. There is no additional training specific to overseas review.

40 The total number of reviewers involved in an overseas review varies according to how many separate visits are planned during the trip to look at specific provision. For example the visit to China in 2012 involved five reviewers and the visit to the United Arab Emirates in 2014 will involve four. Site visits to specific provision overseas typically involve a team of two reviewers and one QAA officer. Student reviewers have not been used. Increasingly, review teams have been joined by a representative from QAA's counterpart organisation in the destination country, in the capacity of observer.

41 There are several ways in which the composition of TNE review teams might be modified and developed in future:

- the greater use of reviewers with specialist expertise in relation to the country or type of provision, either drawn from the pool of peer reviewers or brought in as consultants
- the inclusion of a student reviewer in line with established practice in institutional review processes, subject to the context in specific destination countries
- the greater use of international reviewers - possibly drawing on the expanding cohort of international reviewers associated with QAA's institutional review processes
- the greater use of input from QAA's counterpart organisations in the conduct of reviews overseas.

42 In the recipient countries of UK TNE, it is possible that the UK quality assurance system may gain in respect and authority if review teams include international reviewers and those with some clear expertise in international education. Such developments might also increase the diversity of the reviewer pool available for reviews in the UK.

**Question 10**

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Review outcomes**

43 During overseas reviews, the Quality Code is used as a guide and key reference point, in particular *Chapter B10: Managing higher education provision with others*. More generally, the reference points and guidance published by QAA to support standards and promote quality enhancement embrace TNE. These can readily be extended to deal with additional topics of particular relevance to TNE; for example, guidance on joint and double degrees is now under development as a supplement to *Chapter B10*. The Quality Code and related guidance also make detailed reference to other relevant publications which users may find helpful.

44 Overseas review reports restrict themselves to making recommendations and highlighting positive features. They do not lead to a judgement concerning any individual institution's capacity for providing TNE. The reasoning is that it could be unfair to make such a broad judgement based on close scrutiny of just one, or a few, examples of provision in a particular country, especially as the practical and regulatory issues to be dealt with are different from country to country. The same reasoning would still apply even in a strengthened TNE quality assurance process since it is unlikely that a sufficient range of any single institution's TNE provision, in different parts of the world, would be looked at contemporaneously.

45 Judgements are used in other QAA review processes and can be useful in providing a concise and clear position for public assurance purposes. They may also be differentiated (as for example in Higher Education Review), so that different judgements may apply to provision delivered wholly by the institution and that offered through arrangements with other organisations. In principle, there are possibilities for introducing some form of judgement into the TNE quality assurance process:

- a judgement about an institution's management of the specific TNE provision under scrutiny
- a judgement about an institution's capacity for providing TNE in a particular country.

46 There is also the related possibility of introducing some sign of approbation for an institution's capacity to manage TNE, in other words some sort of 'badge'. For example, a positive judgement relating to TNE in a particular country might enable an institution to gain a country 'badge'. Of course, the natural corollary of a mechanism for awarding a 'badge' is that there must also be a mechanism for taking it away in appropriate circumstances. Otherwise the badges cease to have meaning and value.

#### **Question 11**

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

#### **Question 12**

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

## Review outputs

47 The output from overseas reviews currently includes:

- individual review reports on specific TNE provision, identifying positive features and making recommendations
- case studies centred on aspects of selected TNE provision or particular themes, which do not include recommendations
- an update on the provision covered in the previous country review
- an overview report on UK TNE in the destination country drawing on available survey data, desk-based analysis and the reports and case studies resulting from in-country visits.

48 All of the outputs listed in paragraph 47 would be feasible to produce from any future TNE quality assurance process, but the development of an annual report on the quality assurance of UK TNE could be considered as well. This might contain:

- a collation of information and relevant findings, including good practice, covering the previous year, drawing on institutional review processes and the Concerns procedure, as well as specific reviews of TNE provision
- forward plans for the review programme for TNE (paragraph 32 refers)
- a summary of developments to the Quality Code and their relation to TNE.

### Question 13

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

## Links with institutional review processes

49 To date, the outcomes of overseas reviews have provided a reference point for institutional reviews and vice versa. However, there may be scope to develop more explicit links and to make the institutional review processes work harder on the quality assurance of TNE.

50 Institutional review processes might, as a matter of policy, always look at some TNE provision where such provision exists at the institution under review. (At present, the review processes look at a sample of collaborative provision, which may or may not include TNE.) In sampling provision, the review might concentrate on programmes where students transfer to the UK for part of the programme - opening up the possibility of meeting students and comparing their experience and performance with those following similar programmes, but based in the UK throughout. Figure 8 gives an indication, based on Higher Education Review, of what might easily be achieved in the short term.

Figure 8: Higher Education Review and TNE

Higher Education Review (HER) is the review method for universities and colleges in England and Northern Ireland. As currently specified, the review team has discretion over how many and which overseas links it looks at.

The proposals for strengthening the quality assurance of TNE would allow HER and the new TNE process to complement one another in ways that previous institutional and overseas audit or review methods have been unable to do.

- Improved information and desk-based analysis of risk should provide helpful pointers to HER review teams in their sampling of TNE provision.
- The TNE process, by taking on primary responsibility for looking at the overseas aspects of TNE provision, would allow HER review teams to focus their efforts on the aspects which can be looked at in the UK. Top-up degrees and advanced entry to programmes in the UK are illustrative examples.
- In turn, HER should generate evidence to inform the prospective review programme for TNE.

51 Other aspects of TNE that might very usefully be looked at from the UK through institutional review processes include:

- issues of certification as they apply to TNE programmes, for example, joint or double awards
- issues surrounding publicity and marketing of TNE programmes
- online distance-learning provision.

52 A more radical proposition is that branch campus operations (above some agreed size or level of complexity) could be subject to their own institutional review, separate from that of the responsible institution in the UK, thereby giving such operations a degree of scrutiny proportionate to their scale. If this were adopted, the same approach to the frequency, duration, and resource allocation would apply to these reviews as to equivalent reviews of institutions in the UK. The possible outcomes would also be the same, and there would be a review report with judgements.

**Question 14**

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

- STRONGLY AGREE
- AGREE
- NEITHER AGREE NOR DISAGREE
- DISAGREE
- STRONGLY DISAGREE

Please give your comments.



### Question 15

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

## Funding the quality assurance of TNE

### Resource implications

53 QAA's core activity is currently 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.

54 Strengthening the quality assurance of TNE will have clear resource implications and consequent funding implications. Some of the aspects described in this consultation seem to be fundamental to any future approach, whereas others are optional and might not be included in the final version of the process.

- Information: building an improved information base is fundamental and will entail some increase in and greater regularity of input from institutions. This will especially be the case in the early stages; although once data collection becomes routine, it should become less resource-intensive.
- Risk: strengthening the risk-based element of quality assurance implies additional effort in analysing information and in deriving and interpreting risk-based parameters. This would mean additional staffing costs for QAA.
- Student engagement: developing student engagement in relation to TNE provision is important and could require resources to be devoted to a special project to look at how this might best be achieved.
- Student reviewers: if adopted, the inclusion of student reviewers would certainly mean extra cost in terms of both training and the size of the review team. (The student reviewer would most likely be an additional member of the review team, as these have typically comprised only two peer reviewers.)
- International reviewers: expanding the pool of international reviewers is likely to incur additional costs, particularly for training. These costs could be shared with institutional review processes and spread over a number of years.
- Overseas campuses: separate institutional reviews, if introduced for sizeable branch operations, would add to the number and cost of institutional reviews undertaken by QAA. However, there should be some cost saving to offset this increase since these campuses would no longer be a part of any ongoing programme of overseas review visits.

## Funding principles

55 It seems reasonable that the sources and level of funding contributions for strengthening the quality assurance of TNE should mirror the beneficiaries of the work undertaken and the extent of their benefit. In that case:

- every institution would make a base-level contribution as all are affected by the international reputation of UK higher education - even the minority that do not have TNE provision of their own (international reputation can also affect an institution's ability to recruit international students or researchers to the UK)
- institutions with TNE provision would make an additional contribution proportionate to the size and extent of this provision
- the higher education funding councils would make a contribution, perhaps focused on the initial set-up of a strengthened quality assurance process for TNE (for instance, this would align with HEFCE's role in protecting and promoting the collective student interest).

56 This consultation seeks to establish the basic principles for funding, rather than the exact mechanisms for calculating contributions. Factors such as the number of TNE students, the types of provision and perhaps also the country or region where the provision is located need to be considered in arriving at the appropriate level for an institution's contribution above the base level. A special funding arrangement would probably be necessary for the separate institutional review of overseas campuses (if this were adopted). Additional detail relating to these factors is given in Figure 9.

Figure 9: Funding mechanism - possible factors to be considered

### Scale of provision

Student numbers could be used as a way of measuring the scale of TNE provision. The most readily available source is the student headcount from the HESA annual aggregate offshore record. One option for introducing funding for TNE quality assurance based on scale of provision would be to adjust the banding for QAA subscriptions to include TNE students as well as UK-based students.

### Country banding

The cost of quality assuring TNE provision varies to some extent depending on the location of the provision. Travel costs for overseas visits is one variable; another is the reliance that can be placed (through information sharing agreements) on the 'local' quality assurance systems operating in different countries, as this might obviate the need for overseas visits in some cases.

### Provision type banding

Quality assuring some types of provision may be inherently more costly than others. By way of illustration, a review of distance-learning provision might be completed mainly through desk-based analysis, even though a very large number of students may benefit from the provision. Conversely, provision involving face-to-face teaching overseas might entail an overseas review visit, even if there were a smaller number of students involved, making the quality assurance of this provision more costly, relative to the number of students benefiting.

57 Ahead of the results of the consultation, no comprehensive assessment has been made of the cost of introducing and operating a strengthened process for the quality assurance of TNE. The results of the consultation will lead to more detailed work on costing the process, together with a specific proposal for the funding mechanism. Whatever funding mechanism is finally 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 TNE provision at all.

#### Question 16

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

Every institution should make a base-level contribution.

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Institutions with TNE provision should make a proportionate contribution.

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

### Overview

58 To provide a snapshot of the potential process for the quality assurance of TNE that has been developed in this consultation document, the following is a list of the characteristics which could be included.

- An improved information base.
- A risk-based element to vary the intensity or frequency of scrutiny of individual TNE provision.
- A flexible approach starting with desk-based analysis and leading, as necessary, to follow-up visits in the UK and/or overseas.
- Closer working with institutional review processes and the Concerns procedure.
- Some adaptation of institutional review processes so that they focus more constructively on TNE.
- Greater transparency, through publication of a prospective review programme.
- A recognition of the importance of highlighting good practice.
- An emphasis on the collective reputation of UK TNE.

#### Question 17

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

## Consultation questions

For further details, and to complete the survey, go to [www.qaa.ac.uk/Newsroom/Consultations/Pages/TNE.aspx](http://www.qaa.ac.uk/Newsroom/Consultations/Pages/TNE.aspx).

### Question 1 (There is a 300 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

### Question 2 (There is a 500 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

### Question 3 (There is a 500 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 4** (There is a 500 word limit.)

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 5** (There is a 300 word limit.)

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 6** (There is a 500 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 7** (There is a 500 word limit.)

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 8** (There is a 300 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 9** (There is a 300 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 10** (There is a 500 word limit.)

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 11** (There is a 500 word limit.)

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

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 12** (There is a 500 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 13** (There is a 300 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 14** (There is a 500 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.



**Question 15** (There is a 300 word limit.)

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

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Please give your comments.

**Question 16** (There is a 500 word limit.)

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

Every institution should make a base-level contribution.

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

Institutions with TNE provision should make a proportionate contribution.

STRONGLY AGREE  
AGREE  
NEITHER AGREE NOR DISAGREE  
DISAGREE  
STRONGLY DISAGREE

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

**Question 17** (There is a 500 word limit.)

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

**QAA 577 12/13**

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