



Strengthening the quality assurance of UK transnational education

**Consultation report
May 2014**

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Introduction

1 The consultation: Strengthening the quality assurance of UK transnational education (TNE) was jointly managed by the Quality Assurance Agency for Higher Education (QAA) and the UK Higher Education (HE) International Unit. It opened on 16 December 2013 and closed on 10 March 2014. Briefing events were held in London, Cardiff and Glasgow.

2 The basic question underlying the consultation was: 'What is needed to strengthen the quality assurance of TNE?' and the presumption at the outset was that some strengthening of the present arrangements would be necessary. Note that the term TNE is used in the context of higher education providers that are degree-awarding bodies.

3 The consultation document set out proposals for a quality assurance process that would not always be the same fixed structure, but flexible, choosing from a number of building blocks as needed to meet specific requirements. These comprised: an information base; a risk-based element; desk-based analysis; review visits; reviewers and review teams; review outcomes; review outputs; and links with institutional review processes.

4 The consultation survey mostly related to the building blocks and contained some open ended questions. There were 16 questions in all, for which ratings were compulsory, with respondents indicating the extent of their agreement on a five-point scale: strongly agree; agree; neither agree nor disagree; disagree; strongly disagree. The addition of comments was optional.

5 Of the total number of responses (113) submitted through the survey, over 75% were from institutions (including alternative providers that are degree-awarding bodies). The remainder were from individuals (8%) and organisations (16%). The latter included professional, statutory and regulatory bodies (PSRBs); government or sector bodies; QAA's overseas counterpart agencies; and one university's students' union.

6 The next section gives an overview of the consultation results. A full analysis of the results, both quantitative and qualitative, is given later.

Overview of the consultation

7 There was a high level of agreement (69%) with the proposition in Question 1 - that the quality assurance of UK TNE needs to be strengthened. The comments brought out a number of themes that recurred throughout the responses to later questions in the consultation.

8 Many institutions and organisations used their comments to amplify their overall agreement that the quality assurance of UK TNE needs to be strengthened. Others did so with caveats, such as the need to be proportionate so as not to stifle innovation, the need to recognise the diversity of TNE provision in developing the approach to its quality assurance, and the importance of avoiding an overly bureaucratic process.

9 Those who did not agree with the proposition, or who were neutral, saw the current systems as adequate, and questioned whether there was really any evidence of a need for strengthening the quality assurance of UK TNE. Some institutions, doubtful of a

need to strengthen quality assurance of TNE generally, conceded that newcomers to the sector, or to the business of TNE, might benefit from stronger quality assurance.

10 One of the important recurring themes was the idea that institutional review should be the process that quality assures TNE, along with all the other provision of an institution, with no need for a separate TNE process. Some institutions recognised that institutional review might need to be adapted or expanded to meet these requirements. In some cases, though, it was not entirely clear whether there was a presumption that the old process of overseas review would simply be continued, running in parallel with an expanded form of institutional review. (It is worth pointing out that when Higher Education Review (HER) was introduced, its design was predicated on there being a separate process for TNE, while in the guidelines on Enhancement-led Institutional Review (ELIR) it is made clear that Scottish institutions are presumed also to participate in the UK-wide TNE review process.)

11 Another theme that surfaced in the responses to the first question, but which came through more strongly in later responses, was that the consultation and the process focused far too much on risk and far too little on quality enhancement. The idea that 'risk-based' is a loaded term (and an unhelpful one, through negatively influencing external perceptions of the TNE that is subject to the quality assurance process) appeared in many responses.

12 Finally, many institutions called for more guidance from QAA about TNE quality assurance - what is acceptable and what is not. This also recurred elsewhere, and there does seem to be a view that the sector would benefit from QAA providing more detailed guidance.

Outcome of the consultation

13 Analysis of the consultation results has helped to shape plans for the methodology to be adopted for the quality assurance of UK TNE. Specific plans will be taken forward by an Implementation Group to be established with representation from universities and colleges across the four nations and from other interested parties. The terms of reference for this group will be based on the following principles for the quality assurance of TNE, which have been distilled from the consultation. These principles are fixed, and will set the limits for the shape of the methodology to be introduced.

Links with institutional review processes

14 While different institutional review processes operate in different parts of the UK, they have broadly comparable outcomes. A strong view from the consultation was that institutional review should remain an holistic process and embrace TNE proportionately. In that way, an assessment of the management of TNE provision would be reflected in the summative judgements reached by institutional review teams.

Principles

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

Risk-based element

15 TNE is developing quickly and takes on diverse forms, with a level of risk that varies from country to country, from one TNE model to another, and according to how the provision is managed by the UK provider. Both geographical and cultural distance can make managing TNE more difficult than managing provision in the UK. The risk-based element in the TNE review process is intended to act as a guide so that attention and resource for quality assurance can be directed to where they appear to be most needed. It is a way of anticipating problems that may be developing with a view to early prevention.

16 The phrase 'risk-based' has negative connotations and there is no need to label the process as such, particularly overseas: all review methods sample provision in one way or another. Furthermore, in selecting provision for scrutiny, the process should achieve a balance between attention to risk and the prevention of problems and opportunities for quality enhancement and the demonstration of good practice. Both are important in a process that is to command respect overseas.

Principles

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

Information base

17 There was a clear recognition in the responses to the consultation of the need to gather better information on UK TNE, ideally through the Higher Education Statistics Agency (HESA): in particular, that there needs to be regular collection of data on TNE at both provider and programme level.

Principles

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

Desk-based analysis

18 From the standpoint of cost, it makes sense to tackle the quality assurance of TNE from the UK to the extent that this can be effective. Within a given budget, greater coverage of provision is likely to be achievable through using more desk-based analysis, combined with video-telephony.

Principles

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

Overseas visits

19 Many aspects of the quality assurance of TNE are best served by overseas visits, especially those related to the student experience and student engagement, where gaining a first-hand understanding is more critical. There is also a need to look closely at provision where the desk-based analysis has identified potential risks to quality or standards. In addition, overseas visits give visibility to UK quality assurance processes for the benefit of foreign governments and regulatory bodies.

20 However, overseas visits are costly; therefore to mitigate costs it makes sense to combine visits so that those needed in a single country or geographic area can be undertaken during the same overseas trip.

Principles

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

Student engagement

21 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. Where TNE is concerned local cultural norms will influence the nature and extent of student engagement.

Principles

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

Composition of review teams

22 In assembling overseas review teams, QAA currently draws on the pool of reviewers that it uses for reviews conducted in the UK. There are obvious benefits to be gained from identifying reviewers with specialist expertise relevant to TNE and in increasing the diversity of the reviewer pool through new recruits.

Principles

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

Funding arrangements

23 Strengthening the quality assurance of TNE will have resource implications and consequent funding implications. There were two propositions in the consultation document: every institution should make a base-level contribution; and institutions with TNE provision should make a proportionate contribution. These are not mutually

exclusive, with a two-part tariff being an obvious possibility. QAA will now draw up funding proposals based on an estimate of the likely costs.

Principles

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

Action Plan for 2014-15

24 The following are the actions to be undertaken in the coming year that will take forward the strengthening of the quality assurance of UK TNE.

Ongoing overseas review work

- Carry out the overseas review of UK TNE in the Caribbean centred on Trinidad and Jamaica: the review is focused on distance learning, and the overseas visit is scheduled for November 2014.
- Start preparations for the next overseas review: destination and timing to be confirmed by July 2014.

Implementation work

(to be undertaken or overseen by the Implementation Group)

- In conjunction with HESA, develop institutional data-reporting requirements in relation to TNE, involving clarification of data definitions as necessary.
- Establish how the relationship between institutional review and TNE review should be taken forward.
- Identify branch campuses and other large provision that might be deemed suitable for their own form of institutional review.
- Review country overview reports in terms of their content and target audience.

Related QAA work

- Compile a register of reviewers with specialist expertise on TNE: this will draw on the existing register (including students) and also entail a recruitment exercise.
- Produce a pilot version of an annual publication that will provide a global overview of UK TNE activity, drawing together key developments relating to quality assurance and enhancement: the precise medium for publishing this document is to be decided.
- Publish guidance related to TNE, starting with guidance on joint/double degrees (January 2015).
- Draw up a funding proposal for the TNE quality assurance process based on a clearer estimate of its likely cost (split between set-up costs and operating costs): there will be appropriate coordination with the Implementation Group.

Detailed analysis of consultation

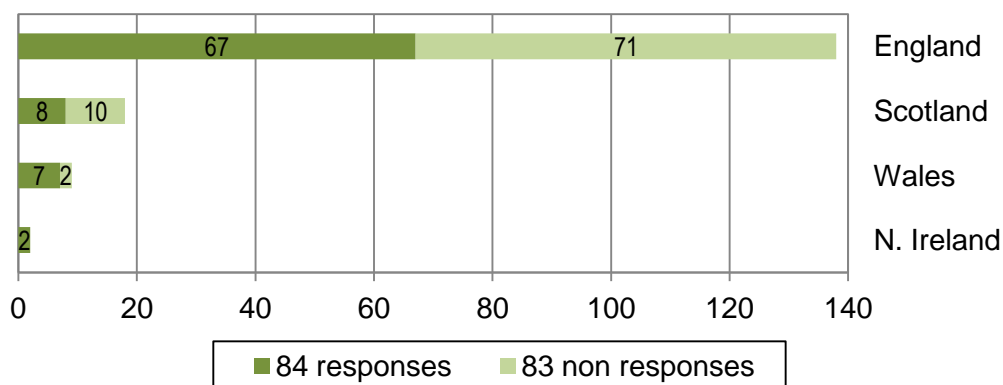
Statistical analysis

25 The total number of responses to the consultation submitted through the survey was 113. In addition, three responses were submitted outside the survey - from the Higher Education Funding Council for England (HEFCE), the Russell Group and an individual respondent.

Respondents	Number
Higher education institutions	84
Further education colleges	3
Professional, statutory or regulatory bodies (PSRB)	10
Sector/government bodies	4
Overseas agencies	3
University students' union	1
Individuals	8
Submitted outside survey	3
Total	116

26 The response rate from higher education institutions was 50%.

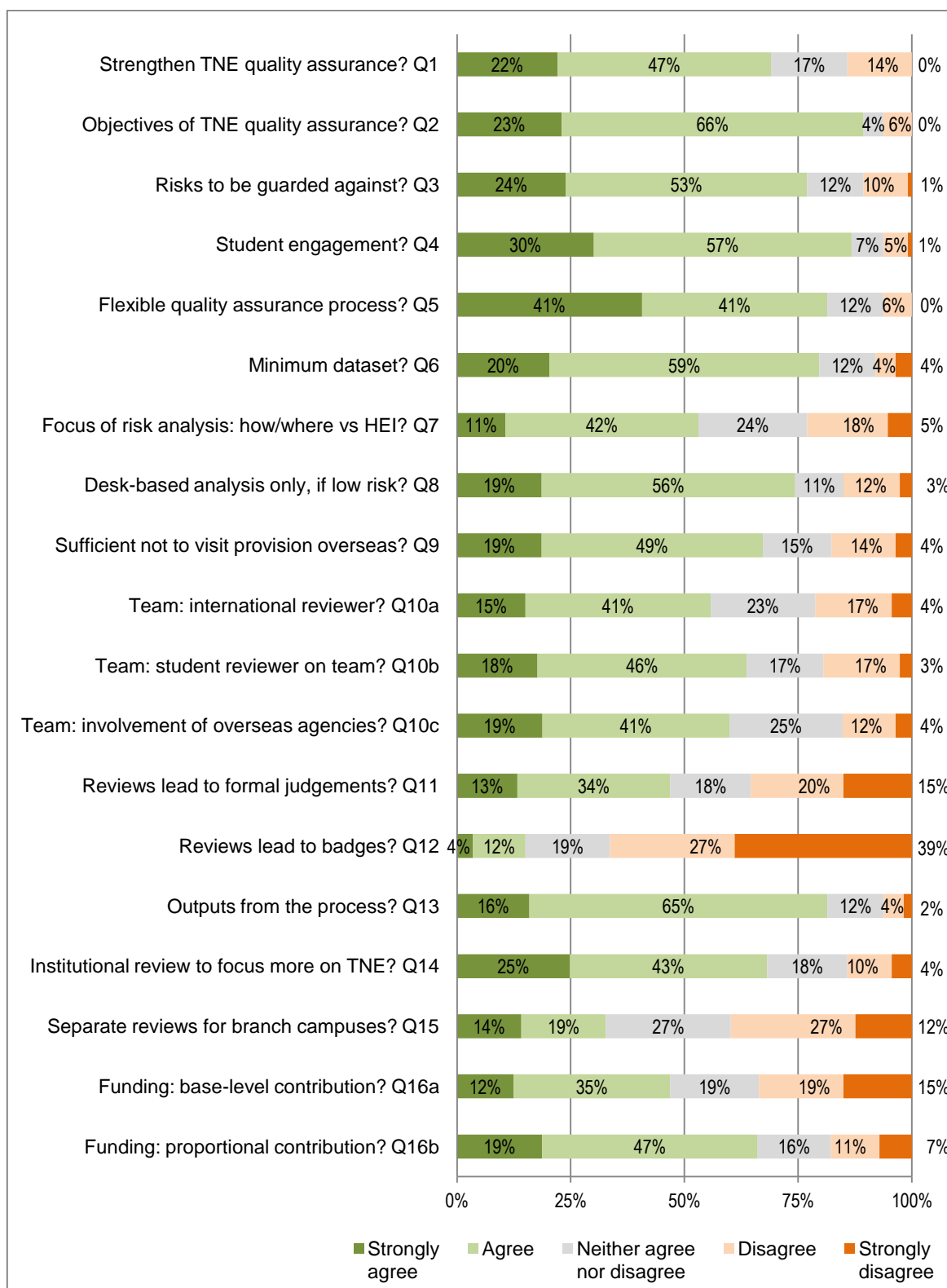
Response rate shown by country



27 Of the 83 higher education institutions that did not submit a response, 36 reported zero TNE students to HESA for the 2012-13 Aggregate Offshore Record (the most recent figures available) and a further eight reported fewer than 100. That accounts for about half of the non responses. (Note that 26 of the institutions that did not respond were, nevertheless, represented at one of the briefing events.)

28 There were 16 survey questions, with respondents indicating the extent of their agreement on a five-point scale: strongly agree; agree; neither agree nor disagree; disagree; strongly disagree. An analysis of the responses is given below:

Analysis by question



29 Respondents have rated questions 1-6 in broadly similar ways - they mainly agreed, and for most questions agreement was 70% or higher. Generally speaking, there was less consensus among later responses, although there was a high level of agreement (81%) about review outputs (Question 13). However, there was one question where the responses indicated a clear disagreement (66%) - Question 12 about the introduction of a badge system.

Analysis of comments

30 In this analysis, extracts from comments are quoted for illustrative purposes, but are not attributed to the particular respondents that made them. The numerical level of agreement among respondents is shown in brackets after each question number.

Question 1 (69%)

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

31 There was a high level of agreement with the proposition that the quality assurance of UK TNE needs to be strengthened.

32 The comments bring out a number of themes that recur throughout the responses to the various questions in this consultation. The other recurring theme, of course, is that whatever the numerical responses may appear to indicate, the comments add numerous shades of grey to either agreement or disagreement! There is a serious point here, though, and that is that the responses of those who do not choose to add a comment on a given question should not be 'lost' among the range of views and opinions expressed by those who do.

33 Many institutions and organisations used their comments to amplify their overall agreement that the quality assurance of UK TNE needs to be strengthened. Others did so with caveats, such as the need to be proportionate so as not to stifle innovation, the need to recognise the diversity of TNE provision in developing the approach to its quality assurance, and the importance of avoiding an overly bureaucratic process.

34 Those who did not agree with the proposition, or who were neutral, saw the current systems as adequate, and questioned whether there was really any evidence of a need for strengthening the quality assurance of UK TNE. Some institutions, doubtful of a need to strengthen quality assurance of TNE generally, conceded that newcomers to the sector, or the business of TNE, might benefit from stronger quality assurance:

'It is not clear what problem the proposals are seeking to solve. QAA's processes are highly praised and the current process for TNE review is regarded as a benchmark for QA agencies internationally ... and, in the absence of any clear deficiency, it would be unwise substantially to increase the bureaucratic burden and to build in further substantial costs in relation to TNE provision.'

'Whilst the quality assurance of TNE in individual institutions may need strengthening through institutional internal frameworks, we do not believe that this statement applies to the sector as a whole.'

35 One of the important recurring themes is the idea that institutional review should be the process that quality assures TNE, along with all the other provision of an institution, with no need for a separate TNE process. Some institutions recognise that institutional review might need to be adapted or expanded to meet these requirements. In some cases, though, it is not entirely clear whether there is a presumption that the old process of overseas review will simply be continued, running in parallel with an expanded form of institutional review. (It is worth pointing out that when HER was introduced, its design was predicated on there being a separate process for TNE, while in the guidelines on ELIR it is made clear that Scottish institutions are presumed also to participate in the UK-wide TNE review process.)

36 Other themes that surface here but come through more strongly elsewhere are that the consultation and the process focus far too much on risk and far too little on quality enhancement. The idea that 'risk-based' is a loaded term (and an unhelpful one, through negatively influencing external perceptions of the TNE that is subject to the quality assurance process) appears in many of the responses to other questions that relate to the risk-based approach.

37 Finally, many institutions call for more guidance from QAA about TNE quality assurance - what is acceptable and what is not. This also recurs elsewhere, and there does seem to be a view that the sector would benefit from QAA providing more detailed guidance.

Question 2 (90%)

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

38 There was an exceptionally high level of agreement with the listed objectives for the quality assurance of TNE. However, given that the list contained seven individual objectives, the comments from respondents introduced caveats to the broad level of agreement, as well as indicators as to priorities that might be attached to particular objectives. A flavour of the views expressed is given in the following selection of comments.

'The key objective ... must be to protect quality and standards of provision and the interests of students on TNE programmes.'

'Specific emphasis needs to be laid on "to protect the interests of students studying on UK TNE programmes".'

'In Scotland there is particular emphasis on quality enhancement and we feel that this should be given more prominence in the proposal.'

'We agree with most of the objectives, but are not convinced that all are achievable through external quality assurance.'

'Such items as protecting the interests of students and the reputation of UK qualifications are more sensitive to the commitment of academic staff and the culture of excellence within institutions than to formal quality assurance mechanisms.'

'The objective "to secure and enhance the reputation of UK HE qualifications offered in other countries" would be a by-product/result of TNE review processes and should not be an objective of the review itself.'

39 There were quite a few suggestions for additions to the list of objectives, including, for example, 'to promote communication between government/QA agencies in different countries'; 'to foster opportunities for staff development of all those involved with UK TNE'; and 'sharing and dissemination of good practice'.

40 The responses to this question also included suggestions about how the need for better information and guidance for institutions involved in TNE might be developed. One institution put forward that QAA and the UK HE International Unit should 'provide a service to UK institutions in understanding the local regulatory frameworks and the impact that these could have on delivery in the relevant areas', and that the two organisations also had a clear role 'in doing far more to promote the UK's quality assurance framework

so that there is clearer visibility of UK regulation and less opportunity for misconceptions'. Others emphasised the importance of using case studies and of 'gathering data about how institutions approach similar quality challenges, [which] would be useful for developing shared practice across the sector'.

Conclusion

The main thrust of the objectives has hit the mark, but there should be recognition that the means of achieving them should look beyond the confines of a quality assurance process. Greater prominence should be given to 'enhancement' - that is making quality improvements over time through the preparation of guidance, the dissemination of good practice and the use of case studies.

Question 3 (77%)

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

41 There was a high level of agreement with the listed risk outcomes - the risks to be avoided. Several PSRBs endorsed the risk outcomes on the basis that they were similar to those they had identified themselves. However, there were many negative comments from institutions - on misconceptions concerning UK quality assurance systems, on the level of reputational risk, and on the importance of the visibility of UK quality assurance processes overseas.

42 While some institutions stated they had themselves been affected by misconceptions regarding UK quality assurance systems, or were concerned about the risks to the sector as a whole resulting from an institution engaging in TNE without being fully aware of the risks, others believed that the risks of collateral damage from poor performance by other institutions was overstated, and saw their own reputation as the best shield. Some considered that the risks could only be mitigated by individual institutions, making them the necessary focus of any quality assurance process (through institutional review), as opposed to a focus on the TNE provision in a particular country or region.

43 There was little consensus as to whether visibility and understanding could be achieved through QAA and others engaging in better public relations with overseas bodies, or whether a visible quality assurance process was needed as well. However, a number of organisations working overseas considered visibility to be essential, while the British Council has indicated that the quality assurance of TNE is a subject regularly raised in its dialogue with overseas governments.

44 The point was also made (and this is a recurring theme throughout responses to the consultation) that the prominence given to risk could lead institutions to be associated with the risk outcomes, in the event of their having an overseas visit, perhaps leading to reputational damage (based on a misperception of the process), and that this might have sector-wide consequences.

Conclusion

The visibility and understanding of the UK's quality assurance system should be tackled in multiple ways by institutions, by QAA, and by the UK HE International Unit. QAA's input should build on its relations with relevant overseas bodies, alongside its direct involvement in the quality assurance of TNE. Visibility should be a natural by-product of the process, not one of its prime objectives.

Question 4 (87%)

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.

45 There was an exceptionally high level of agreement that the quality assurance of UK TNE should include the UK approach to student engagement as far as practicable. However, given the caveat embedded in the question - 'as far as practicable' - the comments really revolve around exactly *how far* this should be, and where the 'red lines' (if any) should be drawn.

46 Some respondents were very clear in their support for adoption of the UK approach to student engagement in the quality assurance of TNE:

'The UK student experience is paramount and includes student engagement.'

'Engagement with students ... is one of the cornerstones of UK higher education.'

'The UK approach to student engagement is critical.'

'It needs to be clear to in-country providers and quality assurance agencies that the student voice is seen as a vital element.'

47 But there were some dissenting voices, at the other end of the scale:

'This could come across as somewhat imperialistic - the imposition of British views and values on overseas activities.'

48 On the whole, however, respondents recognised that there was likely to be some need to set the UK approach to student engagement in the cultural context of the country in which the TNE provision was located, and that this would require some flexibility, on a case-by-case basis, as to the exact form that student engagement should take. This might even involve asking students, as well as institutions and other organisations, what level of student engagement there should be. At the same time, some argued that QAA should be doing more to make clear to overseas providers and agencies the importance attached by the UK higher education sector to student engagement and the benefits that can be realised from it. The point was also made that it was necessary for institutions to deal with issues relating to student engagement when negotiating the partnership agreement with an overseas organisation:

'When a TNE programme is set up, it is essential that there is clarity in the agreement about the processes whereby students will be engaged, including whose responsibility it is to manage that engagement (whether the awarding institution or partner).'

49 One institution considered the 'as far as practicable' phraseology to offer an easy 'get out clause', and proposed a strengthened wording such that student engagement should follow the UK model 'unless there are compelling reasons not to do so'. There were also practical suggestions that in-country comparisons between different UK TNE provision should be made, looking at the extent of student engagement achieved by different institutions. This could provide the basis for 'supporting institutions in implementing student engagement by sharing good practice from other institutions who have already achieved this implementation in difficult circumstances'.

Conclusion

Institutions should be encouraged to follow the UK model for student engagement in their TNE provision 'unless there are compelling reasons not to do so'. QAA should take every opportunity in its dealings with overseas institutions, agencies and government bodies to explain and promote the UK approach to student engagement. QAA should undertake a study of the relative achievements of UK institutions in implementing student engagement in a selected country, with a view to preparing case study material for use in the promotion of student engagement.

Question 5 (82%)

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.

50 There was a very high level of agreement with the proposition that the TNE process should be applied flexibly, according to perceived risk. Flexibility and proportionality were seen as key to the effectiveness of the new process, which ought to be commensurate with the volume and range of the TNE activity engaged in by particular institutions.

51 One institution summed up well the argument in favour of the proposition (aside from the need to make pragmatic use of limited resources):

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

52 Many institutions put forward the view that institutional review processes should be the basis of TNE quality assurance and suggested that these processes should be adapted and/or extended to meet this need.

53 The point was also made (again) that a focus on provision that was perceived as risky, based on a risk-based approach, could lead those observing the process to conclude that any TNE provision receiving scrutiny from QAA must be a bad risk: the opportunity to demonstrate good practice and enhance the reputation of UK TNE might be lost.

54 Comments included much advice on the operational pitfalls of introducing risk parameters, and on the need to ensure complete clarity about the risk assessment process. Based on its own experience, one PSRB advised that it was helpful to start with an assumption of 'full process', and look at factors that mitigated risks, with a view to reducing the need for some elements of the process.

55 One institution also expressed a preference for an adaptation of the existing country-by-country review system, as a result of which a series of case studies would be published, but with private recommendations for improvements being made to the institutions whose provision had been reviewed.

Conclusion

The TNE process should be flexible, and take some cognisance of perceived risk in selecting provision for review. However, it should not be labelled as 'a risk-based quality assurance process', and the criteria for selection should give equal weight to opportunities for quality enhancement and the demonstration of good practice. Some provision should also be selected randomly for benchmarking purposes. Complete transparency of the selection process is probably an illusory goal, but QAA should be prepared to discuss its reasons with related institutions as needed.

Question 6 (80%)

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.

56 The high level of agreement with the proposition that institutions should maintain a minimum dataset reflects a general acceptance that there is a need to have a more complete picture of UK TNE and that institutions do not regard the practicalities of maintaining the dataset as too onerous (since most already keep the relevant information).

57 The preferred mechanism is for the data to be captured and maintained by HESA so that it is public information and a useful resource for all institutions. Institutions were keen to avoid duplication of effort and minimise the number of occasions they have to supply information to external agencies. As one institution put it, 'we strongly advise that QAA work with HESA to simplify this process'. HESA has indicated that it is keen to work with QAA on developments to the national dataset for TNE.

58 Unsurprisingly, given the increased diversity of TNE arrangements, there were calls to review definitions and reach a common understanding of terms across the sector to ensure consistency of data. Some institutions favoured closer prescription through the development of common typology and templates, whereas others felt the onus was on central agencies to develop more coherent approaches to analysis, so as to limit the requirement for institutions to re-present data that they developed for their own needs.

59 Many institutions focused their comments on the limitations of the Aggregate Offshore Record, seeing it as ripe for development or overhaul - a view echoed by HESA itself. Indeed some saw the opportunity to add more fields than proposed in the minimum dataset, or in the longer term to replace the aggregate record with reporting based on individual student records along the lines used for reporting students in the UK. Quite a few institutions, as well as overseas agencies, suggested that more information should be collected in the dataset. However, there were also some reservations about additional reporting requirements and the collection of data for data's sake, if it were not actually used.

60 The treatment of overseas distance learning where there is no organised local support surfaced as a specific issue. Its inclusion in TNE was seen by one institution as a 'crucial shift' in definitions and there was some support for leaving it out.

Conclusion

QAA should work with HESA to develop an improved process for collecting data on TNE at programme level, with a view to avoiding duplication of effort by institutions. Definitions should be reviewed and clarified in the interests of consistency for both providers and users of data. The status of distance-learning programmes within the definition of TNE should be decided (with the up-coming analysis of distance-learning activity in the Caribbean providing a useful starting point for this).

Question 7 (53%)

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.

61 There was no obvious consensus with the proposition that 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, with almost a quarter of respondents registering a neutral position.

62 Respondents' interpretations of what was intended by the question seemed to vary. Some comments indicate a concern that QAA's intention might be to devise a strict typology of TNE provision, and then, according to some rigid formula, arrange these types along some sort of risk spectrum.

63 In fact, the intention was to recognise the unfairness of giving undue weight to the track record of an institution - leading (because of some past problem with its TNE provision) to its being labelled as 'a risky institution', or allowing an institution to rest for too long on its laurels, without being subject to incisive scrutiny, because it came to be seen as a 'low-risk institution'.

64 In their comments many institutions pointed out that the 'how', the 'where' and the 'by whom' were all important factors to consider, and that there was a delicate balance to be drawn between them:

'Past performance can never guarantee that problems would not arise in the future.'

'A UK institution's level of input is a vital part of the risk process here.'

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

'The form of TNE provision is an important risk factor ... However, much of the risk still remains with the institution, particularly on the reliability of its mechanisms for oversight.'

'It would make a complete nonsense of a risk-based approach to treat providers with widely differing experiences and capabilities in a similar manner.'

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

65 There was also a view that it would be helpful if more information could be made available on risks that might be encountered in particular countries or through engaging in particular types of TNE activity. There was seen to be a role here for the UK HE

International Unit, or for QAA working with its international partners, in compiling such guidance.

Conclusion

Risk-based analysis should not be overly complex, or formulaic. Countries, types of TNE and institutions should not have risk-scores attached to them. The approach should take account of an institution's experience and capability in operating TNE, but should also look for indicators as to how well particular TNE provision is being managed in a given country context.

Question 8 (75%)

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?

Question 9 (68%)

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

66 There was a high level of agreement with the proposition that the review of some TNE provision (if assessed as low-risk) might be completed solely through desk-based analysis. There was a similar, although slightly lower, level of agreement with the proposition that the review of some TNE provision might be completed solely in the UK, without visiting the provision overseas.

67 However, apart from a very few institutions which saw an overseas visit as simply an unnecessary cost, agreement with these propositions was laced with caveats.

68 In particular, there was a concern that desk-based analysis was unlikely to give sufficient regard to good practice and the importance of quality enhancement, especially within a process whose overall thrust was 'risk-based'. In the context of the reputation of UK TNE, it was important that the overseas visit did not become a signal that risks had been identified for investigation, and that the need to showcase good practice was just as important in deciding what provision should be looked at in an overseas visit.

69 Overseas visits were also seen as necessary to pursue issues related to student engagement and to give visibility to UK quality assurance processes for the benefit of foreign governments and regulatory bodies. There was also recognition that QAA's overseas visits could have a breadth of coverage and bring a fresh perspective that was difficult for a single institution to attain.

70 Responses from overseas quality assurance agencies were unanimous in their view that an overseas presence was an essential element in the quality assurance process in order to yield a complete and accurate picture.

71 Among the sceptics about reliance on desk-based analysis were those who feared that institutions might become adept at producing paperwork that 'papered over the cracks', while others were very clear of the need for 'boots on the ground', pointing out that a physical presence overseas could also provide helpful leverage for UK institutions with their foreign partners to secure quality improvement. Even some of those who agreed that more might be done from the UK - especially with the aid of video-telephony, which was now cheaply available - proposed that overseas visits should be used randomly to benchmark any more UK-centric approach.

72 Some institutions expressed the view that desk-based analysis should simply be part of the institutional review process, rather than undertaken separately. (The greater integration of TNE quality assurance within institutional review is a recurring theme throughout the responses of some institutions to the consultation.)

73 The point was also made that desk-based analysis should not be used on its own as the basis for an adverse quality assurance judgement.

Conclusion

While, within a given budget, greater coverage may be achievable through using more desk-based analysis, combined with video-telephony, overseas visits remain important, though they should be used to highlight provision as examples of good practice just as much as to investigate provision where potential risks have been indicated.

Question 10

Please indicate the extent of your agreement with the following statements relating to the composition of review teams: (Note: level of agreement is given after each statement.)

- *Greater use should be made of international reviewers and those with specialist expertise (56 %)*
- *Teams should include a student reviewer, subject to the context in specific countries (64%)*
- *There should be a higher level of participation from QAA's counterpart organisations (59%).*

74 This question dealt with the ways in which the composition of TNE review teams might be modified and developed in the future. The levels of agreement are broadly similar for each of the three questions and cluster around the 60% mark.

International reviewers and those with specialist expertise

75 The main arguments put forward for using international reviewers were that they could fulfil a valuable role as cultural broker for the process; assist in cases where there were language, cultural or regulatory issues; and facilitate an exchange of ideas while broadening the pool of expertise. It was pointed out that many UK institutions would have suitable staff 'on the ground', or alternatively greater use could be made of UK-based reviewers with international expertise.

76 Some institutions saw the benefit of adding a country expert (as opposed to an international reviewer) to the team, who might take on the role of adviser, or observer. They would be excluded from making judgements, on the assumption that they would not be fully conversant with UK quality assurance procedures. However, others questioned whether international reviewers would add 'significant value' or were concerned that they might add a 'level of distraction' to the review process. One institution suggested that they could be used 'exceptionally rather than as the norm'.

77 Several of the institutions that disagreed with the proposal recalled that it had proved controversial in the previous HER consultation and reiterated their concern that international reviewers would have insufficient understanding of UK frameworks for quality and standards and the autonomy of UK institutions.

78 However, there was little disagreement that some level of specialist knowledge could be helpful to the review process, for example through appointing reviewers with professional or specialist expertise, such as in distance learning. These reviewers might be drawn from UK or international pools.

Student reviewers

79 On the subject of the inclusion of a student reviewer on the review team, there was a broad spectrum of views, with the pros and cons akin to those put forward in relation to the issue of student engagement more generally.

80 One institution noted that 'we cannot envisage circumstances where cultural variations could provide a sufficient reason for excluding a student reviewer'; another that involvement of student reviewers can be very beneficial in some settings, less so in others; and a third that 'it is dangerous to impose UK assumptions and approaches ... and potentially damaging to the reputation of UK higher education in some countries'.

81 Some institutions cautioned against a system 'that offered different options in different cultural contexts because it could be perceived to have a lack of parity/equality/fairness' and because maintaining consistency across TNE reviews was important. There was a suggestion from one institution that 'there may be roles that student reviewers could play in relation to desk-based analysis'.

82 Several institutions indicated that if student reviewers were to be used they should be TNE students, or students from the host country, which would add significantly to the costs of training. Others were sceptical that enough students with the appropriate level and breadth of experience of TNE would be available. With regard to team size, one institution suggested that inclusion of the student reviewer should be achieved through reducing the number of non-students on the team.

Counterpart organisations

83 The main arguments in favour of participation from counterpart organisations were that it would result in a more credible and inclusive process and could bring to the team a clearer understanding of the sometimes disparate frameworks that need to be brought together when developing a TNE partnership. Counterpart organisations would also be in a good position to advise on cultural norms and in-country regulatory issues.

84 However, many respondents, including those that favoured participation, felt it should not go so far as full membership of the review team, as this could be seen as a conflict of interest or as a challenge to the concept of peer review. There was a suggestion that counterpart organisations should play a supporting role to provide local context, or participate as observers.

85 Institutions that disagreed with participation by counterpart organisations cited the confusion it might introduce to the process and its objectives, and the possibility that QAA's process might be seen as insufficiently robust to operate alone.

86 The points were also made that QAA's counterpart might not necessarily be a 'like' organisation and that the interface with such counterparts should remain at agency level, rather than involving participation in the review process.

Conclusion

The inclusion of a student reviewer on the review team would be a substantial and expensive development, there could be a negative reaction from overseas partners and agencies, and there does not seem to be sufficient support for the idea from institutions. So introducing student reviewers is not seen as a priority for TNE reviews.

However, if it is assumed that TNE reviews do not lead to formal judgements, but rather to recommendations for action and acknowledgements of good practice, the arguments put forward for complete consistency with regard to the make-up of review teams appear to be less strong. On this basis there could be scope for some experimentation.

So, in relation to reviewers with specialist expertise on TNE, QAA should draw up a list of reviewers who fall into this category (from existing reviewer pools and through a request for nominations from institutions). These reviewers might either be 'UK' or 'international'. This specialist pool could become a useful source in the formation of teams for TNE reviews. (However, the criterion for inclusion would be usefulness and appropriateness for the review, not a requirement that there should always be a specialist reviewer).

QAA will continue to work closely with counterpart organisations overseas, and this will include a continuation of some level of participation by them in some reviews (the exact arrangements to be subject to agreement with the relevant UK institutions before the related review visit takes place).

Question 11 (47%)

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).

87 The level of agreement with the proposition that TNE review reports should contain some form of judgement was relatively low.

88 The main argument in favour of judgements was that they sent out the right signals - that the review mattered and that the quality and standards of TNE really were seen as important. In this context, judgements would 'help to make review outcomes better understood' and would be 'necessary to provide public assurance about quality and standards'. But there were also equivalent counter-arguments that 'judgements can be interpreted very differently in different jurisdictions and educational environments' and that the 'subtlety of terminology and phrasing is often lost in translation'. Another, related, concern was that they might be misinterpreted overseas as a judgement on the local partner, rather than the UK institution.

89 There were many arguments put forward against judgements. One was that they added no value: 'Reports need to be useful to the sector, the mode of TNE and the country where the TNE is located - judgements would add nothing but misunderstanding and confusion'. Others focused on practical points: 'What status would [judgements] have and how would they fit with HER?'; 'Could a judgement made on TNE conflict with the findings of an institutional review?'; and 'It could result in an institution with a broad range of TNE arrangements receiving numerous, different, and potentially conflicting judgements about the management of their TNE'.

90 Other institutions were clearly grappling with the familiar problems about the need for judgements to be valid and fair:

- whether it was reasonable to extrapolate from a judgement based on one country to the whole of an institution's TNE
- whether it was reasonable to publish judgements unless every institution operating in the same country had been subject to the same degree of scrutiny
- whether the country where the TNE provision is located has any relevance, or whether the institution's ability to manage TNE effectively is key.

91 There was one suggestion that judgements might be 'reached over time on the basis of a number of visits and/or desk-based analyses'.

92 However, many saw institutional review as the rightful home of judgements, perhaps with a separate judgement specific to TNE. For instance, TNE review might lead to a report for the institution, with recommendations, which would be subject to follow-up in institutional review, or might, if serious issues had emerged, even trigger an early institutional review.

93 Finally, one of the overseas agencies made the point that 'recommendations could be viewed in the same light as judgements' and that it was 'the underlying message that is important'.

Conclusion

TNE reviews should not lead to judgements. TNE review reports should contain clear recommendations for action, some of which may be characterised as requirements, together with acknowledgments of good practice. Consideration should be given to whether there should be a distinct judgement on TNE in institutional review processes. There should be improved linkages between the reports and recommendations of TNE review and institutional review processes.

Question 12 (16%)

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

94 There was a particularly low level of agreement with the idea of introducing some sort of 'badge system'. There were also 66% of respondents who disagreed.

95 The main arguments in favour were that a badge system would be particularly well understood by students, and that it might provide greater encouragement to UK institutions to enhance the quality of their TNE than the potential use of negative judgements. However, there were also questions about the purpose of the system - a licence of competence, a badge of quality, or a potential recruitment tool?

96 Many of the arguments against stemmed from concerns that such a system could be unfair, particularly if it were based on country badges. It might, for example, hamper the success of an institution trying to break into a country for the first time, or damage the reputation (built over many years) of an institution with significant TNE if it were seen not to have a badge in some areas. There was also a view that it might be easier for small institutions with a narrow range of provision to gain a badge than large institutions with a complex range of provision. The sheer impracticality of trying to achieve fairness, even within a single country was pointed out:

'To make this system fair, all TNE in a country would need to be assessed and all UK [higher education institutions] awarded badges at the same time, which would appear to be logistically impossible.'

97 Other respondents saw a badge specifically related to TNE as unnecessary - even potentially confusing - since institutions that had a successful institutional review could already use the QAA Quality Mark. One respondent believed that the high quality of the educational brand was itself a sufficient badge, while another felt that there were already too many badges in use in the sector.

98 The point was made that overseas governments and institutions 'often press strongly to have a badge system'. But, it was also recognised that situations change rapidly in an international context and that a badge could quickly become outdated. It was felt that any system that required constant monitoring would inevitably be associated with additional paperwork, and it did not sit well with the flexible approach being proposed within the consultation.

Conclusion

There should be no introduction of a badge system for TNE. The existing use by institutions of the QAA Quality Mark should be explained more clearly overseas.

Question 13 (80%)

Please indicate the extent of your agreement with the proposed range of outputs from the TNE quality assurance process.

99 There was a high level of agreement with the proposed range of outputs from the TNE quality assurance process; this comprised existing reports, with the addition of an annual report.

100 Respondents were broadly positive about the current reports, though some institutions felt that the identification of good practice should have a higher profile if the aim was to promote UK TNE overseas. The importance of making review visits to 'good' links, as well as ones perceived as problematic was emphasised.

101 The overseas agencies suggested there should be more reporting on student and graduate outcomes, and a greater emphasis on statistics generally. Of relevance to this is that HESA has expressed an interest in working collaboratively with QAA to explore the potential for additional outputs.

102 Case studies were seen as helpful, given their ability to focus on specific topics or themes, although their status might also be confusing, especially if reviews were to lead to judgements, and it might need to be made clear whether a case study was illustrative of good or bad practice.

103 Some institutions saw the value of country overview reports in terms of the information they provided on regulatory and legal requirements, which was useful for the purposes of due diligence, while another considered that having a collation of TNE in a specific country would provide a good base for wider market intelligence.

104 In the context of producing market-focused outputs, it was suggested that the reports could have a more positive effect if they were aimed at an overseas audience - prospective students/parents, TNE providers and overseas agencies:

'Demystifying the processes will expand the knowledge of UK TNE and potentially increase allies and new partners for UK universities to work with.'

105 Many institutions welcomed the proposed addition of an annual report, seeing it as a potentially useful synthesis of information on UK TNE, relevant findings from review reports, and good practice. However, others were not convinced of the added value,

anticipating that it would duplicate other outputs; and some questioned whether there would be a sufficient level of activity to warrant annual reporting.

106 Overall, this question teased out a tension between transparency of the quality assurance process and promoting the quality of the brand. The point was made that an individual institution should not be singled out in overview reports where there were poor judgements, and (as mentioned above) there was a clear view that the emphasis should be on highlighting good practice. There was also a suggestion that QAA might consider giving confidential feedback to an institution in place of publishing a formal judgement.

Conclusion

Existing outputs should be continued in the future. The content and target audience of the country overview reports should be reconsidered: should the emphasis be on useful information for UK institutions, or should it be a promotional package aimed at overseas users? The annual report should be introduced on a pilot basis: it should be concise and up-to-date; it should add value through collating key points from other reports; and it should not diminish its value through pointless duplication. The idea of developing case studies as a tool for enhancement of quality and for promoting UK TNE provision overseas should be pursued further.

Question 14 (68%)

Please indicate the extent of your agreement with the idea of having institutional review processes focus more explicitly on TNE.

107 There was a high level of agreement with the proposition that institutional review processes should focus more explicitly on TNE. However, from the comments, it appears that respondents were agreeing with a variety of different options.

108 Some institutions were of the view that there should be a single process - institutional review - and have framed their whole response to the consultation in these terms. Others were very clear that there were advantages in having two separate processes, each concentrating on different areas of an institution's activity. But there were many that saw two, complementary, processes as the way forward, provided institutional review retained its key characteristic of being 'holistic'. One institution suggested that 'closer alignment would be sensible and, to some extent, inevitable'.

109 There was a body of opinion that institutional review, as an holistic process, should embrace TNE and that scrutiny should be proportionate to the overall provision. Some saw proportionality in terms of size of provision, while others saw risk as the defining characteristic (given that both TNE review and HER are risk-based processes).

110 However, there was also recognition that institutional review processes (particularly HER) might not have the capacity to deal with TNE and would need to be modified to include longer review visits and larger review teams, especially for institutions with significant TNE. The implications are captured in comments as follows.

'There is a real danger that the HER process could become overly burdensome.'

'There is a danger that a relatively small component of an institution's portfolio is given excessive attention.'

111 In some cases, the proposed modifications were fairly major and included: the triggering of an overseas visit if a problem were detected; introducing a separate judgement on TNE; and adding a new chapter to the UK Quality Code for Higher Education. Note that HER (at the time of the consultation, yet to be experienced fully by

any university) was based on the presumption that there would be a (revised) TNE process running alongside, and envisaged more sharing of information between the two processes.

112 In contrast, ELIR is part-way through its third cycle, and differences between ELIR and HER were apparent from some comments. Institutions in Scotland were more upbeat about the capacity of ELIR to make the necessary operational changes to handle TNE. ELIR operates on a shorter cycle than HER and has more frequent QAA intervention through annual conversations about strategies and future plans. The outcomes from overseas reviews currently form 'useful' reference points for ELIR.

113 There was, however, also a body of counter-opinion in favour of separate processes, with many of the arguments here contradicting those for greater integration. One institution, concerned that separate processes might become rivals rather than working together, pointed out the danger of HER 'becoming a campus-based review'. On the other hand, another institution, concerned about a major shift towards TNE within HER, pointed out that the main focus of HER was on-campus provision. Another institution saw entirely separate processes as being the way forward in an environment where TNE was increasingly separated, for business purposes, from the institution's home provision.

Conclusion

Institutional review should remain an holistic process and embrace TNE proportionately. It should not have an automatic focus on TNE that might give TNE undue attention in institutions with little such provision. However, institutional processes relating to TNE should be as much a part of institutional review as those relating to other elements of an institution's provision. Steps should be taken to make the TNE process work in a manner complementary to institutional review. One possibility would be for institutional review to concentrate on the management of TNE arrangements and the setting and maintenance of academic standards, while the TNE review process would focus on the student learning experience, information, and enhancement, by reviewing specific TNE provision.

A working party should be set up (including representation from relevant institutions) to establish how the relationship between institutional review and TNE review should be taken forward. Its scope might include consideration of whether complete amalgamation of TNE review within institutional review is a feasible or desirable prospect. (Note that this topic is covered by the remit of the Implementation Group.)

Question 15 (33%)

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.

114 The level of agreement with the proposition that overseas branch campuses should have their own institutional review was low. Meanwhile, 40% of respondents disagreed, and 27% were neutral.

115 The main argument in favour was that many branch campuses were large and complex in nature, so a separate review was the best way to secure the necessary resources to ensure the student learning experience was comparable to that in the UK. A related point was that some branch campuses are semi-autonomous institutions and a comparison was made with college providers of higher education in England, which already have separate institutional reviews.

116 On a similar theme, a couple of institutions, while agreeing with the proposition, asked how an overseas branch campus differed from a UK branch campus, in relation to quality assurance, given that a UK branch campus would not be visited as part of institutional review.

117 Inevitably, there were questions, particularly from institutions with overseas campuses, about the definition of a branch campus - given that these have been set up according to different philosophies, models, and in-country regulatory systems. As one such institution (which agreed with the proposition) put it, 'it would not be appropriate to introduce a blanket rule for all branch campuses'. Those regarding their branch campus as an integral part of a single UK institution could not countenance separate institutional reviews, with their risk of arriving at conflicting judgements on the 'home' institution and its branch campus.

118 Other suggestions were framed in terms of a risk-based approach: for instance, that a separate review could be instigated when a campus reached a certain size or complexity; or undertaken for developmental purposes or if a concern were triggered. There was also the view that the scale and range of provision, rather than the model of delivery, should be the determining factor, and that there was also merit in reviewing a substantial partnership as a separate entity.

119 Several responses focused on institutional review as the preferred mechanism for looking at branch campuses, with several institutions recognising that the review 'might need to be extended to do this properly', or 'strengthened and widened ... with a heavier touch'.

120 Essentially similar suggestions were put forward by two institutions, but from differing standpoints:

'It would be more effective to have the two reviews operating concurrently or at least in succession, as ... the locus of responsibility remains the same.'

'What is needed in the case of operations over a certain size (to be determined), be this branch campus or other arrangement, is a visit to the operation overseas as part of the HER process. It is difficult to see how sufficient scrutiny could be achieved purely by a desk-based analysis for large operations.'

121 Another pointed to the importance of 'consistency between panels', if there were separate reviews.

Conclusion

A list should be drawn up of overseas branch campuses and of other large provision bearing some of the characteristics of a branch campus, in terms of size or complexity. A more specific proposal should be put forward as to which of those on the list might be deemed suitable for their own form of institutional review (including the rationale for the choice). Consideration should be given (in conjunction with the relevant UK institutions) as to how the proposed reviews might be undertaken from a practical viewpoint - in particular focusing on the need to have a strong linkage with institutional review and the avoidance of conflicting or inconsistent judgements.

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: (Note: level of agreement is given after each statement.)

- *Every institution should make a base-level contribution (47%)*
- *Institutions with TNE provision should make a proportionate contribution (66%).*

122 There was little consensus on proposition (a), that all institutions should make some base-level contribution to the cost of TNE quality assurance: 47% agreed; 34% disagreed; and 19% were neutral. The level of agreement was slightly higher (51%) among institutions (as opposed to all respondents, including organisations and individuals). Many of the respondent organisations registered a neutral response.

123 There was a higher, but not overwhelming, level of agreement with proposition (b), that those institutions with TNE provision should make a proportionate contribution: 66% agreed; 18% disagreed; and 16% were neutral. The level of agreement among institutions only was almost exactly the same (67%).

124 Of course, the two propositions are not mutually exclusive, with a two-part tariff mechanism being an obvious possibility. Thus it is important also to consider the responses to the two propositions in combination. Looking at the responses from institutions only, a significant proportion (40%) agreed with both propositions. A small proportion (7%) agreed with (a), but disagreed with (b). A rather higher proportion (22%) agreed with (b), but disagreed with (a). And then there were those institutions (14%) that disagreed with both propositions!

125 In the comments from those institutions agreeing with both propositions there was a wide range of views expressed, as illustrated by the following selection:

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

'All student numbers should be counted in the base level, wherever and however they are delivered, as our processes and awards are to ensure the quality and standards of all provision.'

'The costs incurred by an enhanced HER would be relatively modest and should simply be shared by the sector as part of the overall contribution to QAA.'

'All institutions should pay a small base-level contribution for the quality assurance of TNE as it safeguards the UK [higher education] brand for the purposes of international student recruitment, which all institutions benefit from. However ... we believe the majority of funding should come from a proportional contribution.'

'The scale factor should take into account the number of different TNE arrangements for each subscriber. This could be a bigger driver of review cost than student numbers.'

126 Those institutions favouring a proportionate charge, without a base-level contribution from all institutions, considered such a system to be fairer to those institutions with no TNE:

'Many small specialist institutions have little or no TNE provision and would be paying for a service they cannot take advantage of. This would be unfair.'

'If a UK [higher education institution] makes a strategic decision not to have any TNE, it seems unreasonable that they should be financially penalised to cover the costs of another [higher education institution's] strategic choice.'

127 However, the opposing view was also put forward by several institutions, citing the complexity of arriving at an acceptable proportional charge as a key consideration:

'A proportionate contribution is likely to be far too complicated ... A primary function of the QAA ... is to protect the reputation of UK HE as a whole, and [we] would therefore advocate most of the activities are part of a base-level expectation of our subscription costs.'

128 Institutions in disagreement with both propositions also, in some cases, cited complexity and the need for extra data-gathering to apportion charges as reasons for their disagreement. Others were concerned with keeping overall costs down:

'Any additional costs attached to this should be covered from within the existing budget (by reducing other [quality assurance] activities and through efficiency savings) rather than passing on the additional costs to [higher education institutions].'

'It is unreasonable to expect institutions to pay for an enhanced review process when there is neither the evidence available that the current system is not working, nor clarity that methodology proposed will meet the stated objectives.'

129 Finally, one institution suggested that the question of funding mechanisms should be dealt with through a separate process of consultation.

Conclusion

A clearer estimate of the likely costs of TNE quality assurance should be drawn up, comparing this with the current cost level for overseas review. (In any case) the current funding model should be adapted to take account of TNE provision and TNE students. The impact on subscription levels of any additional costs associated with a strengthened TNE quality assurance process should be calculated. In due course, a proposal for subscriptions should be put forward to subscribers.

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© The Quality Assurance Agency for Higher Education 2014
Southgate House, Southgate Street, Gloucester GL1 1UB

Tel: 01452 557 000
Email: enquiries@qaa.ac.uk
Website: www.qaa.ac.uk

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