Developing a Strategic and Coordinated Approach to the External Quality Assurance and Enhancement of UK Transnational Education

Contents

Summary

1   This is the final report of the Implementation Group (the Group), which was established to take forward some of the outcomes of the consultation on strengthening the quality assurance of the UK's transnational higher education held in the spring of 2014.[1]

2   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.[2] It is a significant and growing part of many UK awarding bodies' portfolios: figures from the Higher Education Statistics Agency (HESA) show that in 2013-14 over 120 UK higher education awarding bodies were involved in the delivery of TNE to almost 640,000 students. Research by the Careers Research and Advisory Centre estimates that UK TNE generated £496 million in revenue in that year.[3]

3   The primary responsibility for enhancing the quality and safeguarding the standards of UK TNE lies with individual awarding bodies. External quality assurance is provided by QAA through reviews of awarding bodies in the UK and by a separate system of TNE reviews. QAA's approach has largely been effective in supporting awarding bodies to deliver high quality TNE. However, as we look ahead to a more competitive and complex TNE market, its limitations become apparent. The two sides of the existing approach - domestic and TNE reviews - are insufficiently coordinated, and the planning and implementation of TNE reviews in a series of self-contained projects lacks clear strategic direction.

4   The Group's overarching recommendation, therefore, is that QAA, in partnership with its subscribers and other bodies as appropriate, develops a strategic and coordinated approach to the external quality assurance and enhancement of UK TNE, so as to continue to safeguard the reputation of UK higher education and support the further growth of high quality UK provision internationally.

5   This report describes how the overarching recommendation can be achieved. The key elements are:

- the development of a longer-term, flexible plan for the external quality assurance and enhancement of UK TNE
- the alignment of that plan with domestic review processes, supporting the development of a coordinated system of quality assurance that includes a greater opportunity for enhancement
- improvements to the range and quality of data about TNE to better inform internal and external quality assurance systems
- the establishment of a committee to oversee the development, implementation and evaluation of QAA's TNE review activities.

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[1] The consultation document sets out the remit given to QAA and the UK Higher Education International Unit to undertake this work. The consultation report sets out the outcomes and recommendations. The consultation document is available at: www.qaa.ac.uk/en/Publications/Documents/TNE-consultation-13.pdf. The consultation report is available at: www.qaa.ac.uk/en/Publications/Documents/TNE-consultation-report-May14.pdf.

[2] The definition of TNE is taken from the BIS International Education Strategy 2013, available at: www.gov.uk/government/uploads/system/uploads/attachment_data/file/340600/bis-13-1081-international-education-global-growth-and-prosperity-revised.pdf.

[3] *Transnational Education: Value to the UK*, available at: www.gov.uk/government/publications/transnational-education-value-to-the-uk.

6　　　　　These key elements are reflected in recommendations situated throughout the report and listed in part 5. The benefits of these recommendations are to:

- provide more comprehensive assurance of the quality of UK TNE through a coordinated approach
- reinforce the risk-based approach to the external quality assurance of UK awarding bodies' TNE activities
- support enhancement through the sharing of best practice across awarding bodies and different parts of the UK
- build closer relationships with other countries' higher education regulators and quality assurance agencies
- improve the consistency and completeness of information on UK higher education and, hence, the visibility of its economic and cultural benefits.

Part 1: Background to the creation of the Implementation Group

7   In 2013 the Department for Business, Innovation and Skills asked QAA and the UK Higher Education International Unit to consult publicly on '...what is needed to strengthen the quality assurance of TNE' (HM Government Industrial Strategy: International Education: Global Growth and Prosperity, July 2013). The consultation was published in December 2013 and closed in March 2014.

8   The analysis of the consultation results was published in a report in May 2014. One of the conclusions in this report was that an implementation group should be created to take forward specific plans in four main areas. The consultation report also identified the principles that were meant to provide a framework for the shape of a future TNE review system, and described other activities for QAA to undertake in the 2014-15 academic year. The consultation report is available on the QAA website.[4]

9   The Implementation Group (the Group) was established in summer 2014, met three times before the end of November that year, and continued its discussions by correspondence until February 2015. The Group's members included representatives from higher education awarding bodies and national agencies with particular experience in the delivery and quality assurance of TNE from across the UK. A full list of the Group's members and its terms of reference can be found in Annex A.

10   The Group was asked to formulate recommendations to the High Level Steering Group in the following areas.

- 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.

11   The Group considered the outcomes of the consultation report and made recommendations that relate to each of these areas. However, given the interdependencies that became evident, the Group agreed to place these recommendations in the context of a holistic consideration of the overall effectiveness of the external quality assurance of UK TNE. This has led the Group to make a single overarching recommendation for the consideration of the High Level Steering Group, with several supporting recommendations.

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[4] *Strengthening the Quality Assurance of UK Transnational Education*, available at:
www.qaa.ac.uk/en/Publications/Documents/TNE-consultation-report-May14.pdf.

Part 2: A strategic approach to the external quality assurance and enhancement of UK TNE

Introduction and key features

12   QAA has a remit to safeguard standards and to improve the quality of UK higher education. It aims to protect the interests of everyone working towards a UK higher education award, regardless of how or where they study, within the UK or overseas.

13   QAA currently provides external quality assurance of UK TNE through reviews of awarding bodies in the UK ('domestic review') and by reviewing provision to students based outside the UK ('TNE review'). This part of the report proposes changes that the Group sees as necessary to make TNE review more strategic and, therefore, more effective and efficient. The third part of the report considers how TNE review could be more closely aligned to domestic review.

14   Throughout the remainder of this report, 'we' refers to the Group.

Limits of the existing approach

15   QAA has been conducting TNE reviews for nearly 20 years.[5] These reviews are of the management of provision by individual awarding bodies, focusing on a destination country chosen for the review. 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. There is normally one overseas visit every year (to several different provisions in the same country) and the destination country tends to be selected annually according to a range of considerations, including the size of the UK TNE student population and the time elapsed since the previous visit to that country. This approach has tended to focus on countries with relatively large volumes of UK TNE. In contrast to other review methods, QAA does not specify its approach to reviewing TNE in the form of a method or handbook.

16   There has been recent TNE review activity in India in 2009, Malaysia in 2010, Singapore in 2011, China in 2012, and the United Arab Emirates and the Caribbean in 2014.

17   While we recognise the effectiveness of QAA's TNE review activity to date, as well as the reasons why QAA has adopted this approach, as TNE grows and becomes more significant to the UK higher education sector the limitations of the current approach begin to become apparent. In particular, the management of TNE review as a series of self-contained projects in the absence of an obvious overarching strategy makes it difficult for QAA to demonstrate to its funders and other stakeholders (as well as perhaps to itself) how it ensures that finite resources are allocated to areas and activities that are likely to achieve the optimum outcomes over time. The absence of a published approach to reviewing TNE may compound this difficulty and also makes it hard for stakeholders to satisfy themselves that QAA's approach meets their expectations.

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[5] These reviews have had different names, including 'reviews of overseas provision' and 'overseas audits'.

18   Against this backdrop, we **recommend** that QAA, in partnership with its subscribers and other bodies as appropriate, develops a strategic and coordinated approach to the external quality assurance and enhancement of UK TNE based on the proposals set out below. Such an approach should help to ensure - and demonstrate to stakeholders' satisfaction - that finite resources are allocated to areas and activities that will help to achieve an overall strategic outcome of enhancing the quality and securing the standards of UK TNE. It would also support UK awarding bodies in their role as having primary responsibility for the quality assurance and enhancement across the whole of their provision.

Longer-term planning

19   A more strategic approach demands a longer-term plan of activity than QAA is currently committed to. A longer plan would facilitate a stronger alignment of TNE and domestic institutional reviews, which is the second major theme of this report. It would allow awarding bodies to plan for their involvement in external quality assurance and promote the integration of that activity with their own internal assurance processes.

20   TNE is delivered in many different environments and the pace of change can be rapid. A longer-term plan must therefore be flexible. We envisage a rolling three-year plan subject to annual review, allowing for future activities (that is those which appear in the second and third years of the plan) to be refined or even substituted by other activities should good reasons for doing that emerge.

The activities in the plan

21   The main body of the plan would set out the specific activities that QAA intends to carry out over the period to achieve the overall strategic aim. We provide more details of the kinds of activities we envisage below; in essence there would be a broader range of activities than at present, each tailored to its specific objectives and circumstances.

22   Each activity would be specified, making clear why it has been chosen, what it is meant to achieve and how it will be carried out. The rolling plan would also include the measures by which QAA and its stakeholders can gauge whether the plan in aggregate is meeting its overall strategic aim.

Preparing the plan

23   The rolling plan should be the product of a thorough understanding and analysis of UK TNE. The collection of an improved dataset from UK awarding bodies is integral to this understanding; we return to the question of how to improve data about TNE below. Until such time as better data is routinely available, QAA will have to continue to work with HESA to gather more sophisticated information than is currently available from the HESA Aggregate Offshore record. Gathering this data may require awarding bodies to make changes to their student record systems.

24   Data from UK awarding bodies should be supplemented with information from other sources, including other bodies with a role or interest in the quality of UK TNE, both within the UK - such as professional, statutory and regulatory bodies (PSRBs) - and overseas.

Underlying principles

25   Flexibility in the external quality assurance of TNE is needed to accommodate the dynamism and diversity of this provision. However, we believe that to build and maintain the confidence of stakeholders, TNE review activities should maintain a consistency in their contribution to the overall strategic aim and its underlying principles. We propose what these underlying principles are in Figure 1. Some of these principles are taken directly from the outcomes of the consultation that gave rise to the establishment of the Group. Others are adapted from QAA's values and ways of working, and from the principles of good regulation in higher education published by the Higher Education Better Regulation Group.

Figure 1: Principles underlying a TNE review system

- The primary responsibility for enhancing the quality and safeguarding the standards of UK TNE lies with the awarding body or bodies involved.
- The selection and implementation of TNE review activities should:
  - give equal weight to opportunities for quality enhancement and the demonstration of good practice as to the investigation of potential problems
  - be underpinned by QAA's values of integrity, professionalism, accountability, openness and independence
  - be informed by the views of awarding bodies and national agencies from the UK and in countries where UK TNE is delivered.
- TNE review activities should:
  - have a clear purpose that is justified in a transparent manner
  - depend to the largest possible extent on reliable, transparent data
  - be coordinated with other quality assurance activities
  - ensure the interest of students and other stakeholders in overseas countries are considered and promoted.
- TNE review activities should not lead to summative judgements, but may inform other quality assurance processes (including domestic reviews) within a more coordinated system.

26   Building and maintaining the confidence of stakeholders in this system (and in particular of UK awarding bodies engaged in TNE) will be crucial to its success as well as to the willingness of awarding bodies to contribute to its costs. We believe the establishment of a longer-term plan of activity will go a considerable way towards building confidence. To build confidence further, and also to provide externality and effective governance, we **recommend** that QAA establishes a subcommittee of its Board to guide the development of the plan outlined above, recommend the plan to the QAA Board of Directors, and issue an annual opinion to the Board on the plan's effectiveness. This committee should be comprised primarily of representatives of awarding bodies and other relevant organisations from across the UK with particular interests in this area. For the sake of brevity we refer to this group throughout the rest of this document as the 'TNE Committee'. We propose terms of reference for this Committee in Annex B.

27   We also **recommend** that QAA continues to broaden and strengthen its relationships with other stakeholders (including awarding bodies and national agencies from the UK and in countries where UK TNE primarily occurs) about the development, implementation and evaluation of TNE review activities, since the effectiveness of any external quality assurance system is enhanced when the needs and expectations of all its beneficiaries are considered. In this connection, QAA may wish to consider having non-UK observers or advisors assist the TNE Committee.

A strategic approach in practice

28   This section expands on the key features of a more strategic approach to the external quality assurance of UK TNE set out above. These features appear in the order in which they are likely to occur in the first year of operation. Once the system becomes established many of these features will operate concurrently.

Data

29   Without a detailed understanding of how, where and on what scale UK TNE is occurring, external quality assurance of this provision is at risk of being poorly targeted and inadequately specified. Good data on UK TNE is, therefore, a pre-requisite for a more effective strategic approach.

30   The HESA Aggregate Offshore record is the main source of information about UK TNE. HESA produces the record based on data provided by UK higher education awarding bodies annually. The record includes the number of students (undergraduate and postgraduate) studying for an awarding body's awards in different countries, classified according to the level of study. The numbers are also classified according to whether students are studying at a branch campus, through a collaborative arrangement (either registered directly with the UK awarding body or with an oversees partner) or by distance learning. At present, alternative providers with degree awarding powers are not covered by the annual Aggregate Offshore record.

31   In 2015 HESA is initiating a major review of student reporting, to include the Aggregate Offshore record. We fully support the review of the Aggregate Offshore record and have developed specific recommendations for the development of the record, which we have already presented to HESA. These recommendations include:

- the addition to the Aggregate Offshore record of specific information at programme level, and in line with the minimum dataset the retention of an aggregated approach to gathering data on TNE
- the continued inclusion within the record of distance learners, which would correspond to the overall definition for TNE students (although we do acknowledge that the external quality assurance of this provision can largely be done from the UK).

32   Within two years a revised HESA record should become the primary data collection tool for UK TNE. To inform the revisions to the Aggregate Offshore record, and also to provide better TNE data while the record is being revised, the Group **recommends** that QAA, working in concert with HESA and other stakeholders, undertakes its own temporary annual data collection. This collection should:

- be based on the minimum dataset specified in the TNE consultation, which is an extension of the dataset that awarding bodies already submit to the Aggregate Offshore record

- involve all UK awarding bodies, including alternative providers who do not submit data to HESA
- replace the annual collection that QAA already conducts in support of TNE review
- cease immediately once a new HESA record is launched (with the exception of those alternative providers who are not HESA subscribers, and who will, therefore, continue to submit this data to QAA as an additional part of the annual returns they are already required to submit).

Analysis

33 To furnish a proper understanding of the challenges to good quality provision, quantitative data must be supplemented by a range of other information and intelligence about the environments in which UK TNE occurs (both national and supra-national), the expectations of stakeholders in the UK and overseas, and the particular characteristics of different types and forms of provision. Examples of such information are outlined in more detail in the scoping section below.

34 The first stage in the preparation of the rolling plan will be the gathering of the data and its analysis against the considerations set out below. This is likely to be a significant task for the officers responsible, yet necessary to ensure subsequent activities are well targeted. The analysis is also likely to be of interest to UK awarding bodies and other stakeholders in managing their own interests in this area. To realise this benefit, we **recommend** that QAA, working with relevant stakeholders, publishes an annual report about UK TNE, using statistics and intelligence, as well as findings from its reviews, to highlight significant patterns and trends. We return to the purpose and content of this report under Outputs (see page 10).

Scoping

35 The next stage in the system is scoping. The purpose of scoping is to transform or convert the outcomes of the data analysis into a package of specific external quality assurance and enhancement activities that are likely to make the optimum contribution to the strategic aim within the time and resources available. In order to make that conversion, QAA will need to apply a range of considerations to the data analysis. Some of these considerations will be quantitative, such as changes in the scale or type of UK TNE in a particular country. Others will be qualitative and might include, for example, a change in the legal environment in one of the UK's primary markets. We propose a list of the considerations that QAA could apply in Figure 2. It will not be possible to apply all considerations to all TNE provision and the application will be, to some extent, subjective (hence the need for the TNE Committee to provide oversight).

Figure 2: Scoping considerations

- The range, scale and diversity of UK TNE in particular countries and regions, and any significant changes.
- UK awarding bodies' experiences of operating in a given country or region.
- UK awarding bodies' quality assurance track records overseas.
- Overseas partners' profiles and quality assurance track records.
- Duration and maturity of provision.
- Level of integration of TNE provision with UK awarding bodies' home activities.
- Outcomes of domestic (that is UK) and receiving countries' review processes.
- Timing of domestic reviews.
- Nature and complexity of in-country quality assurance requirements.
- QAA's relationship with counterpart organisations in destination countries.
- Student performance and satisfaction data.
- Interval since last QAA review in given country or region.
- Accreditation or recognition by local, UK or global accreditation, quality assurance, professional, statutory and regulatory bodies.
- UK and receiving countries' governments' priorities.

36   Given the diversity of the information analysed, these considerations cannot be made or applied formulaically. Scoping will rely heavily on the professional judgement and experience of the responsible officers. The officers must be able to justify the outcomes of the scoping exercise in aggregate according to the overall strategic aim, its underlying principles and the outcomes of the data analysis. The TNE Committee should also have the opportunity to guide the formulation of activities at this early stage.

37   The Group **recommends** that branch campuses and other large TNE provision should not have their own institutional review, separate from that of the awarding body in the UK. Rather, this provision should be given the necessary consideration during the scoping stage of the TNE review system proposed in this report. This scoping stage should also acknowledge the importance of looking at examples of small-scale UK TNE.

Scoping outputs

38   We envisage the outputs of the scoping stage will identify a number of potential TNE review activities (see paragraph 39 for a description of different activities). At this stage we would expect those activities to have a clear rationale, but the operational details would not be developed until the activity had been considered by the TNE Committee.

External quality assurance and enhancement activities

39   We envisage a broader range of activities than the country-by-country reviews that QAA has tended to undertake hitherto. This flexibility in having different activities will enable QAA to review a broader range of TNE activity, including, for example, the review of smaller scale provision of TNE or a review that focuses on a theme. The range of activities would include the following.

- Desk-based analyses by country, region or theme (such as by type of TNE provision).
- Review by country, region or theme, undertaken virtually or involving a visit to UK awarding bodies only.

- Review by country, region or theme, involving visits to both the UK awarding bodies and their provision overseas.
- Working with other quality assurance agencies and networks of agencies to share information and develop guidance materials for operating particular types of TNE or in particular countries or regions.
- Promoting opportunities for awarding bodies to learn from each other's practice, with the aim of enhancing TNE provision, its management and the student experience overall.

Outputs

40   The outputs from TNE activities will vary according to the nature of the particular activity. At a minimum, we would envisage the continuation of some form of published overview report describing the purpose and scope of the activity and its outcomes. Part of the role of this report would be to raise awareness of the quality assurance of UK TNE in the countries involved, recognising the important impact these reports can have on the enhancement of UK provision overseas. A list of potential published outputs is included in Figure 3.

Figure 3: Potential published outputs

Name	Purpose and content overview	When	Intended audience
Overview reports	To provide an overview of the key findings from a specific TNE review of a country, region or theme.	Following country, region or thematic review.	Awarding bodies in the UK and institutions overseas. Government and sector bodies in the UK and overseas.
Individual institutional reports	To provide awarding bodies with findings and recommendations following review of their provision during a specific TNE review of a country, region or theme.	Following country, region or thematic review.	Awarding bodies in the UK and institutions overseas. Other stakeholders including students and parents with an interest in the specific TNE provision.
Case studies of provision	To consider a specific area or type of TNE, in order to enhance UK TNE provision. The purpose of these case studies needs to be clearly articulated and their content informed and supported by TNE review activity.	Following country, region or thematic review.	Awarding bodies, other institutions, governments and sector bodies in the UK and overseas. Other stakeholders with an interest in UK TNE provision.
Guidance/ characteristics documents	To provide guidance and information on specific types of TNE.	As required, to include an overall guidance document on TNE in July 2016.	Awarding bodies in the UK and institutions overseas. Quality assurance agencies in the UK and overseas.

41   As paragraph 34 sets out, as well as publishing outputs associated with particular TNE activities, we recommended that QAA prepares and publishes an annual report about UK TNE based on the results of its statistical analysis and scoping, as well as findings from its reviews and other research. The purpose of this report should be to describe the range, scale and diversity of UK TNE, and highlight any significant patterns or trends in its development. We envisage that this report could be of particular value to UK awarding bodies in planning their international activities.

Reviewers

42   In order to preserve the fundamental principle of peer review, we are clear that TNE activities should continue to be carried out by peers drawn from other awarding bodies. These peers should have specialist expertise in relation to the activity they are invited to carry out, and be trained specifically for their role in TNE review.

43   QAA should also consider the greater use of advisers drawn from the country the review activity is taking place in, where that is likely to promote the reputation and authority of the UK quality assurance system.

Utilising existing information and expertise

44   In order both to achieve maximum value for money and rationalise the requirements placed on awarding bodies, in scoping and specifying TNE review activities QAA should make particular efforts to identify how it might use the work of other bodies in this arena. This would allow QAA to focus its efforts on countries and themes that have not been subject to other kinds of review. QAA should also make use wherever possible of evidence generated for or by PSRBs and quality assurance bodies in other countries; and consider the possibility of joint planning or activity with other organisations to support both the quality assurance and the enhancement of UK TNE.

45   QAA is participating in a project funded by the European Commission, Quality Assurance of Cross-Border Higher Education (QACHE), which has as one of its objectives the development of a toolkit for facilitating greater cooperation among quality assurance agencies from different countries. We **recommend**, once that toolkit is finalised, that QAA should consider whether and how to incorporate it within the system proposed in this report in order to make maximum use of existing information and expertise.

Finalising the plan

46   Once the TNE Committee has had the opportunity to consider and comment on the outputs of the scoping stage, QAA officers will then be responsible for developing the activities into the three-year plan. This will allow for precise details, including rationale, purpose and operational arrangements, to be given for each activity. We suggest what a review activity initiation document might look like in Annex C.

47   On the recommendation of the TNE Committee to the QAA Board, the three-year plan should be published annually. Publication of the plan will provide transparency, allow awarding bodies to prepare for their participation in review, promote stakeholders' confidence in the system, make explicit the links with other QAA review activities, and enable proper scrutiny and accountability. Where the plan includes significant changes from the previous version, this should be clearly explained and justified.

Evaluation of the plan and the system

48   Alongside guiding the development, and approving the publication and implementation, of the three-year plan, the other key role for the TNE Committee should be to evaluate the plan's implementation on behalf of the QAA Board. To allow the Committee to discharge this responsibility, and also to promote transparency more generally, the plan should include Key Performance Indicators related to each of the specific activities and to its contribution to the overall strategic objective.

Part 3: A coordinated approach to the external quality assurance and enhancement of UK TNE

49   QAA provides external quality assurance of UK TNE through reviews of awarding bodies in the UK ('domestic review') and by a separate system of TNE reviews. This part of the report focuses on the relationship between the system proposed in the previous part and QAA's current domestic review processes.

Introduction: QAA's existing approach

50   QAA manages different domestic review processes in the four countries in the UK. In Scotland the process is called Enhancement-led Institutional Review (ELIR); in England and Northern Ireland it is called Higher Education Review; and in Wales it is called Higher Education Review: Wales. Each process considers TNE slightly differently, as follows.

Enhancement-led Institutional Review (Scotland)

51   ELIR encompasses all credit-bearing provision at an institution wherever and however delivered. Each ELIR results in an overarching judgement on the current and likely future effectiveness of the institution's arrangements for managing academic standards and enhancing the quality of the student learning experience. Areas of positive practice and areas for development are also identified.

52   Every ELIR includes a standard line of enquiry around the effectiveness of the institution's management of collaborative provision (including TNE). This must be addressed by each institution in its Reflective Analysis and is addressed in every Technical report. This also involves the consideration of the nature of the collaborative provision, the management of academic standards and the enhancement of the student learning experience. It results in an explicit indication of the ELIR team's view of the effectiveness of the arrangements overall. In advance of ELIR, the QAA officer coordinating the review would agree with the institution whether any special arrangements are needed to ensure the team will have enough access to evidence to support that line of enquiry (for example, if there would be value in arranging particular video or telephone links to have meetings with students, or even a questionnaire of students/staff involved with collaborative programmes). The outcomes of ELIR are followed up through the annual discussion meetings and through 'challenge' sessions, where institutions that were reviewed around the same time meet and constructively challenge each other's responses to the ELIR (that is the actions taken since the ELIR). These sessions are currently known as Follow-up Events.

Higher Education Review (England and Northern Ireland)

53   Higher Education Review encompasses all provision in a single process; the review method does not provide for separate reviews of TNE or any other provision offered away from the home campus or campuses and/or through arrangements with other delivery organisations or support providers. Thus, the judgements of Higher Education Review encompass the entire provision, although there is provision for review teams to differentiate judgements so that different judgements may apply, for example, to provision delivered wholly by the provider and that offered through arrangements with other delivery organisations overseas.

54   In Higher Education Review the parameters of the review of arrangements for working with others vary according to whether the partners, delivery organisations or support providers in question are also reviewed by QAA. Where they are subject to QAA review, in any form, the parameters of the review of the provider making the awards are confined to

the management of the arrangement by that provider, and to the setting and maintenance of academic standards. The reviewers do not consider the quality of learning opportunities, information and enhancement - not because these areas are unimportant, but because they will be addressed in the review of the other organisation.

55   Where partners, delivery organisations or support providers are not subject to QAA review (because, for instance, they are outside the UK), the review of arrangements for working together will consider all four core areas: academic standards, quality of learning opportunities, information and enhancement.

56   In practice, for awarding bodies with significant amounts of TNE, Higher Education Review teams tend to sample several partnerships or programmes for detailed investigation in order to test the efficacy of the awarding body's processes for managing these provisions. The team will ask for specific evidence about these partnerships or programmes (such as the most recently concluded formal agreement between the awarding body and the other overseas partner, and the report of the process through which the awarding body assured itself that the organisation was appropriate to deliver or support its awards), and then follow up its analysis of the documentary evidence by arranging meetings with staff and students during the review visit. As the review team is confined to the awarding body's premises for the review visit, any discussions with staff and students overseas have to be conducted by video or teleconference.

Higher Education Review: Wales

57   Higher Education Review: Wales begins in the academic year 2014-15.
The outgoing review method, Institutional Review Wales, provided for separate collaborative provision reviews of institutions with large amounts of partnership activity. Higher Education Review: Wales considers TNE in the same way as Higher Education Review in England and Northern Ireland.

Links between domestic and TNE reviews

58   With the exception of ELIR, there is currently no explicit link between domestic and TNE reviews. This is because of the logistical barriers to coordinating several different and dynamic domestic review methods with a TNE review programme, which is managed as a series of separate year-long projects. In practice, however, QAA has often taken advantage of opportunities to link domestic and TNE reviews. For example, in 2013-14 several awarding bodies in England and Scotland took part in the TNE review in the United Arab Emirates and underwent Higher Education Reviews or ELIR in that order. The teams for the Higher Education Reviews and ELIR took the results of the United Arab Emirates exercise as one of the examples of TNE that it would otherwise have interrogated itself, thereby rationalising the burden on the awarding bodies and improving the coverage of the review.

59   This example points towards a better planned and more coordinated system, wherein:

- the selection of countries and/or themes for TNE review is informed by domestic review schedules (and to a limited extent vice versa)
- the selection of awarding bodies to take part in TNE review is informed by domestic review schedules
- the format and outcomes of domestic review are informed by the findings of TNE review for awarding bodies who are involved in a TNE review in the run up to their domestic review (and vice versa for awarding bodies whose domestic review occurs in the run up to the TNE review)

- in exceptional cases, the scheduling of domestic reviews could be informed by the outcomes of TNE review.

Figure 4: Worked example

> QAA is considering conducting a TNE review in the countries of Aero, Biz and Cat in 2016-17. An analysis of the four UK domestic review schedules for 2016-17 and 2017-18 shows that six of the UK awarding bodies on those schedules have campuses in Cat, four have 'franchised' provision in Biz, and three have 'validated' provision in Aero. There are also two other awarding bodies with campuses in Cat whose domestic reviews are happening in the current academic year. On that basis, QAA decides to target Cat for a TNE review with the theme of the management of branch campuses.
>
> Eight awarding bodies are invited to participate in the TNE review in Cat - the six undergoing domestic review in 2016-18 and the two taking part in domestic review this year.
>
> The six awarding bodies undergoing domestic review in 2016-18 take part in the Cat review prior to their domestic review. Five of these awarding bodies are regarded by the reviewers as managing their provision in Cat successfully. These outcomes feed into the subsequent domestic reviews and lead to a reduction in the intensity of those reviews in relation to its TNE provision owing to a reduction in the review teams' information requirements.
>
> The other awarding body is found to have significant problems in its operations in Cat leading to a number of urgent recommendations for remedial action. The subsequent domestic review provides a mechanism for checking on progress against these recommendations, removing the need for a bespoke follow-up process.
>
> For the two awarding bodies undergoing domestic review in the current academic year, the outcomes of those reviews feed into the preparations for the exercise in Cat, leading to a significant rationalisation of the burden on the awarding bodies to provide evidence to the TNE review teams.

60   For awarding bodies, this approach should lead to strengthened external quality assurance and assist with planning and preparation for external reviews as they are given more advanced notice. It should also rationalise the burden of preparing for and participating in different review processes, as these processes increasingly inform one another. During the planning process, QAA will need to ensure that an individual awarding body's involvement in TNE review over time is proportionate to the scale of their TNE activity.

61   The new approach will allow QAA to generate a more holistic view of a given awarding body's total provision and to coordinate its activity with other sector bodies more effectively.

62   The success of this approach would depend on QAA having the ability to plan for TNE review over at least a three-year timescale, as recommended in part two of this report. The Group **recommends**, therefore, that QAA aligns its domestic and TNE review activities according to the proposals above, such that domestic review schedules are among the considerations made in the selection of awarding bodies for participation in TNE review, and the outcomes of TNE review activity inform domestic review and vice versa.

Part 4: Resource implications

63   This part of the report identifies the costs of the existing TNE review process and compares those with the estimated costs of the system proposed in part two. The recommendation in part three about the alignment of domestic and TNE reviews in itself will cost very little to deliver, although it does rely on QAA having a longer-term plan of TNE review activity than at present.

64   The costs of the six TNE reviews QAA has undertaken since 2009 are set out in Figure 5. Costs vary according to several factors, including the number of 'delivery' sites chosen for review, the size of the review team, the distance between the 'delivery' sites and the UK and each other, and the local cost of accommodation.

Figure 5: Costs of previous TNE reviews (2009-14) (non-staff costs only)

India (2009)	£117,220
Malaysia (2010)	£91,453
Singapore (2011)	£102,654
China (2012)	£106,164
United Arab Emirates (2014)	£39,789
Caribbean (2014)	£55,000 (estimate)
Mean average cost	**£85,380**

65   We estimate the mean average staffing cost (including on-costs) of the TNE reviews since 2009 is £65,000 at current prices. The total mean average cost of TNE reviews since 2009 is, therefore, £150,380.

66   Strengthening the external quality assurance of UK TNE according to the proposals in this report demands additional resources. QAA would need to engage approximately 1.5 full-time equivalent officers on the development and implementation of the three-year plan. Combined with one overseas visit each year and two UK-based activities, and including also the costs of running the TNE Committee, the annual costs of the system would be just under £250,000. Further increases in cost would be driven by additional activity, the most expensive being visits to provisions at the greatest distance from the UK.

Figure 6: Estimated annual costs of a strengthened TNE review system

QAA staff costs (including on-costs)	Head of TNE or similar (0.5 FTE)	£39,600
	TNE Manager or similar	£65,000
	Additional support for overseas visits	£33,000
	TNE Administrator (0.5 FTE)	£14,000
UK-based activity		£1,000
Overseas visit		£85,380
TNE Committee		£4,650
Other costs (including publishing, research, events)		£3,000
Total		**£245,630**

67   The estimated annual costs of the revised system are, therefore, approximately £100,000 more than the cost of the current arrangements. The main reasons for the higher costs are increased staff time and more activity compared to the current approach, as well as the creation of a TNE Committee. The main benefits of these higher costs are a reflection of the cost drivers: more dedicated staff time with more analysis of UK TNE leading to more effective review activity. This will represent a significantly strengthened external quality assurance and enhancement framework, and one which will provide far more information for the UK higher education sector about the nature and range of TNE, and emerging trends and issues.

Part 5: Conclusion and list of recommendations

68   UK TNE has a hard won reputation for academic rigour and excellent learning and teaching. It is the individual awarding bodies themselves who should take the credit for the development of that reputation, and the primary responsibility for sustaining it. But the external quality assurance and enhancement system managed by QAA must also play its part by targeting its activities more effectively and aligning those activities more closely with other review activities within the UK as part of a holistic quality assurance system.

69   Our overarching recommendation, therefore, is that QAA, in partnership with its subscribers and other bodies as appropriate, develops a strategic and coordinated approach to the external quality assurance and enhancement of UK TNE.

70   To give effect to that overarching recommendation, the Group further recommends that:

- QAA aligns its domestic and TNE review activities, such that domestic review schedules are among the considerations made in the selection of awarding bodies for participation in TNE review, and the outcomes of TNE review activity inform domestic review and vice versa
- branch campuses and other large TNE provision should not have their own institutional review, but should be given the necessary scrutiny within the domestic institutional review of the awarding body in the UK (where appropriate, this scrutiny will include the consideration of findings from any relevant TNE review activities)
- QAA establishes a subcommittee of its Board to:
  - guide the development of the plan for the external quality assurance of UK TNE
  - recommend the plan to the QAA Board of Directors
  - issue an annual opinion to the Board on the plan's effectiveness
- QAA continues to broaden and strengthen its relationships with other stakeholders (including awarding bodies and national agencies from the UK and in countries where UK TNE primarily occurs) about the development, implementation and evaluation of TNE review activities
- QAA, working in concert with HESA and other stakeholders, undertakes its own temporary annual data collection until such time as the new HESA Aggregate Offshore record is launched
- QAA, working with relevant stakeholders, publishes an annual report about UK TNE, using statistics and intelligence, as well as findings from TNE reviews, to highlight significant patterns and trends
- QAA considers whether and how to incorporate ideas being developed in the sector globally, including, for example, the QACHE toolkit, within the system proposed.

Annex A: Implementation Group membership and terms of reference

Members

Keith Brown	Teesside University and British Universities' International Liaison Association
Dan Cook	Higher Education Statistics Agency
Ailsa Crum	Quality Assurance Agency for Higher Education
Damian Day	The General Pharmaceutical Council
Raegan Hiles	UK Higher Education International Unit
Victoria Korzeniowska	University of Southampton
Martin Lockett	Ashridge Business School
Ruth Moir	Heriot-Watt University
Wendy Muir	University of Glasgow
Will Naylor (Chair)	Quality Assurance Agency for Higher Education
Xinyu Wu	Bangor University

Secretariat

Rafe Smallman	Quality Assurance Agency for Higher Education
Sally Clark	Quality Assurance Agency for Higher Education

Terms of reference

Definition of Transnational education

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 the Implementation Group, TNE is used in the context of higher education providers that are degree-awarding bodies, including 'alternative' providers.

Role of the Implementation Group

Working within the parameters and principles established by the outcome of the consultation on *Strengthening the Quality Assurance of UK Transnational Education* (May 2014), the role of the Implementation Group (the Group) is to formulate recommendations to the High Level Steering Group about:

- the development of institutional data-reporting requirements in relation to TNE (in conjunction with HESA)
- how the relationship between institutional review and TNE review should be taken forward
- the identification of branch campuses and other large provision that might be deemed suitable for their own form of institutional review
- country overview reports in terms of their content and target audience.

Schedule of work and meetings

The Group shall meet at least three times before the end of 2014 and aim to submit its recommendations as soon as possible after the final meeting.

Record of meetings

The secretariat shall make a formal written record of each meeting and the Group
shall ensure that this record is agreed and forwarded to the High Level Steering Group for
its information.

Reporting arrangements

The Group's primary reporting line is to the High Level Steering Group, which oversaw the
formulation of the TNE consultation in 2013-14.

The Group shall also submit its recommendations to other bodies with interests in those
areas within the Group's remit. These bodies include, but are not necessarily limited to,
the four UK higher education funding bodies, Universities UK, GuildHE and HESA.
The Group shall submit its papers and minutes to these same bodies on request.

Annex B: Proposed terms of reference for the TNE Committee

Remit

The role of the TNE Committee is to oversee the development, implementation and evaluation of QAA's TNE review activities. The Committee will:

- provide guidance to QAA on the development of its TNE review activities in light of the overall objective of enhancing the quality and securing the standards of UK TNE
- recommend a rolling plan of TNE activities to the QAA Board annually
- consider and propose changes to the rolling plan
- ensure that TNE review activities are coordinated with QAA's other review processes
- evaluate the implementation of the rolling plan annually and inform the QAA Board as to whether the plan has achieved its objectives
- provide advice and guidance to the QAA Board on any other issues related to the standards and quality of UK TNE emerging in the course of the Committee's activities or referred to the Committee by the Board.

Membership

The TNE Committee should comprise 10 members with representation from across the UK, as follows:

- two QAA Board members (at least one of whom should be from a higher education awarding body)
- six members from the higher education sector with appropriate experience and understanding of UK TNE
- two other members with appropriate experience for the work of the Committee.

The Director of Quality Assurance and other QAA officers will attend meetings to advise and support the Committee.

Secretariat

Head of TNE and Lead Administrator.

The Chair

One of the two Board members is appointed by the Board to act as the Committee's Chair.

If the Chair is absent (or needs to withdraw) from the meeting, she/he designates a deputy from the Committee for the meeting (or item) in question.

Appointment to the TNE Committee

All appointments and reappointments are made by the QAA Board.

Processes for the recruitment and selection of members will reflect QAA's commitment to transparency, equality and diversity.

Term of office

Members are invited to serve on the Committee for three years in the first instance. Members may be reappointed for a further period of three years. Six years is the maximum permitted continuous period of office.

A member who retires, or leaves the sector from which they were appointed, may remain on the Committee for up to two years from the date of retirement (providing this does not exceed the standard term).

Quorum

The Committee is quorate when five members are present, including the Chair (or his/her designated deputy).

Frequency of meetings

The Committee will normally meet three times a year.

Report

The Committee will report routinely to the Board through its minutes, and occasionally through such reports as the Board may request.

Review

The Committee will review its terms of reference no less than once every three years to ensure its continuing effectiveness and fitness for purpose.

Annex C: TNE review activity initiation document

Purpose

The vision of the review, including a short, concise summary of the proposed activity.

Background/rationale

A clear reasoning for undertaking the activity indicating the end results of the review.

Objectives: the activity's expected contributions to the overall strategic aim

How the review breaks down into individual objectives and the specific, measurable results expected upon project completion.

Scope of the review

- What the review must deliver, including what's in and out of scope.
- An outline of all who will be affected by the review, including details of any relationship to other QAA activities.
- Details of any relationship to previous activities in the country, region or theme.

Business case

- A full justification for the rationale for the review, including reference to the data analysis.
- An illustration of how the review conforms with the underlying principles (as yet not developed).
- An overview of the financial and resource implications of the review.

Review approach

An illustration of the principal tasks involved in accomplishing the objectives.

Alternative approaches

A summary of possible alternative approaches to achieving the objectives and why these are not recommended.

Project plan

- A description of the tasks involved in the review, including how the awarding bodies involved will be expected to participate (include a timetable for the completion of the activity and indicate who will be involved in the activity).
- A breakdown of how much each activity is expected to cost.
- Outputs: what the activity is expected to produce, including the number and nature of published reports and any other outputs (such as events).
- A review of the management and governance.
- A communication plan.

Key performance indicators

The measures that will be used to determine whether the review has been successful.

Risks, issues and opportunities

- Identification of any associated risks, indicating if they are strategic or operational and demonstrating how they will be managed.
- A summary of the issues associated with the review.
- Likely organisational or business development opportunities.

Follow-on activities

Details of any relationship to future planned or potential TNE review activities.

Initial analysis

Details of the initial analysis that has been undertaken that supports the proposal.