

Consultation on Future Approaches to the External Quality Enhancement of UK Higher Education Transnational Education - survey questions

This document details the questions being asked in the online survey for this consultation and is intended to help you prepare your answers. The [full consultation document](#) is available on the QAA website.

All responses **must** be submitted via our [online survey](#) by 23.00 on 3 January 2020.

Information about you

Q1 Name: Chris Laity

Q2 Role: Policy Officer

Q3 Institution/organisation: Universities Wales

Q4 Do you deliver TNE? No.

yes

no

Q4a If yes, number of TNE students:

less than 100 TNE students

101-500 TNE students

501-1000 TNE students

1001-2000 TNE students

over 2000 TNE students

Q5 Nation:

England

Northern Ireland

Scotland

Wales

other (please specify):

Q6 I am responding:

on behalf of my university

as an individual

on behalf of my organisation (not a university)

Consultation information and questions

Section 1: Guiding principles

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

Any effective system should:

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

Question 7

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

Universities Wales are firmly of the view that a UK-wide approach to quality enhancement is desirable in order to maintain a united front which can be presented in overseas markets. The current QAA badge is widely understood and to introduce divergence will weaken the UK brand. However, maintaining a UK picture at all costs is not necessarily desirable as there are risks in some of the potential approaches. Were model 1 to be selected in isolation as the preferred option, which would not include in-country reviews, then we will support and work towards an alternative approach to continue to safeguard and enhance the sector in Wales.

Question 8

To what extent do you agree that a quality enhancement system of UK HE TNE should be underpinned by the 11 guiding principles outlined above?

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments if you think that additional or different principles should be taken into account (*max 250 words*)

We are broadly content with the principles as outlined.

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

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

Both models align fully with existing quality assessment and assurance arrangements in the UK nations, including those UK-wide elements that apply to all provision (such as the Quality Code for Higher Education) and both build on established principles such as

avoidance of duplication. Each of the national systems in the UK makes use of information and data, and therefore would embrace further information and data on TNE as it becomes available. Neither model precludes other actions such as the development of guidance and advice for TNE providers and international engagement with overseas quality assurance bodies and regulators.

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

2A - Model 1: Reaffirming institutional and national enhancement arrangements

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

Key operational features of this proposed approach are:

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

The governance arrangements will allow the sector to identify where future context-specific and proportionate measures are required to provide additional reassurance to their governing bodies and domestic and overseas regulators and partners. These could include:

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

Question 9

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

We recognise that existing assurance and enhancement mechanisms are strong throughout the UK. However, regular in-country reviews provide a vital service and builds and maintains the international reputation of UK HE. The QAA is an

internationally recognised brand and the strength that this gives the sector in overseas markets is a useful lever for all institutions operating in that space.

Individual provider mechanisms do of course provide a substantial level of assurance, but in the unlikely event of an isolated assurance incident the damage that the entire sector could suffer may prove irreparable. Having a rolling programme of in-country visits does not duplicate the work undertaken by individual institutions but rather complements it providing insights into markets that individual operators may not be able to provide or choose to share. This work encourages properly staged entrances and indeed exits from overseas markets and overall allows for the UK sector to remain competitive with other nations.

Question 10

What additional measures, if any, could complement existing national quality enhancement mechanisms to underpin a robust and internationally-trusted quality enhancement approach to UK HE TNE? (*max 500 words*)

As outlined above, we would be supportive of a rolling programme of in-country visits that provide insights into markets. We would also be supportive of efforts to increase data collection within overseas markets in order to provide metrics that are equivalent to those we are able to collect for students studying within the UK.

Governance of Model 1

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

Question 11

Do you agree that there should be UK-wide sector-led oversight to ensure that existing national quality enhancement arrangements are, and remain, fit-for-purpose for TNE?

- yes**
 no

Please comment on whether a new or existing body would be appropriate to fulfil this role (*max 250 words*)

We believe that UK-wide oversight is a useful tool for ensuring that arrangements remain fit for purpose and that, internationally, UK-wide sector-led oversight helps build and maintain the credible, world-leading reputation of UK HE. We do feel that this is currently achieved through our existing quality assurance framework and the work that is done in combination with the QAA including in country reviews.

Funding mechanism of Model 1

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

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

Question 12

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

Our view is that TNE visits should be carried out as part of normal business and therefore we do not agree with the suggested funding mechanism for Model 1.

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

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

The key operational features of this proposed model are to:

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

Question 13

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

We strongly agree that a regular programme of in-country visits should be maintained and indeed increased to three countries per year.

A failure at any point within TNE for any institution could cause extensive reputational damage not only the institution concerned but also to the entire UK sector. Any suggestion that the existing mechanisms be weakened carries with it a risk that if realised may take years to recover from. At the point where we are leaving the EU and looking to develop further in overseas markets, it makes little sense to increase the risks associated with TNE activity.

We believe that overseas visits should be a core part of the mechanisms and that they will continue to enhance our international reputation.

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

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

Question 14

Do you agree that three countries/regions is an appropriate number of locations to be selected for quality enhancement activity normally each year? If you disagree, please indicate in your comments the number of locations that you would consider optimal.

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

Yes, as outlined above we believe that three countries/regions will give the sector the appropriate cover and this should be considered the minimum requirement.

Governance of Model 2

In this scenario, the in-country quality enhancement process could be supported by an advisory board of experts from the sector which, ensuring external oversight and sector ownership of the process, would be consulted, at least annually, on the rolling programme of TNE quality enhancement activity and locations. This would take place in communication with, and respecting decisions taken by, the respective authorities and regulators in each of the nations.

Question 15

If in-country reviews were retained, would there be a need for additional external oversight of the in-country review programme?

- yes
- no

Please comment on whether a new or existing body would be appropriate to fulfil this role (*max 250 words*)

Yes, we believe that oversight of the activity carried out would be a useful tool. The oversight function should be one that advises on methodology and effectiveness of the activity rather than one which scrutinises individual results.

Funding mechanism of Model 2

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

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

Question 16

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

Question 17

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

- through **a flat fee** where all providers pay the same
- through **differential fees** where providers pay different amounts depending on specific factors
- no opinion

Please give your comments (*max 250 words*)

We have no strong views on this. A flat fee would evidently be easier to administer but we acknowledge that some operators have larger TNE provision than others.

Question 18

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

- TNE student numbers³
- number of TNE arrangements²
- number of countries of delivery¹
- other

Please give your comments (*max 250 words*)

We believe the order of priority should be as outlined above.

Question 19

Taking the example of three locations being selected for quality enhancement activity each year - each involving three peer-reviewers and a QAA Officer, and assuming that a significant majority of all degree-awarding bodies with TNE

provision buy into the scheme - the annual fee per provider might range between £2,500 and £5,000. Would you agree that this is a reasonable and acceptable fee range for the service?

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

For the amount of (what amounts to) insurance this fee would provide, this seems appropriate for the service. We understand that HEFCW would be content to contribute as appropriate.

Question 20

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

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Please give your comments (*max 250 words*)

We believe that this possibility warrants further discussion as it is unclear what the mark/statement would be signifying at this point in time.

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