

# Review of UK Transnational Education Greece and Cyprus 2015



# Introduction

During 2015, the Quality Assurance Agency for Higher Education (QAA) undertook a review of UK TNE in Greece and Cyprus. The purposes of the review were to safeguard the reputation of UK higher education in these countries and elsewhere by demonstrating a robust, independent approach to its quality assurance, and, by doing so, to support the further growth of high quality UK provision internationally.

As part of the TNE review of Greece and Cyprus, the QAA review team also developed a set of case studies. The case studies in this document focus on qualifications involving a UK degree-awarding body in conjunction with another degree-awarding body: the University of Central Lancashire operating in Cyprus and the Open University operating in Greece. These are largely factual accounts of the type of degree awarded and are intended to illustrate the types of arrangement that are discussed in QAA's Characteristics Statement: Qualifications involving more than one degree-awarding body. Accordingly, these case studies primarily address the awarding function, approaches to setting and maintaining academic standards, how quality assurance arrangements are shared, the terminology employed, and the provision of information about the qualification.

Also available on our website is a case study that provides a short overview of the recent experience of UK universities with an active presence in Greece and Cyprus. It draws on information obtained from visits to each provider, held in the summer and autumn of 2015. In total, nine universities were visited, of which five had a partner in Greece two had a partner in Cyprus and two had a presence in both Greece and Cyprus.

# Case studies: Qualifications involving more than one degree-awarding body

# University of Central Lancashire in Cyprus

# Context for the arrangement

The University of Central Lancashire (UCLan) traces its origins back to 1828, with the founding of the Preston Institution for the Diffusion of Knowledge. The Institution developed into Harris College in 1956, Preston Polytechnic in 1973, Lancashire Polytechnic in 1984 and the University of Central Lancashire in 1992. Its distinctive mission is to promote access to excellence in higher education for all students with the ability to benefit from it. The University has approximately 31,000 students studying across all UCLan campuses and partner institutions, of whom 22,821 are based in Preston. The University works with a network of further education colleges to provide full and part-time higher education opportunities for students in the North West region of England, as well as further afield for some specialist provision. Approximately 5,000 students are currently studying on UCLan awards through 29 UK partners. The University has 2,700 students studying with partners in 13 countries in addition to around 1,800 international students on campus in Preston. Throughout this document, the University will be referred to as UCLan UK.

In 2012, UCLan opened a branch campus in Cyprus (UCLan Cyprus). In order to develop the campus, it was initially set up as a joint venture company with a board of directors. UCLan Cyprus was then established as a private university in Cyprus and was registered by the Evaluation Committee of Private Universities (ECPU) with the Cypriot Ministry of Education and Culture. The ECPU is the competent authority in the Republic of Cyprus, stipulated by the Laws for the Establishment, Operation and Control of Private Universities 109(1)/2005 and 197(1)/2007, for the examination of the applications submitted for the establishment and operation of a private university.¹ UCLan Cyprus is under temporary licence during its first four years of operation. Once it is granted a permanent licence (following a review at the expiry of the first four years in 2016), the institution will be reviewed by ECPU on a quinquennial basis. There are three Schools (Business and Management, Law, and Sciences, and a short courses and summer school) offering a portfolio of 21 bachelor's and master's programmes. It currently has 488 students on course. Its staff are appointed by, and to, UCLan Cyprus.

A Higher Education Review (HER) of UCLan was conducted by QAA in March 2015. This review included the operation of UCLan (Cyprus). One recommendation focused on the need to ensure the accuracy of information relating to the status of qualifications delivered at UCLan (Cyprus). At the time of the review there was some confusion about the nature of the qualifications being awarded. This case study enabled QAA to consider this more fully with UCLan, and below we consider the issue in more detail.

# Legal authority and recognition issues

UCLan UK states in its Academic Regulations that it has the power to award degrees with other institutions. These regulations are derived from the 1992 Higher and Further Education Act.

As a private university in Cyprus, UCLan Cyprus has a separate legal identity and its own charter while remaining part of the UCLan group (with UCLan UK as its parent university).

<sup>1 &</sup>lt;u>www.highereducation.ac.cy/en/eval-private-un.html</u>

It is legally obliged to be an autonomous entity within the higher education area of Cyprus (as defined by the Cypriot Ministry of Education and Culture) with its own administrative structures and its own officers. Its charter is, under *The Private Universities* (Establishment, Operation and Control) Law 2005,<sup>2</sup> required to prescribe arrangements for Senate, Council and Faculty Boards and for officers and staff.

Private universities are required by the 2005 Law to award their own degrees. These qualifications, as domestic degrees, secure automatic recognition by the Cyprus Ministry of Education and Culture. A condition of the registration of UCLan Cyprus is that the degrees conferred are those of UCLan Cyprus (verified by its Senate and signed by its Rector) and not solely of UCLan UK (through a franchise).

However, UCLan UK and UCLan Cyprus appear to have also had the option of conferring a single qualification jointly, with a single certificate signed by both of the competent authorities (that is, a joint degree). UCLan chose, in this context, to award what it describes as 'dual' qualifications. Students who register at UCLan Cyprus receive, on satisfactory completion of their programme of study, the 'dual' award of a degree from UCLan UK and a degree from UCLan Cyprus.

The University's Academic Quality Assurance (AQA) Manual includes a statement on Joint and Dual Awards as part of the section on Collaborative Provision Policy and Procedures,<sup>3</sup> which currently states that:

'**Dual award** describes an arrangement where a single programme of study leads to two awards of the same level, one awarded by the university, the other by a partner institution represented by separate certificates and transcripts, each referring to the other, and both awarded at the end of the full period of study concerned. '

'Joint award describes an arrangement under which the university and one or more awarding institutions together provide programmes leading to a single award made jointly by both, or all, participants leading to a single certificate and transcript.'

The manual does not explore more fully the different characteristics of these qualifications, nor the circumstances under which each might be chosen. As discussed and described later, the University's definition of a dual award more closely resembles the definition of a double award, which is the term generally used within the European Higher Education Area (EHEA) for a single programme of study leading to two qualifications (see paragraph 2.6 of *Characteristics Statement: Qualifications involving more than one degree-awarding body*). A dual degree is conventionally the term used within Europe to describe two distinct programmes (which may have some intentional overlap or sharing of the curriculum), possibly of different durations/volumes and with two distinct sets of learning outcomes. It is acknowledged that, at the time the UCLAN initiative was developed, QAA's *Characteristics Statement*, which elucidated this distinction, had not yet been published.

## Type of qualification and nature of the provision

Each programme at UCLan Cyprus comprises a single programme of study, with a single set of programme learning outcomes and a single assessment scheme, which leads to the dual qualification and the award of two separate certificates. The titles of the two qualifications are identical.

The Private Universities (Establishment, Operation and Control) Law 2005 requires undergraduate degree programmes at private universities in Cyprus to comprise 240 European Credit Transfer and Accumulation System (ECTS) credits (equivalent to 480 credits under The Framework for Higher Education Qualifications in England, Wales and Northern Ireland). All the undergraduate programmes delivered at UCLan (Cyprus) are therefore four years in duration and have the equivalent of 240 (English) credits at Level 4 (whereas the UCLan UK versions of the same programme have 360 credits in total). The University's

<sup>2</sup> www.ecpu.ac.cy/en/legislation/private\_universities\_law.pdf

<sup>3 &</sup>lt;u>www.uclan.ac.uk/aqasu/aqa\_manual.php</u>

<sup>4 &</sup>lt;u>www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2984</u>

Academic Regulations were explicitly changed to take account of the requisite structures for UCLan Cyprus programmes. In most cases, the programmes are based on the common core of compulsory modules of the UCLan UK versions of the undergraduate programmes of the same title delivered in the UK. However, the UCLan Cyprus versions include additional study skills modules at Level 4, and some additional optional modules that are specific to Cyprus. These latter provide opportunities for local variation of the curriculum and local contextualisation of the learning materials. In the majority of cases, the programme learning outcomes are identical to the programme learning outcomes of the degrees of the same title delivered by UCLan in the UK. However, in some cases the programme learning outcomes differ (for example, for law, accountancy and finance) and the UCLan UK version comprises a subset of the UCLan Cyprus version. In some cases, the option choices that the student makes determine the jurisdiction in which professional accreditation may be obtained, it not being possible to satisfy both professional requirements within the single curriculum (for example, in accountancy degrees).

Students studying programmes at UCLan Cyprus also have available extracurricular options that are delivered in Greek, and which are not assessed, which relate to the Cypriot context and jurisdiction (for example, Cypriot law).

The award of the UCLan Cyprus qualification is currently dependent on the award of the UCLan UK qualification. A student can either gain both qualifications or neither; it is not possible to obtain one qualification without the other. However, UCLan considers it possible that this co-dependence may not be required in perpetuity and that single awards from UCLan Cyprus might be a long-term possibility.

The programmes are delivered entirely in Cyprus by staff of UCLan Cyprus, and the language of delivery and assessment is English. Mobility between the campuses of UCLan is not a required part of the programmes. However, there is scope on some programmes to study individual modules at the Preston campus or even to transfer to the UK. There is evidence of movement of students between the two campuses and plans to continue this. At the outset of the arrangement, the programmes were designed by UCLan UK. There has been a gradual increase in contributions from staff at UCLan Cyprus to the development of both existing and new programmes.

# Academic and operational oversight

Accountability for the UCLan UK qualification rests with the UCLan Academic Board, and that for the UCLan Cyprus qualification will rest with Senate in UCLan Cyprus once this is established and operating in the fourth year of the arrangement (that is, from 2015–16). Thus far an Interim Governing Committee has been operating at the Cyprus campus (on which UCLan UK is represented) with this function. UCLan Cyprus has established a hierarchy of academic committees beneath Senate, mirroring those that sit beneath the Academic Board at UCLan UK in Preston. Representatives from UCLan Cyprus are ex officio members of the UCLan UK Academic Board and its three subcommittees, and these bodies will in due course receive reports from the counterpart committees at UCLan Cyprus as procedures develop. This will facilitate UCLan UK committees reviewing equivalent provision across the campuses. There is also cross-representation from UCLan UK on the main UCLan Cyprus committees. One aim is to enhance provision across both by interchange of ideas and identified good practice.

All programmes leading to the UCLan Cyprus qualification must undergo the Cypriot accreditation process. All the programmes of study are evaluated and considered for recognition by the Ministry of Education and Culture in Cyprus through the Evaluation Committee of Private Universities (ECPU).

UCLan Cyprus administers the programmes and is responsible for all operational aspects of the programmes, including the admissions process, fee collection, the operation of the academic years and timetabling, organisation of examinations/assessments, and record keeping.

The academic year is similar at the two campuses but not identical, and starts later in Cyprus compared with in Preston. There is synchronicity in assessment timings where the same module is being taken. UCLan UK provides a draft timetable and Cyprus-specific examinations are fitted around the common examinations. Accommodations also have to be made for Cypriot public holidays and so on. Examination boards and reassessments are coincident.

# Academic and other regulations

UCLan UK Academic Regulations apply in their entirety to both qualifications. Where variations were required (for example, relating to the duration of study for the UCLan Cyprus programmes or to limits on the recognition of prior learning specified by the ECPU), these have now been included in the substantive regulations.

Students at UCLan Cyprus are subject to a single set of disciplinary regulations and procedures parallel with those for UCLan UK. The procedures mirror the UCLan UK structures and processes but are implemented by the equivalent local officers, who replace the corresponding UK officers (for example, where the Vice-Chancellor would act at UCLan UK, the Rector of UCLan Cyprus fulfils the role).

# Programme design, approval, monitoring and review

As indicated previously, all undergraduate programmes at UCLan Cyprus are of four years' duration, comprising 240 ECTS/480 English credits. Programme development and approval are subject to two parallel processes conducted by the two institutions and in the context of the requirements of the two jurisdictions. However, for the planning and business development stages, UCLan Cyprus acts in an advisory capacity. Thus new programmes are approved through UCLan UK's standard approval processes involving a validation event (usually in the UK with video link to Cyprus), with final approval granted by the Course Approval Panel for report to the Academic Board. The ECPU also convenes a separate validation event with its own external assessors in order to accredit the programme under Cypriot law. The course team at these events usually includes representation from UCLan UK. As ECPU may stipulate certain requirements, the approval process between the two parallel strands has to be iterative, with the UCLan UK Academic Board approving the finally agreed version of a programme.

Minor programme changes are again considered and approved in parallel through the relevant hierarchy of committees at each of UCLan Cyprus (where module changes may be initiated) and UCLan UK. Final sign-off for such changes rests with UCLan UK. Formally agreed changes have to be notified in writing to, and approved by, ECPU in Cyprus.

Annual monitoring follows the prescribed format determined by UCLan UK. It is undertaken by parallel processes in the Schools in UCLan Cyprus; currently, it is then reported across to the counterpart Schools in UCLan UK. Thus there is moderation and verification across campuses. As the relevant Senate subcommittees at UCLan Cyprus become embedded, and as provision consolidates, UCLan UK may consider altering the reporting structure so that reports on UCLan Cyprus provision flow as an entity from UCLan Cyprus committees to the counterpart Academic Board subcommittees in the UK. ECPU requires the return of specific data sets from UCLan Cyprus on an annual basis but does not require an analogous annual programme monitoring process.

Periodic review is conducted in accordance with UCLan UK procedures, and the subject level reviews conducted include the Cyprus provision (for example, the review of law in 2014). The resulting report is shared with UCLan Cyprus.

#### Assessment

The assessment strategy for each programme is approved (as part of the programme approval process) by each of UCLan Cyprus (and ECPU) and UCLan UK. Where modules on the UCLan Cyprus programmes are identical to modules delivered at the Preston campus, then the same assessments are used but are marked by UCLan Cyprus staff. For modules that are specific to the UCLan Cyprus programmes, the assessments are set and marked locally at UCLan Cyprus. In both of these situations, the assessments are overseen by the relevant programme/subject board at UCLan UK (see below). A sample of assessed work (10 per cent of scripts across the standard ranges plus all potential firsts and fails) is sent to UCLan UK for moderation.

All marking is conducted using the UCLan UK grading schemes and marking criteria. Marks are aggregated for the purpose of awarding qualifications according to the UCLan UK schemes set out in the Academic Regulations. As noted previously, where any variations are necessary for the purposes of the UCLan Cyprus qualifications, these have been embedded in the regulations.

#### Examination boards

UCLan operates a two-tier examination board system and this system is used to consider the award of both the UCLan UK and UCLan Cyprus qualifications simultaneously. Pre-assessment boards meet in Cyprus to consider the marks of local students before they are considered at the substantive module boards in the UK. Initially all module examination boards were held in the UK with representation (sometimes by video link) from UCLan Cyprus. A number of Cyprus-specific module boards are now held in Cyprus with representation from UCLan UK.

Course Assessment Boards in the UK consider progression and award, and they consider all programmes, including the UCLan Cyprus programmes. Staff members from UCLan Cyprus join the proceedings of the relevant board by video link. Level 4 progression (years 1 and 2) was conducted in Cyprus as a new initiative in 2015. Stage 2, Levels 5 and 6, (years 3 and 4) are conducted in the UK with a video link to Cyprus. Thus, effectively, the UCLan UK examination boards are acting as joint examination boards, determining the award of both qualifications.

Examination boards at UCLan UK are empowered to award degrees on behalf of Academic Board but decisions on awards of UCLan Cyprus have to be verified by its Senate under the requirements of the ECPU. This will come into effect from 2016 (with the Interim Governing Committee acting in the intervening period).

#### External examiners

External examiners are appointed and paid by UCLan UK. They are not required for the Cypriot qualification. The same external examiners are used for both the UCLan UK provision delivered in the UK and for the UCLan Cyprus programmes. However, additional external examiners are appointed for Cyprus-specific modules. The external examiners operate in accordance with the UCLan UK procedures.

# Certification and records of study

Two separate certificates are produced, one in respect of each of the two degree-awarding bodies. The titles of the degrees are identical. Both certificates are printed in the UK. The certificates refer to the fact that they should be read in conjunction with the Higher Education Achievement Record (HEAR) transcript. However, neither the UCLan UK certificate, nor the accompanying HEAR transcript, refers to the existence of the second qualification and certificate and the fact that a single programme has resulted in a dual qualification. The same omission is true of the UCLan Cyprus certificate and transcript.

# Registration, enrolment and contractual relationship with students

Students on the UCLan Cyprus programmes are registered as UCLan students on the main UCLan system but flagged as being at the Cyprus campus. Student records are maintained on the main UCLan system but UCLan Cyprus staff have access to relevant parts of this database. Marks are forwarded to UCLan UK school administrators, who put marks into the system. UCLan Cyprus maintains a small database (for example, of student numbers/teaching hours) for ECPU purposes.

### Complaints and appeals

For UCLan Cyprus programmes there are sets of regulations governing academic complaints and appeals that are parallel to those for UCLan UK. The processes mirror the structure and procedures of UCLan UK but are handled by local staff members who hold the equivalent roles to those specified in the UCLan UK procedures. A single set of procedures, therefore, operates for both qualifications awarded.

#### Public information

The UCLan Cyprus website makes it clear to prospective students that the degree programmes that they undertake will lead, on satisfactory completion, to the award of what is described as a 'dual' qualification of a degree from UCLan UK and a degree from UCLan Cyprus. Students interviewed by the review team are clear about the position and said that this had been explained to them as part of their induction. Students regard it as an advantage to obtain a degree that is automatically recognised locally by the Cyprus Ministry of Education and Culture but also has the kudos of a UK higher education qualification. There is a perception among some students that two qualifications will make them appear to prospective employers as better qualified and will also be impressive on their CVs (although they would have the advantage of having to expend fees and study time on only one programme). It is important that the public, and specifically employers, are not misled as to the nature of the qualifications gained. It is for this reason that it is important that certificates and transcripts make absolutely clear the nature of the qualifications awarded and the amount of study actually involved.

## Observations and suggestions

The programmes of study provided at UCLan Cyprus have all the hallmarks of double as opposed to dual degrees as conventionally used within the EHEA and as described in the recently published *Characteristics Statement: Qualifications involving more than one degree-awarding body.* There is a single integrated programme of study that has taken account, in its design, of the requirements of two jurisdictions. The two degree-awarding bodies work together to develop the programme and assessments. Each programme has a single set of programme learning outcomes and is subject to a single set of academic regulations and assessment requirements. Assessment outcomes are formally determined through a single set of examination boards (with verification of the award undertaken by the two respective academic authorities). The two awarding bodies work together to implement a single set of quality assurance procedures. It is, of course, recognised that at the time UCLAN was developing the programmes and deciding on the terminology for the awards, QAA's *Characteristics Statement* had not yet been published.

Where possible, it is suggested that in describing their provision in future, degree-awarding bodies use the terms adopted within the EHEA to reduce the risk of causing confusion. This seems particularly relevant when the degrees are being offered in a European context.

It is important to maintain transparency about the nature of the qualifications awarded, and the learning involved, when awarding qualifications. It is suggested that if two qualifications are conferred, then in order not to mislead employers or other stakeholders, the certificate and/or transcript should make clear that two qualifications have been awarded in relation to one programme of study, and the transcripts should make clear that the achievement of the same academic credit has been used for more than one qualification. Chapter B10 of the UK Quality Code for Higher Education (Quality Code) and the *Characteristics Statement: Qualifications involving more than one degree-awarding body guidance* provide further detail.

A further observation is that an unambiguous representation of the study undertaken in this example would be the award of a joint qualification where a single qualification is conferred, and the issue of only one certificate, signed by both of the degree-awarding bodies, plus one transcript. The *Characteristics Statement* provides further detail. This model depends on there being no legal or recognition impediments to the award of a joint qualification. In this example, it is not clear that a joint qualification is necessarily precluded by Cypriot requirements.

# The Open University and the American College of Greece, Deree College (ACG)/ the American College of Thessaloniki (ACT)

#### Context

The Open University (OU) was founded in 1969 by Royal Charter. Its headquarters are located at Walton Hall in Milton Keynes but it operates across the whole of the UK. It is unique in the UK because it primarily provides open and distance learning programmes for those who might not otherwise have an opportunity to study for a degree. The University's mission is to be 'Open to People, Places, Methods and Ideas'. It sees its collaborative ventures (those where programmes are delivered by other providers but lead to OU awards) as providing strategic flexibility for fulfilling its mission, particularly through diversification of the curriculum and reaching a wider range of learners. The University operates a range of models for working with other organisations to deliver higher education, including many internationally. It has a typology that defines these. The main type is validated provision (provision designed and delivered by a collaborative organisation with OU approval and oversight).

Deree College is a private, non-profit, liberal arts college located in Athens. It is a division of the Boston-based, not-for-profit organisation the American College of Greece (ACG). It is the oldest American accredited college in Europe and the largest private college in Greece. ACG, similarly, holds an operating licence granted by the Greek Ministry of Education. It provides US-style undergraduate programmes through three Schools (Business; Fine and Performing Arts; Liberal Arts and Sciences) and postgraduate programmes through its Graduate School of Arts and Sciences. It also offers graduate diplomas and certificates, as well as professional qualifications and continuing education courses. The OU was approached by ACG in 2010 with a proposal that the OU should validate its undergraduate provision. A partnership was agreed with effect from 2011, and validated undergraduate programmes now lead to the award of an OU qualification in addition to a US bachelor's degree.

The American College of Thessaloniki (ACT) is the tertiary division of Anatolia College, a non-profit educational institution in Thessaloniki. ACT holds an operating licence issued by the Greek Ministry of Education under a governmental decree that recognises the right of private post-secondary educational institutions to operate in Greece (KEME). ACT's undergraduate portfolio leads to US bachelor's degrees in business, business computing, international relations and English. In addition it offers a Master of Business Administration programme (MBA). The Open University was approached by ACT with a proposal that it should validate ACT's undergraduate programmes. A partnership between the OU and ACT was established, with effect from 2013, enabling validated ACT undergraduate programmes to lead also to OU qualifications.

As part of this Case Study, a QAA review team visited the American College of Greece, Deree College (ACG) and held meetings with senior staff, students and a selection of academic and administrative staff. Some of the examples of procedures employed relate, therefore, solely to ACG and not necessarily to ACT.

# Legal authority and recognition issues

The legal authority of the Open University to award degrees derives from its Royal Charter (granted in 1969, as noted above).

Both ACT and ACG are accredited by the American New England Association of Schools and Colleges through the latter's Commission on Institutions of Higher Education (NEASC-CIHE). Accreditation of an institution of higher education by NEASC indicates

that it meets or exceeds criteria for the assessment of institutional quality periodically applied through a peer review process. An accredited college or university is one that has available the necessary resources to achieve its stated purposes through appropriate educational programmes, is doing so substantially, and gives reasonable evidence that it will continue to do so in the foreseeable future. Institutional integrity is also addressed through accreditation. ACT and ACG respectively award the qualifications. Degrees awarded by an institution accredited by NEASC are deemed equivalent to degrees issued by US colleges and universities.

Undergraduate and postgraduate programmes at both ACT and ACG are based on the US system of higher education. Their degrees do not correspond to those granted by Greek educational institutions and are not recognised by Greek authorities as the equivalent in all respects of Greek public university degrees. In both cases the OU was approached by ACG and ACT. ACG was seeking validation by a European partner and ACT was seeking to find a new validating partner. This was required in order that graduates could obtain qualifications that were recognised in Greece (under the European Union directive 36/2005) for work in the public service, as well as professional rights. Under Greek law, such recognition is required for the professional rights to undertake some work (mostly in the public sector but also for some roles in the private sector, such as law). Professional rights also allow male graduates to defer military service for a period of up to six years.

# Type of qualification

Students admitted to ACT and ACG are encouraged to study for the OU degree as well as the US degree, covered by NEASC accreditation. Those studying for both degrees are registered with both institutions. They are able to complete both the US degree and the UK qualification within the typical timeframe for US undergraduate degrees (that is, four years).

Therefore, in both cases, the partnerships result in offering programmes that lead to two separate qualifications, and two separate certificates, from the two degree-awarding bodies involved (the OU and either the ACT or ACG, accredited by NEASC).

The OU describes these as dual awards. The University is involved in approximately 40 of these qualifications with a total of three partners (one in the UK in addition to ACT and ACG in Greece). Although the OU has a typology of arrangements for working with other organisations, it does not currently include a definition or characteristics of a dual qualification. Nevertheless, it uses the term to describe awards that result in two separate qualifications from a single programme. The review team suggests that the University might consider defining, and describing the characteristics of, dual degree qualifications in which it is involved. The University's use of the term 'dual' is consistent with the way in which the term is typically used within Europe (see paragraph 2.10 of Characteristics Statement: Qualifications involving more than one degree-awarding body). A dual degree is the term used conventionally to describe two distinct programmes (possibly with some intentional overlap or sharing of the curriculum), possibly of different durations/volumes and with two distinct sets of learning outcomes. They lead to two distinct qualifications subject to different assessment requirements.

The nature of the agreement is that the OU validates the provision under its standard validation arrangements and the OU qualification is awarded to candidates who successfully complete the requirements for the OU degree. In addition, a US BA or BSc is awarded to all those candidates who successfully complete the requirements for the respective qualification. The legal agreements with ACT and ACG do not explicitly refer to the award of dual qualifications as a consequence of the partnership. It is the view of the review team that it would be more helpful and transparent if this arrangement were explicitly acknowledged in the agreement.

The OU academic regulations for programmes delivered within the UK have restrictions on the extent to which credit can be used more than once in a second or subsequent qualification at the same level. However, these do not apply to transnational provision. The OU see this as

acceptable where the dual qualification provides a passport to recognition of a qualification in circumstances where jurisdictions have different legal and recognition requirements.

# Nature of provision

In each instance of the dual qualification, there are two different formal programmes (an OU programme and an ACT or ACG programme) that lead to the respective qualifications. The US programmes are larger in terms of duration (typically four years as opposed to three) and larger in terms of the volume of credits, in keeping with the US higher education model. The OU programme is nested or embedded within the ACT or ACG programmes. The programme learning outcomes may be different for the two programmes but the OU learning outcomes are effectively a subset of the ACT/ACG programme outcomes. Students may be able to choose between more than one major for the US ACT/ACG programmes and so there isn't always a one-to-one mapping of an OU degree with a specific ACT/ACG major. Students at ACG are given individual guidance on choosing modules that will satisfy the curriculum requirements of the specific OU programme for which they are registered and, at the same time, for the ACG major of their choice.

The two qualifications are not co-dependent. The OU qualification could, therefore, be awarded to any candidate who satisfies the requirements for the OU degree, irrespective of whether or not the requirements for the counterpart degree are satisfied. The same is potentially true for the Greek colleges, ACT and ACG, which can award the degrees to those who satisfy their requirements. However, the team was advised that this, in practice, is not currently possible at ACG.

The language of delivery and assessment is English for each of the two qualifications. The programmes are delivered entirely in Greece, and mobility is neither a necessary, nor optional, part of the programme. In terms of relative input by the two awarding bodies to the design, delivery and assessment of the qualifications, the OU follows its typical pattern for a model of validated provision. Thus it considers, for validation, a curriculum that is designed, delivered and assessed entirely by the collaborating organisation (although the OU supports the development stages as appropriate). The OU delivers the assurance of academic quality and standards through the work of its academic reviewers, Quality and Partnerships Managers and other staff in the University's Centre for Inclusion and Collaborative Partnerships, and its external examiners.

# Academic and operational oversight

Each of the two degree-awarding bodies involved in the dual degrees is individually responsible for the academic oversight of its respective qualifications. The OU discharges this through its usual validation procedures, set out in the Handbook for Validated Awards. Its oversight arrangements are identical to those for its validated arrangements where only a single OU qualification is involved. Ultimate responsibility rests with Senate, but a hierarchy of subcommittees have delegated functions for approval, monitoring and review. The ultimate academic authorities at ACT and ACG are similarly responsible for the academic standards and oversight of their qualifications. There are no formal joint academic bodies or boards through which this is jointly enacted.

As with all other arrangements validated by the OU, the partner colleges administer the programmes and are responsible for all operational aspects of them, such as the admissions process, fee collection, the operation of the academic years and timetabling, and the organisation of examinations/assessments and record keeping.

# Academic and other regulations

Each of the dual programmes, and the respective qualification, is subject to the academic requirements of the relevant awarding body. Thus, for each of the dual qualifications there is a separate regulatory framework, which has to be satisfied. Nevertheless, there is a need to ensure that the two sets of requirements and regulations do not contradict each other, given the structure of the programmes leading to the dual qualifications. The OU has a set of regulations that applies to all undergraduate and taught postgraduate validated provision. In 2014, it approved a version of these specifically for dual awards made with partners operating under the US system. This version incorporated two specific differences, one explaining the relationship between UK and US credit values and the other providing for a different approach to retakes, so that a maximum of 10 retakes is permitted over a degree (of 12 modules) in order to align with the US system.

ACG needed to identify a means whereby its existing regulations, and those of the OU, could be harmonised in a way that would allow one programme to be embedded within the other. ACG effectively revised its academic regulations so that they became a synthesis of their existing academic requirements with those of the OU. Similarly, ACT has a student handbook which details an OU-ACT regulatory framework (based on the OU regulations for validated provision) alongside the requirements for US degrees.

# Programme design, approval, monitoring and review

ACT and ACG were responsible for developing and designing programmes of study that would simultaneously deliver the required structure and content of the US-style bachelor's degrees, but also meet the requirements for OU degrees, as well as taking account of the relevant Subject Benchmark Statements that form part of the Quality Code. The US degrees have fewer core and more elective modules, whereas the OU's model implies a more prescriptive and structured approach for named degrees. The flexibility inherent in the ACT and ACG programmes meant that it was possible to provide a shared curriculum coincident with the OU requirements, plus an additional Foundation element (taking approximately a year to complete) within the typical four-year duration of the ACT and ACG programmes. At ACG, there was a two-year development period, during which the curriculum, assessment and regulation alignment was undertaken (by ACG in conjunction with the OU) for the cohort of students that would be registered for the dual qualifications.

The OU approves the programmes at validation events and will review and consider re-approval at least every five years through a comparable event. The procedures followed are set out in the standard Handbook for Validated Awards. NEASC re-accredits institutions every 10 years (but does not accredit individual programmes).

The OU expects modules and programmes to be subject to its annual monitoring procedures for validated provision. Staff of ACT and ACG, of course, provide the data and the initial reports for this process. The two colleges have no additional requirements in terms of monitoring and a comparable process is not required by NEASC. Statistical data for all partners are compared by the OU with performance indicators used within the University and by the Higher Education Statistics Agency. The analyses are not currently shared with the partner colleges. In general, there is currently no process for sharing information between the respective awarding bodies or accrediting organisations that could potentially have an impact on, or be of interest to, the other (for instance, on key performance indicators in comparison with other programmes in the same subject, or outcomes of external reviews). The OU might wish to consider the mutual benefits of doing so.

#### Assessment

The overall assessment strategies are approved by the respective awarding bodies. The assessment is identical (irrespective of the programme and degree) for any shared components. However, marks are aggregated according to different schemes for the purposes of the two qualifications (see below). ACG has implemented the OU system for assessment, which also satisfies the vast majority of requirements for the US-based degrees, with the exception of the synoptic, programme-level assessment that is an additional requirement for these.

In accordance with the standard OU arrangements for validated provision, the conduct of the assessment is delegated to the collaborating college, and so ACT and ACG are responsible for setting and marking the assessments in accordance with the requirements of the Handbook for Validated Awards and with the involvement of the OU's external examiners.

#### Examination boards

There is a shared process for confirming marks, but the respective awarding bodies have separate mechanisms for determining the final outcomes for the award of their respective qualifications. For ACT and ACG, the OU operates the standard validated model of a two-tier system of examination boards, with subject boards dealing with confirmation of module marks beneath programme boards, which deal with progression and award of qualifications. The precise structures of the examination boards and their composition for each of ACT and ACG were approved at the point of institutional approval. All the examination boards are held at, and administered by, the partner colleges, but an OU representative attends the boards where awards are determined. The subject examination boards serve the same purpose of confirming marks in the shared modules that contribute to both qualifications. However, the programme and award examination boards consider the progression of students through programmes and the award of the OU degree, whereas for the US degrees, pass lists are submitted to the senior academic authority in ACG and ACT. At ACG, the students' grades are checked termly, both by departmental heads and by the relevant Deans' offices, before submission to the Registrar's Office, which computes the final GPA.

#### Classification and award criteria

One unforeseen consequence of the different arrangements for the award of qualifications (classification as opposed to a GPA) is that different outcomes may emerge as a result of the ways in which marks are aggregated for award purposes. For example, a student might achieve a first class honours classification for the OU qualification, but the same marks on individual components might not achieve a distinction for the American qualification (or vice versa). This is because the OU's classification algorithm (reflecting widespread practice across the sector) excludes Level 4 marks and weights the final two years' results differentially, such that the final year is weighted more heavily (reflecting exit velocity). By contrast, the GPA calculation is based on marks from all four years of the programme, with all years being weighted equally.

This difference is not in itself a problem, and is a natural consequence of historic differences in approach to education and assessment for two separate qualifications. However, explaining to students the differences between the requirements for the two qualifications comprehensively and with absolute clarity is paramount. For example, a number of students at ACG had expressed an interest in postgraduate study within the UK (for which the achievement of a first class or upper second class honours degree is generally important as an entry requirement); understanding the significance of exit velocity as a factor in the OU classification algorithm would be important in achieving such an outcome.

Students whom the review team met at ACG are not aware of any differences in the approaches to calculating the overall marks on which the two awards will be based (other than their marks being translated into grades, about which there is some confusion). Nor do they therefore understand the consequences of the different approaches to marks computation for each of the two degrees and what this implied for their approaches to learning.

#### External examiners

External examiners are appointed, contracted and paid by the OU for their qualifications (nominations being made by ACT and ACG). The external examiners operate in accordance with the procedures set out in the Handbook for Validated Awards. External examiners are not required for the award of the US-accredited qualifications.

# Certification and records of study

One certificate is produced for each of the two qualifications by the respective awarding bodies. The OU certificate bears the same wording as for all other validated provision. It refers to the existence of a diploma supplement. However, neither the certificate, nor the accompanying diploma supplement (which is produced by the partner college subject to the approval of the OU), currently refers prominently to the dual status of the programme. The diploma supplements now include a sentence in 'Additional Information' which indicates that the programme leads to a NEASC accredited qualification, although it doesn't state unambiguously that the same learning and credits are used towards the award of a second bachelor's degree issued by ACT or ACG.

# Registration, enrolment and contractual relationship with students

Students are registered primarily with ACT/ACG, and with the OU for specific administrative purposes. ACT and ACG are responsible for enrolment, induction and student record keeping in accordance with the OU's standard process for validated provision.

# Complaints and appeals

Students must first exhaust the local procedures for appeal and academic complaints in respect of the OU qualification, but then have the right of appeal to the OU if they remain dissatisfied. ACT and ACG deal with complaints and appeals in respect of US-accredited qualifications. When asked what would happen if an appeal was made to both bodies and a different outcome was obtained from each, the OU confirmed that it would hope to negotiate or resolve the issue with the partner, such that a mutually agreed conclusion would emerge.

#### Public information

The websites of ACG and ACT make clear that they provide programmes of study that lead to dual qualifications. Students at ACG and ACT are provided with a range of student handbooks that set out the requirements of the two programmes and qualifications. At ACG, individual programme handbooks do not provide the classification algorithm for the OU degree, although the main Undergraduate Catalog and Student Handbook does so, and sets out in a single document the curriculum and assessment requirements of each of the two degrees. ACT provides a similar handbook that describes the two sets of requirements. The team was advised that students are given information about the duality of the two awards at every stage from enquiry to registration, at induction, and for termly module choices.

However, where there are important differences between the requirements for two separate qualifications (such as the way in which marks will be aggregated for the purposes of award), there is a significant challenge in ensuring that students are fully apprised of the technicalities and that their consequences are fully understood.

# Observations and suggestions

Where degree-awarding bodies establish typologies or taxonomies of arrangements to describe the ways in which they work with other bodies to deliver higher education, it is suggested that these are updated and augmented as arrangements for joint, double/multiple or dual qualifications are developed, in order that the specific arrangements are clearly defined.

Dual qualifications are potentially complex. Both degree-awarding bodies have a responsibility to provide prospective students with clear information about the nature of the two qualifications associated with the study on which they may embark. Ensuring that students have a sound understanding of the different approaches of two degree-awarding bodies with regard to curricula and assessment, and the implications of these differences for their learning, is vitally important. The technicalities of the different premises for the computation of marks on which awards are based is perhaps an issue where students would benefit from more detailed briefing and advice, over and above publication of the information in a handbook. It is incumbent on the two degree-awarding bodies to ensure that the students understand the different requirements, in order to maximise their potential performance in their respective qualifications.

The team suggests that the nature of the relationship with another degree-awarding body (and the award of separate qualifications) should be explicit in the legal agreements. In this way, the responsibilities of the two awarding bodies for the joint development of their programmes and their joint responsibilities to students on the programmes can be acknowledged.

Dual (and double/multiple) qualifications inevitably involve the same learning (and credit where academic credit is awarded) being used towards more than one qualification (either at the same level or at a different level). Academic regulations often address issues such as the extent to which academic credit can be used more than once in contributing to qualifications, or whether students can be simultaneously registered for more than one award at the same level. It is suggested that when degree-awarding bodies explore the possibilities of awarding qualifications with another degree-awarding body that consideration is given to what is permitted under their academic regulations, to whether the issue in the context of double/multiple or dual awards has been addressed in their regulations, and what conditions might justify the use of some or all of the same learning (or academic credit) towards the award of more than one qualification.

In order not to mislead potential employers and other stakeholders, it is important to ensure transparency about the nature of the dual qualifications awarded and the dual programmes of study undertaken, and in particular to clarify where the same learning (or academic credit) has been used to contribute to more than one award. It is suggested that degree-awarding bodies consider how the dual status of the programmes and awards may be most clearly presented on the student record of achievement so that the relationship between the qualifications is unambiguous.

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