

# **Audit of** overseas provision

**University of Wales and Fazley International College** 

**MARCH 2010** 

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#### Introduction

This report considers the collaborative arrangement between the University of Wales and Fazley International College.

#### The Quality Assurance Agency for Higher Education

- The primary responsibility for academic standards and quality in United Kingdom (UK) higher education rests with individual universities and colleges. The Quality Assurance Agency for Higher Education (QAA) checks how well they meet their responsibilities, identifying good practice and making recommendations for improvement. QAA also publishes guidelines to help institutions develop effective systems to ensure students have high quality experiences.
- Many universities and colleges in the UK offer their higher education programmes to students wishing to study outside this country. This is a significant and growing area of activity: data published by the Higher Education Statistics Agency indicates that almost 100,000 students were studying for UK HE awards entirely outside the UK in the 2007-08 academic year, either at overseas campuses directly run by UK institutions or through collaborative arrangements that UK institutions have made with foreign partners. QAA reviews both collaborative arrangements and programmes delivered on overseas campuses through a process called Audit of overseas provision. We conduct Audit of overseas provision country by country. In 2009-10 we conducted an audit in Malaysia. The purpose of the audit was to provide information on the way in which a group of UK universities and colleges were maintaining academic standards and the quality of education in their provision in Malaysia. The reports on the individual audits will be used in the preparation of an overview report.

#### The Audit of overseas provision process

- In April 2009, QAA invited all UK higher education institutions to provide information about their provision in Malaysia. On the basis of the information returned, QAA selected for audit visits 10 UK institutions with provision in that country. These institutions produced a briefing paper describing the way in which their provision (or a sub-set of their provision) in Malaysia operated, and commenting on the effectiveness of the means by which they assured quality and standards. In addition, each institution was asked to make reference to the extent to which the provision was representative of its procedures and practice in all its overseas activity. Institutions were also invited to make reference to the ways in which their arrangements met the expectations of the Code of practice on the assurance of academic quality and standards in higher education (Code of practice), particularly Section 2: Collaborative provision and flexible and distributed learning (including e-learning), published by QAA in 2004.
- Audit teams visited each of the 10 UK institutions to discuss their provision in Malaysia between November 2009 and February 2010. The same teams visited Malaysia in March 2010 to meet some of the staff responsible for managing and delivering the provision, and to meet students. The audit of the University of Wales was coordinated for QAA by Will Naylor, Assistant Director, Reviews Group. The audit team comprised Professor John Baldock and Professor Mark Davies (auditors), with Will Naylor acting as audit secretary. QAA is particularly grateful to the UK institutions and, where applicable, their partners in Malaysia for the willing cooperation they provided to the team.

#### Higher education in Malaysia

According to UNESCO's Global Education Digest, there were about 750,000 students enrolled in higher education institutions in Malaysia in 2009. The institutions can be broadly divided into two types: public and private. Public institutions, which comprise 20 public universities, 27 polytechnics and 57 community colleges, are government-funded; private institutions, which include universities, university colleges and colleges, receive no public funding.

The UNESCO Global Education Digest states that two thirds of students in Malaysia are enrolled in public institutions.

- Executive responsibility for higher education in Malaysia resides with the Ministry of Higher Education, which was separated from the Ministry of Education and established as a full ministry under a Federal Government Minister in 2004. Among the various departments and agencies under the purview of the Ministry of Higher Education is the Malaysian Qualifications Agency (MQA). The MQA is the single higher education quality assurance agency in the country, whose scope covers both public and private higher education providers. The MQA is responsible for accrediting higher education programmes and for maintaining a definitive list of accredited programmes the Malaysian Qualifications Register (MQR) which includes programmes provided in collaboration between Malaysian and overseas partners and programmes delivered at overseas campuses in Malaysia. Students studying unaccredited programmes are ineligible for student loans and institutions providing unaccredited programmes are not allowed to recruit overseas students to them.
- In addition, the MQA is responsible for maintaining the Malaysian Qualifications Framework, an instrument that develops and classifies all Malaysian higher education qualifications from certificates to doctorates. The Act that created the MQA also provides for the conferment of self-accrediting status to 'mature' institutions that have well established quality assurance mechanisms. To achieve self-accrediting status, the institution must undergo an institutional audit. If it is successful, all qualifications it offers are automatically recorded on the MQR. At the time of the audit, the MQA was conducting the first round of institutional audits.

# Section 1: The background to the collaborative link

#### Nature of the link

- In 2007 the University of Wales (the University) signed a validation agreement with Fazley International College (FIC) in Kuala Lumpur, authorising FIC to deliver programmes of study leading to university awards in Business Administration. Two main programmes, a BA in Business Administration and an MBA were included in this agreement. They were subdivided into seven pathways as follows:
- BA (Hons) in Business Administration (Marketing Management)
- BA (Hons) in Business Administration (Human Resource Management)
- BA (Hons) in Business Administration (Accounting and Finance)
- MBA (Marketing Management)
- MBA (Human Resource Management)
- MBA (Finance)
- MBA (International Business).
- The first students were admitted to the BA in 2008 and the MBA in 2009 following provisional approvals from the Malaysian Qualifications Agency. The management of FIC told the auditors that full approval would be granted following the successful graduations of the first cohorts of students from the programmes. At the time of the audit in March 2010 there were 22 students registered on the MBA pathways and 10 on the BA pathways. All the students were part time and some were domiciled outside Malaysia.
- The validation agreement is complicated by the fact that FIC had evolved out of another private higher educational institution, the KLC Centre for Higher Studies (KLC) with which the University had validation agreements for the provision of similarly named programmes in Business Administration and for a Diploma in Law. These earlier validation agreements were withdrawn by

the University in 2004 because of evidence of managerial instability at KLC and its failure to pay debts. At that point over 300 students had graduated from KLC with University of Wales awards and a considerable number remained registered on its programmes. The University's Validation Board had confirmed its responsibility for ensuring that the 180 existing students on validated KLC programmes continued to receive appropriate teaching and assessment. No further students were recruited by KLC after May 2004.

- In 2005 KLC was bought by Vision Strike Holdings. The college was moved to new premises in Kuala Lumpur, and the existing staff involved in managing and teaching the University of Wales programmes retained. In 2006 the college was renamed Fazley International College, after the family name of the owners of Vision Strike Holdings. The University continued to monitor the teaching and assessment of the former KLC students until the final examining board was held in November 2007. Between 2005, when it took over the responsibilities of KLC, and November 2007, the management and staff of FIC taught and assessed to completion over 100 BA students and almost 75 MBA students. A number of students who had completed Part 1 of the MBA transferred at this point to the FIC programme beginning in 2008.
- At the time of the audit, FIC occupied two floors of an office block in central Kuala Lumpur and had registered some 300, mainly part-time, students studying for professional qualifications in accountancy, computing, banking and commerce. It had articulation agreements with a number of overseas universities including Middlesex University, the University of East London, Thames Valley University and the University of Westminster. However, the validation agreement with the University of Wales was the only one leading to degree-level awards.
- During the visit to Malaysia, the audit team heard that FIC was investing heavily in its ambition to become a large higher education institution for some 5,000 students and eventually attain University College status. A new seven-story college building, with space to teach 2,500 students, was nearing completion on the outskirts of Kuala Lumpur and was expected to be ready in early 2011. The new building would provide substantially enhanced teaching and library space as well as sports facilities and a student café. However, the existing teaching accommodation would continue to be used, particularly because of its accessibility for students working in central Kuala Lumpur. FIC indicated that it had no immediate plans to expand the range of degree-level programmes but wished to increase substantially numbers registered on the two extant University programmes. In the longer term, it envisaged broadening the range of University of Wales degrees it could offer. FIC perceived the advantages of the link with the University to lie in the range of subjects that the University could validate, the clear and robust quality assurance processes provided, the positive perception of a University of Wales award in Malaysia and surrounding countries, and the employability of its graduates, evidenced by the success of the University alumni taught at the former KLC.
- The validation agreement and procedures for managing the collaborative provision at FIC are consistent with those used by the University to oversee programmes in over 120 centres in the UK and in more than 30 other countries. In 2009 the University awarded more than 4,000 higher degrees and the number of students pursuing its courses was over 80,000, of which some 15,000 were on validated programmes outside Wales, making it the second largest degree-awarding body in the UK after the University of London. In 2010 the University had collaborative agreements with three other colleges in Malaysia and was engaged in negotiations with a number of institutions. The audit team was provided with records of not only the FIC programmes but also their predecessors, which had been managed and taught by broadly the same team since 1998. This link was therefore considered to be usefully representative of the University's normal processes and procedures for setting up and managing overseas collaborations.

#### The UK institution's approach to overseas collaborative provision

- 15 Until 2007 the University of Wales was a federation of self-governing higher education institutions. In 2007 the federation became an alliance within which the University of Wales itself became a unitary institution seeking to establish links with centres of good standing in other countries and so to provide an international validation service across all subject boundaries by drawing on the University's and the alliance's pool of academic expertise and excellence. Its stated mission is to, 'maximize the University's status as a national award-granting university in an international context,' and to, 'facilitate the development of mutually productive partnerships between the University and appropriate providers of education at centres in the UK and overseas'.
- The University's Strategic Plan 2010 to 2014 includes amongst its primary purposes that it will, 'maintain the University of Wales degree and the University of Wales brand as global exemplars of excellence and quality,' and by, 'interacting with the rest of the world through collaborative academic provision and through other intellectual and cultural linkages and partnerships,' it will take, 'the best of Wales to the world and bring the best of the world to Wales'.
- 17 The principal method by which the University collaborates with other higher education institutions is through validation. Validation is a precisely specified agreement that allows the partner to develop, deliver and assess its own programmes leading to University awards provided they meet the quality and standards prescribed by the University and are shown to do so through defined arrangements for external examining, Joint Board of Studies, and annual and quinquennial review.
- A distinctive feature of the University's approach to meeting its responsibility for the academic standards and quality of its awards is the application of a highly standardised model of approval, validation and subsequent monitoring of partner institutions awarding its degrees. The key features of this method are set out in detail in the Validation Unit Quality Handbook, an annually updated compendium of its policies and procedures including: a Code of Practice for the validation of courses at other institutions; procedures for initial vetting of partners; and a detailed validation process, followed by post-validation checks that requirements have been met and staff induction has taken place before courses begin. The Quality Handbook sets out in detail the required procedures and practices for: the specification of programmes; provision of learning resources; the assessment and examination of students including the use of external examiners; annual monitoring; quinquennial reviews; and the grounds on which validation may be withdrawn. The validation agreements that the University signs with partners follow a standard template that require partners to operate the regulations and procedures set out in the Quality Handbook.
- Responsibility for the day-to-day management of partnerships largely resides with the Validation Unit. In the case of academic matters a key role is played by the Moderator, an academic appointed by the University, usually from within the alliance of Welsh universities (the Alliance). The Moderator is required to maintain close and regular contact with the validated institution, visiting at least twice a year for the first five years, attending the Joint Board of Studies and examining boards, agreeing and monitoring an action plan with the validated institution, holding regular meetings with course directors and teaching teams, meeting with students, reviewing physical resources and facilities and providing appropriate examples of good practice from the institutions of the University of Wales. The Moderator must submit an annual report and a mid-term visit report to the University. The Moderator is the key guide to the partner in understanding and applying the University's regulations and procedures and the main source of reports back to the University on compliance with its requirements.
- Where the University validates provision for which it does not have precisely analogous programmes within the Alliance, the Quality Handbook calls for the appointment of an External Expert who acts as a course consultant to assist the Moderator. External experts are required to help review validation submission documents, liaise with the partner in the development of

course content, approve proposed changes to curricula, visit the partner at least once a year including attendance of the Joint Board of Studies, and submit a report to the University following each visit. In the case of the programmes delivered by FIC it had not been necessary to appoint an external expert since the programmes delivered are within the competence of the Moderator.

- Where the language of study is not English, the Quality Handbook prescribes in detail the arrangements for translation that apply. These requirements are designed to ensure appropriate oversight by the University of all course content, assessment, annual review and examination. The language of instruction and assessment must be recorded on academic transcripts. In the case of FIC the language of instruction is English and so these requirements do not apply.
- In cases where it is necessary to seek approval or recognition from any professional, statutory or regulatory body (PSRB) for the programmes provided, the University requires this to be sought by the validated institution but can provide guidance and support based on its experience elsewhere. In the case of FIC, the programmes had received provisional accreditation from the Malaysian Qualifications Agency.
- The University manages its collaborative provision outside Wales through its Validation Unit, an office based at the University Registry in Cardiff. The Validation Unit was responsible in 2009 for the oversight of collaborative provision for over 20,000 students, studying across some 25 different disciplines at over 120 centres. The University allocates an Institutional Officer to each partner who is the administrative contact within the Validation Unit, and will advise on and coordinate administrative matters such a registration, credit transfer, matriculation, the processing of assignments, recording of results and the production of certificates usually by email. In addition a Validation Officer from the University attends examining board meetings run by the validated partner to advise on procedural and regulatory matters.
- Until 2009 the work of the Validation Unit was overseen by the University of Wales Validation Board with delegated responsibility from the Academic Board for the approval and monitoring of collaborative activity. The detailed executive functions of the Validation Board were carried out by a Quality Assurance and Executive Committee (QAEC). However, following an internal review of governance processes, the Validation Board was retitled the Taught and Validated Degrees Board (TVDB) from the academic year 2009-10. It took over the executive functions carried out by QAEC, such as consideration of all initial proposals for collaboration, and the approval of validation agreements and quinquennial reviews of partnerships. The QAEC became the Quality Assurance and Enhancement Committee with a remit to disseminate good practice and to identify areas for quality development. The TVDB is chaired by the Pro Vice-Chancellor (Learning and Teaching) of the University of Wales and includes representatives from each of the accredited institutions in Wales and a student member. The auditors were told that the University had further decided that from 2010-11 the TVDB would be recast as the Taught Degrees Board (TDB) and will have greater external membership and focus on academic matters. Strategic development will be dealt with by a validation strategy committee reporting directly to Council.
- While the application of the University's policies and procedures to the validation and oversight of programmes at FIC was distinctive in that an element of revalidation was involved, the audit team was able to examine the documentation recording all the steps required by the Validation Unit Quality Handbook. The team was also able to speak to the individuals involved from the University and FIC. In the view of the auditors the detail and explicitness of the University's written procedures provide a comprehensive framework which had been fully and effectively applied to the creation and management of this link.

# Section 2: Arrangements for establishing the link

#### Selecting and approving the partner organisation

- The Validation Unit Quality Handbook prescribes a standard set of information requirements, documentary checks, conditions, visits and vetting procedures that must be applied before TVDB will recommend approval or rejection of a validation agreement to the University's Academic Board. The audit team learned that the University receives a large number of inquiries from institutions seeking validation and that, in 2009, some 130 were turned down at or before the initial vetting stage.
- Where the Validation Unit considers an approach worth pursuing, a formal Initial Vetting Visit is conducted on behalf of TVDB by an appropriately qualified person independent of the applying institution. The information sought is defined by an Initial Vetting Form that requires substantial detail of the legal and financial status of the applying institution together with an assessment of its educational and academic character and strengths. A risk matrix is completed and on this basis TVDB will decide whether to proceed to the full validation process. In the case of FIC the initial vetting visit took place in June 2006 and led to a detailed report that was considered by TVDB. Where it is agreed to proceed a Moderator Designate is appointed by the Validation Unit to assist the applicant in negotiating the next stages. FIC was then asked to complete a submission document containing specified information, including programme specifications and staff curriculum vitae, that informed the full Validation Event that took place in November 2006 and which led to a report to, and approval by, TVDB in January 2007. The legal agreement between the parties was signed in February 2007.
- In the view of the audit team, the University's procedures for selecting and approving partners are explicit and detailed, and if followed should provide protection against the risk of approving unsuitable partners. The documentary evidence shows that in FIC's case the procedures were conducted with due diligence.

#### Programme approval

- Programme and module approval are part of the validation process. The applying institution is asked to prepare a specified set of validation documents including descriptions of the proposed programme structures, programme specifications using a University pro forma, and module descriptors including modes of delivery and methods of assessment. The documentation also requires comprehensive details of student induction and the intended provision of learning resources.
- The Moderator Designate and staff from the Validation Unit assist the institution in the preparation of the required documentation. This is reviewed in draft by the Moderator Designate who provides feedback and advises on revisions. The pre-validation process ensures that a high proportion of the validation events that follow lead to approval. In the case of FIC, because of the experience of the existing staff, and particularly because the programme director and chief administrator of the college had some 10 years experience of collaboration between the University and KLC in delivering similar programmes, the process went smoothly and the validation visit took place in November 2006.
- The visiting panel of assessors is precisely defined, chaired by a member of the TVDB and includes subject experts from both the University of Wales and external to it. The validation visit includes the Moderator Designate as an observer. Following the visit to FIC, the Validation Panel Report recommended approval subject to several conditions related to IT and library provision, the mapping of proposed entry qualifications against University requirements, more detailed descriptions of delivery modes to part-time and full-time students, a range of changes to the structure and content of the proposed degree programmes, and changes to the proposed assessment procedures and weightings. In April 2007 the Moderator visited, as required by the

Quality Handbook, to report to the Validation Unit on FIC's compliance with the conditions set at validation. The procedures set out in the Quality Handbook do not allow for validation to be confirmed until the Validation Unit has received the form and report from the Moderator confirming that all conditions set have been met. The procedures set out in the Quality Handbook do not allow for courses to commence until the Validation Unit has received the necessary form, signed by the assessors following a post-validation report from the Moderator confirming that all conditions set have been met.

- Procedures for approving amendments to existing validated schemes of study are also set out in the Quality Handbook. Changes that affect less than 30 per cent of a programme of study, in terms of credit, will normally be discussed at the Joint Board of Studies and can be agreed in writing by the Moderator and external examiners. Where more than 30 per cent of a programme is affected the Joint Board of Studies is normally required to recommend the setting up of a panel of independent assessors chaired by a member of the TVDB. All changes must be reported in detail in the annual moderator report to the Validation Unit.
- The programmes approved by the validation panel that visited in November 2006 had been developed by the existing, former KLC, staff and academic management, out of the programmes that were continuing to be taught by FIC. The panel discussed the proposed developments and changes in the programmes with the staff involved and made a number of specific recommendations that were accepted before validation. They were also able to meet students completing the KLC programmes and explore a range of issues of teaching and learning support.
- In the view of the audit team the programme approval procedures set out in the University's Quality Handbook are comprehensive and appropriate. From its examination of the application of these procedures to the approval of the programmes validated at FIC, it concluded that the procedures had been effectively applied in this case.

#### Written agreements with the partner organisation

- 35 The Quality Handbook provides a template for a validation agreement with a partner institution. The agreement covers a comprehensive range of legal, financial and educational matters and is consistent with the precepts set out in Section 2 of QAA's *Code of practice*. Among the matters covered are: the term of the agreement and the conditions for renewal, amendment or termination; entry requirements to programmes and their application; assessment and the conduct of examinations; quality assurance procedures and sanctions should they not be met; appeals; the management of promotional and publicity materials; and the exclusion of any rights to subcontract or assign to others rights and obligations under the agreement.
- The audit team examined the original agreement signed in February 2007 between the University and FIC and also subsequent updated versions. In the view of the team the template provided by the University, and used in this case, is both clear and comprehensive.

# Section 3: Academic standards and the quality of programmes

#### Day-to-day management

The validation arrangements delegate to the partner all responsibility for the day-to-day delivery and management of the programmes of study involved. The performance of these responsibilities is subject to reports to and evaluation by the University through the specified roles and reports of the Moderator, external examiners, external experts (where applicable), Institutional Officer and Validation Officer. These arrangements ensure that a regular flow of prescribed information about the conduct of the partnership is received by the Validation Unit in Cardiff and reported to TVDB and its subcommittees. This formal approach is clearly necessary given the very large number of partnerships that the Validation Unit is responsible for. TVDB is necessarily dependent on the vigilance of its Validation Unit staff in monitoring and reviewing the data it receives.

- Moderators are fundamental to effective oversight of the University's partnerships. Newly appointed moderators are provided with an induction session and also invited to attend a general induction (which is conducted as part of an annual Moderators' Meeting). Moderators are provided with relevant documentation annually and kept abreast of the Validation Unit's activities and changes to the wider national quality framework through University publications such as the quarterly eUpdate, Quality News and other email circulars. A Moderators' Handbook was developed in 2009-10. A further source of support to moderators (as well as to Validation Unit staff) are the Moderator Champions, recently appointed in the areas of Learning, Teaching and Assessment, Research, Flexible and Distributed Learning, Personal Development Planning, Learning Resources, Student Engagement and Key Skills. The Moderator's performance is assessed as part of the Quinquennial Review event and in comments required in the External Examiner's Report Form and the Annual College and Course Review (ACCR).
- The audit team met both the Moderator responsible for FIC and the Programme Director and Chief Administrator at FIC, whose links with the University began with the former KLC. Communication between these two individuals had been the main conduit for dealing with routine procedures and questions. The Moderator in this case was responsible for 12 partnerships and indicated he was able to devote the equivalent of six days a year of time to this partnership. Nonetheless, because of the small number of students currently registered on the FIC programmes, the Moderator had been able to approve all student admissions individually although technically the validation agreement delegated this responsibility to the institution and had played a substantial part during his visits in providing staff development and meeting students.
- The Programme Director and Chief Administrator at FIC reported that she dealt, largely by email, with several different people in the Validation Unit at Cardiff depending on the nature of the issue involved. For quality assurance matters she normally dealt with the Moderator or the Director of the Validation Unit. She had also been responsible for staff induction at FIC into the requirements and procedures of the University of Wales. Both the University and FIC confirmed that the teaching staff had little or no direct contact with the University; the main channel of communication is between FIC's Programme Director and Chief Administrator and the University Moderator.
- New students are registered initially by FIC. Normally within one month FIC communicates enrolment details to Cardiff. Students' marks are recorded by FIC and the University receive them at examining boards. Student data on retention and progression is collected as part of the ACCR and comparative data is collated by the Validation Unit for review by the TVDB. At the time of the audit, the University was developing a report-writing tool to generate automatically comparative data across its partnerships on progression and other measures.
- The Quality Handbook and the validation agreements set out the University's expectations on student representation and the requirement for a student-staff liaison committee. The partner is responsible for collecting student feedback and the University has its own online Student Survey providing the Validation Unit with direct access to student evaluations. Some of the FIC students whom the audit team met confirmed they had completed the online questionnaire but were not aware of any particular consequences of the collection of students' views.
- At the commencement of study each new cohort of students elects student representatives. The student representatives whom the audit team met explained that they received some queries and complaints from their constituents and had raised them directly with the FIC Programme Director. They explained that the relatively small number of students on the programmes meant that most students raised issues directly with teaching staff or the Programme Director. It appeared that currently no formal student-staff meetings took place and students had not participated in the Joint Board of Studies, as formally required, nor were they aware of any contribution to the processes of annual review. Students confirmed that any problems had been dealt with very quickly. For example, a student request for the provision of wireless internet access was dealt with almost immediately.

In the view of the audit team, the arrangements for the day-to-day management of the programmes at FIC, together with support for, and feedback from, both staff and students, operated effectively largely because of the small number of students involved and the commitment and experience of the local Programme Director and her staff. The University's procedures governing these areas, while well-designed and clearly specified, had not been tested by this partnership because of low student numbers.

#### Arrangements for monitoring and review

- The ACCR process is a requirement of the Quality Handbook and the validation agreement. It asks the partner institution to reflect and comment on key performance indicators including student recruitment, entry requirements, retention, progression, withdrawal and achievement. It also asks partners to comment on the quality and enhancement of student learning opportunities, student feedback, including mechanisms for collating and responding to it, staffing and staff development, and the quality of interaction with the University. As part of the ACCR, partners are required to provide full responses to recommendations made in external examiner and moderator reports, to append supporting documentation (including curriculum vitae of new staff and committee minutes) and, in addition, to compile an action plan noting key issues arising in the review period which may include features of good practice for dissemination.
- All ACCRs are made available to the relevant Moderator, external examiners and Validation Unit staff. Any issues of interest or concern are then referred to a meeting of the QAEC where appropriate action can be discussed and determined.
- The most recent ACCRs for the programmes at FIC were provided to the audit team and, in addition, those produced while FIC was responsible for the former students of KLC. The ACCRs provide a clear and comprehensive review of recruitment and the progress of students and of significant matters that have arisen in day-to-day provision and out of the Joint Board of Studies and the examining boards. Again, given the relatively low numbers registered, the ACCRs for 2008-09 were brief but comprehensive and it is clear that FIC regularly addresses all the areas covered. The firm establishment of annual review should serve FIC well as student numbers increase, though more formal mechanisms for student and staff contributions may need to be established.
- A Joint Board of Studies meeting is held at each partner institution annually. It considers in detail the most recent ACCR as well as providing an opportunity for discussion of current issues, proposed changes to schemes, how previous recommendations by external examiners and moderators have been implemented, and any other matter referred to the Joint Board of Studies by the Validation Board. Moderators and external examiners are members of the Joint Board of Studies, which is usually held immediately after the examining board. Student representation is strongly recommended but had not yet become a part of the process at FIC, partly because the meetings ranged very widely across general and individual matters affecting individual staff and students. It was clear that this meeting would become a more important route for communication within FIC as numbers of students and possibly programmes increase. They currently provided a useful way for the Programme Director to consider together with the Moderator, the external examiners, the Validation Officer and representatives of teaching staff, all of whom are part time, any issue of note in the provision of teaching or assessment.
- The standard validation agreement demands a detailed review of the operation of the partnership at least every five years. The constitution of the review panel for Quinquennial Review, including external representation, and the matters which the panel should consider, are precisely defined by the Quality Handbook. In addition, should TVDB deem it necessary, an interim review may be instigated before the end of the normal five-year cycle. Matters of concern at partner institutions may be drawn to the Validation Board's attention via moderator or external examiner reports, review of the ACCR, review of the risk matrix forms by the Finance and Planning Committee or as a result of data from the Validation Unit's internal risk monitoring tool. The risk

monitoring tool, a spreadsheet, is updated regularly by Validation Unit with the intention of predicting, recording and monitoring risk, using a traffic light system, in a number of designated categories. At the time of the audit, FIC was designated amber owing to low student recruitment.

- The Quinquennial Review is chaired by an independent member of the Validation Board and external assessors who have not been involved with the programme previously comprise the panel membership. The external examiners and Moderator are interviewed about the performance of the partner and the Moderator. Moderators are limited to serving for five years in respect of any one partnership, with a possible extension for a maximum of two more years.
- The Validation Board determines whether or not a validation agreement should be extended for a further five-year term. FIC will be due for its first Quinquennial Review in academic session 2010-11. Low student recruitment and its impact on the financial viability of the partnership are likely to be the main concerns for this exercise.

#### Staffing and staff development

- Staff induction is conducted by the Programme Director on a one-to-one basis. During his visits to FIC, the Moderator has provided staff development sessions dealing with assessment, student engagement and the quality assurance framework required by the University. All the teaching staff are employed part time. Most have worked on these programmes and their predecessors at KLC for many years. Some staff also teach on similar programmes at other private colleges in Malaysia. The teaching staff whom the audit team met indicated that they would value contact with staff from the University of Wales who taught similar modules.
- At the time of the audit, the University had recently made a number of innovations in its contribution to staff development amongst its partners. Themed conferences and an annual Administrative and Quality Conference had been established to provide academic and administrative staff at validated institutions with opportunities to meet one another, share good practice and to learn from expert speakers. FIC had not yet taken advantage of the conferences but the Validation Unit intends to hold them in overseas venues in the future. The annual Moderators' Meeting and Conference held each January provides moderators with the opportunity to meet one another, share experiences and learn about new processes and procedures.
- The University had also established two new initiatives for staff development: an online teacher training programme open to all staff, and a pilot teaching fellowship, whereby three staff from institutions delivering validated schemes will be awarded a £5,000 prize each for providing students with a particularly positive learning experience. There were also new provisions in place to allow staff from partner institutions to be appointed to a University Chair or Readership.
- The audit team concluded that if the University's validated programmes are to provide a distinctly UK or Welsh version of higher education, then it is important for the University to ensure that teaching staff at partner institutions understand how this should manifest itself in their pedagogy. The team was satisfied that the existing staff they met at FIC, many of whom are graduates of UK universities, had gained this understanding. However, should the programmes grow, leading to the recruitment of new staff, then they will be important for the University to consider how it can ensure that its students at FIC continue to receive the appropriate learning experience. This may include responding to the desire on the part of FIC teaching staff for greater contact with teaching staff in the UK.

#### Student admissions

Validation agreements set out admission requirements (including English language requirements) and recruitment expectations and limits are set out in each agreement document. Institution Officers and moderators are consulted over the matriculation of all postgraduate students and credit transfer applications, each of which must be approved by the Moderator. The TVDB generally required an IELTS (or equivalent) score of 6 at undergraduate level and 6.5 at postgraduate level and this was the case in the agreement with FIC.

The small number of registrations on the FIC programmes since July 2008 had meant that the Moderator had approved the entry qualifications of all students.

#### Assessment requirements

- The University's Regulations and Special Cases Committee specifies regulations to which all validated schemes must adhere. Partner institutions are required to produce scheme-specific regulations in the initial validation documentation defining, for example, progression rules, attendance requirements and assessment requirements in line with the guidance in the Quality Handbook. These internal regulations are described in the Student Handbook. Any changes must be approved in accordance with University guidelines.
- All examination question papers and coursework questions (where the assessment contributes more than 50 per cent towards the module mark) that contribute to the final award of a scheme require the approval of the external examiner prior to printing. The University provides detailed notes of guidance for invigilators and candidates, and can issue answer booklets for partners' use. At the end of each assessment period, partners are asked to confirm that the assessments have been conducted in line with University requirements.
- Student work is marked by staff at the partner institution in accordance with University moderation guidelines provided in the Quality Handbook. At FIC all assignments have been double marked with the second marker in ignorance of the first mark. However, at the January 2010 examining boards the external examiner commented for both the BA and MBA that the reconciliation of these marks needed to be more explicitly justified. Since marks are only formally ratified at the examining board meeting, students are initially provided with marks that they are warned may change. The Quality Handbook requires full and timely feedback to students, and this was a matter that had been followed up with the students by the Moderator. Teaching staff at FIC use a standard form to record feedback on assignments. No feedback was provided for summative examinations. The students whom the audit team met indicated they generally received helpful feedback on their work both in writing and, on occasion, personally from their teachers. External examiners assess the level of feedback on the assessments and comment at the examining boards. The University provides all partners with access to plagiarism detection software.
- Examining boards are attended by the external examiners, the Moderator (who is not a full member), the Validation Officer and internal examiners. The boards are chaired by a senior member of staff at the partner institution and conducted in accordance with the agenda provided by the University.
- The first FIC examining boards were held in January 2010 to consider the first MBA cohort completing Part 1 and first cohort of BA students completing Year 2. It was attended by the Moderator, the UK and local external examiners and the Validation Officer. The audit team heard that these events had been preceded by local informal meetings at which the marks of the students had been discussed by the teaching staff. The external examiners had not received work in advance of their visit to FIC because of the low numbers involved. If the numbers grow it may be appropriate for the external examiners to receive a sample of work beforehand.
- The minutes of the examining boards seen by the audit team indicated a range of opinion amongst the local staff about the levels of marking and the weighting of various parts of student work. However, it was clear that the examining boards provided a useful opportunity for the external examiners and the Validation Officer to clarify and explain the University's requirements. In the view of the team the evidence of the first examining boards of this partnership indicated that the assessment process was operating satisfactorily.

#### **External examining**

- Nominations for the appointment of external examiners follow the University's standard procedures, which have been mapped to Section 4 of QAA's *Code of practice*, and are approved by the Validation Board. Newly appointed external examiners are provided with induction literature in addition to the option of a face-to-face session with the relevant Moderator and/or Validation Officer. Full details of the induction process are provided in the Quality Handbook.
- At the time of the audit, the Validation Unit was in the process of producing an External Examiner Handbook and intended to develop the website in order to aid external examiner induction and provide ongoing support. The Unit planned an annual External Examiner Conference/Induction, along similar lines to the existing Moderators' Meeting, in late 2010. Materials from the conference would be made available via podcasts and online presentations.
- The Validation Unit's policy is to appoint at least one UK and one local external examiner for all of its validated provision overseas. This is to provide language expertise in cases where the scheme is not taught and assessed in English, and also to advise the University on local issues and requirements that may be relevant to the successful running of the programmes. Nominations for two external examiners for FIC were approved in 2007. The current appointees are from the University of Southampton and HELP University College, Kuala Lumpur.
- External examiners complete their reports in a standard template which includes questions on the programme's compliance with external reference points and equivalence to other degree schemes. External examiner reports are included in the ACCR and followed up at the Joint Board of Studies. The Validation Unit produces a detailed annual overview report of general and specific issues identified in the reports of external examiners and moderators, together with the action taken in response to such issues, which is considered independently by the University's Academic Board. This report is also considered by the TVDB and the annual Moderators' Meeting and is circulated to all institutions, moderators and external examiners, where specific items are drawn to their attention.
- The audit team noted the substantial engagement of the local examiner reported in minutes of the January 2010 examining boards and concluded that the University should clarify the role of local external examiners and the degree to which they, like the external examiners from UK institutions, are required to benchmark against the standards of other UK universities or whether they are appointed to monitor other or additional criteria. With this exception, the team concluded that the arrangements for the management of external examining required by the University were satisfactory.

#### Certificates and transcripts

The audit team was provided with examples of University certificates and the templates for transcripts issued to graduates. Once the candidates have been admitted to their degrees in absentia, degree certificates and 'diploma supplements', the University's term for transcripts, are produced and sent to partners for distribution to students. The place of study is recorded on the diploma supplement and the certificate states that the certificate and diploma supplement must be considered together. All students graduating from a validated degree programme have the option of attending the annual graduation celebration in Cardiff. In the view of the audit team the certificates and accompanying diploma supplements are clear and comprehensive.

#### **Section 4: Information**

#### Student information (oversight by the UK institution)

- Information for prospective students on validated programmes of study is produced and distributed by the partner institution. A proposed Student Handbook is submitted as part of the validation documentation and an updated version provided at the start of each academic session. The audit team was given a copy of the Student Handbook issued by FIC to students registered on University of Wales programmes.
- Until 2009 the University produced a 'welcome letter' for all newly registered students, which was sent to the validated institutions for distribution. From 2009-10, it has obtained email addresses for all students and sent each student confirmation of their registration electronically. This should provide more timely access to the University's Online Library. Clear guidance on accessing the Library are provided to each student as part of their registration confirmation. The students whom the audit team met reported some difficulties in downloading from the Online Library, possibly due to restricted internet bandwidth in Malaysia.
- The University publishes appeals procedures for students completing or exiting from their degrees. Validated institutions are required to include local appeal and complaint procedures in their University of Wales Handbooks. The team noted that the handbooks included copies of the University's formal 'Verification and Appeals Procedure' but no guidance on local complaints and appeals procedures. These could be provided in the handbooks. All students on validated degrees are able to complain directly to the University using the complaints procedure, although the University encourages all complaints to be resolved at the institution if possible. Descriptions of the procedures are available on the University's website and detailed in the Student Handbook. The Validation Unit has a dedicated officer available for institutions and students if they are in need of assistance or advice in these areas.
- The Validation Unit requires that private meetings with a representative group of students are arranged at all validation and review visits. Following validation of the course, the Moderator, often accompanied by the Validation Officer, meets students privately on an annual basis, either at the mid-session visit or at the examining board, and includes details of this in his or her report. The Validation Unit responds to enquiries from prospective and existing students on validated schemes. The University had recently appointed a Student Liaison Officer to develop the ways in which the University communicates with its students.
- The students whom the audit team met were content with the information they received before and on registration, and indicated that they found no difficulty in obtaining guidance on procedures either directly from staff or the Programme Director or online.

#### **Publicity and marketing**

The Validation Unit provides partners with guidelines for the production and approval of publicity material, including information on websites, and has dedicated officers within the Unit with responsibility for checking such material. On an annual basis, partners must submit a pro forma to confirm that all publicity has been produced in accordance with University requirements. Any serious breaches of the publicity guidelines are identified and reported to TVDB, which can withdraw validation from an institution for this reason. The audit team heard from FIC that all printed publicity material was submitted in advance to the Validation Unit for approval before publication. The publicity material seen by the audit team was clear and accurate.

# Section 5: Student progression to the UK

The validation agreement with FIC did not include or require any formal arrangements for students to progress to study in Wales.

#### Conclusion

- In considering the partnership between the University and FIC, the audit team identified the following positive features:
- the comprehensiveness and clarity of the Validation Unit Quality Handbook (paragraph 18)
- the role of the Moderator, which has been carefully developed and is fundamental to ensuring that partners understand and implement the University's requirements (paragraph 19)
- the development of additional support mechanisms for moderators, such as the Moderators' Handbook and the appointment of Moderator Champions to provide specialist advice and support (paragraph 38)
- the recent enhancements to the online resources available to staff and students at partner institutions, including the Global Campus, which will allow collaboration between university staff, departments, institutions and students and include facilities for blogs, discussion groups and file sharing. This is an important and necessary development in the context of the number and geographical distribution of partnerships.
- The audit team also identified the following points for consideration by the University as the partnership develops:
- ensure that students continue to receive a distinctively British higher education experience as numbers grow and new teaching staff join FIC (paragraph 55)
- facilitate greater contact among FIC teaching staff and lecturers on similar programmes within the University of Wales' Alliance (paragraphs 52 & 55)
- ensure, as student numbers grow, that teaching staff are made more aware of their contributions to ACCR, its function and its outcomes (paragraph 47)
- clarify the roles of the external examiner and the operation of examining boards. In particular, the degree to which the local external examiners is required to have recent experience of the standards applied in UK higher education institutions should be made plain (paragraph 68).
- 79 The audit team considered that the University demonstrated a comprehensive awareness of QAA's *Code of practice* and has established processes that are designed to achieve full adherence to it.
- The Briefing Paper provided the audit team with a full and clear understanding of the origins and current management of the link. As an example of its policies and procedures for collaborative provision, the team's findings support a conclusion of confidence in the University's management of academic standards and systems for the maintenance and enhancement of the quality of learning opportunities for students studying under its collaborative arrangements overseas.

# **Appendix A**

# The University of Wales' response to QAA's report on its collaboration with Fazley International College, Malaysia

The University of Wales is pleased to receive the judgement of confidence in the management of its academic standards and systems for the maintenance and enhancement of the quality of student learning opportunities with respect to its collaborative partnership with Fazley International College (FIC).

The University welcomed the audit exercise as a valuable opportunity to reflect critically upon its procedures and their application. The points for further consideration highlighted in the report will be considered in full, and acted upon, in order to ensure that the systems in place for managing both the specific link with FIC and the University's wider portfolio of partnerships are improved further.

The particular challenges and opportunities of operating collaborative relationships at a distance are acknowledged by the University. As part of its efforts to overcome such challenges successfully (for example, by means of the introduction of the Global Campus concept) the University will make use of the reference points and areas for further consideration set out in the Audit report.

# **Appendix B**

# Current student enrolments (June 2010)

BA (Hons) Business Administration - Year two: 2

MBA - Year one: 16

MBA - Year two: 6



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