15 July 2020

Douglas Blackstock  
Chief Executive  
The Quality Assurance Agency for Higher Education  
Southgate House  
Southgate Street  
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Dear Douglas

Joint commissioning letter for TNE Quality Enhancement Review process

Following the recent joint UUKi-GuildHE-QAA consultation we are writing to you to ask you to develop a new review model for enhancing the quality of UK transnational higher education.

As you know, the joint UUKi-GuildHE-QAA consultation on the future quality enhancement of TNE closed on 3 January 2020. Since that date, the consultation analysis has been completed and tabled, along with recommendations, at both the GuildHE Executive and the UUK Board (on 12 March and 18 May respectively).

Both the UUK Board and the GuildHE Executive have approved the recommendations made in full and this letter therefore requests QAA to proceed with developing a new model for the enhancement of transnational education that meets the principles and recommendations outlined below, and for consultation with the sector (to be undertaken during 2020/21) and for the new model to be implemented from academic year 2021/22.
The new enhancement model should:

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

In summary, the recommendations relating directly to QAA were:

a. That an in-country activity programme be developed and offered to the sector by the QAA. This would take the form of a voluntary subscription offer, except where national regulator and funding bodies agreed to fund the programme for all providers under their jurisdiction.

b. That this activity should be reviewed after five years, based on the impact and usefulness of the programme and its articulation with metrics and regulation in the UK. Metrics do not currently exist which would provide a UK benchmark (see below). At that point, a realistic choice can be made between assurance and enhancement.
A third recommendation, that a UUK-led task group is formed to examine what measures would be necessary to move towards a risk-based, metrics-informed system of quality assurance in England, will feed into the work of QAA but is not directly related to developing the new model.

The associated actions relating to these recommendations and set out in the Board papers are:

**Develop a package of in-country activity and review to supplement QAA’s existing ‘International Insights’ activity.** A new system would offer up to three countries to be reviewed each year, typically pulled from each of three categories – core markets based on the numbers of students studying there and number of providers delivering TNE in-country (e.g. China, UAE, Malaysia), emerging markets (e.g. Nigeria, Kenya), and developing markets (e.g. Peru, Colombia). In-country review would be adapted for each country taking a context-responsive, risk-based and proportionate approach, including mapping existing relationships between UK TNE providers with national regulatory frameworks or with PSRBs in those countries to identify the assurance and enhancement needs in that country.

Taking this approach, after five years, and assuming 15 countries of these types had been covered, we can estimate approximately 25-40% of TNE activity by student numbers would be reviewed.

**Charge providers for access to the new system.** Where national regulator and funding bodies do not agree to fund the programme for all providers under their jurisdiction, this would take the form of a voluntary subscription model. We suggest encouraging providers to contribute regardless of their level of activity, while acknowledging that any service provided can only be subject to a voluntary subscription.
Develop a payment system that includes a significant differential fee component for providers who opt to take part. This is in line with the recommendations of the Bell Review.

**Offer participants a statement of participation.** This could include a “kitemark”. The statement would be made available publicly for access by institutions, regulators and authorities and could indicate both what kind of review providers have received and what enhancement recommendations have been issued.

**Commission QAA to provide in-country review services to the higher education sector** (proposing a set of countries to review, ensuring that individual institutions are not subject to multiple reviews, disseminating outcomes and good practice).

**Request external, sector-wide oversight of in-country activity from UKSCQA.** The programme of in-country activity, made in agreement with sector representative organisations, would then be submitted to this body for scrutiny.

We seek to work together with you to ensure that these recommendations and actions are carried through and will play our part where this is indicated.

Yours sincerely,

Alistair Jarvis
Chief Executive
Universities UK

Gordon McKenzie
Chief Executive
GuildHE