



Audit of overseas provision

**University College Plymouth St Mark and St John and the
Malaysian Ministry of Education**

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Introduction

The Quality Assurance Agency for Higher Education

1 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.

2 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 the academic year 2009-10 we conducted an Audit of overseas provision 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

3 In April 2009, QAA invited all UK higher education institutions to provide information on 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 subset of their provision) 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 for 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.

4 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. There was no visit to University College Plymouth St Mark and St John's partners in Malaysia. The audit of University College Plymouth St Mark and St John was coordinated for QAA by Mrs S Patterson, Assistant Director, Reviews Group. The audit team comprised Professor B Anderton and Mrs E Barnes, with Mrs S Patterson acting as audit secretary. QAA is particularly grateful to the UK institutions and, where applicable, to their partners in Malaysia for the willing cooperation that they provided to the team.

Higher education in Malaysia

5 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.

6 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.

7 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 which 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

8 This report considers the partnership between University College Plymouth St Mark and St John (UCP, Marjon, the University College) and the Malaysian Ministry of Education. Marjon is a Church of England Voluntary University College. Its constituent colleges, St John's and St Mark's, were founded to meet an urgent educational need for trained teachers at a time when government made no direct contribution to higher education. The University College was awarded taught degree-awarding powers in 2007 and prior to that its approach to and management of collaborative provision operated in accordance with the requirements of its validating body. The report was written in May 2010.

9 The partnership between the University College and the Malaysian Ministry of Education was established in 1983 and involves a range of provision, including the delivery of primary English language teacher education, the development of curricula and materials, and activities designed to build capacity in Malaysian institutions. Since 1992 a range of 'twinning' projects with teacher training institutes in Malaysia have been set up to provide training for Malaysian teachers. The projects operate within a consortium involving a number of UK higher education institutions (HEIs) and Australian and New Zealand universities working with Malaysian teacher training institutes. Originally the teacher training awards at the University College were those of Marjon's validating body, a UK university. There have been two previous occurrences or 'cycles' of the English language teacher education programme.

10 The subject of this report is the third cycle of the twinning programme and the first in the arrangement to operate under Marjon's own taught degree-awarding powers. There are projects with two teacher training institutes:

- The Institut Perguruan Gaya (IPG)
- The Institut Perguruan Kota Bharu (IPKB).

The projects consist of two strands: the training of English language teachers; and institutional capacity building to enable the collaborating institutions in Malaysia to deliver their own teacher training programmes in the future. The programme leads to a B.Ed (Hons) Teaching English as a

Second Language (TESL) and consists of four years of study - three at Marjon and a final year taught in the Malaysian institutions by local staff with support provided by Marjon. The B.Ed is preceded by a two-year Foundation Course taught by IPG and IPKB, which is focused primarily on developing English language skills, the assessment of which is moderated by tutors from Marjon. Marjon's register of collaborative provision categorises the B.Ed TESL as a 'customised delivery in-house partnership'.

11 The language of study and assessment for the programmes is English, other than in year four of the programme for the Malay-specific modules as required by the MQA. These modules do not contribute to the classification of the award. The University College has a policy that delivery and/or assessment of a programme in a language other than English must be approved by the Academic Board.

12 The University College will apply for recognition from the Public Services Commission in Malaysia when the full programme is in approval. The programme does not attract Training and Development Agency for Schools accreditation or Qualified Teacher Status.

13 The Consortium operates through six linked management committees. The Joint Universities-Institutes Committee monitors, reviews and supports all aspects of the project. The University-Institute Programme Management Committee determines overall policy and procedures. The Programme Management Committee and Universities and Institutes Coordinating Committees are responsible for the oversight and management of course delivery, assessment, institutional capacity building and student welfare - the latter two in the UK and Malaysia respectively. The Institute Assessment Board considers matters related to assessment and examinations and agrees recommendations for the award of the degree. The Foundation Course and year four are common to all of the arrangements, but for years one, two and three each of the UK institutions may have a different number of modules of differing length with varying credit allocations. Curricula also vary across the HEIs in the UK.

14 The first two cohorts of students in the third cycle, one in each of IPG and IPKB, joined the Foundation Course in 2007, with 25 students in each institution. All 50 students have progressed to the first year of the programme at Marjon. A further two cohorts were recruited to the Foundation Course in 2008. There is no agreement for the programme to be extended beyond 2014.

The UK institution's approach to overseas collaborative provision

15 The University College retains the same responsibility for the quality of teaching and the academic standards in its collaborative provision as it does for programmes delivered on campus. The management of quality assurance and enhancement is therefore integral to the University College's general academic processes. Marjon's five-year Strategic Plan makes reference to an aim to expand franchising, validation or accreditation activity. In discussion with the audit team senior staff at Marjon identified Malaysia as a key strategic area for the development of overseas activities.

16 The arrangement was originally established in accordance with Marjon's Collaborative Provision Regulations and Procedures (2005). Marjon has recently developed revised Collaborative Provision Principles and Procedures (CPPP) (2010) that set out the revised strategy and arrangements for the management of collaborative provision. The CPPP define procedures for: communication with partner institutions; due diligence procedures; the establishment, maintenance and review of written agreements and contractual arrangements; venue and resource checks; institutional and programme-level approval; periodic review of partnership arrangements; and annual programme monitoring. The CPPP also include guidance on approval, monitoring and review processes.

17 The draft regulations and procedures state that responsibility for the quality of the provision and the academic standards of awards is vested in the Academic Board. The Board delegates authority for both the approval in principle of programmes and the discontinuation of programmes to the Academic Development Committee (ADC). Decisions relating to the final approval in detail of programmes of study are taken by the Learning Quality and Standards Committee (LQSC).

18 The Vice-Principal (Academic) oversees the University College's academic planning procedures and has overall strategic responsibility for collaborative provision. The Vice-Principal (Resources) is responsible for the legal arrangements governing the operation of partnerships and for oversight of the related financial transactions.

19 The Vice-Principal (Academic) has academic responsibility for collaborative provision and chairs both ADC and LQSC. The Vice-Principal (Academic) is also responsible for overseeing institutional arrangements for collaborative provision, the quality assurance of collaborative provision and the support of schools in developing programmes.

20 The deans of school are responsible for contact with partners on an operational basis. They liaise closely with partners about the management of existing programmes and the development of new programmes and, through the approval processes, confirmation of the suitability of institutional and programme facilities and resources. Deans of school are responsible for liaising with the Head of Registry and the Academic Standards Officer in the development, scrutiny and validation of new programmes and the approval, monitoring, and review and reporting arrangements for the quality assurance of programmes offered through collaborative provision.

21 Marjon is in the process of implementing changes to its executive and committee structures for collaborative provision to take account of institutional realignment. The audit found some consequent lack of clarity about the structures and policies governing the management of the provision. It appeared to the audit team that the old and new structures were to an extent operating in parallel and were in some instances difficult to reconcile. The team considers that the University College should review and revise as necessary the policy, procedural and committee documentation related to the management of academic quality and standards in collaborative provision to secure clarity and consistency of content and requirements.

Section 2: Arrangements for establishing the link

Selecting and approving the partner organisation

22 The Collaborative Provision Regulations and Procedures (2005) that applied when the link was established stated that the relevant Dean of School should always give due consideration to the implications of any potential collaborative arrangement in the light of Marjon's Mission and Strategic Plan and the School Strategic and Business Plans. The Dean had to alert the Chair of the Curriculum Development Committee (CDC) to any prospective collaborative arrangements; in turn the Chair of the CDC would provide any relevant background information regarding the proposed partner or activity, notify any other relevant parties within Marjon who might contribute to the development of the proposal, and offer advice and guidance to the individual or school concerned about establishment of the partnership and any legal agreements.

23 CDC was responsible for considering proposals for collaborative developments in the light of the University College's Mission and Strategic Plan and the School Business Plan, nominating a working party to consider the detailed applications. The applications normally included the prospective partner's mission statement, strategic plan, aims and objectives, and a business plan if appropriate.

24 The management structures for the establishment of the partnership do not match those set out in the CPPP (2010) as the arrangement predates the revised procedures. The collaborative

provision was originally set up through and operated within the Centre for International Education (CIE) at Marjon. A planned restructuring will see the CIE moving into a faculty as an income-generating unit concentrating on international language teacher education. In May 2009 the CDC queried the extent to which school quality management structures would be replicated in the CIE, within which the Malaysian programmes would be delivered. There was also a proposal that mentoring be provided to the CIE with regard to appropriate quality management procedures for the programmes under the direction of the Chair of the CDC and with the involvement of the Dean of Academic Affairs and the Head of Registry. The autonomy of operation of the CIE, which was significant previously, is being redefined under revised procedures.

25 The current arrangement was negotiated building on the two previous successful twinning projects (see paragraphs 9 and 10). In March 2007 the University College prepared the proposal for a third cycle project to be the basis for technical discussions with the Government of Malaysia and the Malaysian Ministry of Education. The Head of International Education visited Malaysia for preliminary negotiations and produced a report that included a number of recommendations that were variations to Marjon's standard processes to take account of the particular nature of the proposed partnership. The report recommended that consideration be given to the extent to which formal 'heavy'/'high-end' partner recognition procedures would be necessary, given that years one to three were delivered at Marjon. It was also suggested that any such partner approval should be postponed until after years one and two of the programme, by which time appropriate local resources and procedures would be in place for year four students returning to Malaysia. It was agreed with the Malaysian Ministry of Education that Marjon visit its prospective partners to review resources and that a checklist be drawn up to guide the process. The report also noted the need to seek accreditation for the programme from the Malaysian National Accreditation Board (LAN in its Malay acronym, the forerunner to the MQA) and it was hoped that the reports of the visits to the partners would be adequate for the purpose.

26 The report also considered the key risks associated with the arrangement, including the challenge inherent in the complexities of working with two overseas institutions within the framework of a UK Consortium. The fact that the Malaysian Ministry of Education was the overall managing partner of the collaborative provision meant that Marjon was not involved in selecting its partners nor in negotiating the precise terms of the arrangement with its allotted institutions. The financial arrangements at this stage were not fully established but a proposal for costs and income was provided. The report also offered to 'work out' overall staff requirements, including time required for teaching management/administration in the college.

27 An action plan to take the proposal forward was drawn up; at this stage a decision was still required on whether the award would be that of Marjon or its previous validating agent. The key actions identified included a set of decisions for Marjon: agreement for participation in the project; draft curriculum; nature and timing of any formal partner recognition; confirmation of the awarding body; and activities to include projected costings and expenditure, identification of Marjon representatives for negotiations, and contact and sharing of information with the other HEIs in the Consortium.

28 In May 2007 a letter confirming the partnership arrangements was received from the Ministry of Education in Malaysia, followed by a draft Agreement in June of the same year. At this time the Dean of International Education conducted recognition visits to the delivery partners. It had still not been decided whether a formal partnership approval visit should or would take place.

29 In June 2007 the University College received details of the requirements for recognition of the degree from the MQA, which had by then succeeded LAN. Should it be decided that the award would be that of the University College, institutional recognition would also be required. Documentation provided to the audit team did not make any further reference to recognition or accreditation processes.

30 It was agreed at CDC in July 2007 that UK benchmarks would be used to establish the level of the programme. It was confirmed that there were no recognition, resource or staffing issues with respect to the foundation programme, which was due to recruit its first students in July 2007.

31 In January 2009 the Vice-Principal (Resources) presented a risk assessment of the partnership to the University College Executive, at which stage the exact nature of the partnership was still to be defined. The Agreement was signed in February 2009 for two cohorts only.

32 Following the approval in principle of the B.Ed (Hons) TESL third cycle by CDC, in May 2009 the Vice-Principal and Deputy Chief Executive (now Vice-Principal-Academic) visited Malaysia and met representatives of the Ministry of Education, staff at the two delivery partners, and, at IPG, students who were studying on the Foundation Course. He undertook a review of resources and of the establishment of the partnership to date. This visit predated the revised CPPP, which state that such visits will include an external academic member, a senior member of academic staff from the sponsoring school and a representative of the Learning and Quality Unit.

33 In July 2009 details of the proposed partnership with the Malaysian Ministry of Education were presented to the CDC, where some concern was recorded about the tight timescale for approval, given the start date at Marjon of September 2009 for students already on the foundation courses in Malaysia. The concern was mitigated by the fact that the proposal was for an arrangement with a known partner. It was noted that the revised collaborative regulations and procedures, still in draft, would provide guidance on the monitoring and renewal of existing partnerships.

34 In accordance with the University College's processes a working party convened by CDC met in July 2009 to consider the approval. The working party recommended the approval of a partnership arrangement in two parts: the approval of the academic partner and the approval of the programme. It was also stated that the Collaborative Provision Regulations and Procedures were not entirely appropriate given the particular nature of the partnership and that the standard procedures should therefore be adapted.

35 In September 2009 a partnership approval meeting chaired by the Vice-Principal and Chief Executive, with panel membership including an external member, was held. It was noted that this was a reapproval event as there were already a number of existing agreements with this partner and therefore some of the normal due diligence questions would not apply. Consideration was given to potential cultural differences with respect to three aspects of the delivery: equality and diversity policies; different learning and teaching styles; research and scholarship. In all cases the panel concluded that any differences were not significant and could be resolved in discussion with the partner.

36 The partnership was approved with conditions and recommendations to be met during the implementation of the programme as opposed to before commencement. A summary of the panel discussion was provided to CDC in which it was agreed that the partnership be recommended to Academic Board. Chair's action was taken on behalf of the Academic Board in October 2009 and reported to the Board in November 2009.

37 The CPPP define procedures for the renewal of partnerships, with the process starting twelve months before the expiry of the legal agreement in force. For renewal of a partnership, a full review of the partnership and the collaborative programmes will be undertaken. The process is described as flexible according to the scale of the partnership and the nature of the provision. The process includes a review and renewal visit by a panel with membership with appropriate externality, seniority and expertise. The Chair of the LQSC will be responsible for follow-up action to the panel's findings.

38 This reapproval process was not in place at the time of consideration of renewal of the partnership with the Malaysian Ministry of Education. The reapproval of the partnership was protracted and complex due to the particular nature of the partner, and the University College adopted a largely pragmatic approach to secure the relationship. There have been no instances of other partnership renewals to date so it was not possible to appraise the effectiveness of the revised procedure in practice but the audit team considers that it will provide a structured and more secure approach to such arrangements in the future.

39 Arrangements are in place for the termination of collaborative provision, which may be recommended through the reapproval process. Decisions regarding termination are ultimately the decision of the Principal or person so delegated following consultation with the Chief Executive of the partner organisation or person so delegated. The programme team is required to provide an exit strategy for students to ensure that the quality of their experience is not compromised. Students may be asked to transfer to comparable programmes in exceptional circumstances, such as returning from a period of interruption.

Programme approval

40 Currently, years one to three of the programme are in approval; approval of year four, to be delivered in Malaysia, is not scheduled to take place until the academic year 2010-11. The schedule for the partnership renewal process affected the timetable for approval of the programmes.

41 In May 2009 the CDC approved in principle the B.Ed (Hons) TESL third cycle. The Committee noted that there were just four months before the start of the programme and that the late approval should be considered an exception and not a precedent. A completed checklist for approval in principle for new academic provision was presented to the Committee, setting out the outline programme, details of consultation with the Planning and Resources Group and alignment with the Mission and Strategic Plan, including fit with institutional regulatory and award frameworks.

42 A validation event with external representation was held in September 2009. The team presenting the programme comprised the Programme Leader and the Director of International Development. The Programme Leader from Marjon was present at the event but no representatives from the potential delivery partner organisations were involved. The proposal was calibrated against a full range of both UK and Malaysian relevant external reference points. The award of the degree requires attainment of 420 credits to meet the expectations of a UK bachelor's degree in education within 360 credits, with an additional 60 credits to take account of the learning required for the Malaysian context. There was evidence of punctilious use of credit frameworks and *The framework for higher education qualifications in England, Wales and Northern Ireland* to calibrate the requirements for the award. The documentation stated that the proposal for year four should be considered as indicative only, was subject to review and revision, and that it was planned that the modules should be approved by the end of 2011 in accordance with the iterative process in the Consortium.

43 The panel recommended that year four should not be considered at that stage but should be validated in the autumn 2010 in concert with the other UK Consortium members. Year one of the programme was given conditional approval; consideration of years two and three, to be undertaken by the same panel, was deferred until later in 2009.

44 The panel reconvened in October 2009 without the External Representative and the Quality Assurance Officer from the first event present, contrary to the recommendation that 'ideally' the same panel as that for year one should consider the proposal for years two and three. The presenting team was strengthened by the addition of two senior lecturers from the Centre for International Education. Year one was approved retrospectively with effect from September 2009. It was also agreed that, subject to corrections to the presentation of the documentation, years two and three would be validated from September 2009 for six years. The period of approval for years two and three exceeds that of the Agreement governing the operation of the programme.

45 The Chair of the panel signed off the documentation, subject to the monitoring of student achievement on the elective modules. In December 2009 the LQSC ratified the validation of years one, two and three of the programme until 31 August 2015.

46 The timetable and conduct of the approval for the programme were both outside Marjon's standard regulatory and procedural frameworks. Throughout the approval process, the University College was confident of a successful outcome and therefore did not have any contingency plans for the eventuality of the proposal being rejected. The first cohort of students started year one at Marjon in September 2009, before the programmes were in formal approval.

47 The programme is delivered and assessed in English. Students progressing to year one of the programme at Marjon have all completed the Foundation Course, which includes English language tuition. Staff at Marjon stated that the students' oral English language skills were adequate but that written English was more problematic. The staff were confident that over the three years of study the students' written competence in the English language would improve. Remedial support is provided to students for academic writing.

48 Working as part of a Consortium in the delivery of this scheme resulted in some variation to Marjon's regulations and award frameworks. The Agreement incorporates a Malaysian government requirement that UK institutions within the Consortium classify the degree on the basis of 40 per cent for years two and three and 20 per cent for year four.

49 At the stage of approval in principle in May 2009 the CDC stated that any variances to the University College's standard requirements had to be specified and explicitly approved to ensure that the programme was delivered within the University College's award regulations. The internal scrutiny panel prior to the formal programme approval panel requested a justification for the use of 15-credit modules as against Marjon's normal 20-credit structure and for the 40 per cent weighting over year two and 60 per cent weighting over years three and four combined for classification purposes. The 15-credit modules were defended on the basis that the other Consortium partners were using the same approach. It is planned that year four of the programme will be delivered with 20-credit modules. The scrutiny panel was satisfied with the weighting for classification but recommended that further clarification with respect to the 15-credit modules be provided for the validation panel.

50 At the validation event in September 2009 it was recorded that the specification of the 15-credit module structure was a decision that was made by CIE staff at Marjon to maintain continuity with the earlier course offering. The use of a 15-credit module structure had implications for the operation of the elective modules which were offered on other programmes at Marjon within a 20-credit module framework. The approval panel advised that marking criteria should be drafted and implemented to help staff on the elective modules mark their 20-credit and associated 15-credit modules with ease and confidence. Accordingly the content, outcomes and assessment of the elective modules where Malaysian students work alongside UK students have been adjusted to match a 15-credit profile. In discussion with the audit team programme staff reported that an assessment had been removed to adjust to the 15-credit rating modules but that the learning experience was the same for all students. Central staff who met the audit team stated that adjustments should be made to the overall learning hours in accordance with the reduced number of credits and that the reduction in assessment load could meet this requirement. In September 2009, the validation panel confirmed that Marjon regulations would need to be adjusted to accommodate this, along with the 40/60 per cent weighting arrangement.

51 At the LQSC meeting where the programme was formally approved, the Head of Registry noted that the rationale for the classification regime for the programme had been accepted by the Regulations Working Group in discussion at its most recent meeting. Central staff whom the audit team met stated that the classification system was not outwith the regulations, as was confirmed by a written statement provided subsequent to the meeting. The statement affirmed that classification was in line with the regulations in that the regulations state that the classification is calculated from

the equally weighted mean of all credits at levels five and six and that, as stage two was made up of 120 credits and stage three 180 credits, this would lead to a 40/60 split as stated. Nonetheless, the regulations state that 'if exceptionally a student has acquired more than the 120 credits required at each of these levels, the Progression and Award Board will first take account of the marks in all compulsory modules for the award and title for which the student is registered, then the student's best performance in optional modules associated with that award and title, up to the total credit requirement. The Board will disregard all other marks'. It appears to the audit team, therefore, that the classification of the award is at variance with the University College's regulations. Audit team discussions with staff at Marjon found a lack of clarity and consensus about the mechanisms for formal approval of variances to regulations and award frameworks; the predominant view was that such matters were managed within the approval process.

52 There is agreement across the Consortium that there will be no exit award available at the end of year three and that the examination board at the end of that year will be a progression board with no power to award degrees. There is provision for students who successfully complete years one to three at Marjon but are then unsuccessful in year four to be awarded a Marjon BA (Hons) Educational Studies.

53 The audit found that there were appropriate processes and procedures in place for programme approval, which took due account of the relevant precepts of the *Code of practice*. The process of negotiating the terms of the Agreement for the operation of the partnership resulted in compression of the normal schedule for programme approval and the course started before the formal approval process had been completed. There was evidence that all of the normal stages of the approval were undertaken within the constricted timescale process and that the process was thorough. The late approval of the programme meant that the University College was vulnerable should approval not be granted as it was committed to the admission of the students already on the feeder foundation courses; there was no contingency plan for this eventuality.

54 Marjon will wish to ensure that in future students are not permitted to start on programmes of study before the institutional and programme approvals are completed. The University College may also wish to consider whether there might be merit in greater involvement of teaching staff from Marjon and the partner organisations for delivery in the future development, approval, monitoring and review of the programme. The University College should also clarify the procedures and authority for approval of variances to regulations and the awards framework, including the role of the Regulations Working Group, a body that does not feature in the various regulatory and procedural handbooks.

Written agreements with the partner organisation

55 The Agreement governing the operation of the arrangement is between the Government of Malaysia and the University College, with the designated authority for the government being the Malaysian Ministry of Education. The individual partner institutions with responsibility for delivery, IPG and IPKB, are included within the financial schedule but are not parties to the overall Agreement. The form of the Agreement is common for all of the UK HEIs in the Consortium, except for the overall view of the programme and the financial schedule. The Agreement defines responsibilities for: recruitment of students and provision of scholarships; conduct of the course; curriculum development; and ensuring local requirements for recognition are met, including those for accreditation by the Malaysian government. Intake target numbers are included, with the proviso that these are subject to the availability of scholarships and suitable candidates.

56 The financial arrangements do not include any contingency arrangements or any safeguards with respect to non-payment. The Government of Malaysia undertakes to pay Marjon on the basis of invoices from the institution. Intellectual property rights, including the use of name, logo and official emblems, are protected. Termination agreements are included but make no reference to obligations to the students. The Agreement is governed and interpreted in accordance with Malaysian law, with provision for resolution of disputes 'without reference to any

third party or international tribunal'. Marjon may wish to consider whether the current form of Agreement, which meets the requirements of the Government of Malaysia, also provides sufficient safeguards for the University College and its students in the event of dispute or termination.

Section 3: Academic standards and the quality of programmes

Day-to-day management

57 The Foundation Course is delivered by the institutions in Malaysia with no input from Marjon. The three-year programme at Marjon is managed in line with other campus-based programmes. As year four of the programme has not yet been approved, the management of that stage remains to be defined. The Consortium maintains an overview of delivery of the Foundation Course and of the development of year four through the committee structure outlined above (paragraph 13).

58 In line with the CPPP (2010), day-to-day programme management is undertaken by a Programme Leader, designated a Programme Coordinator for the Malaysian provision, who also acts as a Link Tutor. The Programme Coordinator is the first line of referral for all academic issues and for routine programme management and focuses on making sure that the partner maintains appropriate quality assurance procedures. All students are allocated a Personal Tutor, with whom they have at least three meetings a year. Routine contact is maintained through email and students whom the audit team met confirmed that they could get in touch with their tutors at any time if necessary. Students are encouraged to approach the Module Leader if they have queries about specific modules.

59 Marjon is responsible for the management of student records and student data. Information on student achievement and progress will be provided to Malaysian institutions, and the Scholarship Division and Teacher Education Division of the Malaysian Ministry of Education. The Consortium has agreed that students will be asked to give formal consent to transmission of their results to the authorities in Malaysia.

60 Students are provided with an information booklet that sets out full and detailed information about support services available to them. The Marjon virtual learning environment (VLE), known as LearningSpace, provides access to module and institutional resources, including timetables, email, Student Services and the library. Students also have a personal 'virtual hard drive' that is accessible through the internet. The Marjon Open Learning Unit provides online support for basic IT skills and use of the VLE. A Student Support Centre provides a range of support services including counselling, study skills, disability support and careers services. The student support and associated materials provided by the staff at the University College are identified in the audit as features of good practice.

61 There is a formally minuted Staff-Student Liaison Committee (SSLC) convened and chaired by the Programme Coordinator, which meets once each term. Student representatives are elected by their peers. There was evidence of prompt responses to matters raised by students and students receive feedback on action taken. Module evaluations provide feedback on content, teaching and supervision, module support, resources, outcomes and assessment. In the evaluations seen by the audit team students provided detailed feedback that was generally very positive about the classroom experience. Many students commented positively on how one particular module supported the development of their English language skills.

62 In meetings with the audit team, students reported being well supported in their studies and that they had not had any difficulty in adapting to the different teaching styles in the UK and Malaysia. They were particularly appreciative of the elective modules where they studied alongside students from the UK and other countries, which provided a different perspective to their learning experience. Staff also commented on the positive impact that the Malaysian

students had had on the delivery of the option modules, which had enriched the overall learning experience through comparative cultural discussions and the diversification of materials used. The audit found that the integration of home and overseas students in the elective modules, which fosters an understanding and appreciation of cultural influences and differences, was a positive feature of the arrangement.

63 The programme incorporates a placement experience in each year. In year one students spend five days in a primary school and five days in a secondary school. The placements coincide with the modules in classroom management and classroom investigation. The placements are focused around observation, but staff also commented on how well the students interacted with pupils in schools as they worked alongside them. Students are provided with a handbook that sets out expectations, professional requirements, outcomes and assessment details and pro forma for a placement diary and a school attachment report. Activities include comparisons with teaching styles and approaches in Malaysia. Students had opportunities to share their experiences in class in the aligned modules and also in one-to-one tutorials with their personal tutors. Students viewed this as a valuable experience and were enthusiastic about their learning and the support provided. The specification and implementation of the placement element, which enriches the students' learning experience, is identified in the audit as a positive feature of the programme.

Arrangements for monitoring and review

64 The Quality Assurance Handbook 2010 sets out arrangements for annual monitoring. The University College monitors the quality of its provision through module reports, programme reports, subject reports and school reports. The ADC receives an annual report from each Dean of School which summarises and may append the subject and programme reports. At the same time the Director of Programmes reports to the ADC and, if appropriate, to the management team on issues arising in programmes and may affect more than one school.

65 The annual programme report is prepared following a meeting of the SSLC early in the autumn term. It includes reflection on the previous report, module reports, external examiner reports and responses, the minutes of the SSLC, internal audit reports, periodic reviews, validation and external reviews or inspections. The school report, prepared by the Dean, considers recruitment, retention, achievement and progression. A separate report provides statistical management information. The LQSC considers proposed action plans and may also require actions to resolve issues or to make more widely known examples of good practice.

66 As the programme is in its first year of operation the audit team could not see evidence of the process in practice, but the specification is comprehensive and should provide for effective scrutiny of the operation of the programme. The procedures take due account of the relevant precepts in the *Code of practice*.

67 Arrangements for periodic review are set out in *Regulations and Guidelines for Periodic Review*. The programme will not be subject to periodic review unless the Agreement is extended, as periodic review at Marjon is normally undertaken at intervals of not more than six years.

Staffing and staff development

68 The Foundation Course is delivered by lecturers at the Institutes of Teacher Education (ITEs). ITE staff who deliver year four will be employees of the Malaysian Ministry of Education. The report of the partnership approval event recorded that equivalence of awards held by Malaysian staff with UK awards had been confirmed and there was a commitment that staff teaching on year four would all be educated to master's standard. The relevant procedures state that staff designated to teach on programmes offered in partnership will be approved on an annual basis by Marjon through the provision of curricula vitae to the Dean of School. Any changes to staffing should be notified annually for approval by the school.

69 The Agreement with the Government of Malaysia includes a commitment to capacity building in the Malaysian ITEs. There is a development programme that includes visits by Marjon staff to the Malaysian institutions and of ITE staff to Marjon. The impact of the capacity-building activities will be assessed by the Ministry of Education. The Consortium has devised a range of short courses that will be offered to staff in Malaysia. Responsibility for delivery of the courses is assigned according to the expertise of staff in the institutions in the Consortium. There was evidence of Marjon having good operational links with other members of the Consortium to promote effective support to the partner institutions.

70 The short courses are designed to provide updates on developments in the area of study and to demonstrate practical skills and techniques where appropriate. The courses include: literacy and numeracy; alternative forms of assessment; course delivery in elementary education; strategies in teaching in challenging classrooms; multiculturalism and language teaching; understanding and managing learning and emotional behaviour in young learners, adolescents and young adults; literature for children and adolescents; and supervising marginal performance during teaching practice. Visits of Malaysian staff to the UK are supervised and managed through the Consortium. In the academic year 2009-10 each institution had visits scheduled for two weeks and Marjon had two two-week visits to Malaysia planned. The capacity-building activities, which offer a wide range of staff development, are identified as a feature of good practice in the audit.

Student admissions

71 Recruitment to the foundation courses is conducted by the Malaysian government, and to date access to programmes in the UK has been entirely through successful completion of the Foundation Course, whereupon progression is guaranteed. All entrants to the Foundation Course hold a Sijil Pengajian Malaysia (SPM) school leaving certificate with the requirements for attainment specified. There is also provision for students who have the Sijil Tinggi Pengajian Malaysia (STPM) or Higher School Certificate to be admitted directly into the B.Ed TESL. Senior staff whom the audit team met indicated that there were no plans to recruit actively through this route. Should there be any such applications the admissions process would be conducted by Marjon in consultation with the Malaysian government.

Assessment requirements

72 The Foundation Course is delivered and assessed by the Malaysian ITEs, but members of the Consortium provide feedback on the design of assessments as part of the capacity building. Moderation for the Foundation Course is conducted across all the Malaysian Institutes within the partnership and also involves the UK partners.

73 Years one to three of the programme are assessed by Marjon staff in accordance with the University College's standard assessment procedures. The assessment strategy for the element of the programme delivered at Marjon is included in the programme specification.

74 For the purpose of classification year four will be assessed on three taught 20-credit modules. The taught modules will be assessed 60 per cent through course work and 40 per cent through examinations. Students will also be required to pass a practicum that will be assessed based on a minimum of ten observations by supervisors from the Malaysian ITE. Arrangements for marking and moderation for year four have not yet been agreed.

75 The Student Handbook includes module specifications that include the types and weighting of assessments for the assessments at Marjon. The handbook also includes guidelines for assignments and assessment criteria. This is reinforced by staff, who provide assessment briefs. Assignments are returned to students with grades and comments on an assignment report form. Students described the feedback as detailed and timely, with work usually being returned within two weeks of submission. Students can discuss feedback on assessment with the module tutor and/or their personal tutors. Student assignment and examination marks are entered onto a record card that they are able to see and discuss with their personal tutors. During this discussion

the personal tutor adds written comments on academic work. Students can raise any particular circumstances that they feel should be taken into account in assessing their progress, and can discuss plans for their continued personal and academic development.

76 The University College operates a two-tier arrangement of Subject Assessment Boards and Progression and Award Boards for all taught programmes. Subject Assessment Boards determine the final mark for each student in every module and award credit for the module to every student who has demonstrated achievement of the learning outcomes of that module. The process is applied to the Malaysian programmes through an Institute Assessment Board held at the end of each year. The remit of the Board is to consider matters related to assessment and examinations; confirm marks; examine the overall performance of students and recommend actions to be taken, and to agree recommendations for the award of the degree. The Institute Assessment Board has not yet met so it was not possible for the audit team to appraise its operation.

77 The assessment strategies for the programme are designed to provide students with a variety of modes of assessment through a balance of practical, written coursework and examinations. The arrangements within the Consortium to share practice to oversee assessment design and to provide staff development for partners are exemplary. The validity and robustness of the assessment processes across the partnership will be further secured by the arrangements for moderation and the operation of the final assessment board.

External examining

78 The arrangements for external examining applied to delivery of the programme at Marjon follow the University College's standard approach for its home provision. External examiners are appointed by the University College's LQSC, through the exercise of authority delegated by Academic Board. The Committee is also responsible, on behalf of and in consultation as appropriate with the Academic Board, for the University College's external examination functions as a whole. An External Examiner Handbook sets out the relevant requirements and procedures.

79 There are sound arrangements for the nomination and appointment of external examiners in accordance with criteria set out in the External Examiner Handbook. An institutional induction process, which may be supplemented by local induction in the school, covers the role of external examiners in the two-tier system of assessment boards, assessment strategies and marking criteria. External examiners may meet students to discuss the quality of the student learning experience.

80 External examiners' reports are discussed at a meeting of staff teaching on the programmes. The Head of Subject drafts a response to the external examiner's report, which is appended to the Annual Subject Report. The response specifies action to be taken and provides reasons for not accepting any recommendations or suggestions. The Head of Registry maintains a central record of reports and responses to secure an institutional overview. External examiners are asked to confirm that they have received a formal response to issues raised in their annual reports.

81 At the time of the Audit of overseas provision none of the provision had been subject to external examiner scrutiny but the audit team considers that the arrangements are sound and take due account of the relevant sections of the *Code of practice*. If applied in full to the provision the external examiner system should contribute effectively to the security of the academic standards of the award.

82 The Consortium has tried to secure an external examiner overview across the programmes. It was agreed that a 'carousel system' of examining, whereby one of the UK institutions would act as the external examiner for another, was unlikely to meet quality assurance requirements on grounds of inappropriate reciprocity. It was therefore decided that each UK institution would appoint its own external examiner for years one to three and that two of the four external examiners appointed by the UK institutions would act as external examiners at a common year four examination board. A reciprocal system of informal moderation,

whereby a representative of one of the UK institutions will attend the year four 'pre-board' meeting of another UK institution, has been established.

Certificates and transcripts

83 Award certificates will be issued in line with the guidelines set out in the draft collaborative provision regulations. Subject to any overriding statutory or other legal provision in any relevant jurisdiction, the certificate will record the name and location of any partner organisation engaged in delivery of the programme of study. Marjon is not due to issue any certificates and transcripts until 2013 and therefore no examples for the programme were available at the time of the audit. The planned approach takes account of the guidance in the *Code of practice* as at June 2010.

Section 4: Information

Student information (oversight by UK institution)

84 Recruitment of students to this programme is managed through the Malaysian Ministry of Education. Students who met the audit team saw the programme advertised in the local press and, in response to their expressions of interest, were provided with full details of the programme.

85 On arrival at Marjon students receive two information handbooks that provide full details of accommodation, car parking, campus maps and induction and registration. The handbooks include a list of regulatory information referring students to LearningSpace on the University College's portal for full details. Students may also request a paper copy of the Student Regulations Handbook. A Student Programme Handbook includes general programme information, module details and assessment. All students the audit team met had received the handbook. The audit found that information provided for students by Marjon was comprehensive, clear and accurate.

Publicity and marketing

86 The University College has a requirement that promotional material for collaborative programmes must be submitted for its approval to before publication. Partners are required to forward electronic versions of draft materials to the Link Tutor to discuss with the Head of Marketing and Communications, who will then communicate any necessary changes to the partner institution for action. This arrangement applies to paper-based and web-based communication.

Section 5: Student progression to the UK

87 Staff across the UK Consortium have regular contact with staff and students during the Foundation Course and therefore students receive detailed and direct information about Marjon prior to arrival. Students were generally satisfied with the preparations for transfer to the UK.

Conclusion

88 The management of the arrangement between the University College and the Malaysian Ministry of Education is complex and made more so by the Consortium arrangement for delivery of the broader 'twinning' programme involving a number of UK higher education institutions. The requirements of the Malaysian Ministry of Education prevail in the operation of the Consortium and the individual partnerships, which can have a bearing on the University College's freedom of action. In general, the provision meets the expectations of the *Code of practice*. The student experience at Marjon is excellent.

89 The audit team identified the following positive features in the partnership:

- the capacity-building activities, which offer a wide range of staff development
- the student support and associated materials provided by the staff at the University College
- the specification and implementation of the placement element, which enriches the students' learning experience
- the integration of home and overseas students in the elective modules, which fosters an understanding and appreciation of cultural influences and differences.

90 The audit team also identified the following points for consideration by the University College as it develops its partnership arrangements:

- review and revise as necessary the policy, procedural and committee documentation related to the management of academic quality and standards in collaborative provision to secure clarity and consistency of content and requirements
- ensure that students are not permitted to start on programmes of study before the institutional and programme approvals are completed
- clarify the procedures and authority for approval of variances to regulations and the awards framework
- involve teaching staff in the future development, approval, monitoring and review of the programme
- consider whether the current form of Agreement, which meets the requirements of the Ministry of Education, also provides sufficient safeguards for the University College and its students in the event of dispute or termination.

91 The commentary guided the audit team to an understanding of the origins and history of the partnership. Additional documentation provided at the time of the audit was helpful and detailed and provided the team with a more complete picture of the current nature of the partnership. The findings of the audit are that, when the revised procedures set out in the commentary and associated documentation are fully implemented, the operation of the collaborative provision will be more secure. Provided that Marjon takes account of the detail of the Audit of overseas provision findings there can be a more general conclusion of confidence in the University College's stewardship of academic quality and standards in its overseas collaborative provision.

Appendix A

The response of University College Plymouth St Mark and St John (Marjon) to the QAA's report on its collaboration with the Malaysian Ministry of Education

The University College welcomes the positive report on its collaborative arrangements with the Malaysian Ministry of Education and its two teacher training institutes:

- Institut Perguruan Gaya
- Institut Perguruan Kota Bharu.

In particular it is pleased with the substantial list of positive features identified by the audit team, specifically the capacity-building activities undertaken with staff of the Malaysian institutes, which are critical to the successful delivery of the whole programme. Particularly welcome is the judgment that the student experience at Marjon is excellent, with the effectiveness of student support and associated materials provided by the University College and the integration of Malaysian and home students in elective modules being specifically commended.

The University College is grateful to the audit team for its constructive comments and is already addressing the points identified for consideration in order to strengthen its partnership arrangements and to ensure that teaching staff are fully involved in the future development of the programme. It is reviewing and revising policy, procedural and committee documentation related to the management of academic quality and standards in collaborative provision to ensure greater clarity and consistency. It is also clarifying the procedures and authority for approval of variances to regulations and the awards framework.

The University College welcomes the advice to consider whether the current form of agreement with the Malaysian Ministry of Education provides sufficient safeguards for the University College and its students in the event of dispute or termination, which it will discuss with its partner.

Appendix B

Student enrolments for 2009-10

B.Ed (Hons) Teaching English as a Second Language - year one: 50

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