



# Consultation on Future Approaches to the External Quality Enhancement of UK Higher Education Transnational Education

## Introduction

Transnational education (TNE) is an important component of UK higher education provision. In 2017-18, 139 universities reported TNE activity in 225 locations (countries, territories and administrations), with over 690,000 students studying for UK awards outside of the UK. TNE is also one of the pillars of the [International Education Strategy](#) jointly developed by the Department for International Trade and the Department for Education, and it is supported by the [Global Wales](#) and [Connected Scotland](#) initiatives.

The success of UK higher education transnational education (UK HE TNE) is underpinned by its reputation for quality - a reputation recognised by students and their families, and by overseas regulators and agencies; and which makes UK universities partners of choice internationally.

UK providers are ultimately responsible for the academic standards of their awards and for the quality of provision irrespective of where or how courses are delivered or who delivers them. External regulation and quality assurance provide a framework for ensuring that baseline quality requirements are met. UK HE TNE reputation is strengthened by robust quality assurance mechanisms, both internal and external, and by the comprehensive regulatory and funding frameworks applied in the four UK nations.

Universities also engage in quality enhancement as an aspect of institutional quality management designed to secure steady, reliable and demonstrable improvements in the quality of learning opportunities and continual improvement in the effectiveness of the learning experience of students. This aspect of quality has been particularly significant for TNE provision, which has relied on enhancement-led peer review and on close collaboration with overseas quality assurance agencies to underpin its reputation.

Quality enhancement in the UK is built on shared characteristics and requirements but, recently, the way in which this is delivered in practice, in each of the UK's nations, has become more diverse in line with differing needs and policy drivers. The changes to higher education regulatory and funding systems in the UK has had implications for the external quality enhancement of UK transnational education activity.

This consultation is being undertaken to scope the future form that a quality enhancement system of UK HE TNE may take. The intention is to explore a solution supported by higher education providers offering or aiming to offer TNE and that enhances the reputation of the UK higher education sector, in order to achieve the goals of the International Education Strategy and the Global Wales and Connected Scotland initiatives. In this consultation we

have taken a deliberately high-level approach to developing questions. The aim is to receive views on a general framework for quality enhancement of UK HE TNE. Any future system will be developed in detail subsequently.

## Purpose of the consultation

The basic question to be answered by the consultation is:

*What is needed to implement an approach to the quality enhancement of UK HE TNE that strengthens the reputation of the UK higher education sector and is economically sustainable?*

The consultation goals are:

- 1 To understand whether:
  - existing quality enhancement mechanisms in the different UK nations are robust and provide overseas stakeholders and institutions' own governing bodies with reassurance that the quality of provision is being continually improved, alongside the activities of the regulator for England and authorities in the devolved administrations
  - external in-country quality enhancement activity of UK TNE should be added to existing mechanisms, and the most adequate scale of such activity.
- 2 To explore ways to develop an economically sustainable system for the external quality enhancement system of UK TNE that will underpin its continued growth, including by effectively engaging with international stakeholders.

## Who is running the consultation?

This consultation is jointly managed by Universities UK, GuildHE and the Quality Assurance Agency for Higher Education.

- Universities UK is the collective voice of 136 universities in England, Scotland, Wales and Northern Ireland. Our member universities' core purpose is to maximise their positive impact for students and the public, both in the UK and globally, through teaching, research and scholarship. We are led by our members and act on behalf of universities.
- GuildHE is a recognised representative body and official voice for UK higher education, especially for universities and colleges with a tradition of learning, research and innovation in industries and professions. We promote and maintain a distinctive, diverse and inclusive higher education sector.
- The Quality Assurance Agency for Higher Education (QAA) is the UK's independent quality body for higher education.<sup>1</sup> Our mission is to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world.

For any questions related to the consultation, contact: [tne@international.ac.uk](mailto:tne@international.ac.uk)

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<sup>1</sup> QAA is a UK-wide body and independent charity; it is also the Designated Quality Body (DQB) in England where it acts on behalf of the Office for Students. With regard to quality enhancement, the activities proposed in the consultation fall outside of the activities of QAA's remit as DQB.

## Who should respond to this consultation?

We are particularly interested in responses from degree-awarding providers who currently deliver their awards through transnational education arrangements or who are considering entering this market in the near future.

We welcome responses from any organisations with a direct interest in the quality enhancement of UK higher education such as:

- universities and higher education providers
- funding and regulatory bodies
- representative bodies
- student representative bodies
- overseas quality assurance agencies
- overseas sponsoring ministries
- and other interested parties from outside the UK.

We also welcome individual responses from those with a direct interest.

## How to respond to this consultation

The consultation will run from 16 October 2019 until 3 January 2020 (at 23.00 GMT). If you wish to respond, please use the [online survey](#).

The consultation questions can be found at the end of this document to enable them to be discussed within organisations prior to submission of the online response.

**UK higher education providers:** A single institutional response from a respondent nominated to complete the survey on behalf of the provider.

**Any other organisation:** Nominate a respondent to complete the survey on its behalf.

**Individuals:** Should indicate at the start of the survey that they are doing so as individuals and not on behalf of their institution or organisation.

We would like to encourage respondents to answer all questions, to ensure we collect as many views as possible, although we understand that not all questions may be relevant for all respondents.

A word-limit for comments is indicated against each question.

## After the consultation - the next steps

UUK, GuildHE and QAA will jointly analyse the responses and prepare a summary of the outcome and models for the Boards of each organisation, together with an action plan that will be developed to take forward the outcome of the consultation. The action plan will be implemented following recommendations from the Boards of the three organisations.

# UK TNE provision: Context and background

## What is TNE?

Transnational education (TNE) is the provision of education for students based in a country other than the one in which the awarding institution is located. For the purpose of this consultation, we refer to the [Higher Education Statistics Agency \(HESA\) coverage definition](#) which indicates that the Aggregate offshore record should be collected in respect of students studying (to date) wholly outside the UK, who are either registered with the UK reporting provider or who are studying for an award of the UK reporting provider. TNE is used in the context of higher education providers that are degree-awarding bodies and includes distance-learning provision.

## Importance of UK TNE

TNE is an important area for UK higher degree-awarding providers. Over 80% of publicly-funded universities report that they have students in transnational education programmes. In 2017-18, over 690,000 students were studying for UK awards through transnational provision including through open and distance learning. The Department for Education (DfE) estimates that UK HE TNE contributed £610 million in exports to the UK economy in 2016.

The UK Government has explicitly expressed interest in supporting the growth of TNE from English higher education institutions, recognising its economic benefits and soft power returns. The [International Education Strategy: global potential, global growth](#) jointly published by the Department for International Trade and the Department for Education in March 2019, aims at 'supporting TNE as a key growth area'. This interest is mirrored in other nations, as shown through the '[Global Wales](#)' and '[Connected Scotland](#)' initiatives, which also support transnational education.

## Quality assurance and enhancement across the UK

### Shared principles, distinctive approaches

The quality assurance and enhancement of the UK higher education commands an international reputation. However, while to external audiences the sector may be considered homogenous and subject to the same regulatory frameworks and processes, regulation and quality assurance and enhancement occur through a number of interlinking frameworks and guidance, operating at different levels and with national variations in priorities, emphasis, and process.

The different authorities and regulators for each UK nation will use the outcomes in different ways and have different expectations on whether providers are required to participate in the reviews, which will be clarified by the regulators following the outcomes of the consultation. This consultation focuses on enhancement activities beyond meeting baseline regulatory requirements and quality assessment measures applied in the UK nations.

For example, in England, paragraph 88 of the regulatory framework for higher education indicates that the OfS will regulate overseas activity on the basis that the obligations of the registered provider extend to students for whom it is the awarding body wherever and however they study. The OfS has stated their intention to communicate more detail regarding their regulatory approach to TNE and discuss this with the sector in England and representative bodies, as well as other national and international stakeholders, during autumn 2019.

This consultation runs alongside the aforementioned OfS activity in the common understanding that there is a place for the sector and its representative bodies to develop an approach to quality enhancement alongside the regulatory activities of the OfS and national authorities. The models presented in this consultation focus on quality enhancement and, as such, stand apart from the baseline regulatory requirements set in the *Regulatory framework for higher education in England*.

## Background to the consultation

Given the changes and diversity across the UK nations in regulatory regimes and the particular importance and nature of TNE, there is an opportunity to review how to effectively enhance the quality of the TNE student experience in order to meet the transnational education activity goals of the four nations. The aim is to devise a solution that meets the diversity of approaches to quality enhancement across the UK, while remaining valued and trusted internationally.

In November 2018, the UUK Board recommended that a working group should be established jointly by UUK with QAA and GuildHE to consider future quality assurance and enhancement arrangements for TNE. The working group met three times between January and March 2019 and agreed a set of guiding principles and two models to implement an approach to UK HE TNE quality enhancement. These were endorsed for public consultation by the UUK Board and the GuildHE Executive. The two models are:

**Model 1:** Accepts that existing national mechanisms applied in the UK are broadly sufficient to enhance the quality of transnational education provision. Providers use a variety of existing national systems and processes to safeguard their academic standards and enhance the quality of the student experience which are considered to be sufficient to strengthen the reputation of UK higher education vis-à-vis overseas partners and governments. This model seeks to identify where an additional focus may be required by providers and in collaboration with QAA and national funders and regulators, where appropriate. In addition, this model includes taking the opportunity to identify cases where supplementary ad hoc measures, which could include in-country reviews, could provide additional enhancement.

**Model 2:** Adds a regular programme of in-country quality enhancement reviews to existing national quality assurance and enhancement mechanisms. This programme retains aspects of the in-country review process carried out by QAA, while using a simplified methodology with reduced information requirements, and increasing geographical and institutional coverage. It would retain a peer review focus aimed at identifying good practice and areas for improvement, to be shared across the sector; and a rolling programme of in-country TNE quality enhancement activity.

## Consultation questions

**Section 1** asks about the guiding principles (Qs 7-8)

**Section 2A** asks a series of questions about Model 1 - on the proposition, its governance and funding (Qs 9-12)

**Section 2B** asks a series of questions about Model 2 - on the proposition, its governance and funding (Qs 13-20)

# Joint UUK/GuildHE/QAA Consultation on the future quality enhancement of UK higher education transnational education

## Information about you

<b>Q1</b>	Name:
<b>Q2</b>	Role:
<b>Q3</b>	Institution/organisation:
<b>Q4</b>	Do you deliver TNE?
<input type="checkbox"/>	yes
<input type="checkbox"/>	no
<b>Q4a</b>	If yes, number of TNE students:
<input type="checkbox"/>	less than 100 TNE students
<input type="checkbox"/>	101-500 TNE students
<input type="checkbox"/>	501-1000 TNE students
<input type="checkbox"/>	1001-2000 TNE students
<input type="checkbox"/>	over 2000 TNE students
<b>Q5</b>	Nation:
<input type="checkbox"/>	England
<input type="checkbox"/>	Northern Ireland
<input type="checkbox"/>	Scotland
<input type="checkbox"/>	Wales
<input type="checkbox"/>	other (please specify):
<b>Q6</b>	I am responding:
<input type="checkbox"/>	on behalf of my university
<input type="checkbox"/>	as an individual
<input type="checkbox"/>	on behalf of my organisation (not a university)

## Consultation information and questions

### Section 1: Guiding principles

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

Any effective system should:

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

**Question 7**

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

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

Please give your comments (*max 250 words*)

**Question 8**

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

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

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

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

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

Both models align fully with existing quality assessment and assurance arrangements in the UK nations, including those UK-wide elements that apply to all provision (such as the Quality Code for Higher Education) and both build on established principles such as avoidance of duplication. Each of the national systems in the UK makes use of information and data, and therefore would embrace further information and data on TNE as it becomes available. Neither model precludes other actions such as the development of guidance and advice for TNE providers and international engagement with overseas quality assurance bodies and regulators.

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

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

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

Key operational features of this proposed approach are:

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

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

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

### Question 9

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

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

Please give your comments (*max 250 words*)

### Question 10

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

## Governance of Model 1

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

### Question 11

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

- yes
- no

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

## Funding mechanism of Model 1

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

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

### Question 12

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

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

Please give your comments (max 250 words)

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

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

The key operational features of this proposed model are to:

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

### Question 13

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

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

Please give your comments (*max 250 words*)

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

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

**Question 14**

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

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

Please give your comments (*max 250 words*)

**Governance of Model 2**

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

**Question 15**

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

- yes
- no

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

**Funding mechanism of Model 2**

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

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

**Question 16**

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

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

Please give your comments (*max 250 words*)

**Question 17**

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

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

Please give your comments (*max 250 words*)

**Question 18**

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

- TNE student numbers
- number of TNE arrangements
- number of countries of delivery
- other

Please give your comments (*max 250 words*)

**Question 19**

Taking the example of three locations being selected for quality enhancement activity each year - each involving three peer-reviewers and a QAA Officer, and assuming that a significant majority of all degree-awarding bodies with TNE provision buy into the scheme - the annual fee per provider might range between £2,500 and £5,000. Would you agree that this is a reasonable and acceptable fee range for the service?

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

Please give your comments (*max 250 words*)

**Question 20**

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

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

Please give your comments (*max 250 words*)

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