

Russell Group response: Strengthening the quality assurance of UK transnational education (TNE) Consultation

1. Introduction

- 1.1 The purpose of The Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.
- 1.2 The Russell Group represents 24 leading UK universities which are committed to maintaining the very best research and an outstanding teaching and learning experience. We are committed to seeing that the reputation of Russell Group universities is maintained and upheld globally.
- 1.3 We welcome the opportunity to respond to the Quality Assurance Agency (QAA) transnational education consultation. Most (but not all) Russell Group institutions now offer some form of TNE and the numbers of Russell Group offshore students are growing rapidly (by 17% between 2011-12 and 2012-13 compared to 5% growth for the whole sector). In 2012/13 7% of offshore students in UK higher education are enrolled with Russell Group universities.¹
- 1.4 TNE differs greatly in terms of scale and type of provision delivered by individual Russell Group institutions. For those institutions which deliver large-scale TNE this forms an important part of delivering a high-quality teaching experience: TNE allows internationalisation for home students through developing wider opportunities.
- 1.5 The current context and likely expansion of TNE do not in themselves demonstrate a need for the strengthening of quality assurance in TNE. Notwithstanding this, we agree that quality assurance of TNE is a complex issue and additional support and safeguards in this area might be desirable.

¹ Source: Higher Education Statistics Agency, HE aggregate offshore students, 2012/13

2. Risk-based quality assurance

- 2.1 It is important that any quality assurance in TNE is genuinely risk-based where the nature, frequency, and intensity of reviews vary. Any prospective quality assurance procedure must recognise that institutions are different and consequently pose different levels of risk.
- 2.2 Academic track record should form a large part of the basis for assessing risk related to TNE. As world renowned institutions Russell Group universities are important contributors to the reputation of UK higher education. Incorporating academic track record in any assessment of risk is consistent with other QAA review processes which focus on the past performance of an institution as a principal indicator of quality. We are concerned that the proposal to focus solely on an institution's track record in managing its collaborative arrangements would reduce the importance of the academic outputs. Academic track record should also be a determinant in any assessment of risk.
- 2.3 Risk drivers needs to be more clearly defined by the QAA. It would be useful if the QAA were to do some detailed analysis of TNE where problems have arisen to see whether common risk factors can be identified.
- 2.4 Providers which have an excellent track record should not receive the same treatment as those that represent a higher risk. The QAA should concentrate resources on assurance of TNE which is perceived to carry a higher risk.

3. Information

- 3.1 The submission of relevant documentation which is subject to a desk-based analysis should be sufficient to provide evidence of good quality TNE provision by institutions considered low-risk. To avoid any risks emerging from over-reliance on reports, relationships can continue to be built through investment in resources such as video conferencing and through delegation visits. Such activities foster relations, reduce any potential misunderstandings and keep costs down. Visits may form part of an overall assurance process related to TNE, but outside of normal QAA mechanisms. This is distinct from a separate QAA TNE review.
- 3.2 Collection of the minimum dataset should operate through the Higher Education Statistics Agency (HESA). This will allow for comparability between institutions. Whilst we appreciate that more data may need to be collected on TNE, more should be done to reduce duplication and to minimise the number of times institutions have to supply the same information to external agencies. To capture the required data might necessitate a reconfiguration or revision of the existing HESA data set and offshore records. QAA should work with HESA to explore this.
- 3.3 However, any increase in the collection of data on TNE must be considered in the context of the Government's commitment (in the 2011 HE White Paper) to reduce the

regulatory burden on universities and the work of the Higher Education Data & Information Improvement Programme (HEDIPP) to redesign the information landscape in order to arrive at a new system that reduces the burden on data providers.

4. Reviewers and review teams

- 4.1 In principle international reviewers could add value to the work of a review team, if they had had the required training and sufficient familiarity with the UK Quality Code. Any proposal to integrate international reviewers into the review team could increase costs at a time when public resources are under pressure. This objective could be achieved more effectively by ensuring review teams had a UK-based reviewer with relevant expertise. This might be gained from experience of working internationally, and/or working on international and collaborative provision while based in the UK.
- 4.2 There should be investment in staff development to address any cultural differences encountered through the quality assurance process. It is important, for example, that review team members have a full understanding of all the demands placed on providers and any differences in expectations of quality and standards. International colleagues could have observer status on review teams as this would assist in demonstrating the quality of UK quality processes in other countries.
- 4.3 We support student involvement in quality assurance as TNE should be handled in the same way as other aspects of core business. There is a strong case for incorporating TNE review within Higher Education Review (see 6.2) and involving the student member of the HE review panel. There would need to be sufficient training and support for students.
- 4.4 More collaboration is needed with Professional Statutory and Regulatory Bodies (PSRBs). Recognition of external quality assurance procedures should be built into the TNE process given their wider roles. Many PSRBs already carry out assurance processes of their own in overseas institutions in subject specific areas. This could enhance the assurance process, reduce any duplication and further serve to keep costs down.

5. Review outcomes

- 5.1 We strongly disagree with the notion of introducing a 'badge' system in relation to the quality assurance of TNE. A badging system could easily lead to misunderstandings. It could, for example, easily disadvantage providers who are not accredited due to the infancy of their provision. The absence of a badge could furthermore encourage competition from overseas universities.
- 5.2 More clarity is needed concerning what judgements would incorporate in relation to the quality assurance of TNE. More clarity needs to be provided on how this might work, e.g. would judgements relate to the institution, a specific form of TNE, or TNE in a particular country or region? Any prospective judgement would need to be delivered

with a detailed context and narrative with reports. This could increase pressure on providers to put resources into reviews of TNE provision, and add to costs.

6. Links with institutional review

- 6.1 Overseas branch campuses should not be subject to separate institutional reviews. TNE forms part of the home institution's core business and it is therefore inappropriate to treat an overseas branch campus as if it were a separate institution. Established universities have internal processes to assure the quality and standards of partnership provision and these can be demonstrated as part of the institutional review processes.
- 6.2 There is a strong argument that TNE should form part of the Higher Education Review (HER) report of the UK provider, rather than being subject to a separate review and report, unless there is a strong indication of high-risk that is specific to the TNE provision. The TNE process should be flexible in its application, so as to vary the intensity or frequency of scrutiny according to the perceived risk attached to specific TNE provision. By adding TNE consideration to an individual institution's HER, institutions would know what was being reviewed and when.
- 6.3 In devising a system that will be implemented across the UK, consideration needs to be given to the different approaches to institutional review in different parts of the UK. The Enhancement Led Institutional Review (ELIR) process in Scotland has more of an enhancement-led approach.

7. Funding

- 7.1 There should be no additional fees for TNE reviews, as TNE should be incorporated into the Higher Education Review. It would therefore be reasonable to include TNE provision in the calculation for the overall QAA subscription.
- 7.2 However, the current funding model for QA is unsatisfactory. Student numbers are a very poor indicator of costs to the QAA of quality assurance. This is equally true of TNE. We question whether student numbers is a reasonable metric for apportioning costs.