

# QUALITY ASSURANCE OF CROSS-BORDER HIGHER EDUCATION

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Final report of the QACHE Project

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TARIQ AL-SINDI, RAFAEL LLAVORI, KATRIN MAYER-LANTERMANN, JAGANNATH PATIL,  
PAULA RANNE, SOLANGE PISARZ, KAREN TRELOAR, FABRIZIO TRIFIRO



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# TABLE OF CONTENTS

<b>Executive summary .....</b>	<b>1</b>
<b>Chapter 1: Background.....</b>	<b>3</b>
1.1 Defining CBHE and existing guidelines.....	4
<b>Chapter 2: Introduction to the QACHE project .....</b>	<b>8</b>
2.1 Aims of the project .....	9
2.2 Phases of the project .....	9
2.2.1 Surveys.....	9
2.2.2 Country reports.....	9
2.2.3 Regional forums .....	10
2.2.4 Dissemination conference.....	10
2.2.5 Toolkit .....	10
2.2.6 Recommendations to policymakers .....	11
2.2.7 Good practice cases.....	11
2.2.8 Survey on the implementation of the Toolkit.....	11
<b>Chapter 3: Main findings .....</b>	<b>12</b>
3.1 Surveys on CBHE.....	12
3.1.1 Gulf region.....	12
3.1.2 Asia-Pacific region .....	13
3.1.3 European QA agencies .....	14
3.1.4 European providers of CBHE .....	15
3.2 Country reports: main obstacles and challenges of CBHE and its quality assurance .....	17
3.2.1 Australia.....	17
3.2.2 France.....	19
3.2.3 Germany .....	20
3.2.4 Spain.....	24
3.2.5 United Kingdom .....	25
3.3 Outcomes of regional expert forums.....	33
3.4 Outcomes of the dissemination conference.....	33
3.5 Toolkit for Quality Assurance Agencies.....	35
<b>Chapter 4: Conclusions .....</b>	<b>41</b>
<b>Chapter 5: Policy recommendations.....</b>	<b>41</b>
<b>References .....</b>	<b>43</b>
<b>ANNEX 1 - Examples of good practice.....</b>	<b>45</b>
<b>ANNEX 2 - Benchmark survey for QA agencies concerning the use of the Toolkit.....</b>	<b>50</b>

# FOREWORD

The QACHE project has its origins in a 2008 study on transnational education by the Academic Cooperation Association where it was asserted that the image of European-provided transnational education would be improved and enhanced by following a more concerted effort to share good practice, collaborate in the delivery of programmes abroad, and work together to support quality cross-border provision.

Thanks to support from the European Union's Erasmus Mundus programme, QACHE project partners have worked to improve and enhance the national and international oversight of quality assurance of cross-border higher education. Following their research and discussions with international colleagues, they have contributed to the development of improved educational provision by producing a toolkit for QA agencies, recommendations for national and European policymakers, examples of good practice, and a pilot survey for further research. These results, as well as a summary of the work performed which led to their production, are contained in this final report, which aims to be a helpful resource not only for those institutions and agencies directly addressed herein but also for the international community that wishes to take the topic further.

I would like to extend my congratulations to the project consortium for their invaluable work and my sincerest thanks to all those who contributed to the surveys and discussions which informed the process.

**Dr. Pdraig Walsh**  
*President of ENQA*

# EXECUTIVE SUMMARY

The European Association for Quality Assurance in Higher Education (ENQA) was granted funding for an Erasmus Mundus/Action 3 Project entitled “Quality Assurance of Cross-border Higher Education” (QACHE). The project was implemented between 1 October 2013 and 31 March 2016, and it looked closely into different ways in which European quality assurance (QA) agencies and higher education institutions (HEIs) address the quality assurance of the programmes delivered outside of their countries. The project aimed at enhancing policy dialogue within European countries and between Europe and other world regions, thus enhancing the mutual understanding of different approaches to cross-border higher education (CBHE), its quality assurance, and to develop the field further.

The partnership involved QA agencies from four European provider countries, a main provider country outside Europe (Australia) and the two main host regions of European cross-border education (the Gulf and Asia-Pacific regions). The partnering organisations included: the German Accreditation Council (GAC), the High Council for the Evaluation of Research and Higher Education (HCERES, France), the National Agency for Quality Assessment and Accreditation (ANECA, Spain), the Quality Assurance Agency for Higher Education (QAA, United Kingdom), the Tertiary Education Quality and Standards Agency (TEQSA, Australia), the Arab Network for Quality Assurance in Higher Education (ANQAHE), and the Asia-Pacific Quality Network (APQN).

The project involved several data collection phases: a preparation of country reports, supported by interviews, the design and distribution of surveys to QA agencies in the three regions and to selected HEIs in Europe, the organisation of three regional forums, the formulation and publication of a Toolkit on the quality assurance of CBHE, and the organisation of the dissemination conference.

The project began with an understanding that rather little was known about the quality assurance of CBHE. The findings in the project confirmed that the field of quality assurance in CBHE is rather patchy, with gaps in the understanding of the process among all stakeholders, especially among QA agencies and HEIs.

During the data collection phases it was highlighted that there indeed is a need to enhance the national and international oversight of CBHE, as it is currently not very comprehensive. In the Gulf and Asia-Pacific regions, CBHE is gaining popularity, although expertise and capacity-building are needed. Overall, it was found that there is an absence of a common approach for quality assuring CBHE and an especial lack of developed systems for the quality assurance of outbound CBHE. In fact, there is no comprehensive information yet available about outbound CBHE in the surveyed countries. When quality assuring cross-border provision, responsibilities between sending and receiving countries’ agencies are often not clear. There is thus a strong need to further address the lack of information about CBHE and different national regulatory approaches to it. Strengthening cooperation between QA agencies from different regions is seen as the way forward to facilitate and enhance

information exchange, policy dialogue, and the regulation of CBHE. Regional networks, such as ENQA, ANQAHE, and APQN, were seen as key players in addressing the identified information and cooperation needs. Existing international guidelines, such as the UNESCO/OECD Guidelines for Quality Provision in Cross-border Higher Education<sup>1</sup> and the *Standards and guidelines for quality assurance in the European Higher Education Area*<sup>2</sup>, as well as existing national reference points were identified as solid bases for further development of the field.

To conclude, different - although interdependent - principles of cooperation can be formulated. The first principle is about making information about CBHE easily available. The second principle concerns proactive engagement in information-sharing with counterpart agencies sharing responsibilities for CBHE provision. The third principle is about liaising with one another at the agency level whenever intending to quality assure CBHE. The fourth principle is about seeking ways in which to cooperate when quality assuring CBHE provision. The fifth principle is addressed to regional networks of agencies, such as ENQA, ANQAHE, and APQN, challenging them to play a focal role in the facilitation of information sharing and cooperation in the quality assurance of CBHE. These points are highlighted in the QACHE Toolkit, which is hoped to bring assistance to QA agencies engaged or willing to engage in the quality assurance of CBHE.

Finally, it can be stated that CBHE does not only pose challenges, but also creates great opportunities for the sending and receiving countries by widening access to higher education, by addressing skills gaps, and by furthering global citizenship. The QACHE project aimed at facilitating the provision of quality CBHE to help stakeholders avoid regulatory gaps, unnecessary discrepancies, and duplication and to find enhanced ways of cooperation in the interests of the entire higher education community.

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1 UNESCO (2005): Guidelines for Quality Provision in Cross-border Higher Education. Available at: [http://www.unesco.org/education/guidelines\\_E\\_indd.pdf](http://www.unesco.org/education/guidelines_E_indd.pdf)

2 Standards and Guidelines for Quality Assurance in the European Higher Education Area (2015). Available at: <http://www.enqa.eu/index.php/home/esg/>

## CHAPTER 1: BACKGROUND

Since the 1980s cross-border higher education (CBHE), the mobility of students, academic staff, programmes/institutions, and professionals, has been gaining ground as an important form of international higher education. While the United Kingdom and Australia were pioneers in the development of such provision, and are still among the main provider countries worldwide, the last decade especially has seen a significant increase of CBHE provision in a number of European countries.

Higher education institutions (HEIs) engage in CBHE for a number of reasons, but international competitiveness, along with collaboration, seem to be the leading motivational factors. Several countries have invested in CBHE initiatives in order to raise the profile of their foreign offerings and to enhance their attractiveness. Furthermore, CBHE is seen as an important element in the internationalisation of national education systems.

CBHE has not only made its way to the policy agendas at the national level in a number of European countries, but it also features prominently at the European level: the Bologna Follow-Up Group's strategy for the external dimension of the Bologna process (2007)<sup>3</sup> indicates internationalisation is a tool to increase the competitiveness of European higher education, and it invited the signatory countries of the European Higher Education Area (EHEA) to develop strategies and measures to better position European higher education in the global context. As a significant strand of internationalisation of higher education, CBHE has strong potential in supporting the activities aiming at increased competitiveness and attractiveness of European higher education.

As recommended by the High Level Group on the Modernisation of Higher Education (2013)<sup>4</sup> in their report to the European Commission,

Higher education institutions should develop and implement holistic internationalisation strategies as an integral part of their overall mission and functions. Increased mobility of student and staff, international dimension of curricula, international experience of faculty, with a sufficient command of English and a second foreign language and intercultural competences, transnational delivery of courses and degrees, and international alliances should become indispensable components of higher education in Europe and beyond.

For the purposes of this project and in an effort to narrow the focus on CBHE to those aspects which pertain especially to quality assurance (QA) agencies, the definition of CBHE henceforth refers to any learning activity in which the students are based in a country different from that in which the institution providing (mainly) the education is located but excluding student mobility. When planning for this project, it was rather clear that European

<sup>3</sup> European Higher Education in a Global Setting. A Strategy for the External Dimension of the Bologna Process (2007). Available at: <http://www.ehea.info/Uploads/Global%20context/Strategy-for-EHEA-in-global-setting.pdf>

<sup>4</sup> High Level Group on the Modernisation of Higher Education (2013): Report to the European Commission on improving the quality of teaching and learning in Europe's higher education institutions. Available at: [http://ec.europa.eu/education/library/reports/modernisation\\_en.pdf](http://ec.europa.eu/education/library/reports/modernisation_en.pdf)

HEIs, QA agencies in the provider and host countries, as well as national authorities face challenges in the area of quality assurance of CBHE, and those challenges had yet to be addressed sufficiently in related studies and initiatives. In addition, feedback received via various informal channels, such as international conferences and discussions with colleagues involved in international higher education, indicated that both agencies and HEIs struggle with locating the appropriate criteria and procedures to use for their CBHE activities. It appeared that there was no comprehensive picture on how and by whom cross-border provision is quality assured or accredited, what methods and criteria were used, and what kind of collaboration existed between institutions and agencies in the host and provider countries.

As for quality assurance<sup>5</sup>, it was considered that the most common approach at the European level is that CBHE is quality assured by the provider country alone or separately by both the provider and the host country (CHEPS 2012)<sup>6</sup>. In the first instance local recognition in the host country might be limited, reducing the attractiveness and possibly funding opportunities of the provision to students. In the second case, the recognition issues might be solved, but the CBHE initiatives might be subjected to two different – perhaps even conflicting – quality assurance procedures demanding time, money, and human resources. When planning for this project, it was concluded that there was a clear need for practically oriented support and the creation of a European approach to CBHE quality assurance. However, it was quickly realised that the QACHE project could only serve as a starting point, albeit one particularly well suited for initiating a dialogue between Europe and countries outside the EHEA

## 1.1 DEFINING CBHE AND EXISTING GUIDELINES

The OECD-UNESCO *Guidelines for Quality Provision in Cross-border Higher Education* (2005)<sup>7</sup> define cross-border education as any education provision in which “the teacher, student, programme, institution/provider, or course materials cross national jurisdictional borders”. In the case of full degree programmes or branch campuses, this usually – though not always – means that the student is placed in a country different from the country in which the degree is awarded. The provision can take different forms. The distinction between programme mobility and provider mobility is made by Jane Knight in the 2006 UNESCO publication *Higher Education Crossing Borders*.<sup>8</sup>

5 For the purpose of this document “quality assurance” is intended to cover all types of external review activity, including accreditation.

6 Cremonini, L. et al (2012): Impact of Quality Assurance on Cross-Border Higher Education. Center for Higher Education Policy Studies (CHEPS). Available at: [https://www.utwente.nl/bms/cheps/publications/Publications%202012/Cremonini,%20Epping,%20Westerheijden%20C12DW012%20Publicatie%20inqaah\\_e\\_case\\_study\\_report-final-0201.pdf](https://www.utwente.nl/bms/cheps/publications/Publications%202012/Cremonini,%20Epping,%20Westerheijden%20C12DW012%20Publicatie%20inqaah_e_case_study_report-final-0201.pdf)

7 UNESCO (2005) *Guidelines for Quality Provision in Cross-border Higher Education*. Available at: [http://www.unesco.org/education/guidelines\\_E.indd.pdf](http://www.unesco.org/education/guidelines_E.indd.pdf)

8 Knight, J. (2006): *Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education*. A Report Prepared for the Commonwealth of Learning and UNESCO. Available at: <http://unesdoc.unesco.org/images/0014/001473/147363E.pdf>

According to Knight, programme mobility can be distinguished into the following modes<sup>9</sup>:

*Franchise*

*This is an arrangement whereby a provider in source Country A authorizes a provider in Country B to deliver course/program/service in Country B or other countries. The qualification is awarded by the provider in Country A. Arrangements for teaching, management, assessment, profit-sharing and awarding of credit/qualification are customized for each franchise arrangement and must comply with national regulations (if they exist) in Country B.*

*Twinning*

*In a twinning situation, a provider in source Country A collaborates with a provider in Country B to develop an articulation system that allows students to take course credits in Country B and/or in source Country A. Only one qualification is awarded by the provider in source Country A. Arrangements for twinning programs and awarding of degrees usually comply with national regulations of the provider in source Country A.*

*Double/joint degree*

*This is an arrangement where providers in different countries collaborate to offer a program for which a student receives a qualification from each provider or a joint award from the collaborating partners. Arrangements for program provision and criteria for awarding the qualifications are customized for each collaborative initiative in accordance with national regulations in each country.*

*Articulation*

*Various types of articulation arrangements between providers situated in different countries permit students to gain credit for courses/programs offered by all of the collaborating providers. This allows students to gain credit for work done with a provider other than the provider awarding the qualification.*

*Validation*

*Validation arrangements between providers in different countries allow Provider B in the receiving country to award the qualification of Provider A in the source country. In some cases, the source country provider may not offer these courses or awards itself, which may raise questions about quality.*

*Virtual/distance*

*This is an arrangement where a provider delivers courses or a program to students in different countries through distance and online modes. It may include some face-to-face support for students through domestic study or support centres.*

<sup>9</sup> Knight, J. (2006): Higher Education Crossing Borders: A Guide to the Implications of the General Agreement on Trade in Services (GATS) for Cross-border Education. A Report Prepared for the Commonwealth of Learning and UNESCO. Available at: <http://unesdoc.unesco.org/images/0014/001473/147363E.pdf>

Knight lists different forms of cross-border provider mobility as follows:

*Branch campus*

*A provider in Country A establishes a satellite campus in Country B to deliver courses and programs to students in Country B (Country A students may also take a semester or courses abroad). The qualification awarded is from the provider in Country A.*

*Independent institution*

*Foreign Provider A (a traditional university, a commercial company or alliance/network) establishes in Country B a stand-alone higher education institution to offer courses/programs and awards. There is usually no "home institution" in Country A and it is therefore independent.*

*Acquisition/merger*

*Foreign Provider A purchases part of or 100% of the local higher education institution in Country B.*

*Study centre/teaching site*

*Foreign Provider A establishes study centres in Country B to support students taking their courses/programs. Study centres can be operated independently or in collaboration with local providers in Country B.*

*Affiliation/networks*

*Different types of "public and private," "traditional and new," "local and foreign" providers collaborate through innovative types of partnerships to establish networks and institutions to deliver courses and programs in local and foreign countries through distance or face-to-face modes.*

*Virtual university*

*Provider A delivers credit courses and degree programs to students in different countries through distance education, using predominantly the Internet technology mode, generally without face-to-face support services for students.*

The way in which the quality of CBHE is assured underpins the credibility and acceptability of schemes to promote the mobility of learning across national borders and the international recognition of qualifications. The OECD-UNESCO Guidelines<sup>10</sup>, which are intended to provide orientation to developing CBHE and international cooperation in this area and are not meant as normative or binding criteria, provide an authoritative approach to quality assurance of CBHE across the world.

<sup>10</sup> UNESCO (2005): Guidelines for Quality Provision in Cross-border Higher Education. Available at: [http://www.unesco.org/education/guidelines\\_E.indd.pdf](http://www.unesco.org/education/guidelines_E.indd.pdf)

The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) developed in 2007 *Guidelines of Good Practice in Quality Assurance*<sup>11</sup> which also include a reference to CBHE in that they require QA agencies to have “policies related to both imported and exported higher education”.

To support the development of national regulatory frameworks for CBHE, UNESCO and the Asia-Pacific Quality Network (APQN) published a toolkit on this subject in 2007<sup>12</sup>. The toolkit is directed at national level policymakers and provides practical guidance on the development of appropriate frameworks for the accreditation and quality assurance of CBHE in both the provider and host countries. The toolkit does not, however, address QA agencies or HEIs specifically.

In order to attend to the Asia-Pacific region’s specificities further, its diversity of economic, social, and political systems, cultural traditions, as well as values and languages - all of which are reflected in the respective higher education systems - the so-called CHIBA principles<sup>13</sup> were formulated in 2008. They are designed to provide guidance to both HEIs and QA agencies for the enhancement of their policies and practices.

The revised version of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG 2015)<sup>14</sup>, co-written by the European Association for Quality Assurance in Higher Education (ENQA), the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE), the European Students’ Union (ESU), and in cooperation with Education International (EI), Business Europe, and the European Quality Assurance Register for Higher Education (EQAR), were adopted by the EHEA ministers in 2015. The ESG have become widely used in Europe both for external quality assurance (EQA) as well as for internal quality assurance (IQA). The ESG do not make explicit reference to CBHE apart from the assertion that “institutions should be able to demonstrate their quality at home and internationally”.

In 2009, the ministers responsible for higher education in the EHEA expressed that CBHE in Europe should be governed by the ESG and be in line with the OECD Guidelines. However, it can also be concluded that quality assurance of CBHE is still a challenge and in many cases is not even implemented due to ambiguous legal frameworks. While CBHE is expected to be of “comparable quality” to education provided “at home” in the provider country (thereby enabling students to achieve the same learning outcomes regardless of the place of delivery), there are no specific criteria at the European level to assess this and no consistent approach to ensure that it happens.

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11 INQAAHE (2007): The Guidelines of Good Practice in Quality Assurance. Available at: [http://www.inqaahe.org/admin/files/assets/subsites/1/documenten/1231430767\\_inqaahe---guidelines-of-good-practice\[1\].pdf](http://www.inqaahe.org/admin/files/assets/subsites/1/documenten/1231430767_inqaahe---guidelines-of-good-practice[1].pdf)

12 UNESCO (2009): The UNESCO/APQN Toolkit: Regulating the Quality of Cross-Border Education. Available at: <http://unesdoc.unesco.org/images/0014/001464/146428e.pdf>

13 APQN (2008): Higher Education Quality Assurance Principles for the Asia-Pacific Region. The need for quality assurance principles for the Asia-Pacific Region. Available at: [http://www.apqn.org/files/virtual\\_library/other\\_reports/higher\\_education\\_quality\\_assurance\\_principles\\_for\\_the\\_asia\\_pacific\\_region\\_chiba\\_principles.pdf](http://www.apqn.org/files/virtual_library/other_reports/higher_education_quality_assurance_principles_for_the_asia_pacific_region_chiba_principles.pdf)

14 Standards and Guidelines for Quality Assurance in the European Higher Education Area (2015). Available at: <http://www.enqa.eu/index.php/home/esg/>

**CHAPTER 2:**

# INTRODUCTION TO THE QACHE PROJECT

For the period of October 2013 to March 2016, ENQA coordinated the project “Quality Assurance of Cross-border Higher Education (QACHE)”, which was supported by the Erasmus Mundus programme of the European Union. The partnership involved QA agencies from four European provider countries, a leading non-European provider country (Australia), and the two main host regions of European CBHE (the Gulf and Asia-Pacific regions). The partnership thus comprised the following organisations: the Quality Assurance Agency for Higher Education (QAA, United Kingdom), the High Council for the Evaluation of Research and Higher Education (HCERES, France), the National Agency for Quality Assessment and Accreditation (ANECA, Spain), the German Accreditation Council (GAC), the Tertiary Education Quality and Standards Agency (TEQSA, Australia), the Arab Network for Quality Assurance in Higher Education (ANQAHE), and the Asia-Pacific Quality Network (APQN).

The project examined different ways in which European QA agencies and HEIs address quality assurance of programmes delivered outside of their countries. It should be noted again that in the framework of this project, CBHE refers to any learning activity in which the students are based in a country different from that in which the institution providing (mainly) the education is located. The focus of the project was on the movement of programmes, institutions, and course materials – thus excluding student mobility.

Overall it should be borne in mind that the definition of CBHE is a complex one, and the distinctions between categories may be vague. An educational offer (e.g. a programme) may be designed by one institution, delivered by another, and lead to a double degree. The project focused on provision which takes place in a country other than that of the main provider of the education and which would normally lead to a degree awarded by the provider institution. The basic assumption was that collaboration for the quality assurance of CBHE is necessary and desirable, whether delivery is provided collaboratively or by the provider institution alone.

## **2.1 AIMS OF THE PROJECT**

The QACHE project aimed at contributing to the enhancement of a policy dialogue within European countries and between Europe and other world regions on issues concerning quality assurance of CBHE and enhancing mutual understanding of different approaches to higher education and different methods in quality assurance. It aimed to support the further development of a European dimension in quality assurance, by addressing common standards, shared principles, and approaches for the quality assurance of CBHE by European providers, developing the international dimension of higher education, and facilitating and enhancing the engagement of European HEIs in CBHE delivery, thus reinforcing their presence, accessibility, and attractiveness in other parts of the world. The project aimed to contribute to the protection of students against low standard provision and issues related to the recognition of CBHE stemming from a lack of collaboration in quality assurance and to

further support the implementation of international and European standards and guidelines on quality assurance.

These aspects that have been addressed will hopefully, through the wide dissemination and implementation of the project's main deliverable, the Toolkit, facilitate institutional engagement in cross-border activities, guide QA agencies to support HEIs in complex transnational quality assurance procedures, and provide better guarantees of high quality provision and local and international recognition for students undertaking CBHE.

## **2.2 PHASES OF THE PROJECT**

### **2.2.1 SURVEYS**

Phase one of the QACHE project comprised a collection of good practices and information through three online surveys.

A survey was prepared for QA agencies in Europe with the aim to map the role of national QA agencies, the criteria, and processes used in the evaluation of CBHE; to detect the use and impact of international guidelines on national quality assurance practices of CBHE; and to collect information on good practices and challenges.

A second survey was addressed to QA agencies in the membership of the regional network partners, ANQAHE and APQN. The survey collected information on the "host country" context and perspective; collected information on good practice of cooperation with European agencies or institutions for the quality assurance and recognition of education delivered by foreign providers/leading to a foreign qualification; and detected needs, concerns, and legal conditions for quality assurance of imported higher education and recognition requirements.

A third survey was sent to CBHE providers in Europe (France, Germany, Spain, and the United Kingdom). It aimed to investigate the institutions' views on the current criteria, standards, and procedures in place at their respective universities and to collect information on the type of support the institutions need from QA agencies.

All three surveys contained both closed questions (to enable comparison and production of data) as well as open questions, in particular to identify challenges and good practices. The outcomes of the surveys are presented in Chapter 3.

### **2.2.2 COUNTRY REPORTS**

Phase two of the project included the preparation of country reports and the identification of case examples and good practices based on desk research and phone interviews in four European provider countries, as well as in Australia. The preparation of the country reports proved to be an important phase for the project partners to form an overall view of CBHE in the participating countries.

### 2.2.3 REGIONAL FORUMS

In order to validate the findings of phases one and two, and to support the development of the final project outcomes, three regional events were organised in 2014-2015.

The European Expert Forum was organised on 5-6 November 2014 in London, United Kingdom, hosted by BPP University and co-organised by QAA. The forum gathered around 40 participants, including project partners and Advisory Board members, HEI and QA agency representatives, as well as invited experts. It was organised in order to validate the results of the research at the European level and to support the development of the project outcomes.

The Gulf Regional Forum was organised on 19-20 November 2014 in Manama, Bahrain. This was a regional forum hosted by ANQAHE and targeted ANQAHE's member agencies in the Gulf region. The aim was to verify and collect further information on the host perspective; to inform the partner countries of the state of quality assurance of CBHE in Europe; and to facilitate the creation of collaborative links between European and non-European QA agencies and authorities. The event gathered around 30 participants from QA agencies and other relevant actors in CBHE. The event took place after the data collection in Europe was finalised and when the agency surveys in each of the regions were complete.

The Asia-Pacific Regional Forum was arranged in Macau, China, on 22-23 January 2015, hosted by Gabinete de Apoio ao Ensino Superior (GAES) and co-organised by APQN. The Macau event served an equivalent function as the event in Bahrain – it gathered around 35 participants from local QA agencies and other relevant actors in CBHE to verify and collect further information from the host perspective, to inform partner countries of the state of quality assurance of CBHE in Europe, and to discuss needs and opportunities for collaboration between agencies and relevant authorities in the future.

### 2.2.4 DISSEMINATION CONFERENCE

The final conference of the QACHE project was held on the premises of the High Council for the Evaluation of Research and Higher Education (HCERES) in Paris on 5-6 November 2015. The conference gathered over a hundred participants from 38 countries. The conference presented the main findings of the project, especially the regional views and most clearly defined challenges for the quality assurance of CBHE in Europe and in the partnering regions.

### 2.2.5 TOOLKIT

The main output of the project, the *Toolkit for Quality Assurance Agencies*, was published and presented at the project's final conference. It was designed to help QA agencies explore ways to fully harness the opportunities presented by CBHE and to avoid common challenges such as sub-standard education provision and the duplication of quality assurance procedures. The Toolkit was developed in the spirit of strengthened cooperation to better facilitate CBHE and to ensure the protection of students through the provision of high quality education across borders. It is presented in more detail in Chapter 3.

### **2.2.6 RECOMMENDATIONS TO POLICYMAKERS**

As the QACHE project has proven to identify major gaps in up-to-date information concerning CBHE and its provision, including regulatory frameworks, this report provides recommendations to enable the systemisation and development of CBHE frameworks in national contexts and at the European level. The first set of recommendations are aimed at policymakers at the national level, providing suggestions for the clarification of responsibilities between stakeholders and the development of relevant regulations and information provision for CBHE. The second set of recommendations are aimed at policymakers at the European level, as European-level support is seen as crucial when aiming at fully realising the potential and global reach of CBHE provision and its quality assurance.

### **2.2.7 GOOD PRACTICE CASES**

In addition to the above-mentioned phases of the project and their subsequent findings, this report presents two good case practices in order to illustrate actual collaboration in the quality assurance of CBHE. The chosen examples describe collaboration between Australia and Singapore and between the United Kingdom and the United Arab Emirates. These good practice cases are found as Annex 1.

### **2.2.8 SURVEY ON THE IMPLEMENTATION OF THE TOOLKIT**

As the QACHE project progressed, it became clear that, as different national systems operate according to different approaches, and the quality of CBHE involves a broad range of different stakeholders (such as governments, providers, and professional bodies), issuing advice to all the stakeholders would have been beyond the scope of what was feasible and useful during the project term. It was therefore decided that it would be more relevant to find ways to help support QA agencies (the work of which, it is assumed, will eventually help institutions and other stakeholders) by promoting better cross-border coordination and hence more efficient and effective quality assurance of CBHE. In order to assess the extent to which agencies are implementing the advice contained in the Toolkit (which was formulated in such a way as to make it relevant for all agencies, regardless of their national context), and to gain a better understanding of the challenges and limits that their operating context may pose (to the extent to which they can engage in cross-border cooperation), a pilot survey was developed. The pilot survey, presented in Annex 2, is intended as a suggestion for further research, to raise awareness, and to enhance agencies' efforts in the use and implementation of the Toolkit.

## CHAPTER 3.

# MAIN FINDINGS

### 3.1 SURVEYS ON CBHE

#### 3.1.1 GULF REGION

According to the survey carried out in the Gulf region, CBHE programmes are steadily gaining popularity. Approximately 60 percent of respondents indicated a significant presence of CBHE in terms of students, and all of the respondents believed the popularity of CBHE was growing. It appears that private for-profit universities are more involved in CBHE than any other type of education provider, and the United States is the leading provider country in the region.

While the growing presence of CBHE in the region is clear, it is not as clear how QA agencies perceive the quality and added value of CBHE. There is an obvious need for publicly available information about CBHE programmes and institutions in many of the region's countries. One of the critical shortcomings appears to be the lack of legal frameworks for CBHE in many of the surveyed countries. CBHE is also extremely under-regulated.

The main concern for CBHE in the region is the difficulties associated with the recognition of qualifications as well as their comparability. It is challenging to establish a balance in the responsibilities between provider and receiver countries and/or between the different actors within the same country (institution, government, other regulatory bodies, and QA agency) and the quality assurance processes in place. There tends to be a conflict of standards between local and foreign quality assurance systems as well as an absence of coordination between the two systems.

The degree of collaboration between quality assurance entities in matters related to CBHE in the region is still very weak. The main challenges in collaborating with QA agencies in the host country for the quality assurance of CBHE are the differences in the standards and regulations between the two countries and the challenge of harmonising panels which should include experts from both countries. Moreover there is the challenge of the reporting language, the governance of the reviews, and coordinating joint review visits (which come with additional preparations). Finally, a lack of clear regulations for monitoring the relationships may hinder a proper collaboration between the different parties.

Although there are many good practices in quality assurance of CBHE still to be developed and adopted in the region, some quite interesting examples already exist, such as memoranda of understanding with some international accreditation agencies, the organisation of joint review visits, and the development of a "Charter of collective requirements" for some qualifications to ensure alignment with quality assurance requirements in both countries. Overall, there is a clear need for expertise and capacity-building in the quality assurance of CBHE. Respondents indicated different needs, such as for seminars and workshops on the issue and opportunities for networking and collaborating with partners in other countries who can share successful experiences in CBHE.

### 3.1.2 ASIA-PACIFIC REGION

In the Asia-Pacific region, CBHE provision is available in most of the respondent countries or territories, and it is growing. In terms of the number of students, the role of CBHE provision in Asian countries seems to be marginal. Branch campuses and affiliations or networks appear to be the major forms of provision - followed by categories like virtual universities and independent institutions. Articulation, twinning, and double or joint degrees are the most popular types of programme mobility in respondent countries.

Australia, the United Kingdom, and the United States are the biggest CBHE providers in the region. Undergraduate programmes constitute a major share of programme and provider mobility compared to graduate and doctoral programmes. Decreasing outbound student mobility (due to the increasing costs of studying abroad and restrictions related to access and/or visa issues) are considered as the main reason for the development of CBHE in the region. Comparability of qualifications is noted as a major concern, and a large section of respondents (68%) have legal and other issues related to recognition procedures and requirements of higher education delivered by foreign providers and/or leading to a foreign qualification.

About 36 percent of the respondents perceive that imported CBHE by European providers is considered to be of higher quality compared to local provision, while about 26 percent consider it is of same quality. The majority of respondents (68%) agree that CBHE has had a positive influence on the national education systems in the respective countries, for instance in terms of academic standards and access to education. Lack of coordination between quality assurance processes between the sending and receiving countries is regarded as a key challenge to CBHE.

About 57 percent of respondents note that their country or territory has a specific regulatory framework on quality assurance of imported CBHE. For 58 percent of respondents, imported CBHE is subject to compulsory quality assurance procedures. CBHE categories such as branch campuses, independent institutions, and acquisitions or mergers are more likely to be subjected to quality assurance procedures than other types of provision. Double and joint degrees or articulation are subject to quality assurance procedures by the receiving country's agency in the majority of cases. Local regulations, locally developed guidelines for CBHE, and international guidelines such as the OECD/UNESCO Guidelines or the UNESCO/APQN Toolkit are used as frames of reference for quality assurance procedures in most cases.

Using both the agency's home and foreign country's framework for EQA seems to be the most popular approach for assessing imported CBHE provision. Over 62 percent indicate that criteria and procedures used in assessing imported CBHE do not differ from those used for the quality assurance of local higher education provision. It was noted that the level of awareness and participation of higher education stakeholders in implementing the UNESCO-OECD guidelines is low among various stakeholders.

A good number of agencies (58%) have some kind of collaboration with provider country QA agencies and/or HEIs for the purpose of quality assurance of imported CBHE. Collaboration covers issues such as information sharing and joint quality assurance procedures. Respondents experience that a lack of dialogue, restricted information sharing, and problems relating

to cultural issues are sometimes impediments to collaboration. Furthermore, language barriers, lack of national information centres, and the absence of multilateral agreements are considered key challenges. Respondent agencies fully support the need for collaboration and networks in sharing of experiences and good practices on the quality assurance of CBHE. The need for capacity-building for the development of the quality assurance of CBHE processes is stressed in many countries. Also, there is an increased need for public sources of information (in respective national contexts) from which students and other stakeholders can find out whether a cross-border provision (programme or institution) is recognised, licensed, and/or quality assured by any national authorities.

When considering these results, however, it needs to be kept in mind that they have some limitations. At the time of the survey, APQN had 52 members that were quality assurance bodies. The 19 responses used in this analyses may not be sufficiently representative to draw generalisations. Also, the data was not subjected to a cross-check, and the survey analyses were not supplemented by other means. Despite these limitations, the survey results describe the recent situation in the region and present some key trends concerning the quality assurance of CBHE.

### **3.1.3 EUROPEAN QA AGENCIES**

In the survey sent to QA agencies in Europe (members and affiliates of ENQA), the gathered data shows a rather blurred picture concerning any commonalities in the quality assurance of CBHE. It is rather clearly indicated that there is no specific framework in the different countries concerning the quality assurance of CBHE. For QA agencies, it seems that the quality assurance of CBHE is, in many cases, still in the early stages.

Similarities in the features of provider and programme mobility are widely shared throughout the European setting. According to the responses, 80 percent of QA agencies pay attention to CBHE provision "at home", but the level of regulation appears to be low. In some countries only private HEIs and their provision are regulated.

Joint/double degrees are the most common form of CBHE where quality assurance is applied; according to the QA agencies, it is present in 90 percent of the responses. Forms of provision, such as virtual and distance learning and the various types of delivery under this tag, are becoming an increasing area of interest in the EHEA. At the same time, many challenges remain when discussing virtual and distance learning. Most of the CBHE practices are conducted through memoranda of understanding between quality assurance bodies. Student protection is often the main priority when engaging in the quality assurance of CBHE.

Agencies would like to see a clearer framework be put in place for the quality assurance of CBHE. Existing guidelines, such as the OECD/UNESCO Guidelines, should be promoted more in order to better understand the specificities of the quality assurance of CBHE. Concerning issues on recognition and authorisation of degrees, there are several actors involved, such as governments, ENIC-NARIC networks, QA agencies, and institutions. It would be beneficial to strengthen collaboration between these actors, in order to also make roles clearer. At the same time, networks of QA agencies are seen as crucial in disseminating good practices among their members and in providing information to different audiences.

In the survey, respondents name some possible challenges concerning engagement in the quality assurance of CBHE: the lack of systematised mechanisms for cooperation between involved agencies, costs of collaboration, challenges in recognition, language barriers, cultural differences, and particularities and differences in quality assurance methodologies. Overall, the survey addressed to QA agencies in Europe gave a picture of a very uneven landscape which is still in the making. The diversity of providers and types of provision in CBHE is currently combined with a large variety of quality assurance systems.

### 3.1.4 EUROPEAN PROVIDERS OF CBHE

The survey was addressed to institutions in the core European provider countries of CBHE: France, Germany, Spain, and the United Kingdom. A sample was selected with support from the European project partner agencies and in proportion to the number of institutions that were engaged in CBHE (higher number of institutions in countries with a higher number of CBHE initiatives).

The survey was sent to 47 HEIs in June 2014, and 21 responses were recorded. Although the response rate can be considered satisfactory, it should be noted that most of the questions in the survey were answered by less than half of the respondents. Also, the vast majority of responses were from Spanish institutions (12), five from the United Kingdom, and two each from France and Germany. Therefore, hardly any conclusions can be made from the answers. It might be that the questions focused too much on the national level (regulatory frameworks, national guidelines), while representatives of HEIs may have only been prepared to answer questions regarding individual CBHE initiatives at the institutional level. This report thus gives only some very modest observations based on responses to the survey. Of the universities that responded, most were public universities, excepting a few which were private non-profit universities and public institutions similar to university colleges or universities of applied science.

As regards institutional frameworks concerning CBHE, it remains unclear whether there are any, or whether the issue is that they are not properly communicated to the programmes. It is unclear whether there is some strategic approach to CBHE in the universities or whether it solely depends on individual initiatives. Nevertheless, affiliation/networks and branch campuses are the most popular forms of exported education, as almost half of the respondents claim they are engaged in these forms of cross-border provision.

Double/joint degrees is the most common category of provided CBHE; 75 percent of the respondents claim to be engaged in such provision. A bit more than half of the respondents (57%) are engaged in various types of articulation arrangements, and virtual/distance learning arrangements are present according to 50 percent of the respondents.

Half of the respondents (eight out of 16) state that there is no specific regulatory scheme for CBHE provision in their countries but that the same provision applies as for home-delivered higher education. One-third (33%) of respondents do not know what scheme applies. Eight (out of 16) respondents stated that, in addition to legislation, there are policies in their country at national/regional level that support the quality assurance of CBHE, and these policies are ranked as "highly relevant" (56%) for CBHE. National/regional guidelines specifically designed for CBHE are mentioned by three universities (20%). The international

guidelines are barely known; the INQAAHE Guidelines are not mentioned by any respondent, while the UNESCO/APQN Toolkit is mentioned by only one.

Similar answers were seen in response to the question “Which of the following frames of reference does your institution take into account for the internal assessment of exported higher education?”, as there is really no consideration of specific frames of reference concerning CBHE. Instead, the majority of respondents state they consider national/regional legislation (77%) or the ESG (54%).

Risk to the reputation of institutions can be considered as the most common concern with CBHE among HEIs, as 83 percent consider it a risk. Conflicting procedures in quality assurance can be seen as the second most common risk, as it is mentioned by 75 percent of the respondents. Half of the respondents consider there are challenges concerning recognition of qualifications in CBHE.

Quality assurance appears to have a central role according to institutions: adequate quality assurance and systematic cooperation with local authorities are needed to protect the reputation of HEIs and to support recognition. However, at the same time, most of the respondents (58%) do not know whether their national QA agency cooperates with the host country’s QA agency/agencies. In comparison, 58 percent (seven out of 12) indicate that their institution cooperates with the host country’s QA agency or accreditation authority. Some expectations towards QA agencies were recorded: QA agencies should be aware of the different regulatory frameworks in the host country and should work with local QA agencies to match differing requirements, to ensure recognition. QA agencies should enable more flexible approaches that can be adapted to different situations and cases (such as international ventures, joint programmes, etc.). They should provide information on the regulatory frameworks in different countries and on the (exporting) national higher education systems and their specific features, to be used in discussions with the host countries. In CBHE procedures, it is important to make use of knowledgeable individuals, those with an understanding of the regulatory framework and cultural context of the host country in CBHE-related assessments.

To conclude, according to the responses, in most of the countries CBHE does not seem to be a well-known phenomenon. Respondents are aware of little more than their own institution’s initiatives, and they were unable to classify their own initiative within a larger framework (e.g. analyse the typology of the provision or the wider national context). National strategies, policies, guidelines, and requirements are not well known, and there seems to be no mainstreaming of the issue. However, as stated earlier, as the survey was not comprehensively answered by most of the respondents and as the sample is small, only very modest conclusions can be made from the results.

Overall, the survey of providers confirmed the main findings from the surveys of agencies. Regulation of CBHE (whether inbound or outbound) and information about CBHE is found by most respondents to be sparse and often non-existent.

## 3.2 COUNTRY REPORTS: MAIN OBSTACLES AND CHALLENGES OF CBHE AND ITS QUALITY ASSURANCE

### 3.2.1 AUSTRALIA<sup>15</sup>

There are a range of challenges for TEQSA in regulating CBHE by Australian higher education providers. Some of the main challenges relate to the following:

- difficulties in determining whether student learning outcomes for courses delivered outside Australia are equivalent to those for the same course of study when delivered by the higher education provider, as required by the national Threshold Standards
- obtaining accurate information about a provider's full range of cross-border activities
- the understanding by overseas stakeholders (governments, regulatory/QA agencies) of Australia's higher education regulation and quality assurance framework
- lack of recognition of Australian awards in some countries (e.g. China)
- understanding of legislative and regulatory provisions in different countries
- resources to undertake thorough assessments of cross-border activities, including site visits
- language and cultural differences, which affect interactions including interpretation of documentation, interviews with stakeholders, and effective liaison between agencies
- access to partner and delivery sites (and thus physical and learning facilities)

For institutions, there is a range of overarching risks and challenges associated with cross-border operations that are documented and applicable to Australian providers. Those highlighted by McBurnie and Ziguras<sup>16</sup> include:

- difficulties in costing offshore operations
- risks associated with changing government/regulatory requirements in the host country
- cost of meeting both Australian and host country regulatory/quality assurance requirements
- risks in funneling staff time and other resources away from education responsibilities in Australia, with a potential reduction in the quality of offerings onshore
- transnational education offered may be of poor quality, using poorly structured, outdated curriculum materials without proper pedagogical support (e.g. sending country lecturer's PowerPoint slides as subject notes, without any further elaboration or context)
- imported curriculum may be culturally inappropriate without appropriate adaptation

15 This chapter directly extracts from report by TEQSA (2014): Quality Assurance of Cross-border Higher Education Australia Country Report. Available at: <http://www.enqa.eu/wp-content/uploads/2015/07/QACHE-Country-Report-Australia.pdf>. Contributors to the report: Dorte Kristoffersen, Patricia Roessler, Lucy Schulz, Curtin University Australia and RMIT University.

16 McBurnie, G. and Ziguras, C. (2011): 'Global Trends in Quality Assurance for Transnational Education' in Quality Assurance of Transnational Higher Education - The Experiences of Australia and India, Stella, A and Bhushan, S (eds), Australian Universities Quality Agency and the National University of Education Planning and Administration, pp 19-32.

In 2010, AUQA (predecessor of TEQSA) undertook an analysis of its audit reports from 2002 relating to cross-border activities and identified a number of areas that had been noted within the reports as requiring improvement. These included:

- inappropriate arrangements with third parties, due to inadequate due diligence processes and/or poor business planning and management practices (including a lack of monitoring contract and agreement provisions)
- a limited number of personnel being involved in the decision-making and review processes of the contracts and agreements
- in some cases, poor control over the standard of teaching and assessment
- the capacity of higher education providers to monitor the accuracy of marketing information provided to stakeholders when in a language other than English
- appropriate verification of original enrolment application documentation
- consistency in determination of advanced standing for enrolling students given differences in national higher education systems
- maintenance of English language entrance standards
- performance appraisal and support for staff to internationalise course content
- staff support and professional development related to cultural awareness
- securing appropriately qualified and experienced staff offshore
- reconsideration of pedagogical models to place greater emphasis on equivalence of learning outcomes
- adequacy of assessment feedback to students, where assessment is undertaken by a third party/partner (noting that moderation processes do not always account for this issue)
- access to library electronic resources for students studying outside Australia
- location-specific pastoral support for students<sup>17</sup>

### **Support needs: what are institutions' expectations towards agencies? Data to be taken from the survey and interviews**

Because of the mature nature of Australian providers offshore operations, and TEQSA's relative newness, Australian higher education providers have not been very explicit in their expectations of TEQSA. However, through discussions with providers, the following issues have been raised:

- mutual recognition of regulatory approaches between countries to reduce regulatory burden of providers
- collaboration with other agencies in order to reduce documentation required for regulatory processes
- clarity of TEQSA's approach to regulating offshore provision<sup>18</sup>

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<sup>17</sup> Stella, A. (2011): 'Quality Audit of the Transnational Education Operations of the Australian Universities' in Quality Assurance of Transnational Higher Education - The Experiences of Australia and India, Stella, A and Bhushan, S (eds), Australian Universities Quality Agency and the National University of Education Planning and Administration, pp 59-76.

<sup>18</sup> refer to TEQSA information sheet at: [www.teqsa.gov.au/for-providers/provider-resources](http://www.teqsa.gov.au/for-providers/provider-resources)

### 3.2.2 FRANCE<sup>19</sup>

#### **Main obstacles and challenges for agencies**

The main problem for French agencies is the lack of centrally collected information with regard to the number and nature of courses exported. It is possible to discuss the French higher education system as a whole, but analysing it requires wading through the multiplicity of supervisory bodies and organisational differences depending on the various disciplines or levels: art and architecture schools fall under the auspices of the French Ministry of Culture, nursing schools under the French Ministry of Health, etc.

Despite the many sources available, obtaining an “overall” vision of exported higher education turned out to be impossible during the study. Furthermore, most of the information gathered was based on declarations. While the issue of “foreign partnerships” is identified in the information communicated by the institutions, the nature of these partnerships is harder to interpret. It is sometimes impossible to differentiate between joint degrees, double degrees, degrees abroad, or basic cooperation partnerships for a programme. What is more, from one institution to another, the understanding and naming of these types do not always reflect the same reality. At the end of the day, one still wonders who is responsible for the quality assurance of CBHE.

French agencies are responsible, as stated in the legal texts, for evaluating HEI courses and degrees. Are they, however, mandated for evaluating courses abroad? Who should pay the costs associated with these evaluations? Furthermore, in this framework, it is difficult for a French agency to act alone. It may be necessary to envisage new, more automatically applicable cooperation mechanisms between agencies or authorities in the host country and the country where the course originates. The specific case of Diplômes Universitaires (DU) is even more relevant for courses abroad. In France, DUs are awarded by the HEI, as opposed to national degrees issued by the French Ministry, and are not subject to periodic external evaluation. DUs awarded by French institutions abroad are therefore not evaluated by HCERES. For these courses, universities are free to set the amount for tuition fees (in contrast to national degrees). They are therefore a major financial lever for universities. They are also generally financially independent, as they are funded by tuition fees. Since they do not require financial support from a supervising ministry in order for these programmes to operate, they are not subject to the quality assurance of a periodic evaluation.

#### **Main obstacles and challenges for institutions**

The first challenge which institutions must face is student demand. France is both one of the leading countries in the world for hosting foreign students (third host country in the world in 2012 according to UNESCO<sup>20</sup>), but also a country whose students are generally mobile, in comparison to its neighbours. In terms of students going abroad in 2006, outside the Erasmus programme, with 54,000 students enrolled abroad, “France is third, after Germany and Japan. If we include students in the Erasmus programme, that puts France second in the world, behind Germany and ahead of Japan. Comparing international mobility rates attenuates this healthy position slightly, but does not contradict it”.<sup>21</sup>

19 This chapter directly extracts from report by AERES (2014): Quality Assurance of Cross-border Higher Education. France Country Report. Available at: <http://www.enqa.eu/wp-content/uploads/2015/02/QACHE-Country-Report-France.pdf>

20 For more information see: <http://www.enseignementsup-recherche.gouv.fr/cid80133/la-france-3e-pays-le-plus-attractif-pour-les-etudiants-etrangers.html> (in French)

21 Cazin, E. and Piszcz, S. (2008) : “La mobilité sortante des étudiants français : éléments de mise en perspective”, in Les Notes de CampusFrance, no.14. Available at : [http://ressources.campusfrance.org/publi\\_institu/agence\\_cf/notes/fr/note\\_14\\_fr.pdf](http://ressources.campusfrance.org/publi_institu/agence_cf/notes/fr/note_14_fr.pdf)

Institutions will therefore be faced with the need to meet this demand, which is also expected to continue growing. Students going abroad used to go mainly to other countries in Western Europe, but this is now becoming more diverse, with many going to Scandinavia or the Pacific countries.<sup>22</sup> French institutions have therefore not only increased their range of partnership degrees, but also multiplied the countries with which they wish to reach agreements. Managing and making these agreements a reality is also a challenge. If institutions are left without support in this area, they are required to do preparatory work, day-to-day management, and follow-up, which require the investment of both human and financial resources. Once that is the case, the institutions are no longer playing on a level playing field. These inequalities risk creating competition between institutions, universities, and private colleges and French and foreign educational establishments. However, for the moment, the market approach which dominates among some of France's neighbours is not the approach used for French institutions.

Finally, while it has been possible for institutions to be historically focused on French-speaking countries or associated with France's colonial past, other countries are now showing interest in educational provision from France. French institutions will therefore probably need to keep a close eye on the quality and reputation of their courses in order to keep these partnerships viable. The search for new destinations and ways of exporting French courses abroad is also a challenge for these institutions.

### 3.2.3 GERMANY<sup>23</sup>

#### **Main obstacles and challenges for agencies**

For a national regulator<sup>24</sup> in the context of quality assurance of CBHE, questions concerning the scope of application of national accreditation rules arise. In general, the solution that German accreditation is only necessary in case of the award of a German degree seems reasonable. German regulators do not bear the same responsibility for the quality of foreign degrees as for national degrees. In case a foreign degree is awarded, quality assurance in the host country is compulsory. A duty to be accredited also in Germany would overtax the HEIs. In contrast, they may opt for quality assurance by a German agency, e.g. for reasons of reputation of German standards or for easier recognition of the awarded degree in Germany.<sup>25</sup> The question cannot be answered that easily in case of a CBHE programme offered by a German HEI which has a clear connection to Germany and is given a name making reference to that connection, as in the case of German-backed universities. If degrees of German partner HEIs are not awarded and thus German accreditation is not required, the question arises how the respective HEI can keep the promise of application of German standards.<sup>26</sup>

For the majority of German higher education projects abroad, however, degrees of German HEIs are awarded. Also in those cases there may be some uncertainties concerning the applicable rules. Those uncertainties may lead to a situation in which accreditation in

22 Cazin, E. and Pizarz, S. (2008) : "La mobilité sortante des étudiants français : éléments de mise en perspective", in Les Notes de CampusFrance, no.14. Available at : [http://ressources.campusfrance.org/publi\\_institu/agence\\_cf/notes/fr/note\\_14\\_fr.pdf](http://ressources.campusfrance.org/publi_institu/agence_cf/notes/fr/note_14_fr.pdf)

23 This chapter directly extracts from Mayer-Lantermann, K. (2014): Country Report Germany. Available at: <http://www.enqa.eu/wp-content/uploads/2015/02/QACHE-Country-Report-Germany.pdf>. For further information concerning footnotes, refer to the full report.

24 in the case of Germany mainly the Accreditation Council and the KMK

25 which in this case will apply standards based on the criteria of the Accreditation Council but which will not apply purely national standards

26 In case of funding by the DAAD the then binding external project evaluation may be an important element of quality assurance.

Germany of a newly started CBHE offer does not take place at all, e.g. as the programme abroad seems to be identical to a similar, already accredited programme offered by the German HEI in Germany. In such a case an easier accreditation procedure seems reasonable, which focuses on the differences between the offers domestically and abroad. However, it might be questionable in these cases whether one should refrain completely from accreditation according to German standards.

If German accreditation rules are applied, conflicts of national accreditation standards with foreign accreditation standards may arise. German national requirements concerning the standard period of study programmes, the number of credits awarded, the modularisation, or the degrees offered<sup>27</sup> may not fit the foreign national system. For example, the workload in countries such as China is traditionally higher than in Germany. Also the standard period of studies abroad might be very different than in the German system.<sup>28</sup> The rules of the Accreditation Council already face this problem and allow exemptions from German national rules on a case-by-case basis.<sup>29</sup> One may question, however, if the application of national regulations, in the case of transnational education, should not be replaced by a more trust-based approach. Such an approach will only work if flexibility and trust are strengthened on both sides.<sup>30</sup>

Partly different legal rules abroad reflect different values, e.g. if courses in politics are obligatory in natural sciences. There might also be differences in teaching and learning. In some countries, for example, rote learning and memorisation still prevail. In some countries the teacher is seen as an authority which must not be criticised by a student, which can make it difficult to establish course evaluation by students. For German HEIs planning cooperation it is important to be aware of such differences and to show sensitivity to other norms and values.<sup>31</sup> The same is true for accreditation agencies active in the field of CBHE, no matter if they are engaged in a procedure according to the rules of GAC or not. Training of experts should include those aspects. German agencies active abroad are all ENQA members and thus, in any quality assurance activity abroad, will usually apply the ESG. In case of too big cultural or legal differences agencies will refrain from such an activity.

The mentioned difficulties may also be a challenge for cooperation between QA agencies. Such cooperation would be needed to ease the burden of HEIs and to avoid duplicating quality assurance procedures. But cooperation will only work if the quality assurance systems of provider and host country are not completely different.<sup>32</sup> Sometimes quality assurance has

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27 as laid down in the Common structural guidelines of the Länder for the accreditation of Bachelor's and Master's study courses

28 See interview with Marion Moser, ACQUIN: The accreditation agency which regularly accredits study programmes of the German University Cairo, in the case of accreditation of engineering programmes had to face the problem, that the standard period of studies defined in the structural guidelines of the KMK, altogether (for Bachelor's and Master's study courses) must not exceed five years. This did not fit to the Egyptian system where in Engineering after five years only the Bachelor's degree is awarded and after two more years of study the Master's degree. The solution found was to have two different models, a study programme modelled after the German system and a study programme modelled after the Egyptian system

29 This exemption is laid down in the rules for the accreditation of joint programmes which could be applied accordingly in case if CBHE and already often are applied in practice, already; see e.g. interview with Marion Moser

30 Host countries for example may have input oriented norms for study programmes to be respected in case of a transnational study programme, e.g. in Egypt; see the interview with Marion Moser

31 See the interview with Wolfgang Hendricks: at the Vietnamese German University (VGU) German teachers motivate Vietnamese students to enter into discussion. Even if students like this new approach they still need more support if the ability to work independently is needed, e. g. when writing a Bachelor's or Master's thesis. See also Achim Hopbach, „Externe Qualitätssicherung von transnationalen Bildungsangeboten“, essay for the German Academic Exchange Service (DAAD)

32 See interview with Marion Moser: the German University Cairo (GUC) was not only accredited by the German agency ACQUIN but also had to get accreditation by the national Egypt accreditation agency NAQAAE. Documents are only available in Arab Language. A comparison of the criteria was, due to language problems, not possible. Accreditation criteria of NAQAAE have to consider the NARS which defines for each discipline a relatively strict curriculum-framework. Accreditation procedures and criteria seemed to be quite different from each other. For those reasons no cooperation took place between ACQUIN and NAQAAE

not been established yet in a host country or is in the process of being established. Also in these cases cooperation is difficult.<sup>33</sup> A German CBHE project abroad which is funded by the German Academic Exchange Service (DAAD) is required to obtain accreditation by a German accreditation agency and must undergo additional evaluation by the DAAD, which is why it might be worthwhile, as well, to explore ways to increase synergies between both quality assurance mechanisms.<sup>34</sup>

## **Main obstacles and challenges for institutions**

### ***The provider perspective***

Often CBHE projects in Germany are started bottom-up, based on the personal commitment of individual professors. Sustainable engagement in CBHE, however, requires capacity for teaching, curricular development, administration, quality assurance, etc., which can only be ensured with the support of the faculty, administration, and management of the sending HEI.<sup>35</sup> Projects which do not have this backing may die when the individuals whose initiative they rely on leave.

Another challenge is the financing of the project. According to the funding conditions of the DAAD, a project should be able to operate on a cost-covering basis in a mid-term perspective. One means to cover running costs are tuition fees. The DAAD learned that even well-established projects with a secure basis, such as German-backed universities, may need financial support for a longer period to be able to maintain close relations to Germany and to continue orientation towards German standards.

In addition, the complexity of endeavours like establishing and running a German-backed university requires an especially high degree of engagement. Projects of this type are often initiated top-down and are based on agreements at the political/governmental level.<sup>36</sup> They may require the formation of consortia of German HEIs, as the required engagement will overstretch the capacity of one university alone. This alone already is a complex task.

As mentioned previously, the establishment and running of a CBHE project also bears challenges related to the fact that the management and university teachers of a German HEI will be confronted with different norms and values.<sup>37</sup> Big differences concerning the partners' attitudes or a difficult political situation in the host country may hinder cooperation and possibly challenge an existing project.<sup>38</sup>

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33 See interview with Marion Moser, ACQUIN: ACQUIN also accredited study programmes of the GUTech in Oman in 2009. The national agency only was in the process of establishment at that time. A representative of the national agency took part in the preparatory meeting of the peer group but could not take part in the site visit because of scheduling problems. The national agency also got the expert's report.

34 See interview with Susanne Kammüller

35 This paragraph was especially inspired by the interview with Susanne Kammüller.

36 See for example the interview with Prof. Dr. Geiger concerning the establishment of the German-Jordanian University (GJU) or the interview with Wolfgang Hendricks concerning the establishment of the Vietnamese German University (VGU)

37 One minor challenge in this context might be to cope with different legal regulations in the participating countries concerning the establishment of double or joint degree programmes.

38 An example is the Wadi International University in Syria. The DAAD stopped its engagement in 2008 because the DAAD standards were no longer reached; see [http://de.wikipedia.org/wiki/Wadi\\_International\\_University](http://de.wikipedia.org/wiki/Wadi_International_University). Other host countries of German-backed universities may also be not that easy cooperation partners, for example the newly established German-Russian University who is funded by the DAAD: <https://www.daad.de/portrait/presse/pressemitteilungen/2014/26983.de.html>

### ***The recipient perspective***

Partner HEIs will likely face challenges which are in principle not different from those in national programmes or cooperations: they have to have a valid study concept and curriculum, adequate teaching staff, and qualified students, and they have to guarantee sufficient material resources and quality assure the programme. However, it is evident that the problems HEIs face in CBHE projects may also be different from those in purely national programmes. The curriculum will have to respond to the labour market needs of the host country.<sup>39</sup> It should be practice-oriented and, at the same time, maintain a high-level academic education according to German standards. The connection to Germany has to be clear, e.g. via study stays in Germany, German lecturers, and German language courses. Mostly the German partner HEIs are engaged in curriculum development, which means that cooperation also has to be organised in this respect.

Teaching is partly guaranteed via “flying faculty” of the German partner HEIs. But the financial compensation of such stays abroad is not high, and the permanent obligation to teach not only at home but also abroad may cause gradual fatigue. If local academic staff is engaged, in most cases in cooperation with “flying faculty” teachers, the procedures of appointment must guarantee their sufficient academic qualification. Thus German partner HEIs may be engaged in the appointment committees.<sup>40</sup> Lecturers from abroad and local academic staff have to cooperate despite different cultural backgrounds.

Admission conditions and procedures must lead to sufficient qualified students. German partner HEIs will often also be engaged in this field. Material resources have to be adequate, which is not an easy task, especially in disciplines like engineering and natural sciences.<sup>41</sup>

All the mentioned measures that have to be taken will contribute to the quality of the respective programme. Special quality assurance measures will have to be added. A clear share of responsibilities is needed in all areas of cooperation and also concerning quality assurance measures. If German partner HEIs award the degrees, they will have a greater responsibility for quality assurance than in case solely local degrees are awarded.<sup>42</sup> As quality assurance measures such as course evaluations by students often are not part of the tradition of the host countries or, which will constitute a real challenge, are seen very critical, the establishment of quality assurance measures will need time and, again, respect for the different cultural identity of the host country. As concerns EQA, the challenges agencies face and which were already detailed above will result in challenges for the HEIs engaged either in compulsory or voluntary external quality assurance measures.

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39 See interviews with Prof. Dr. Andreas Geiger and Wolfgang Hendricks.

40 See interview with Wolfgang Hendricks for the engagement of German partner HEIs in the appointment commissions of the VGU. In other cases Germans are able to guarantee German standards, e. g. in the context of appointment of academic staff, by being members in the main university bodies.

41 which are the disciplines most of German CBHE projects belong to. See interview with Wolfgang Hendricks: E. g. one German partner HEI provided its laboratories in some cases as the laboratories at the VGU were not yet well enough equipped.

42 In case of the VGU the German partner HEI's are responsible for the quality assurance as they award the degrees (see interview with Wolfgang Hendricks); in case of the GJU the GJU bears the responsibility for QA as it wards the degrees (see interview with Prof. Dr. Andreas Geiger).

### 3.2.4 SPAIN<sup>43</sup>

#### Main obstacles and challenges for agencies

In the case of Spain, there are a lot of challenges at the moment, especially since there is currently no specific quality assurance policy for CBHE. These challenges are also perceived as a great opportunity to improve some of the points raised during the different interviews carried out to inform this report. There is a need to:

- Reach a better centralisation and compilation of data regarding quality assurance of CBHE,
  - For official degrees offered abroad there is a possibility to centralise some data, but, in the case of the university's own degrees, which completely depend on the institution with no need of being accredited by a QA agency, there currently is no way to gather the corresponding data concerning the number of programmes offered, the knowledge area to which they are linked, the countries where they are implemented, or the type of receiving institution.
  - The structure of the quality assurance system in Spain, which is decentralised, is another point that should be taken into account when considering the amount of coordination between Spanish agencies that would be necessary.
- Disseminate the OECD/UNESCO guidelines for quality provision in CBHE: as part of the document, it is stipulated that the guidelines should be disseminated among all the stakeholders involved in the quality assurance of CBHE, and the QA agency which is directly in contact with the universities could be a channel for the dissemination of these guidelines.
- Drive actions to promote the Mutual Recognition of Accreditation Results regarding Joint Programmes (MULTRA)<sup>44</sup> and/or bilateral agreements with agencies abroad (joint accreditation, common frameworks, etc.) through e.g. observation missions and comparisons of systems: the challenge here is that it is time and money consuming for agencies and not always considered when the staff activities and budget are assigned.
- Face the methodological differences between agencies: agencies face the challenge of matching the evaluation criteria (whether for institutional evaluation, programme accreditation, a combination of both, focus on IQA systems of the institutions, etc.) which should be used between the two quality assurance systems.

#### Main challenges and obstacles for institutions

There is a need to:

- Define an internationalisation strategy in order to find a balance or priority between internationalisation at home (less developed but trending in Spain) and internationalisation abroad.
- Improve the level of languages.
- Face the increasing number of international HEIs with which national universities are collaborating and to maintain control of the quality of CBHE offered to safeguard their reputation.
- Provide better information to students going abroad (on the type of degree, recognition procedures, European credit transfer system, learning outcomes, etc.).

<sup>43</sup> This chapter extracts directly from report by ANECA (2014): Country Report - Spain. Quality Assurance of Cross Border Higher Education. Available at: <http://www.enqa.eu/wp-content/uploads/2015/02/QACHE-Country-Report-Spain.pdf>

<sup>44</sup> For more information, see: <http://ecahe.eu/home/services/joint-programmes/multra/>

Regarding the expectations of institutions towards agencies, it was mentioned in several interviews that agencies could develop their knowledge of rankings and support the universities in improving their results through greater visibility (HEIs asked for the identification, in a list, of the most internationalised HEIs).

### 3.2.5 UNITED KINGDOM<sup>45</sup>

Against a backdrop of predicted growth in the demand for CBHE coming from the United Kingdom, the consultation, strengthening the quality assurance of the United Kingdom's transnational education, was launched in December 2013, prompting what is an ongoing debate within the higher education sector about the challenges entailed. The first section gives an overview of the consultation results, focusing on some of the thornier issues it unearthed. The second section, drawing on the main points distilled from the interviews with CBHE providers and other organisations (in connection with the preparation of the current report), offers an insight into the challenges faced by higher education providers.

#### **Challenges for QAA identified from the consultation**

##### ***The challenge of dealing with expansion***

CBHE is developing quickly and takes on diverse forms with a level of risk that varies from country to country, from one CBHE model to another, and according to how the provision is managed by the provider. Both geographical and cultural distance can make managing CBHE more difficult than managing provision in the United Kingdom. Introducing a risk-based element into the quality assurance process for CBHE (as proposed by the Department for Business, Innovation & Skills [BIS] in its International Education Strategy)<sup>46</sup> is a way of directing attention and resources to where they appear to be most needed, anticipating problems that may be developing with a view to early prevention. It is important, however, to concentrate attention in quality assurance not just on activity that appears to be most risky, but also on showcasing good examples so as to improve the practice of others and have a positive impact on the reputation of the United Kingdom's CBHE in general.

The term "risk-based" has turned out to be an obstacle in itself, since a focus on provision perceived as risky, based on a risk-based approach, could lead those observing the process to conclude that any CBHE provision receiving external scrutiny from QAA must be a bad risk. In this context the main challenge is that of striking the balance between attention to risk and the prevention of problems on the one hand, and opportunities for quality enhancement and the demonstration of good practice on the other. Or, as one of the Professional, Statutory and Regulatory Bodies (PSRBs) interviewed for this report put it, "the UK is one of the big volume sellers [of CBHE], and there are a lot of countries - it's a question of how much resource and time balanced against risk and reputation that we have to oversee what is going on in the name of UK higher education."

<sup>45</sup> This chapter extracts from report by QAA, UK (2014): Quality Assurance of Cross-border Higher Education. Project UK Country Report. Available at: <http://www.enqa.eu/wp-content/uploads/2015/02/QACHE-Country-Report-UK.pdf>

<sup>46</sup> The BIS International Education Strategy indicated that the consultation should include in its proposals 'a significantly strengthened risk-based element to focus resource and attention where they are most needed.'

The risk-based question, a selection of responses:

*Providers with a good track record and which concentrate on the types of provision which carry less risk, should not receive the same scrutiny as providers with weaker track records, either through lack of experience, previous failings, or because of the type of provision they have chosen to undertake.*

*Any provision can be managed well or badly, so that low-risk activity can be managed badly, but might escape review under a risk-based analysis.*

*Such an approach would work against the promotion of enhancement and dissemination of good practice in UK TNE since the focus would be on poor practice.*

*If scrutiny is linked to risk then reputational damage may be done to institutions simply through the conduct of external quality assurance.*

### **The challenge of efficiently using resources**

From the standpoint of cost, it makes sense to tackle the quality assurance of transnational education from the United Kingdom to the extent that this can be effective. Within a given budget, greater coverage of provision is likely to be achieved through greater reliance on desk-based analysis, combined with video-telephony. The responses to the consultation revealed a high level of agreement with the idea that the review of low-risk CBHE provision in particular could be completed solely through desk-based analysis and in the United Kingdom. However, overseas visits were still perceived by many respondents as necessary to gain a full picture of how arrangements for the management of CBHE are implemented in practice, as well as to pursue issues related to the student learning experience. Such visits were also regarded as important to give visibility to the United Kingdom's quality assurance processes for the benefit of foreign governments and regulatory bodies. On this issue, responses from overseas QA agencies were unanimous in their view that country visits are essential to give a complete and accurate picture. The challenge remains of finding the most efficient and effective way to undertake overseas visits, while also using desk-based analysis whenever possible.<sup>47</sup>

A related issue is the extent to which the quality assurance of CBHE can be integrated within institutional review processes carried out in the United Kingdom. A strong view from the consultation was that institutional review should remain a holistic process and embrace CBHE proportionately. In that way, an assessment of the management of CBHE provision would be reflected in the summative judgements reached by institutional review teams. However, there was also recognition that institutional review processes might not have the capacity to deal with CBHE and would need to be modified to include longer review visits and larger review teams, especially for institutions with significant CBHE. In particular, including visits to overseas delivery sites as part of institutional review would pose again the resource challenge that QAA has so far addressed by containing costs through country-based reviews. Nevertheless, there was a clear message that overseas review and

<sup>47</sup> A challenge related to the desk-based analysis element of CBHE review, which was raised in one of the interviews for the project, is that of fine-tuning the information sets that providers are required to submit for analysis in order to avoid burdening them more than necessary.

institutional review should be complementary processes and closely aligned, with improved linkages between their respective review schedules, reports, and recommendations.

### ***The challenge of improving the information base***

One of the main challenges where CBHE is concerned is that there is not enough information about “what is going on in the name of UK higher education”. Some data is available from the Aggregate Offshore Record of the Higher Education Statistics Agency (HESA), and this is supplemented by survey data supplied by higher education providers to QAA for the target country or region selected for review. However the HESA data and the information from QAA surveys do not, together, provide a complete picture. The HESA data are collected routinely on an annual basis and are worldwide in scope, but limited in detail; the QAA surveys are conducted only as and when needed for particular country reviews.<sup>48</sup> QAA’s Quality Code anticipates that higher education providers will maintain records of their CBHE arrangements where these are subject to a formal agreement with a partner. However, such records do not follow any prescribed format and do not lend themselves to analysis across providers.

There was clear recognition in the responses to the consultation for the need to gather better information on the United Kingdom’s CBHE: in particular, that there should be regular collection of data on CBHE at both provider and programme level. But there is likely to be much less agreement on how this might be achieved, which will be an obstacle to making fast progress.

### ***The challenge of involving students***

The consultation also considered the extent to which attention to local cultural norms should influence the nature and extent of student engagement in the quality assurance of CBHE, including whether there should be a student reviewer in review teams. Some respondents were very clear in their support for the adoption of the United Kingdom’s approach to student engagement, cautioning against a system “that offered different options in different cultural contexts, as it could be perceived to have a lack of parity/equality/fairness” and because maintaining consistency across reviews was important.

Others were concerned that the United Kingdom would “come across as somewhat imperialistic - the imposition of British views and values on overseas activities”. On the whole, however, respondents recognised that there was likely to be some need to set the United Kingdom’s approach to student engagement in the cultural context of the country in which the CBHE provision is located and that this would require some flexibility, on a case-by-case basis, as to the exact form that student engagement should take.

### ***The challenge of implementing a new approach***

The outcomes of the consultation were presented as a set of principles, which are fixed and set the limits for the shape of the new methodology to be introduced. These principles also set the parameters for the work of the Implementation Group which was established, with representation from the sector, to take forward the operational detail. Key tasks for the group are to develop institutional data-reporting in relation to CBHE (involving clarification of data definitions) and to establish how the relationship between institutional review and

<sup>48</sup> Information may also be obtained by QAA from its counterpart organisations in other countries, but this is subject to the existence of agreements covering information sharing, and to the counterpart organisation routinely collecting data about imported CBHE.

CBHE review should be taken forward. Two additional tasks are to consider the suitability of separate institutional reviews for branch campuses and to review country overview reports in terms of their content and target audience.

The information question, a selection of responses:

*Makes complete sense - we have to have sound data on the scale of transnational education and at the moment we don't.*

*There is an urgent need for this data set, providing it is public information and a useful resource for all higher education providers.*

*Rather than have this collated from two different sources, the HESA data collection could be expanded to incorporate the additional elements.*

*One possible approach would be to abolish the Aggregate Offshore Record and require institutions to record a full student record for all students registered with them and include a primary location of study.*

### **Outcomes of the consultation on strengthening the quality assurance of the United Kingdom's transnational education**

Links with institutional review processes

- The CBHE and institutional review processes should be complementary and closely aligned processes.
- There should be improved linkages between the reports and recommendations of CBHE review and institutional review processes.
- CBHE reviews should not lead to summative judgements.

Risk-based element

- The CBHE review process needs to be flexible and take cognisance of risk in selecting provision for review.
- The selection criteria should give equal weight to opportunities for quality enhancement and the demonstration of good practice.
- Emphasis should be placed on transparency in the selection process.

Information base

- An improved database should be developed on the United Kingdom's CBHE, which would form the basis of planning quality assurance activity.
- The data collection process should avoid duplication of effort by institutions.

Desk-based analysis

- Desk-based analysis is an essential preliminary step in the quality assurance of CBHE.
- The detailed analysis of documentation should be undertaken by reviewers.

#### Overseas visits

- The CBHE review process should include an overseas visit.
- Visits should be used to highlight excellent provision just as much as to investigate provision where potential risks have been indicated.

#### Student engagement

- The quality assurance of transnational education should include the United Kingdom's approach to student engagement unless there are compelling reasons not to do so.
- While there should be no requirement at this time for transnational education review teams to include a student reviewer, the opportunity should be open to students, with the clear objective of expanding the use of student reviewers over time.

#### Composition of review teams

- There should be no requirement for teams to include any specific category of reviewer - student, international specialist, or other specialist. The main criterion for inclusion in a review team should be appropriateness for the review.
- QAA's counterpart organisations overseas should not be members of review teams; their role should be limited to giving advice or observing the process.

#### Funding arrangements

- The funding question should not drive the design of the CBHE quality assurance process: the exact funding arrangements should be a secondary issue.
- The issue of funding

Finally, returning to the issue of funding, the consultation sought only to establish basic principles, setting out two propositions: that every institution should make a base-level contribution and that institutions with transnational education provision should make a proportionate contribution. While a proportionate approach would take into account that some institutions have little or no CBHE, a base-level contribution would reflect the fact that the review of CBHE benefits all providers by safeguarding the reputation of British higher education as a whole. Of course the two approaches are not mutually exclusive, and a two-part tariff mechanism is also a possibility. There will now be more detailed work to cost the process, leading to a specific proposal for the funding mechanism. Whatever the mechanism eventually proposed, it is essential that it is both transparent and simple to operate. It seems likely that it will involve some adaptation of the existing subscription model, which does not currently reflect CBHE provision. As one respondent to the consultation put it, "This will not be a popular proposal: I cannot think of any alternative funding mechanism. Not reviewing [CBHE] is not an option, so the funding needs to be found from somewhere."

### **Challenges for providers of CBHE**

#### ***The challenge of reconciling cultural differences***

An obstacle identified in all of the interviews was cultural difference, arising from both a lack of familiarity of partner institutions with British higher education and its quality assurance system, and a lack of familiarity of British providers with the host country's regulatory context and local customs. This is seen as a challenge for the implementation of established quality assurance processes, for the quality of teaching and learning in CBHE, and for the sustainability of CBHE arrangements.

The point was made that partners may struggle to understand the complexities of the United Kingdom's approach to quality assurance. For instance, as stated by one interviewee, some partners "may find the use of external examiners and the idea that assessment is approved at programme level as an infringement on faculty freedom, as bureaucracy, and so on"; while other partners, "in particular those operating in systems more dependent on national approvals than the UK", may find it hard to appreciate how it is possible to reconcile institutional autonomy with rigorous quality assurance.

The centrality of student engagement in the United Kingdom's quality assurance structure was also identified as an aspect not always fully appreciated by overseas partners. More generally, "ensuring that partners understand what it means to deliver UK provision, in terms of both standards and the structures that need to be put in place to support students and staff, and how these relate the Quality Code, is a challenge." It was indicated that failing to address and mediate between these different perspectives could potentially lead to difficulties in implementing important elements of the United Kingdom's quality assurance.

Providers from the United Kingdom reported facing similar challenges in getting to grips with the complexities of the local regulatory systems in which they operate and keeping abreast of changes. Lack of understanding or awareness of local requirements for institutional and programme approval was said to lead to unnecessary delays in establishing CBHE arrangements. This was compounded by the need to rely on local partners in order to obtain information on local regulatory requirements and liaise with local regulators. As confirmed by all the providers interviewed, this is a dynamic with which they were not always at ease. For instance, as observed by one interviewee:

*It is difficult because it is the partner's responsibility to have the course accredited locally in order that they can deliver it, but often we have more experience of understanding and working with regulatory authorities, and a lot of the time it might be easier if we were able to go direct to the authorities to support the partner. But I think it is important that the partner has the relationship, because they are the ones that need to meet the demands of their regulatory bodies rather than us - although it could be helpful for us sometimes to forge a more direct relationship.*

The lack of familiarity on the part of staff in the United Kingdom with local academic and broader cultural customs, together with the lack of familiarity of locally employed staff with British approaches to teaching and learning, was also highlighted as a challenge to the smooth operation of CBHE arrangements. In this context, the Higher Education Academy (HEA) identified as important "ensuring an equitable student learning experience in transnational arrangements." However, this was not seen by the HEA as a requirement to replicate the same teaching and learning experience as in the United Kingdom, rather as the need to adapt programmes and teaching methods to the local context so as to enable students to achieve their learning needs.

There was a clear view that QAA and organisations such as the UK Higher Education International Unit and the British Council had an important role to play in promoting an understanding of British quality assurance internationally through their respective relationships with overseas bodies and in providing an information service to the sector on the regulatory frameworks and developments in CBHE host countries. The HEA is also responding to sector demands by assisting British providers and their overseas partners by offering staff development programmes aimed at enhancing student learning and teacher development in CBHE.

These sorts of cultural differences, sometimes compounded by language problems, were generally perceived to be greater outside Europe, where common policy frameworks, such as those established through the Bologna process (for example, the ESG and the qualifications frameworks in the EHEA) and European Commission directives (for example the 2005/36 Directive on the recognition of professional qualifications) are seen to facilitate cooperation. However, working within Europe was not always perceived as being less challenging, since different European countries have developed their quality systems in different ways and at different speeds, whereas some non-European countries are very familiar with the higher education system in the United Kingdom and operate in the English language. For example, in some East-Asian countries a number of institutions have partnerships with multiple British providers, and there may be historical links with the United Kingdom.

### ***The challenge of geography***

Geographical distance, as well a cultural distance, was also regarded as an obstacle. As one provider explained:

*Working at a distance brings challenges in that you have to find mechanisms of working effectively with partners who are geographically removed and in different time zones from you. We have invested a lot in videoconferencing. While it does not compensate for visiting, it means that you can have quick catch-up meetings with people and set up a quick meeting to talk about a specific issue.*

### ***The challenge of capacity***

Another resource-related challenge identified by providers relates to the internal capacity required to establish and manage CBHE arrangements. Adequate and specialist resources are needed for setting up these arrangements, which is “time consuming” and requires “appropriate due-diligence enquiries” to be undertaken so as to identify the different risks involved: academic, financial, legal, reputational, etc. Similarly, appropriate resources are needed for maintaining oversight of arrangements once they are established, e.g. through regular internal reviews. Training of staff working with partners, such as link tutors, as well as the partners themselves, was unanimously seen as crucial but as having obvious resources implications. “Capacity is a challenge. We may have to say goodbye to a partner in order to be able to develop in another area.”

Capacity may also be affected by providers' own organisational structures. For instance, one interviewee stressed the importance of collaboration within institutions between those with responsibility for the establishment and promotion of CBHE arrangements and those responsible for their quality assurance. "If you divide up the responsibility for establishment and promotion of partnerships from the quality assurance, you can get a situation where you build institutional conflict between those who are trying to get things done and those perceived as trying to stop them."

### ***The challenge of regulation***

The differences between regulations applying in the host and provider countries are often perceived as obstacles to establishing CBHE arrangements. The complexity of local procedures for institutional and programme approval, already touched upon, may dissuade institutions from engaging in CBHE arrangements in specific countries: "China is just too complex for us, in terms of government approval and so on, so we avoid it". Challenges to the recognition of CBHE qualifications are also regarded as an impediment to developing CBHE arrangements. Particular reference was made in interviews to issues related to the recognition of CBHE qualifications delivered through private providers, such as in Greece, or through distance learning, where China was given as the example.

Immigration and visa regulation, and specifically the eligibility to work in the United Kingdom, were also mentioned in interviews as representing a challenge for providers delivering programmes overseas, in particular for programmes which lead to professional registration. When students start a programme accredited by a PSRB, there may be no problem with obtaining a visa and working in the United Kingdom, but this may change during their programme of study, as particular occupations may come and go from the "shortage occupation list". As one PSRB put forward, "Providers are recommended to be transparent and honest about the state of government policy at any point, and be very clear that it is beyond their control."

The varied approaches taken by PSRBs to the accreditation of programmes delivered overseas were also mentioned as a challenge, in particular the reluctance of certain PSRBs to accredit CBHE programmes. As mentioned in interviews: "PSRBs don't yet fully understand CBHE; they are just starting to get a grip on CBHE" and "PSRBs have different requirements in relation to whether you can extend recognition to different countries or even across campuses".

A related challenge is posed by the variability of accreditation between host and provider countries' professional bodies. As it has been highlighted in a recent study of CBHE and engineering education, this variability requires having a single set of processes that are capable of addressing the multiple requirements of these separate accreditation bodies, while at the same time maintaining the programme in an undifferentiated form, complying with the rules and regulations of the university, and being true to its educational ethos.<sup>49</sup>

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<sup>49</sup> Harrison, I. and Bond, K. (2012): 'Transnational education and engineering accreditation', in *Engineering Education* vol 7, issue 2, 2012, p 27, available at: [http://cede.lboro.ac.uk/ee2012/papers/ee2012\\_submission\\_205\\_gp.pdf](http://cede.lboro.ac.uk/ee2012/papers/ee2012_submission_205_gp.pdf)

### 3.3 OUTCOMES OF REGIONAL EXPERT FORUMS<sup>50</sup>

Three regional expert forums were organised to discuss the outcomes from the surveys and to inform the next phase of the project. A European forum took place in London, hosted by QAA (5-6 November 2014), followed by a Gulf regional forum in Bahrain, hosted by ANQAHE (20-21 November 2014), and by an Asia-Pacific forum held in Macau and hosted by APQN (23-24 January 2015). The three regional forums in themselves helped address the information needs highlighted by the regional surveys and country reports by facilitating policy dialogues amongst agencies in sending and receiving countries, involving other key stakeholders as well, such as sector bodies and higher education providers. The forums were pivotal in shaping the final phase of the project, directing the development of the planned toolkit in a direction that could improve the practice of quality assuring CBHE.

The challenge facing the development of such a toolkit was to build on the international guidelines and documents already in place, such as the UNESCO/OECD Guidelines, the UNESCO/APQN Toolkit, and the ESG, as well as the existing national reference points<sup>51</sup>, in a way which would help to progress international practice without duplicating existing work. The discussions held in London, Bahrain, and Macau pointed to a clear direction of travel for a toolkit capable of bringing a new contribution to the field: to develop guidance to help agencies in sending and receiving countries build mutual trust surrounding the quality of CBHE and its quality assurance. The discussions held at the forums brought, in fact, to the fore what can be referred to as a “trust gap” between sending and receiving countries concerning the quality and comparability of CBHE provision - a gap perhaps most clearly manifested by the different approaches to the recognition of CBHE qualifications adopted by sending and receiving countries. Sending countries would normally recognise the qualifications obtained by studying in programmes delivered overseas as being equivalent to those obtained by studying in programmes delivered at a provider’s home campus, for all purposes, pursuing further studies and employment in private and public sectors (with the exception of some regulated professions). This is not always the case in CBHE host countries, especially for certain types of CBHE provision, such as distance learning and collaborative partnerships with local private institutions. Providing practical guidance on how sending and receiving countries’ agencies can address this “trust gap” was seen by the participants in the forums and by the project consortium as a useful, timely, and new contribution.

### 3.4 OUTCOMES OF THE DISSEMINATION CONFERENCE

The final dissemination conference took place in Paris in November 2015. The discussions largely confirmed the findings of the project: there is a lack of up-to-date information, and strengthened cooperation is seen as the way forward. Higher education provision is a public good, therefore governments have a responsibility to make sure it is appropriately supported and that new forms of education are being regulated. In this respect, it remains a challenge how the higher education community should react, for instance, to the EU services directive and trade treaties that hinder receiving countries’ control towards incoming education provision.

50 This chapter extracts from article by Trifiro, F. (2015): Quality Assurance of Cross-Border Higher Education (QACHE) - moving towards strengthened cooperation.

51 See for example: the QAA’s UK Quality Code: Chapter B10: managing higher education provision with others (QAA 2012); the Australian Higher Education Standards Framework (Threshold Standards), overseen by TEQSA (Australian Government 2013), and the GAC’s Rules for the Accreditation of Study Programmes and for System Accreditation (GAC 2013).

The Toolkit was distributed at the conference, and according to the participants, it is a welcomed initiative to better understanding and coordination of the quality assurance of CBHE. In a way, it was seen as a comprehensive synthesis of experiences in CBHE and its quality assurance. However, it was agreed that a lot of effort should be put into its dissemination. It was also discussed whether the Toolkit should be translated into different languages for a wider approach. Some additional resources would be necessary for comprehensive implementation. It was again emphasised that regional networks play a key role in its dissemination to a wide audience. In addition to their contribution in the dissemination of the Toolkit and the facilitation of information sharing and cooperation, networks of agencies could engage in initiatives such as training of staff of agencies to provide them with intercultural competencies and skills required for cross-border activities. Furthermore, they could join forces by establishing a think tank, and through such initiative, bring together different higher education stakeholders on a regular basis to exchange experiences and knowledge concerning CBHE at the global level.

It was also widely discussed that recognition is strongly linked with challenges of CBHE, as it is an issue of both recognition of diplomas and of quality assurance decisions. Recognition, or ways to improve recognition frameworks and decisions, was agreed to be a political issue. When discussing the quality assurance of CBHE, it should be kept in mind that the duties of QA agencies should be separated into regulatory duties and any additional, “voluntary” quality assurance processes. In this respect, a broader mapping of regulations and practices in countries would be useful to make it clear to all stakeholders why and how specific quality assurance processes are carried out. In the conference, cultural and societal differences that may influence the contents of education were also discussed. Overall, it was agreed that as higher education is universal, countries consider adapting to the more advanced societies’ views, but differing values and views need to be handled with ultimate respect. Education should remain universal and free of prejudice.

### 3.5 TOOLKIT FOR QUALITY ASSURANCE AGENCIES<sup>52</sup>

The Toolkit<sup>53</sup> is a brief document offering general principles supported by explanatory text and examples on their implementation in practice. It aims to complement the UNESCO/APQN Toolkit's effort to support the implementation of the UNESCO/OECD Guidelines with a specific focus on providing practical guidance to agencies in sending and receiving countries on how they can "share the responsibility of assuring quality provision of cross-border higher education"<sup>54</sup>.

In short, the following four key findings contributed to the final form of the Toolkit:

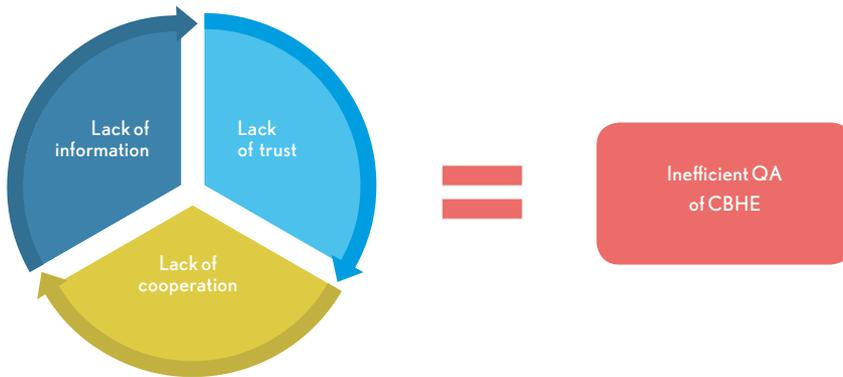
- the sheer diversity of approaches and regulatory frameworks for inbound or outbound CBHE within and across the three investigated regions
- lack of information about and knowledge of different agencies' approaches and national frameworks
- a "trust gap" between sending and receiving countries about the quality of CBHE, with receiving country being generally more skeptical than sending countries about the quality, and quality assurance, of incoming provision
- low levels of cooperation amongst QA agencies in the quality assurance of CBHE

These aspects are interrelated, creating a vicious circle (as illustrated by Image 1) where lack of information of each other's approaches to C BHE causes lack of trust amongst agencies, which in turn hinders cooperation. The result is less efficient and effective quality assurance than would be possible.

52 This chapter borrows from articles "Trifiro, F. (2015): Quality Assurance of Cross-Border Higher Education (QACHE) - moving towards strengthened cooperation." available at: [https://qache.files.wordpress.com/2016/03/trifiro\\_qache-e28093-moving-towards-strengthened-cooperation.pdf](https://qache.files.wordpress.com/2016/03/trifiro_qache-e28093-moving-towards-strengthened-cooperation.pdf), "Trifiro, F. (2015): Strengthening cooperation in the quality assurance of cross-border higher education: an introduction to the QACHE project." Available at: [http://www.obhe.ac.uk/what\\_we\\_do/news\\_articles\\_reports/news\\_analysis/na\\_2015/news\\_analysis\\_ga10\\_20oct15](http://www.obhe.ac.uk/what_we_do/news_articles_reports/news_analysis/na_2015/news_analysis_ga10_20oct15) and "Trifiro, F. (2015): The QACHE Toolkit for Quality Assurance Agencies: Cooperation in Cross-Border Higher Education", available at: [http://www.obhe.ac.uk/what\\_we\\_do/news\\_articles\\_reports/news\\_analysis/na\\_2015/news\\_analysis\\_ga11\\_9dec15](http://www.obhe.ac.uk/what_we_do/news_articles_reports/news_analysis/na_2015/news_analysis_ga11_9dec15)

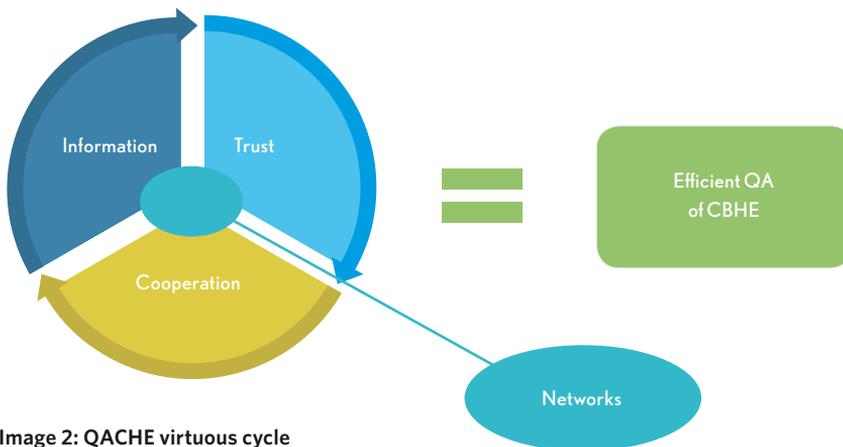
53 Cooperation in cross-border higher education. A toolkit for quality assurance agencies (2015). Available at: <http://www.enqa.eu/wp-content/uploads/2015/11/QACHE-toolkit.pdf>

54 UNESCO (2009): The UNESCO/APQN Toolkit: Regulating the Quality of Cross-Border Education. Available at: <http://unesdoc.unesco.org/images/0014/001464/146428e.pdf>



**Image 1: QACHE vicious cycle**

Following this rationale, the Toolkit provides practical advice to QA agencies, and their networks, on how they can revert that vicious circle and instead set in motion a virtuous circle (as illustrated by Image 2) where, by improving the sharing of information, knowledge, relevant data, and good-practice about CBHE and its quality assurance, agencies can start building reciprocal trust and explore ways in which they can cooperate to enhance the effectiveness and efficiency of their oversight of CBHE. Regional networks of agencies, such as ENQA, ANQAHE, and APQN can play a key role in facilitating the activation of this virtuous circle.



**Image 2: QACHE virtuous cycle**

The first step to facilitate mutual understanding should be to have easily accessible and explicit policies outlining their chosen approach to CBHE. This supports agencies in articulating how they deal with CBHE and thereafter begin addressing the information needs of agencies from both sending and receiving countries. However, the information needs of agencies typically extend beyond solely obtaining a clear and comprehensive account of the regulatory framework within which the CBHE providers they are overseeing operate, whether in the sending country or in the receiving country. Agencies would additionally benefit from keeping themselves updated concerning regulatory developments in the countries that are under their oversight in terms of CBHE provision. It would also be useful for them to receive information such as outcomes of quality assurance procedures among certain CBHE providers. This extent of information sharing requires a more regular and proactive approach than just making their policies and approaches publicly available.

As a further step, agencies should seek to establish regular channels of communication between themselves, to share developments in their respective national settings, to share information about providers operating in both jurisdictions, and to understand and gain an overview of their respective approaches to quality assurance. Establishing formal memoranda of understanding is often seen as an effective way to enhance regular information and intelligence sharing, and is thus a good start for building trust and strengthening cooperation.

These first two steps are about agencies getting familiar with each other and cooperating through information sharing. To take cooperation further, with a specific focus on the quality assurance of CBHE, agencies should consider liaising with their counterpart agencies, in either the sending or receiving country(ies), when they are about to look at specific instances of CBHE provision. For instance, before looking at a provider's CBHE provision, a sending country's agency should liaise with the relevant receiving country's agency, or vice versa, to inform them about the planned quality assurance activities and to monitor whether the provider in question has already been subject to recent quality assurance oversight or if it is planned to be overseen by the other agency. In this way sending and receiving countries' agencies will be able to use each other's information and reports to stay updated on planned CBHE review activities and eventually coordinate any forthcoming overlaps in quality assurance, e.g. with regard to scheduling reviews or even considering carrying out a joint review procedure.

As regards joint review procedures, discussions held at the QACHE forums confirmed there is an agreement on the principle that agencies of sending and receiving countries should seek to explore ways to engage in joint reviews of CBHE. The Toolkit, respecting the autonomy of agencies, cannot recommend specific ways in which they should cooperate in the review of CBHE. Considering the different approaches present in the quality assurance of inbound and outbound CBHE, and considering that there is a different level of autonomy between agencies in adapting their methodologies - many having to rely on their government's endorsement, for example - the particular way in which agencies may decide to cooperate in joint reviews activity will need to be established on a case-by-case basis. However, the Toolkit can provide concrete examples of how they could cooperate in practice in this respect.

Finally, a key role in addressing the information and cooperation needs of agencies should also be played by regional networks. Networks such as ENQA, ANQAHE, and APQN are ideally placed to function as central repositories of information on national higher education systems, quality assurance approaches, and higher education providers, and as facilitators of international policy dialogue and promoters for cooperation between agencies.

The Toolkit is accordingly composed of three sections: Information Sharing, Cooperation in Quality Assurance, and Networks of Agencies. It should be stressed that the Toolkit respects the diversity and autonomy of national systems and their agencies. It acknowledges that the extent and way in which agencies may be able to engage and cooperate in the quality assurance of CBHE will depend on the different national and regional regulatory frameworks within which they operate. Therefore, the Toolkit does not make recommendations on how CBHE should be quality assured, nor are its guidelines for inter-agency cooperation prescriptive. The Toolkit should rather be regarded as offering practical advice on how agencies, regardless of their specific approach to CBHE, can facilitate that mutual understanding, trust, and cooperation to make the quality assurance of cross border provision more efficient and effective.

## CHAPTER 4.

# CONCLUSIONS<sup>55</sup>

The QACHE project was initiated through an understanding that rather little was known about the quality assurance of CBHE despite its increasing popularity around the world. In order to understand the phenomenon better, the QACHE project aimed to map the state of the art in selected European countries and in the Gulf and Asia-Pacific regions. Finally, confirmed at the various phases of the project, it can be concluded that the field of quality assurance in CBHE remains rather scattered, and there are several initiatives that can be taken to facilitate cooperation in order to develop and systemise the quality assurance of CBHE.

The surveys to QA agencies in three global regions, the survey sent to European providers of higher education, and the national country reports highlighted the need to enhance the national and international oversight of CBHE, which is currently very inconsistent. In the receiving Gulf and Asia-Pacific regions, the popularity of CBHE is increasing, while at the same time, expertise and capacity-building are urgently needed. The main challenges in CBHE in these regions are often associated with the recognition of qualifications and their comparability.

Indeed, the survey sent to QA agencies in Europe and the country reports highlighted the absence of a common European approach to CBHE and its quality assurance. There is also a lack of developed systems for the quality assurance of outbound CBHE, with the exception of the United Kingdom and Australia, which are more experienced in the field. There is no comprehensive information available about outbound CBHE, especially in France and Spain, although this is the case to some extent in the other surveyed countries, too.

There is no reciprocal understanding between sending and receiving countries' agencies about the regulatory frameworks in their respective jurisdictions. Responsibilities in quality assurance between sending and receiving countries agencies are often not clear. There is thus a greater need to further address the lack of information about CBHE and different national regulatory approaches to CBHE concerning all stakeholders in higher education. Strengthening cooperation between QA agencies from different regions is seen as the way forward to facilitate and enhance information exchange, policy dialogue, and the regulation of CBHE.

Strengthened cooperation is also seen as the way to narrow a trust gap between sending and receiving countries. Regional networks such as ENQA, ANQAHE, and APQN were seen as key players in this respect, in addressing the information and cooperation needs of agencies outlined above. Such networks were seen as ideally placed to function as central repositories of information on national higher education systems, quality assurance approaches, and higher education providers. In addition, they could support international policy dialogue and cooperation between agencies.

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<sup>55</sup> This chapter borrows from article by Trifiro, F. (2015): Quality Assurance of Cross-Border Higher Education (QACHE) - moving towards strengthened cooperation. Available at: [https://qache.files.wordpress.com/2016/03/trifiro\\_qache-e28093-moving-towards-strengthened-cooperation.pdf](https://qache.files.wordpress.com/2016/03/trifiro_qache-e28093-moving-towards-strengthened-cooperation.pdf)

Discussions at the regional forums clearly emphasised the need to build on existing international guidelines such as the UNESCO/OECD *Guidelines for Quality Provision in Cross-border Higher Education*, the UNESCO/APQN *Toolkit Regulating the Quality of Cross-border Education*, INQAAHE's *Guidelines of Good Practice in Quality Assurance, the Standards and guidelines for quality assurance in the European Higher Education Area*, and the CHIBA principles, as well as existing national reference points.

The discussions held at the three regional forums have not only helped in bringing these findings forward, but also to inform the development of the main deliverable of the project, the Toolkit, which was designed to facilitate the quality assurance of CBHE. The Toolkit is focussed on providing practical guidance and suggestions on how QA agencies can engage in different types of cooperation by building on the above-mentioned existing international guidelines, while contributing in an innovative manner to the enhancement of the practices of quality assuring CBHE following the suggestions of the QACHE Toolkit.

The principles, emerging from the discussions between members of the project consortium and all participants present at different events of the project, can be seen as pointing to different, although interdependent, stages of cooperation. The first principle is about making information about national approaches to CBHE easily accessible. The second principle is about proactively engaging in information-sharing activities with counterpart agencies sharing CBHE provision. The third principle is about seeking to liaise with them whenever intending to quality assure CBHE provision. The fourth principle is about seeking ways in which to cooperate in the actual quality assurance of CBHE provision. The fifth principle is directed to regional networks of agencies, calling on them to play an enhanced role in the facilitation of information sharing and inter-agency cooperation. At the same time, it should be stressed that these principles cannot be fully realised without comprehensive support from policymakers at both national and regional levels.

Finally, as one of the main conclusions of the project, it can be stated that CBHE not only poses challenges, but also creates great opportunities for our societies, in particular in terms of widening access to higher education, addressing skills gaps of young people, and furthering global citizenship. Indeed what brought the quality assurance practitioners and other higher education professionals in this project together was the need to explore ways to work together to fully harness the opportunities posed by CBHE while avoiding its possible challenges and shortcomings and, in particular, sub-standard education and bogus provision. The shared goal of all those who have contributed to the QACHE project is to facilitate the provision of quality CBHE, avoiding regulatory gaps as much as possible and unnecessary discrepancies and duplication, to the ultimate benefit of higher education providers and students.

## CHAPTER 5.

# POLICY RECOMMENDATIONS

### Recommendations to national policymakers in Europe

As identified throughout the QACHE project, there is a lack of comprehensive information concerning cross-border higher education (CBHE). For instance, institutions seem to struggle to understand whether there is a specific framework at home and in host countries for CBHE provision, and quality assurance (QA) agencies seem to lack comprehensive and up to date data about the extent and forms of existing inbound or outbound CBHE. It appears that in many cases, national frameworks for the quality assurance of CBHE or the collection of data about CBHE are not yet developed.

Governments have a key role to play in supporting the development of adequate frameworks and systems to support the delivery and quality of inbound or outbound CBHE. It is for the benefit of all stakeholders and would protect the system from dubious providers and low quality education provision and quality assurance services.

*In this respect, governments should:*

- Support higher education institutions in fully harnessing the opportunities and benefits associated with CBHE, for both sending and receiving countries. It would be useful to support institutions in developing the capacity needed to develop and maintain high quality provision, including facilitating the sharing of good practice and disseminating information about national approaches to CBHE.
- Support QA agencies in facilitating and supporting the development of the required national capacities for the quality assurance of CBHE and inter-agency cooperation. This should include supporting the participation of national agencies in the activities of international networks, which, as identified by the QACHE project, play a key role in facilitating the sharing of information and good practice, building reciprocal trust, and encouraging cross-border cooperation between agencies. Quality assuring CBHE requires adequate resources, intercultural skills, and international expertise, which may be lacking in some countries, particularly those that are new to CBHE.
- Facilitate the development of regular and reliable data collection systems for inbound and outbound CBHE at the national level. This is required to analyse the patterns and trends in CBHE to develop the field further and to gain information about the required quality assurance activities. This will also protect the system from bogus education provision.
- Engage in a dialogue with QA agencies in order to identify and review any unnecessary policies or regulatory restrictions and initiate any required reforms which would facilitate the quality assurance of CBHE and cross-border cooperation in the spirit of the QACHE Toolkit<sup>56</sup>. Agencies wishing to enhance coordination in the quality assurance of CBHE through joint review activity and the recognition of other agencies' quality assurance decisions may be hindered by restrictive national policies or regulation.

<sup>56</sup> Cooperation in cross-border higher education. A toolkit for quality assurance agencies (2015). Available at: <http://www.enqa.eu/wp-content/uploads/2015/11/QACHE-toolkit.pdf>

- Develop, together with all relevant stakeholders, clear policy frameworks. As recommended in the QACHE Toolkit, QA agencies should “have clear and accessible policies for the quality assurance of inbound and outbound CBHE.” Such policy frameworks should be aligned with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)*<sup>57</sup> and other international reference points, such as the OECD/UNESCO Guidelines<sup>58</sup>.

### **Recommendations to European policymakers**

In order to help address the information needs identified by the QACHE project, it is recommended that policymakers at the European level should:

- Support a regular mapping of cross-border activities in Europe and of their quality assurance. Although the QACHE project has begun describing the current landscape of CBHE, a broader initiative could further support national efforts to develop adequate data collection and quality assurance frameworks for CBHE that could address the situation throughout the entire European Higher Education Area.
- Support policy dialogue initiatives between different stakeholders involved with CBHE in order to facilitate increased understanding of different frameworks and approaches, and eventually contribute to the strengthening of reciprocal trust. This would include supporting the activities of regional networks of QA agencies which, as clearly identified by the QACHE project, are ideally placed to facilitate the sharing of information and good practice in the spirit of enhanced inter-agency cooperation.
- Overall, support the creation of a European approach for quality assurance in CBHE through the comprehensive implementation of the QACHE Toolkit and by means of developing favourable policy for cross-border cooperation in the quality assurance of CBHE and through capacity-building initiatives aimed at strengthening the competencies of QA agencies to respond to the challenges related to CBHE.

57 Standards and Guidelines for Quality Assurance in the European Higher Education Area (2015). Available at: <http://www.enqa.eu/index.php/home/esg/>

58 UNESCO (2005): Guidelines for Quality Provision in Cross-border Higher Education. Available at: [http://www.unesco.org/education/guidelines\\_E.indd.pdf](http://www.unesco.org/education/guidelines_E.indd.pdf)

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# ANNEX 1 - EXAMPLES OF GOOD PRACTICE

This chapter presents two cases of good practice in order to concretely demonstrate possibilities as well as challenges in cross-border collaboration.

## **CASE 1: QAA COOPERATION WITH KHDA IN THE REVIEW OF UK CROSS-BORDER HIGHER EDUCATION IN THE FREE TRADE ZONES OF DUBAI**

### **Involved bodies:**

- QAA, United Kingdom - QA agency of the sending country
- Knowledge and Human Development Authority (KHDA) - governmental authority of the host country
- University and Quality Assurance International Board (UQAIB) - operational body of the governmental authority concerning quality assurance

### **Background on the quality assurance of CBHE in the United Kingdom**

QAA regularly reviews UK higher education (HE) delivered overseas as part of its mission to safeguard standards and to improve the quality of UK HE, wherever this is delivered. Given the extent and geographical spread of UK outbound CBHE, QAA supplements its institutional reviews in the UK with a dedicated review process for CBHE which includes visits to overseas delivery sites. This review process is carried out on a country-by-country basis, each year focusing on a country, or region, where significant UK CBHE is present. This process is more efficient than sending different review teams to different overseas locations every year as part of mainstream institutional reviews in the UK. It also allows for enhanced cooperation with host countries' QA agencies.

### **Case UAE**

In 2013-14 QAA reviewed UK CBHE in the United Arab Emirates (UAE). The UAE is the country hosting most foreign branch campuses in the world, most of which are based in the different Dubai free trade zones (FTZs), with a majority from UK universities. The decision to undertake a review of UK CBHE in the UAE followed the signing of a strategic Memorandum of Understanding in spring 2013 with the KHDA, the Dubai government's authority with responsibility to regulate and oversee the quality of higher education offered by foreign providers operating in the Dubai FTZs. To assure the quality of international branch campuses KHDA, through its University and Quality Assurance International Board (UQAIB), operates on the basis of an "Equivalency Validation Model" aimed at assessing the demonstrated quality equivalence of provision in Dubai in relation to the provision offered at the home campus.

### **Description of the model of cooperation**

This model places particular reliance on the quality assurance and accreditation from the home country, with UQAIB taking account of existing reports on the quality of provision of foreign providers produced by their home country's QA agencies. It is in this context that QAA and KHDA decided to cooperate in quality assuring UK higher education provision

delivered at UK universities' branch campuses located in the FTZs in Dubai. In conducting overseas reviews QAA has always sought to liaise with the host country's QA agency, primarily through information sharing and allowing counterpart agencies to observe review visits. However, with KHDA this cooperation in CBHE review was taken to another level, with KHDA supporting the QAA review process at every stage.

**Key points:**

- Reliance on the quality assurance of the sending country
- Host country supporting review process at every stage

In summer 2013, QAA members of staff visited KHDA to agree on the timelines of the review process and to start gaining a better understanding of each other's approaches to CBHE. In autumn 2013 KHDA members of staff visited QAA to help brief the QAA review team about the higher education system and regulatory context in Dubai and the UAE. The two agencies also started sharing knowledge about those providers within the scope of the review and arranging the logistics of the review visit, which took place in February 2014. Particularly significant has been cooperation around data sharing and review activity.

KHDA undertakes an annual census of all higher education providers operating in the Dubai free zones, and was therefore able to share with QAA the data relative to UK providers. This allowed QAA to limit the amount of information requested from the providers and to avoid duplication of information requests.

**Key point:**

- Use of already existing data gathered by host country authority

QAA had an established review observers' protocol designed to safeguard the integrity of the independent peer-review process by strictly limiting the role of observers to just observing, without interacting with the process. This protocol was perceived to be too restrictive in the context of cooperation in the review of UK CBHE in Dubai. QAA therefore revised its review observers' protocol to allow KHDA observers to ask clarification questions during the review meetings and to help the QAA review team clarify matters pertaining to the local context or a particular provider during de-briefing meetings. The QAA review team also shared draft meeting agendas with KHDA prior to the review visits, so that they could suggest further issues for the reviewers to explore, based on their local knowledge.

**Key point:**

- Observers' protocol adjusted according to the situation

The integrity of the review visit was however maintained as KHDA did not play any role in identifying recommendations and examples of good practice. The reports were entirely drafted by the QAA review teams, although KHDA checked the overview report for factual accuracy. Significantly, KHDA was able to use the QAA review reports for their annual institutional permits' renewal and academic programme registration. The QAA review reports facilitated UQAIB's assessment that the provision in Dubai is equivalent to that delivered at the UK home campus.

QAA and KHDA further coordinated the communication strategy after the launch of the report, including coordinating responses to some media reports that misrepresented the outcomes of the review.

**Key points:**

- Host country authority was able to make use of the review report in their national procedures
- Common communication strategy between sending and receiving country

The cooperation between QAA and KHDA as part of the QAA review of UK CBHE in Dubai, can be regarded as an example of how agencies can effectively cooperate in the quality assurance of CBHE, streamlining processes and lessening the burden on cross-border providers and on themselves.

## **CASE 2: TEQSA AND CPE COOPERATION IN DEVELOPING APPROACHES TO CBHE BETWEEN SINGAPORE AND AUSTRALIA**

**Involved Agencies:**

CPE, Council for Private Higher Education, Singapore

TEQSA, Tertiary Education and Quality Assurance Agency, Australia

**Background on approaches to quality assurance of CBHE of Australian providers: a TEQSA perspective**

TEQSA is a national regulatory and QA agency established by the Australian government in 2012 to regulate and quality assure higher education. TEQSA conducts a risk-based approach to regulation and quality assurance to the establishment of approaches to the quality assurance of CBHE.

TEQSA's regulatory and quality assurance focus on CBHE has been grounded in a provider's ability to meet higher education standards, and this has included a strong focus on the "equivalency" of experience for a student, no matter where in the world they may be accessing Australian accredited degrees and higher education.

Early in its establishment, TEQSA focused on establishing a small number of memoranda of understanding (MoU) with regulators in the countries where Australian higher education providers are operating, which are predominantly in Asia and the Middle East. TEQSA has begun to establish strong relationships with these QA agencies and is focused on building a partnership model of regulation that is sustainable into the future.

To this end, TEQSA staff recently conducted the first CBHE provider visits to further explore how TEQSA can work with local regulatory agencies in the future and how information can be shared between agencies, particularly given the different approaches to regulation and quality assurance across countries.

At the core of these initial provider visits was a focus on:

- understanding provider equivalency of cross-border operations
- developing a greater understanding of provider delivery models, including branch and partnership models
- conducting a constructive dialogue with the provider ensuring compliance with Australia's Higher Education Threshold Standards
- student experience and student performance at offshore operations
- an engagement with staff and students involved in the providers' local operations

In each case these provider visits were supplemented by:

- visits and discussions with local regulators, which in most cases are ongoing
- contact with the local Australian government education offices and delegates including counsellors and Australian Education International
- the progressive development of TEQSA guidance notes such as the third party arrangements guidance note
- the development of international profiles on each individual provider, a collection of data and market intelligence on providers including where they are operating and information on the characteristics of student cohorts

### **Case Study: CPE and TEQSA approaches to CBHE**

In 2013, TEQSA signed one of its first MoU with the CPE. Numerous Australian providers are operating in Singapore, under various partnerships and one branch campus arrangement. Both the CPE and TEQSA have been actively working together to build the relationships between staff in both agencies, and this is assisting both agencies in the provision of sharing information and market intelligence on providers.

Over the last two years a number of staff exchanges have occurred where staff from both agencies have shared their experiences of regulation and quality assurance. This activity has been supported by a number of shorter visits by staff as they have travelled between Singapore and Australia, further promoting dialogue and the currency of information between the two agencies.

### **Description of the model of cooperation**

An MoU signed between the two agencies provides for information sharing regarding providers, and this activity continues via regular videoconference and individual communications. Staff from both the CPE and TEQSA are also involved in a range of international forums and also engage at these broader forums and discussions and share information.

Whilst the relationship between the two agencies was developed initially at a formal level, with an MoU, there are now numerous connections between staff at various levels at both agencies, and a "trust" between the agencies is consolidating. This "relationship-building" will allow for both the CPE and TEQSA to work together in more coordinated approaches to regulation and quality assurance of CBHE.

Over 2016 TEQSA will review its initial MoU with the CPE to further consolidate the working relationship, through discussions and the development of a forward work plan to scoping joint approaches to CBHE.

**Key point:**

- Development of relationship for trust between staff at both agencies

The relationship that is developing between CPE and TEQSA is providing a strong foundation for future activity. It should also be noted that the two agencies have many operating similarities in common in that both are responsible for the regulation and quality assurance of higher education in their respective countries, and both are public agencies and must make an efficient use of public resources, which is both responsible and accountable. These drivers on both agencies are also influencing the imperatives of the working relationship which is developing between the two agencies and approaches to CBHE which remove duplication and allow for an efficient use of resources.

Staff at TEQSA and CPE are now comfortable in contacting each other and in requesting and sharing information and advice. It is anticipated that these information sharing activities will eventually be extended to all Australian providers operating in Singapore. For example, CPE has recently developed an annual survey of all higher education providers operating in Singapore, and the results of this survey and Australian provider operations will be discussed with TEQSA. Both TEQSA and the CPE look forward to a fruitful relationship over the coming years, building on a common understanding of the role of regulation and quality assurance of CBHE.

Whilst still in the initial stages of development, the relationship between the two agencies has a broad foundation upon which to develop future efficient joint activities on the quality assurance of CBHE.

There are many challenges which the two agencies will progressively work through together and some of these issues include: mapping the standards that each respective agency quality assures against and a gap analysis of where there are differences in approach and considering what form any joint assessment would take that reduces duplication and burden on the provider, whilst still enabling both agencies to assess a provider's CBHE activities against the respective requirements and standards. Time and resources will influence any further quality assurance of CBHE activities between the two agencies.

# ANNEX 2 - BENCHMARK SURVEY FOR QA AGENCIES CONCERNING THE USE OF THE TOOLKIT

## BACKGROUND

The Toolkit developed as part of the QACHE project, *Cooperation in Cross-Border Higher Education: A Toolkit for Quality Assurance Agencies*, offers practical advice to QA agencies on things that they could do to enhance cooperation in the quality assurance of cross-border higher education.

In order to facilitate the implementation of the Toolkit, a pilot survey has been developed, aimed at gathering information on the key challenges and obstacles that agencies may encounter when trying to cooperate in the quality assurance of CBHE.

The survey also serves the purpose of taking stock of the extent to which agencies are currently cooperating in the spirit of the Toolkit, and of the initiatives they are intending to put in place to implement the Toolkit. Furthermore, as quality assurance involves a diversity of approaches within Europe and worldwide, and as the quality assurance of CBHE brings another dimension of complexity to the field, the aim of the survey is not to narrow the diversity of approaches but rather to explore the areas where further support or cooperation is necessary. Thus a more descriptive pilot scheme for the quality assurance of CBHE was not deemed most fitting.

The survey can be distributed to QA agencies in Europe as well as in the other regions of the world.

## Survey

### **1) Does your agency have clear and easily accessible policies for the quality assurance of inbound and outbound CBHE? (See Toolkit 1.1)**

If yes

- a. Please explain if your agency has encountered any obstacles in doing this
- b. Please share any recommendation of good practice your agency may have in this regard

If no

- c. Please explain the factors that might prevent your agency doing this
- d. Please also explain if your agency has plans to start developing such policy and to make it accessible

### **2) Does your agency make easily accessible a list quality assured institutions, including any eventual list of quality assured CBHE provision, either inbound or outbound, and associated reports? (See Toolkit 1.2)**

If yes

- a. Please explain if your agency has encountered any obstacles in doing this
- b. Please share any recommendation of good practice your agency may have in this regard

If no

- c. Please explain the factors that might prevent your agency doing this
- d. Please also explain if your agency has plans to start making such information available

**3) Does your agency routinely share data, information, or intelligence about CBHE and its quality assurance with other agencies in sending and/or receiving countries of CBHE? (see Toolkit 1.3)**

If yes

- a. Please explain if your agency has encountered any obstacles in doing this
- b. Please share any recommendation of good practice your agency may have in this regard

If no

- c. Please explain the factors that might prevent your agency doing this
- d. Please also explain if your agency has plans to start sharing such data, information, or intelligence

**4) Has your agency reached agreements with other agencies, in either sending or receiving countries of CBHE, for the reciprocal recognition of quality assurance decisions? (see Toolkit 2.2)**

If yes

- a. Please explain if your agency has encountered any obstacles in doing this
- b. Please share any recommendation of good practice your agency may have in this regard

If no

- c. Please explain the factors that might prevent your agency doing this
- d. Please also explain if your agency has plans to start reaching any such agreements

**5) Does your agency engage in any form of joint review activity of CBHE with agencies of either sending or receiving countries? (see Toolkit 2.3)**

If yes

- a. Please explain if your agency has encountered any obstacles in doing this
- b. Please share any recommendation of good practice your agency may have in this regard

If no

- c. Please explain the factors that might prevent your agency doing this
- d. Please also explain if your agency has plans to start engaging in forms of joint review activity

**THE PRESENT PUBLICATION** reports the findings of the “Quality Assurance of Cross-border Higher Education (QACHE)” project. This report summarises the findings from several data collection phases which included surveys, in-depth country reports, and regional forums. The gathered information resulted in the production of the project’s key outcomes – the *Toolkit for Quality Assurance Agencies* and recommendations for policymakers at the national and European level – and revealed a further need for better facilitation and strengthened cooperation in the quality assurance of cross-border higher education.

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