



# **Good Practice in Transnational Education**

## **A Guide for New Zealand Providers**

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## Introduction

Compared to other major education exporting countries, and most notably Britain and Australia, New Zealand is in an early stage in the development of transnational education. This means that New Zealand providers entering overseas education systems now may encounter more competition than established overseas providers did during when beginning their transnational operations. Fortunately, by learning from the experience of other countries' providers, New Zealand institutions launching into offshore education now can deliver efficient high quality programs that can compete with established overseas providers, effectively leap-frogging decades of trial and error.

This guide aims to provide a brief introduction to good practice in transnational (or 'offshore') education by drawing on the New Zealand and international literature on transnational education, international codes of practice, case studies of large-scale successful overseas programs, and reports of quality assurance bodies. It covers transnational strategy, selecting an offshore partner, drafting a written agreement, curriculum development, teaching and learning materials, supporting teaching staff, and language issues. It provides links to many detailed resources showcasing good practice that can be used by providers in developing their own internal processes for transnational program delivery.

This guide has been designed to be used by academic, teaching, management and administration staff in New Zealand educational institutions which are considering or are already engaged in offshore initiatives. The guide:

- Explains key international standards and guidelines on transnational provision, and their applicability with the NZ and regional context
- Explains relevant NZ standards, regulations, quality assurance requirements and sources of government and industry support
- Provides examples of good practice in transnational delivery
- Provides an overview of the types of processes involved in the development of offshore programs, and directions to practical resources that can assist NZ providers in these processes
- Provides links to key sources so that you can easily obtain more detailed information about the issues addressed in this guide.

Definitions of transnational education sometimes differ slightly from country to country, and in New Zealand the interchangeable term 'offshore education' has been used more commonly in the past. The term transnational is preferred here as it is more widely used internationally and is more widely understood in both sending and receiving countries. The specific definition used here is 'the delivery of New Zealand formal educational qualifications by New Zealand providers outside New Zealand's shores' (Catherwood, 2006, p.5). Thus study tours and other short programs for New Zealand students delivered overseas are not included here. It is useful to distinguish

three main forms of transnational education:

1. International distance education, in which students are supported remotely from the home campus in New Zealand, using a combination of communication tools and sometimes short visits
2. Partner-supported programs, in which the New Zealand provider collaborates with an in-country partner to share the delivery of services to students
3. International branch campus, in which a New Zealand provider establishes an overseas subsidiary to teach students in that country

This guide focuses on the second of these, which is the most common mode of delivery. Much of the guide is also very relevant to forms of distance education that do not involve a local partner, especially the sections dealing with equivalence and teaching. And while there are currently no offshore campuses of New Zealand tertiary education providers, this guide will be of assistance to providers contemplating such an initiative, as the relationships between home campuses and offshore campuses are in many ways similar to partnerships between independent entities.

Within the broad category of 'partner-supported programs' there are a wide variety of organisational and pedagogical models, and invariably each transnational initiative is designed to reflect the needs of the institutions and students involved, and the regulatory and commercial environment in the program operates. Therefore this guide does not aim to present a definitive template but instead explains the broad 'good practice' principles that have evolved in the field and presents examples of successful approaches that may provide food for thought for those considering implementing new programs and rethinking existing operations.

## The Promise and the Pitfalls of Transnational Education

Between different countries there is often a huge variation in the range of educational options available to students. While students in New Zealand may be spoilt for choice, in many countries local providers are not able to offer the type of programs that are sought after by students, their families, employers and governments. There is often unmet demand for programs taught in English and in rapidly growing sectors of the labour market, and it is in these areas that New Zealand providers may be able to offer programs that local institutions do not yet have the capacity to deliver. Filling such gaps in other countries' education systems allows New Zealand institutions to grow their operations while helping those countries' economic development by increasing the supply of skills their growing economies need.

Overseas governments sometimes encourage the development of transnational programs as a way to reduce the number of students travelling abroad to study. When students study locally in a foreign program rather than studying overseas, they take less money out of the country, support the growth of the domestic education system, and are less likely to emigrate after completing their studies. Transnational programs also cater to those students who want a foreign education but cannot travel because of family or work commitments, or because of the considerable costs involved in studying abroad.

Transnational operations have the capacity to generate additional revenue for the New Zealand provider. Institutions can capitalise on the significant investment that they have made over the years in infrastructure, staffing and curriculum development by extending programs to serve a larger student population based overseas. In doing so, institutions can build on their existing strengths in ways that enhance their reputation both in New Zealand and abroad. Done well, such initiatives can help in recruiting future students and staff, and can provide existing students and staff with international engagement opportunities not available on the home campus.

Unfortunately, in practice much transnational education has failed to live up to these goals, and it is more common to read critical accounts of offshore programs than words of praise. For example, Philip Altbach, one of the world's leading scholars in the field argues that transnational education:

does not really contribute to the internationalisation of higher education worldwide. Knowledge products are being sold across borders, but there is little mutual exchange of ideas, long-term scientific collaboration, exchange of students or faculty, and the like (Altbach, 2000, p.5).

This refrain that transnational provision is merely a commercial exchange stripped of the broader benefits of education is commonly heard, and not just from outside commentators. It is not uncommon for academic staff involved in offshore programs to be ambivalent about the social and educational merits of their overseas programs. Poor quality transnational programs may be profitable in the short-term but are rarely sustainable as they are likely to

harm the reputation of the provider, divert energy away from more valuable activities and sap the energy of staff.

This guide draws on existing literature on transnational education and institutional experience to help New Zealand educational institutions to develop commercially-viable international initiatives that are in line with the institutional mission, enhance reputation, and bring benefits to current and future students and staff.

## International Standards for Transnational Education

The regulatory framework governing New Zealand education providers operating overseas is set out in a comprehensive report and resource kit, *Offshore Education: Minimum Regulatory Requirements, Including Quality Assurance Measures* (Catherwood, 2006). This report is available from Education New Zealand and is essential reading for those responsible for institutional management of offshore operations. Providers should also consult the specific accreditation and quality assurance requirements for New Zealand universities (NZVCC 2007, pp.60-3) and other tertiary education providers (NZQA 2005) operating offshore, and this guide is intended to supplement these.

This guide aims to complement the statement of legal requirements by setting out the emergent international standards for quality provision of transnational education and drawing on the international literature to provide accounts of good practice.

The most important statement of international standards in transnational education are the *Guidelines for Quality Provision in Cross-Border Higher Education*, which were developed by UNESCO and the OECD in 2005 following extensive consultations with many governments. The guidelines set out minimum standards in order to 'provide an international framework to protect students and other stakeholders from low-quality provision and disreputable providers' (p.3). In doing so, they incorporate the main features of the International Association of Universities' (2004) policy statement *Sharing Quality Higher Education Across Borders*, which was the first effort to develop a global statement of the sector's expectations of individual institutions operating across borders. The development of such global policy statements in recent years points to the level of agreement on international standards that has now been reached between governments and providers, and this guide summarises the main features of these for New Zealand providers.

The UNESCO and OECD guidelines are not legally binding on educational institutions or governments, but they are widely respected and are having considerable influence in shaping governments' regulatory frameworks and the way in which quality assurance systems approach transnational education. They apply to tertiary vocational education and training as well as degree-level programs, and the principles set out in the guidelines are also of relevance to schools and English-language teaching institutions operating offshore. The specific guidelines for transnational providers are listed in Appendix One.

In addition to these international guidelines, some major exporting countries have developed binding guidelines for their providers operative offshore. The practices of other exporting countries, particularly the UK, Australia and the United States, shape the expectations of partner institutions and governments, and so it is important for New Zealand providers to understand the norms that other exporting countries have adopted.

The most extensive of these is the British Quality Assurance Agency for Higher Education's (2004) *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education. Section 2: Collaborative Provision and Flexible and Distributed Learning (Including e-learning)*. This sets out a detailed list of expectations for UK providers operating in collaboration with partner institutions within the UK and abroad. The QAA's guidelines for providers are listed in Appendix Two, and while they are not binding on New Zealand providers as they are on British institutions, because Britain is the largest provider of transnational education these guidelines have shaped the expectations and practices of transnational education providers and governments globally.

## Developing a Transnational Education Strategy

Richard Garrett, of the London-based Observatory on Borderless Higher Education, observes that in many educational institutions transnational operations there is a mismatch between the large scale of provision and the small amount of attention paid strategic planning and governance:

there are growing tensions between the current and predicted scale of transnational activity and what appears to be (with key exceptions) generally poor central institutional understanding of provision, plus limited co-ordination with broader institutional mission. The focus here is on the UK, but the argument would apply with equal force to other countries (Garrett, 2004, p.1).

Typically, institutions in the UK and Australia that have developed offshore programs have then gradually enhanced their quality assurance systems to oversee these, usually in an ad hoc and reactive manner, and often prompted by quality assurance agencies. Many Australian universities have only recently begun to develop an institution-wide strategy for transnational engagement after a decade or more of sporadic and opportunistic offshore program development.

The ease for other providers to replicate transnational teaching models reduces profit margins considerably. In many cases, a profit is only realized from students who go on to complete their studies at the institution's home campus (Lydia, 2006). Most New Zealand transnational programs are at the Certificate and Diploma levels and are intended to staircase students into onshore programs in New Zealand, sometimes as loss-leaders (Catherwood & Taylor 2005, p.26). New Zealand transnational education providers may have cost advantages compared with those from other countries, as Li (2004) argues. However, most costs in transnational programs are incurred in the host country, and all affect all foreign providers equally, so New Zealand's cost advantages will be less significant offshore than for onshore international students. For a detailed discussion of New Zealand's competitive position see Catherwood and Taylor (2005, p.30) and Olsen (2006).

Too often the decision to initiate an offshore program is taken on the basis of expected financial returns alone, but the educational, reputational and organisational impacts of these programs often far outweigh the financial costs or benefits derived. In internal decision-making processes, education providers need to be able to balance the ability to be responsive to opportunities as they arise in a competitive environment, with rigorous academic, financial and logistical assessment of the merits of a proposal (Connelly *et al.* 2006). A successful and reputable transnational program can enhance an institution's prestige in a particular location, but conversely, a poor quality or failed transnational program badly can seriously damage an institution's reputation and discourage students from studying at the institution's home campus. So when deciding whether to engage in transnational education, it is important to think about the reasons for doing so on a number of levels. In relation to prospective offshore students and their families, will a transnational program:

- Broaden access to education
- Provide a type of education that is not currently available, or not in sufficient scale
- Respond to the learners' educational demands, contribute to their cognitive, cultural, social, personal and professional development

In relation to the awarding institution, will an offshore initiative:

- Build on an existing strength
- Be seen by staff as a worthwhile and rewarding activity
- Improve the institution's reputation
- Help or hinder efforts to meet the institution's key strategic objectives

Pearce (2006) outlines the factors behind the success of Wintec's offshore programs:

- Programmes chosen were a special strength of that institution
- Offshore partners were carefully selected
- Risks were systematically managed
- There was more than one income stream from project
- Wintec's brand was built locally and regionally
- Robust business models and scalability

The University of Western Australia (UWA 2005) has developed a website containing detailed information for staff considering transnational programs, including guides and proformas relating to:

- Rationale and processes for considering and establishing transnational courses
- Procedure for obtaining approval for offshore programmes
- A general policy on developing links with overseas institutions
- Policies for articulation agreements with international institutions

This collection of resources begins with a useful list of general issues that need to be considered by any institution undertaking any offshore teaching program:

- How is the transnational program linked to UWA's overall strategic objectives and internationalisation policies? To Faculty strategic plans?
- Will it add value to the core activities of the university at its home campus? In what ways?
- What is the rationale for the transnational program (educational and financial, short term and long term)?
- Will there be an impact of the transnational program on Perth operations? Will it affect local markets and/or teaching and research and if so in what ways?
- Has the university/faculty recognized and accepted the risks associated with the transnational program and developed risk management strategies?
- Is there an adequate student market for the transnational program and how has this been assessed?
- If the students are intended to have some time on the home campus in Perth, has the school consulted the International Centre about visa requirements?

## Selecting a Partner

Nearly all transnational programs are centred around a relationship between the New Zealand institution awarding the qualification and a local partner institution, and the choice of overseas partner is the single most important decision affecting the outcome of the program. Many strategic alliances with partners begin as informal relationships between individuals, who are able to build more formal links between senior officials on each side. This process takes time and persistence and involves repeat visits on the part of both parties.

The type of partner that is most appropriate will be dependent on the local regulatory and commercial environment, as well as the New Zealand institution's objectives. In China, for example, foreign degree programs can only be offered jointly with a Chinese university, whereas in Singapore and Malaysia, most foreign programs have been partnered with private colleges or professional associations. While there are benefits to seizing opportunities as they arise, in the longer term institutions benefit much more from taking strategic decisions early on about what types of local partners are being sought. Some awarding institutions have decided only to partner with highly-regarded public and private not-for-profit universities in order to maximize long-term reputation benefits and research linkages in the host country. Others have sought to partner with entrepreneurial private colleges in order to quickly develop programs in areas of high demand. In many established markets, the most experienced and reputable local partner institutions will already have relationships with foreign providers in place, and it is not uncommon for a university department or private college to be teaching programs from several foreign providers.

The most important consideration is, that 'the educational objectives of a partner organisation should be compatible with those of the awarding institution' (QAA 2004, p.12). This involves not just understanding your prospective partner's goals, but also being able to articulate your own offshore educational objectives. Once a partnership is established, students, employers and governments will judge your institution by the quality and orientation of your local partner, so partner choice is important in positioning your institution internationally. Adams (2000), speaking from personal experience, warns that 'working with a partner without experience in education will be a high risk strategy' (p.88). Some institutions have entered into seemingly attractive partnerships, for example, with a property developer seeking to establish a college as part of a business and residential development, or with a large enterprise requiring training for many staff, only to find that while their partner's business operations may be highly successful, their capacity to manage and operate an educational institution is lacking.

Because of the importance of partner choice it is important not to rush this decision. The QAA (2004) advises that:

An awarding institution should undertake, with due diligence, an investigation to satisfy itself about the good standing of a prospective partner or agent, and of their capacity to fulfill their designated role in

the arrangement. This investigation should include the legal status of the prospective partner or agent, and its capacity in law to contract with the awarding institution (p.12).

Such an investigation needs to take into account the financial and reputation risk to the New Zealand provider. This is clearly a very detailed process, and below some useful guides to the process are briefly described. While this guide does deal with the New Zealand regulatory framework governing transnational provision (see Catherwood 2006), it is worth noting at this point that as part of accreditation procedures, universities are required to provide the New Zealand Vice Chancellor's Committee's Committee:

A statement on the standing of the overseas institution(s) and sufficient information to ensure that CUAP recognises the overseas institution(s) as meeting appropriate quality and programme management requirements, that are essentially equivalent to those expected by a New Zealand university (p.60).

In an excellent literature review on strategic alliances in education, Bannerman *et al.* (2005, p.52) provide the following list of considerations in offshore partner choice.

- What are my strategic goals?
- What is my target market? (Not just physically, as in Country X, but what type of students and programs, etc.?)
- What is my positioning concept?
- Whose brand and how will it be protected?
- Am I exposed politically? (Is the potential partner aligned to a particular government or party?)
- Who is responsible for each value chain function?
- How will the costs and benefits be shared?
- How will disputes and new challenges be managed?
- What controls, protections and remedies can be built into the contract?

A similar list of considerations is provided by Adams (2000, pp.87-94), a long-time senior manager involved with many transnational operations:

- Does the partner have experience in education?
- Is the partner appropriate to the host country and to the discipline?
- Is there a clear understanding of the investment required?
- How is the relationship managed?

- What are the long-term plans for the provider and the home partners?
- Are there agreements on exclusivity?
- Does the partner understand the requirements of operating a degree?
- Are students protected reasonably from the operation ceasing because of insolvency, changes of regulations, etc.?
- Has there been proper business, legal and regulatory planning?
- Does the partner understand the regulatory environment?
- Does the partner understand the market?

Some very useful resources detailing five Australian universities' practices in choosing partners are available online (Australian Education International, 2006). These are described briefly here, and links to the resources are listed at the end of this guide.

- Charles Sturt University (Cochrane, 2005) describes standard partner selection processes and specific regulatory and contextual issues that need to be taken into account when selecting partners in China and Indonesia. Supporting documents illustrate how general principles and processes can be applied in very different contexts. Detailed appendices describe various aspects of transnational program delivery in China and Indonesia, as well as Charles Sturt University's financial modeling systems.
- Deakin University (2006) has developed an Offshore Teaching Partnership Toolkit, which is a set of questionnaires, forms and templates to be used when establishing, managing and reviewing an offshore teaching partnership. It includes 146 Microsoft Word documents in various directories that other institutions are free to customise.
- Edith Cowan University (2005) sets out to identify 'best practice' in the selection of offshore partners by studying audit reports of transnational programs conducted by the UK Quality Assurance Agency for Higher Education and the Australian Universities Quality Agency. It then compares the practices that are commended by the quality assurance agencies with Edith Cowan's own systems and makes recommendations for modifications.
- The University of Tasmania's report (Cooper, 2005) consists of three very detailed and thoroughly researched papers: 'Approaches to Transnational Education (TNE) management: how they influence decisions about partner selection; 'Reputation as a criterion for Transnational Education (TNE) partner selection: the influence of research and the research-teaching nexus'; and 'Closing the loop:

cyclical performance review in Transnational Education (TNE) – the use of balanced scorecard reporting and TNE databases’.

- La Trobe University (2005) presents a compact checklist that can serve as a template for internal approval processes for new transnational programs.

These resources allow New Zealand providers to draw on the experience of other institutions in offshore delivery, but invariably each partnership is different, and needs to be approached in an open manner so that the relationship can develop and evolve over time. As the summaries of three New Zealand providers’ offshore programs presented in the Ministry of Education’s (2003) ‘APEC Joint Venture Schools Project’ show, it is impossible to predict every aspect of a program’s delivery. The key to building and maintaining a successful relationship, as one of the case studies notes, is:

that each organisation ensures that demonstrable benefits are consistently provided to its partner organisation and most importantly, to the students. It is argued that these benefits need not be equivalent or result in large financial gains in the short-term. The importance, however, of communicating these to governing bodies, staff and students is emphasised (p.13).

## Written Agreements

Most transnational partnerships in education involve two types of agreements – an initial ‘memorandum of cooperation’ affirms the institutions’ willingness to collaborate and a subsequent ‘memorandum of agreement’ specifies in detail how a particular transnational program will operate.

For program delivery, written agreements detailing the responsibilities of the New Zealand awarding institution and overseas partner are required by both the NZVCC (2007) and the NZQA (2005), who specify the scope and contents of the agreements for universities and other tertiary providers respectively. The written agreements are crucial in clarifying the division of responsibilities between the parties involved, and are therefore important frameworks for ongoing quality assurance, but they are less valuable as legal agreements.

In practice, as Adams (2000) has observed, written agreements for transnational programs are often either legally unenforceable or impossibly expensive to enforce. Nevertheless, a written contract:

- Provides a clear statement of principles and responsibilities of each party, ensuring that critical aspects of program delivery are understood prior to commencement
- Establishes processes for resolution of disagreements between the parties
- Is required by accreditation and quality assurance agencies in New Zealand and in the host country

Drafting a written agreement that accurately reflects the commercial and educational aspects of the relationship, as well as meeting the requirements of New Zealand and overseas authorities is a serious and sometimes costly undertaking. Once the two education providers are satisfied with the agreement it must often be translated, then submitted to authorities in each country, who may each require specific changes, which will need to be made in both language versions and then the agreement resubmitted to authorities in both countries. Each step may take several months and require face-to-face meetings to resolve issues that need clarification during the process.

It is important that the agreement clearly outlines processes for renegotiation and termination and has an end date, thereby necessitating a review of the relationship at a specified future time. An exclusivity clause may restrict either party from entering into similar arrangements with another institution in a particular location.

The UK Quality Assurance Agency’s recent review of British programs offered in China contains a detailed account of the nature of written agreements governing these relationships (QAA 2006).

A sample written agreement is available on the Education New Zealand website.

## **Ensuring Equivalence in Curriculum**

There is a generally accepted principle, enshrined in various codes of practice and national regulations, that the curriculum of a transnational program should be the same as that delivered in the home country, with appropriate adaptation to suit the local context and student group. As an abstract principle, this is straightforward, but in practice it is very difficult to ascertain how similar different iterations of a program are, and there are ongoing debates about how similar they should be, in light of cultural and language differences between delivery locations. For instance, the UNESCO and OECD (2005) *Guidelines for Quality Provision in Cross-Border Higher Education* state that awarding institutions should:

Ensure that the programmes they deliver across borders and in their home country are of comparable quality and that they also take into account the cultural and linguistic sensitivities of the receiving country. It is desirable that a commitment to this effect should be made public (p.14).

This discussion needs to be considered in relation to the way in which curriculum for transnational programs is developed and delivered. Transnational education involves what some commentators refer to as 'unbundling' or 'disaggregation of the supply chain' in which the various services that need to be supplied as part of an educational enterprise (including marketing, administration, teaching, provision of library facilities, assessment) are disentangled from one another and delivered by one or other organization as specified in the written agreement between the two institutions. This approach is very similar to the packaging of curriculum employed by multi-campus for-profit universities in the USA (Farrel 2003).

## **Teaching and learning materials and resources**

Many transnational partnerships originally grew out of distance education programs designed for local students. Local partners could provide classrooms, tutors, library and administration facilities to supplement the packaged materials produced in the home country. This model has been strengthened by the development of online courseware, digital library collections and email communication with lecturers and teachers in the home country. It is possible now to provide students in dispersed locations with access to very similar educational resources, which simplifies the task of curriculum development for transnational programs. In the case of self-contained material developed for distance education – printed or electronic collections of readings, questions and assignments arranged into weekly modules – uniformity is easily maintained.

Very often, offshore students and teachers comment about aspects of centrally-produced materials that are particular to the context of the home campus but do not travel well, such as references to business, politics, law or environment. A common reaction is to remove such location-specific content that is not relevant to other sites, but this may not be the best course of action, both because such local references are important for New Zealand-based

students and also because such local examples and contextualization often help students to make sense of abstract ideas and theories. It may be more appropriate to introduce content from each site in which the program is taught, but to contextualise and elaborate these so that they are useful to student from any site. The UNESCO and Council of Europe (2001) 'Code of Good Practice in the Provision of Transnational Education' mandates such an approach, stating that:

Transnational education arrangements should encourage the awareness and knowledge of the **culture and customs** of both the awarding institutions and receiving country among the students and staff (emphasis in original).

By embedding a course in several local contexts in which it is taught, students in each teaching location begin to gain from the course's transnational character, and lecturers and students alike are encouraged to reflect on the curriculum in terms of various differences and similarities of experience at global, regional, national and local levels. Internationalising the curriculum in this way is much easier if offshore teaching staff have input into curriculum development and review processes.

It is important for staff responsible for curriculum development on the home campus to be in close contact with offshore teachers also to ensure that their materials are being used. Where teaching is carried out exclusively by the offshore partner, as is the case in nearly a quarter of New Zealand transnational programs (Catherwood & Taylor 2005), academic oversight and monitoring by program and course coordinators at the home campus is crucial. The following example illustrates the type of disjuncture that can develop between the 'intended' and 'received' curriculum in transnational programs if there is no communication between teaching staff:

We know of a case where the partner – duly armed with the list of subjects and collection of curriculum material approved and developed by the credentialing Western university – engaged local academics to teach the same subject material they taught at their own university. The course had the same subject titles as the exporter's course, but was a collection of content from three different local universities. Because the staff were well-qualified teachers from prestigious institutions, it may indeed have been a better course than that of the awarding university. However, this would be more by good fortune than good design, and the situation could change overnight, depending on the caliber of the staff involved (McBurnie and Ziguras 2007, p.113).

The point here is that the university awarding the qualification had little control over, or knowledge of, the 'received' curriculum despite having sent extensive materials to the partner. This illustrates the need for a close working relationship between the home campus and offshore partner institution at the level of teaching staff and not just at the level of management. Pannan *et al.* (2005) present a detailed account of RMIT University's offshore programs delivered through the African Virtual University and RMIT International University Vietnam (its Ho Chi Minh City campus) to illustrate the

importance of communication and collaboration between teaching staff onshore and offshore in ensuring equivalent outcomes for students.

One study that compared the learning experience of offshore distance education and students studying on campus in Australia advocated several practical steps to ensure greater equivalence between the two modes of delivery:

- Appointing the same course coordinator for both traditional learning and distance learning. This ensures that both modes adhere to the Division's (or Department's) guidelines on quality, content and regulations.
- Appointing the same lecturer to teach in both modes of learning. This is to ensure quality as well as equivalence. The same lecturer can adjust the content, delivery and quality of the material to meet the needs of the two groups of students.
- Using the same textbooks, collections of readings and other core material for both face-to-face learning and distance learning. This ensures that both cohorts of students have the same core material for assignments and examinations.
- Using the same learning objectives for assessment for both modes of learning (Paul 2005, p.16).

### **Ensuring Equivalence in Selection and Assessment of Students**

The principle of equivalence between admission and assessment standards across transnational and home campus programs is enshrined in most national quality assurance systems. The UNESCO and Council of Europe (2001) 'Code of Good Practice in the Provision of Transnational Education' states that:

The admission of students for a course of study, the teaching/learning activities, the examination and assessment requirements for educational services provided under transnational arrangements should be equivalent to those of the same or comparable programmes delivered by the awarding institution.

Achieving equivalence in entry standards for different groups of students is notoriously difficult, even on one campus in one country, as students' pathways into institutions become more internationalized and diverse. International students, whether at the home campus or offshore, are likely to enter a tertiary program direct from secondary education in various national systems, foundation programs, or prior tertiary study. In many cases students have also studied in intensive English programs.

There are several measures that should be put in place to ensure consistent standards are being applied in selection and assessment of students:

- Ensuring that clear and consistent assessment criteria and standards

are used across different teaching sites

- Moderating assessment across different teaching sites
- Tracking retention, the distribution of grades and graduation rates of students across different teaching sites, and who enter through different pathways
- Tracking retention, the distribution of grades and graduation rates over time so that the effects of various changes in student selection, teaching and assessment can be understood

The comparative data on academic performance of students from different teaching sites that is produced through such monitoring is not easy to interpret, as differences may be due to intake standards, language issues, teaching quality, access to learning resources or assessment practices. It is difficult to disentangle these factors, but the collection of such data is a necessary starting point, and allows potential problems to be identified early.

## Supporting Teaching Staff

Teaching staff from the awarding institution who travel overseas to teach for the first time often find the experience challenging. On top of the planning, preparation and logistics of teaching far from home, teachers are put into an unfamiliar learning environment in which they are the outsider. Their students and the local staff they are teaching with will usually have quite different expectations of them as teachers and professionals, compared with students and colleagues back home. Transnational classrooms are invariably culturally hybrid learning environments, in which the teaching staff and students need to understand each others' expectations and norms to be able to accommodate effectively (Chambers 2003; Dunn & Wallace 2006; Hoare 2006; Leask 2004).

Just over half (56 per cent) of New Zealand providers' involved in transnational education teach offshore using only their own staff. The other providers also involve teaching staff from the offshore partner institution, either in combination with New Zealand teaching staff (21 per cent) or without the direct involvement of New Zealand teaching staff (23 per cent) (Catherwood and Taylor 2005, p.6).

Some awarding institutions are involved in the selection of offshore teaching staff, requiring that all staff appointments to teach into the program are approved by them, while others trust the partner institution to appoint staff based on agreed prerequisites that are written into agreements between the institutions. The level of involvement of the awarding institution is usually based on the demonstrated capacity of the partner, and may change over time. Nevertheless, the awarding institution remains responsible for ensuring that the staff teaching its programs, whoever they are employed by, meet the standards set by that institution. The UK QAA (2004) sets out this expectation as follows:

The awarding institution should be able to satisfy itself that staff engaged in delivering or supporting a collaborative programme are appropriately qualified for their role, and that a partner organisation has effective measures to monitor and assure the proficiency of such staff. This applies equally to staff engaged in delivering or supporting a flexible and distributed learning programme (p.33).

In summary, there are three main ways in which New Zealand providers should prepare their own staff for transnational teaching:

- provide information about the general issues that lecturers routinely face in transnational programs, including organisational and cultural differences
- ensure teachers have access to country-specific information to make their teaching relevant to offshore contexts, and are encouraged to do so

- develop systems that support and enhance the informal support and sharing of information between teaching staff (Gribble and Ziguras 2003).

Just as for onshore staff, offshore teaching staff should of course have educational qualifications at an appropriate level and specific content knowledge for the subjects they are teaching. More difficult is to find staff who understand the educational approach and teaching style of the awarding institution, and who are highly proficient in English. The Australian Universities Quality Agency encourages Australian providers to establish induction and professional development for offshore staff, focusing on differences in assessment and teaching models. This ensures that local staff, who may be working with several foreign providers, understand the awarding institution's expectations and processes for staff and students. Flinders University (2005, appendix four) has published a good example of a guide produced for offshore teaching staff, introducing the institution and its teaching philosophy in a clear and concise manner. Many awarding institutions find that the best way to build a collaborative teaching culture is to bring senior teaching and administrative staff from the partner institution to the home campus to introduce them to the educational culture of the provider and provide them with intensive training.

A UNITEC program in Beijing faced a serious lack of suitably qualified teaching staff upon inception, requiring New Zealand-based staff to relocate to Beijing for several months to staff the program (Ministry of Education 2004). This caused a range of issues, ranging from accommodation to cultural adaptation of New Zealand staff, which would have been difficult to foresee given the original intention to recruit staff locally. Suitable staff were eventually recruited locally via referrals, talent fairs, employment agencies and the Internet, and these new staff were trained for teaching in the program by UNITEC staff:

Both Chinese and locally-recruited native English speaking teachers went through a period of UNITEC enculturation which involved:

- a) upskilling in the requirements of the Certificate in Intensive English;
- b) regular observation and training by the Director of Studies;
- c) increased awareness of the various policies that apply to UNITEC staff;
- d) familiarisation to UNITEC through the website;
- e) a work culture of hard work and unqualified support from UNITEC in Beijing and New Zealand (p.22).

Handing the program over to local teaching staff required much communication and support from UNITEC staff, especially during the first year, and was one of several aspects of program delivery that turned out to be much more time-consuming and demanding than had been envisaged.

The University of South Australia, which has over 7,000 offshore students constituting over 20 per cent of its student population, has developed one of the comprehensive induction packages. It includes detailed information written staff employed by partner institutions and by the University of South Australia, providing a range of contextual information, teaching strategies, practical guides, and links to an email discussion forum for staff teaching offshore (UniSA 2006). Clearly, few New Zealand providers have the volume of offshore activity to enable such an investment in transnational teaching development, but many of these resources can be provided relatively simply, and existing staff development materials can be revised to be inclusive of offshore teaching.

There is a growing body of literature on the expectations of students in transnational programs, which is able to inform professional development of teaching staff. For example, Leask (2006) examines the characteristics of teaching staff most valued by students and teachers in transnational programs. Pyvis and Chapman (2005) examine the cultural adjustment required of transnational students with the transition from domestic education into a foreign program. Chapman and Pyvis (2006) explore the ways in which students decision to study in a transnational program is related to their broader self-identity and aspirations. Hoare (2006) has conducted perhaps the most detailed study of transnational student experience, and draws on extended fieldwork including classroom observation to describe the expectations and experiences of a group of students in Singapore.

## Language

Most transnational programs are awarded by providers from English-speaking countries to students who are not native English speakers. So one key aspect of student selection is ensuring that students have adequate English competency to do well in their course of study, and most institutions do this by setting the same entry requirements as for the equivalent program at the home campus. This usually takes the form of an IELTS or TOEFL score, or an agreed English for academic purposes preparation program. While these entry requirements may suit international students in New Zealand, whose English improves through full-time study and immersion in an English-speaking environment, offshore students may not have the same exposure to English through their studies and may need additional language support. Two increasingly common ways of doing this are through English language classes at the beginning of courses to introduce the specific vocabulary of the area of study and concurrent English language study incorporated into the structure of the program.

New Zealand providers need to assess the ability of prospective partner institutions to teach in English, especially if they are new to transnational education or entering into a new field of study. The partner needs to have English language texts available to students appropriate to the type of studies being undertaken. Increasingly, offshore students are able to access books, journals and newspapers online through the library of the awarding institution, but this may require a dedicated space with fast Internet access, printing facilities and technical/library support, each of which may prove difficult or costly to provide well.

The level of English proficiency of local teaching staff is a second common issue in dealing with partner institutions. This is often a more sensitive issue than selecting students. Students are entering into a program being awarded by the New Zealand partner, whereas staff are being employed, or may already be employed, by the partner institution. For this reason, it is important that staffing requirements of the program and the capacity of the partner's staff be clearly understood prior to commencement of the program, and future staffing requirements be discussed and written into the agreement.

Melbourne's Victoria University (2005) has conducted a detailed review of language issues in its transnational programs in Malaysia and China, which includes recommendations for language learning services needed by students, and provides a very useful and much more comprehensive discussion than is possible in this guide.

There are good educational reasons for aspects of a course to be conducted in a language other than English, and it is useful to distinguish between the language used in teaching materials, formal instruction, out-of-class explanation, and assessment. It may be very helpful for students to have access to set readings and textbooks in their own language as well as those in English. Students may benefit from being able to have face-to-face discussions with their local teachers in their own language as well as being able to email teaching staff at the New Zealand provider in English. However, where languages other than English form a significant part of the teaching or

assessment of a transnational program, the degree of difficulty for the awarding institution rises exponentially. There are three main issues:

1. There is an expectation that graduates of a New Zealand program, wherever it is taught, will be able to apply that knowledge in English, so graduates with New Zealand qualification who are not competent in English to a level implied by the course of study may harm the reputation of the provider and of the country's education system. For this reason, many institutions choose to identify on the testamur and/or transcript the language in which a program is conducted if not English.
2. It is very difficult for the awarding institution to ensure the quality of a program that is taught by a local partner institution in a language other than English.
3. It is very difficult for the awarding institution to assess students' work in languages other than English, and so it may be impossible to ensure equivalence in academic standards between different teaching sites. Assessing translations of students' work is very unreliable given the impossibility for the assessor of distinguishing the quality of the translation from the quality of the student's work.

The University of South Australia, which offers several large programs in Mandarin offshore, has developed a very useful framework for quality assurance in the development and delivery of programs in languages other than English (Scarino *et al.*, 2006, pp. 52–74). The authors draw on an extensive literature review, as well as the university's experience in operating dual language programs, to provide a comprehensive guide to the educational, administrative and logistical issues involved in developing high quality programs in languages other than English.

## Ongoing Quality Assurance

Transnational programs require more rigorous ongoing quality assurance both because of complexity of teaching arrangement, and because the distance from the home campus. As a result, national quality assurance systems, both in exporting and importing countries, are increasingly scrutinising transnational programs. Much of these processes focus on the adequacy of program features that should be put in place from commencement, and which have been discussed earlier in this guide: the written agreement between the awarding institution and the local partner, and the quality of teaching materials, physical resources and teaching staff. In addition, there are two main ongoing internal quality assurance systems which external agencies scrutinise: the adequacy of student evaluation processes and periodic institutional self-review of offshore programs.

### Student Evaluation

Audit reports published by the Australian Universities Quality Agency have observed that student evaluation of teaching is often not conducted with the same level of rigor offshore as is required onshore. Usually student evaluation forms are distributed and collected by a person not directly involved in the teaching and are treated confidentially, to ensure that students feel free to reflect honestly on their experience, however in many cases partner institutions appear not to follow this practice and students' feedback may not be as accurate as is required to ensure program quality.

Providers with established transnational programs usually develop student evaluation forms specifically for offshore students, which are able to account for the different roles of the partner institution and awarding institution. These are sometimes produced bilingually to avoid the possibility of language issues limiting student feedback. A good example of tailored student evaluation forms are those produced by Flinders University (2005), which ask students for their views on the quality of research supervision (appendix one), classroom teaching (appendix two) and a specific topic (appendix three).

### Periodic Self-Review

The purpose of an internal review of transnational programs is to provide a structured opportunity for the awarding institution to inspect physical resources, collect a wide range of documentary information about program performance and conduct structured interviews with students, and academic and managerial staff from the awarding institution and the local partner institution. Such reviews may be organised in several ways, and are often either:

- Incorporated into the institution's normal curriculum review processes in which each program is reviewed every three years or so

- Conducted according to timelines established in a written agreement, where all programs offered by a partner institution are reviewed together and the relationship renegotiated
- Prompted by upcoming external quality assurance reviews, in an effort to discover and address issues before the external review process commences

As well as interviewing a range of participants in the program, the statistical and documentary information that should be analysed normally includes:

- Student performance data (including a comparison between the performance of students in transnational programs with their counterparts at the home institution): pass rates; completion rates; spread of marks;
- Information on learning resources, including: library holdings; number and generation of computers; number and capacity of classrooms;
- Student access to resources in addition to those provided as part of the program, including: home computer; home access to internet; private membership of library;
- Documentation of student feedback, including evaluation forms;
- Details on turnaround times for return of assignments, and replies to correspondence;
- Legal and contractual documentation, including: evidence of host country approvals; evidence of professional accreditation (where applicable); copies of contracts, partnership agreements (McBurnie and Ziguras 2007).

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## **Appendix One – UNESCO and OECD (2005) Guidelines for Transnational Tertiary Education Providers**

Reproduced from: UNESCO and OECD (2005) *Guidelines for Quality Provision in Cross-Border Higher Education*, Paris: United Nations Educational, Scientific and Cultural Organization and the Organisation for Economic Co-operation and Development. <http://www.oecd.org/dataoecd/27/51/35779480.pdf> pp.14-5.

Commitment to quality by all higher education institutions/providers is essential. To this end, the active and constructive contributions of academic staff are indispensable. Higher education institutions are responsible for the quality as well as the social, cultural and linguistic relevance of education and the standards of qualifications provided in their name, no matter where or how it is delivered. In this context, it is recommended that higher education institutions/providers delivering cross-border higher education:

- a) Ensure that the programmes they deliver across borders and in their home country are of comparable quality and that they also take into account the cultural and linguistic sensitivities of the receiving country. It is desirable that a commitment to this effect should be made public.
- b) Recognise that quality teaching and research is made possible by the quality of faculty and the quality of their working conditions that foster independent and critical inquiry. The UNESCO Recommendation concerning the Status of Higher Education Teaching Personnel and other relevant instruments need to be taken into account by all institutions and providers to support good working conditions and terms of service, collegial governance and academic freedom.
- c) Develop, maintain or review current internal quality management systems so that they make full use of the competencies of stakeholders such as academic staff, administrators, students and graduates and take full responsibility for delivering higher education qualifications comparable in standard in their home country and across borders. Furthermore, when promoting their programmes to potential students through agents, they should take full responsibility to ensure that the information and guidance provided by their agents are accurate, reliable and easily accessible.
- d) Consult competent quality assurance and accreditation bodies and respect the quality assurance and accreditation systems of the receiving country when delivering higher education across borders, including distance education.
- e) Share good practices by participating in sector organisations and inter-institutional networks at national and international levels.
- f) Develop and maintain networks and partnerships to facilitate the process of recognition by acknowledging each other's qualifications as equivalent or comparable.

- g) Where relevant, use codes of good practice such as the UNESCO/Council of Europe Code of Good Practice in the Provision of Transnational Education<sup>9</sup> and other relevant codes such as the Council of Europe/UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications.
- h) Provide accurate, reliable and easily accessible information on the criteria and procedures of external and internal quality assurance and the academic and professional recognition of qualifications they deliver and provide complete descriptions of programmes and qualifications, preferably with descriptions of the knowledge, understanding and skills that a successful student should acquire. Higher education institutions/providers should collaborate especially with quality assurance and accreditation bodies and with student bodies to facilitate the dissemination of this information.
- i) Ensure the transparency of the financial status of the institution and/or educational programme offered.

## **Appendix Two – United Kingdom Quality Assurance Agency Guidelines for Transnational Tertiary Education Providers**

Reproduced from: QAA (2004) *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education. Section 2: Collaborative Provision and Flexible and Distributed Learning (Including e-learning)*. Gloucester: Quality Assurance Agency for Higher Education. <http://www.qaa.ac.uk/academicinfrastructure/codeOfPractice/section2/collab2004.pdf> pp.31-8.

- A1 The awarding institution is responsible for the academic standards of all awards granted in its name.
- A2 The academic standards of all awards made under a collaborative arrangement should meet the expectations of the UK Academic Infrastructure. This applies equally to awards made as a result of flexible and distributed learning arrangements.
- A3 Collaborative arrangements should be negotiated, agreed and managed in accordance with the formally stated policies and procedures of the awarding institution.
- A4 An up-to-date and authoritative record of the awarding institution's collaborative partnerships and agents, and a listing of its collaborative programmes operated through those partnerships or agencies, should form part of the institution's publicly available information. This also applies to flexible and distributed learning programmes where these warrant a separate identification.
- A5 The awarding institution should inform any professional, statutory and regulatory body (PSRB), which has approved or recognised a programme that is the subject of a possible or actual collaborative arrangement, of its proposals and of any final agreements which involve the programme. This applies equally to programmes for which significant flexible and distributed learning arrangements are developed after the programme has been approved or recognised. In any case, the status of the programme in respect of PSRB recognition should be made clear to prospective students.
- A6 The awarding institution's policies and procedures should ensure that there are adequate safeguards against financial or other temptations that might compromise academic standards or the quality of learning opportunities.
- A7 Collaborative arrangements should be fully costed and should be accounted for accurately and fully. This applies equally to flexible and distributed learning arrangements.
- A8 The educational objectives of a partner organisation should be compatible with those of the awarding institution.

- A9 An awarding institution should undertake, with due diligence, an investigation to satisfy itself about the good standing of a prospective partner or agent, and of their capacity to fulfill their designated role in the arrangement. This investigation should include the legal status of the prospective partner or agent, and its capacity in law to contract with the awarding institution.
- A10 There should be a written and legally binding agreement or contract setting out the rights and obligations of the parties and signed by the authorised representatives of the awarding institution and the partner organisation or agent.
- A11 The agreement or contract should make clear that any 'serial' arrangement whereby the partner organisation offers approved collaborative and/or flexible and distributed learning provision elsewhere or assigns, through an arrangement of its own, powers delegated to it by the awarding institution, may be undertaken only with the express written permission of the awarding institution in each instance. The awarding institution is responsible for ensuring that it retains proper control of the academic standards of awards offered through any such arrangements.
- A12 The awarding institution is ultimately responsible for ensuring that the quality of learning opportunities offered through a collaborative arrangement is adequate to enable a student to achieve the academic standard required for its award. This applies equally to learning opportunities offered through flexible and distributed learning arrangements.
- A13 An awarding institution that engages with another authorised awarding body jointly to provide a programme of study leading to a dual or joint academic award should be able to satisfy itself that it has the legal capacity to do so, and that the academic standard of the award, referenced to the Framework for Higher Education Qualifications (the SCQF in Scotland), meets its own expectations, irrespective of the expectations of the partner awarding body.
- A14 The scope, coverage and assessment strategy of a collaborative programme should be described in a programme specification that refers to relevant subject benchmark statements and the level of award, and that is readily available and comprehensible to stakeholders. This applies equally to programmes offered through flexible and distributed learning arrangements.
- A15 The awarding institution should make appropriate use of the Code to ensure that all aspects of the Code relevant to the collaborative arrangement are addressed by itself and/or the partner organisation, and should make clear respective responsibilities of the awarding institution and a partner organisation in terms of addressing the precepts of the Code. This applies equally to flexible and distributed learning arrangements that involve other organisations.

- A16 In the case of a collaborative or flexible and distributed learning arrangement with a partner organisation, or engagement with an agent, the awarding institution should be able to satisfy itself that the terms and conditions that were originally approved have been, and continue to be, met.
- A17 The awarding institution should be able to satisfy itself that staff engaged in delivering or supporting a collaborative programme are appropriately qualified for their role, and that a partner organisation has effective measures to monitor and assure the proficiency of such staff. This applies equally to staff engaged in delivering or supporting a flexible and distributed learning programme.
- A18 The awarding institution should ensure that arrangements for admission to the collaborative or flexible and distributed learning programme take into account the precepts of Section 10 of the Quality Assurance Agency's Code of Practice [Admissions to Higher Education (2006)].
- A19 The awarding institution is responsible for ensuring that the outcomes of assessment for a programme provided under a collaborative or flexible and distributed learning arrangement meet the specified academic level of the award as defined in the Framework for Higher Education Qualifications (or SCQF in Scotland), in the context of the relevant subject benchmark statement(s).
- A20 The awarding institution should ensure that a partner organisation involved in the assessment of students understands and follows the requirements approved by the awarding institution for the conduct of assessments, which themselves should be referenced to Section 6 of the Agency's Code [Assessment of Students (2006)].
- A21 External examining procedures for programmes offered through collaborative arrangements should be consistent with the awarding institution's normal practices. This applies equally to programmes offered through flexible and distributed learning arrangements.
- A22 The awarding institution must retain ultimate responsibility for the appointment and functions of external examiners. The recruitment and selection of external examiners should be referenced to Section 4 of Code on External Examining (2004), or any successor document.
- A23 External examiners of collaborative programmes must receive briefing and guidance approved by the awarding institution sufficient for them to fulfill their role effectively. This applies equally to flexible and distributed learning programmes.
- A24 An awarding institution should ensure that:  
a) it has sole authority for awarding certificates and transcripts relating to the programmes of study delivered through collaborative arrangements. This applies equally to programmes delivered through flexible and distributed learning

- arrangements;
  - b) the certificate and/or transcript records (a) the principal language of instruction where this was not English, and (b) the language of assessment if that was not English [except for awards for programmes or their elements relating to the study of a foreign language where the principal language of assessment is also the language of study]. Where this information is recorded on the transcript only, the certificate should refer to the existence of the transcript;
  - c) subject to any overriding statutory or other legal provision in any relevant jurisdiction, the certificate and/or the transcript should record the name and location of any partner organisation engaged in delivery of the programme of study.
- A25 The minimum level of information that prospective and registered students should have about a collaborative programme is the programme specification approved by the awarding institution. This applies equally to a flexible and distributed learning programme.
- A26 The information made available to prospective students and those registered on a collaborative programme should include information to students about the appropriate channels for particular concerns, complaints and appeals, making clear the channels through which they can contact the awarding institution directly. This applies equally for students registered on a flexible and distributed learning programme.
- A27 The awarding institution should monitor regularly the information given by the partner organisation or agent to prospective students and those registered on a collaborative programme. This applies equally to students registered on a flexible and distributed learning programme.
- A28 The awarding institution should ensure that it has effective control over the accuracy of all public information, publicity and promotional activity relating to its collaborative provision, and provision offered through flexible and distributed learning arrangements.
- B1 Students should have access to:
- a) documents that set out the respective responsibilities of the awarding institution and the programme presenter for the delivery of an flexible and distributed learning programme or element of study;
  - b) descriptions of the component units or modules of a flexible and distributed learning programme or element of study, to show the intended learning outcomes and teaching, learning and assessment methods of the unit or module;
  - c) a clear schedule for the delivery of their study materials and for assessment of their work.
- B2 The awarding institution, whether or not working through a programme presenter, should ensure that students can be confident that:
- a) any flexible and distributed learning programme or element

- offered for study has had the reliability of its delivery system tested, and that contingency plans would come into operation in the event of the failure of the designed modes of delivery;
- b) the delivery system of a flexible and distributed learning programme or element of study delivered through e-learning methods is fit for its purpose, and has an appropriate availability and life expectancy;
  - c) the delivery of any study materials direct to students remotely through, for example, e-learning methods or correspondence, is secure and reliable, and that there is a means of confirming its safe receipt;
  - d) study materials, whether delivered through staff of a programme presenter or through web-based or other distribution channels, meet specified expectations of the awarding institution in respect of the quality of teaching and learning-support material for a programme or element of study leading to one of its awards;
  - e) the educational aims and intended learning outcomes of a programme delivered through flexible and distributed learning arrangements are reviewed periodically for their continuing validity and relevance, making reference to the precepts of Section 7 of the Agency's Code on Programme approval, monitoring and review (2000), or any successor document.
- B3 Prospective students should receive a clear and realistic explanation of the expectations placed upon them for study of the flexible and distributed learning programme or elements of study, and for the nature and extent of autonomous, collaborative and supported aspects of learning.
- B4 Students should have access to:
- a) a schedule for any learner support available to them through timetabled activities, for example tutorial sessions or web-based conferences;
  - b) clear and up-to-date information about the learning support available to them locally and remotely for their flexible and distributed learning programme or elements of study;
  - c) documents that set out their own responsibilities as learners, and the commitments of the awarding institution and the support provider (if appropriate) for the support of a flexible and distributed learning programme or element of study.
- B5 Students should have:
- a) from the outset of their study, an identified contact, either local or remote through email, telephone, fax or post, who can give them constructive feedback on academic performance and authoritative guidance on their academic progression;
  - b) where appropriate, regular opportunities for inter-learner discussions about the programme, both to facilitate collaborative learning and to provide a basis for facilitating their participation in the quality assurance of the programme;
  - c) appropriate opportunities to give formal feedback on their experience of the programme.

- B6 The awarding institution, whether or not working through a support provider, should be able to ensure that students can be confident that:
- a) staff who provide support to learners on flexible and distributed learning programmes have appropriate skills, and receive appropriate training and development;
  - b) support for learners, whether delivered through staff of a support provider or through web-based or other distribution channels, meets specified expectations of the awarding institution for the quality of learner support for a programme of study leading to one of its awards.
- B7 Students should have access to:
- a) information on the ways in which their achievements will be judged, and the relative weighting of units, modules or elements of the programme in respect of assessment overall;
  - b) timely formative assessment on their academic performance to provide a basis for individual constructive feedback and guidance, and to illustrate the awarding institution's expectations for summative assessment.
- B8 The awarding institution, whether or not working through a programme presenter or support provider, should ensure that students can be confident that:
- a) their assessed work is properly attributed to them, particularly in cases where the assessment is conducted through remote methods that might be vulnerable to interception or other interference;
  - b) those with responsibility for assessment are capable of confirming that a student's assessed work is the original work of that student only, particularly in cases where the assessment is conducted through remote methods;
  - c) any mechanisms, such as web-based methods or correspondence, for the transfer of their work directly to assessors, are secure and reliable, and that there is a means of proving or confirming the safe receipt of their work.