NZQA
NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

Proposal For

OFFSHORE EDUCATION QUALITY ASSURANCE REQUIREMENTS

August 2011

Consultation Proposal

NZQA is consulting with the tertiary education sector on proposed *Offshore Education Quality Assurance Requirements* that would supplement the current requirements for programme approval and accreditation.[1]

The proposed requirements, summarised on pages four and five, would apply to offshore delivery by universities, institutes of technology and polytechnics, wānanga, government training establishments and registered private training establishments.

Questions to guide sector comment are presented throughout this paper and in a separate online questionnaire on the NZQA website. Consultation responses are due with NZQA on 15 September.

NZQA developed these proposals together with Universities New Zealand, New Zealand Institutes of Technology and Polytechnics (NZITP), the Metro Institutes of Technology and Polytechnics, New Zealand Association of Private Education Providers (NZAPEP), Te Wānanga o Aotearoa, English New Zealand, the Independent Tertiary Institutions, the Ministry of Education and the Tertiary Education Commission. Members of the Sector Reference Group providing advice to NZQA on the project are listed in **Appendix A**.

The proposed requirements also draw on a range of international guidelines and publications, in particular the United Kingdom (QAA, 2010) and Australian (AVCC, 2005) documents. A selected bibliography is presented as **Appendix B.**

Context

The Government seeks to increase the economic value of international education and offshore delivery has the potential to contribute to economic growth. The proposed requirements would provide certainty to the tertiary education sector when delivering offshore.

As part of the offshore project NZQA plans to endorse the UNESCO/OECD Guidelines for the Quality Provision in Cross-Border Higher Education. Endorsement would offer reputational benefits in the international market by allowing New Zealand providers, NZQA and Universities New Zealand to publicly state that they meet an important international benchmark for offshore delivery.

The OECD *Guidelines* use international experience to indicate potential challenges to quality for cross-border education, including:
- financial risks of overseas ventures
- information about overseas partners not always being readily available
- complex arrangements with different business models often involving 'third countries"[2]
- geographical distance itself creating special challenges and costs
- different quality assurance expectations and evaluative cultures in overseas countries
- difficulties in ensuring: equivalence in entry criteria and assessment of learning, teaching staff are well supported and equivalent in terms of qualifications and experience, and support for students, with particular regard to language of delivery.

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[1] NZQA anticipates that the offshore requirements would be NZQA Rules enabled by changes to the Education Act 1989 proposed in Education Amendment Bill No. 4.

[2] Some examples have been collected by the United Kingdom Quality Assurance Agency for Higher Education: a Swiss college, accredited by a US Regional Accreditation Agency, sets up a campus in Greece and offers a franchised UK degree top-up programme to the US accredited one; a private Belgian college accredited by a US Accreditation Agency, validated by two different UK universities recruits almost exclusively non-Belgian students.

The proposed offshore requirements also respond to and address issues raised by Asia-Pacific Economic Cooperation (APEC) economies about offshore education provision within the region.[3]

Such challenges do not mean that New Zealand should avoid offshore education opportunities. Instead, the proposed extension to quality assurance would enable and underpin the marketing of New Zealand tertiary education offshore, and its international reputation.

Definition of offshore education

The proposed requirements cover offshore education, defined as:

> *tertiary education[4] that takes place in situations where approved programmes and qualifications listed on the New Zealand Qualifications Framework are delivered offshore by a New Zealand tertiary education organisation and/or in partnership with an overseas organisation*

The Sector Reference Group developed this definition to reflect New Zealand's terminology and context, using UNESCO's Guidelines as a reference point.

The offshore requirements do not apply to any programme delivered in New Zealand. New Zealand already has well-established quality assurance requirements for overseas providers and programmes operating in New Zealand, and for international students studying in New Zealand.

Offshore delivery occurs when an approved programme leading to a qualification on the New Zealand Qualifications Framework is delivered outside of New Zealand. However, there are a number of situations that would not be covered by the proposed requirements. These include:
- International students that travel to New Zealand to study are excluded. This covers examples such as, PhD students enrolled at a New Zealand tertiary education organisation, who are supervised in New Zealand, visit New Zealand from time to time but are gathering data in their home country where they are residing.
- New Zealand programmes delivered in New Zealand that includes an overseas component such as a field trip.
- An e-learning programme that was approved specifically for New Zealand students that has a small number of unsolicited international students. (However where larger groups of offshore students enrol in e-learning programmes, the requirements would apply).

Consultation question

1. Should the exemption for e-learning specify a threshold number of students?

Scale of offshore provision

Current data on the level of offshore provision by New Zealand providers includes Ministry of Education's figures for 2010 indicate that there are 2,898 offshore international students, but there could be more 'undisclosed' involvement offshore. NZQA has undertaken a survey of the tertiary education sector to identify their current and planned level of offshore provision. The results of the survey are presented in **Appendix C.**

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[3] These concerns were discussed at the APEC conference on Cross-border Education in Shanghai, which NZQA attended in June 2011.

[4] The New Zealand term 'tertiary education' equates to a combination of 'higher education' and 'vocational education and training', which are terms not commonly used in New Zealand.

Summary of Proposed Offshore Education Quality Assurance Requirements

Detailed principles, issues and risks that underpin each section of the requirements are in the section starting on page nine.

Principles

The requirements are based on the following principles:

- Offshore programmes are of comparable quality, in terms of outcomes and key processes leading to outcomes, to comparable programmes in New Zealand, thus protecting offshore learners and the international reputation of New Zealand's tertiary education system.
- Quality assurance of offshore education needs to be cost effective and not duplicate other quality assurance requirements
- Accreditation for delivery offshore is mandatory when the programme, or part of the programme leads to the award of qualifications listed on the NZQF
- The requirements should balance the facilitation of offshore education with protecting the reputation of the New Zealand education brand.

Partners and Relationships

1. The New Zealand tertiary education organisation must undertake a due diligence investigation of any offshore partner organisation, based on its experience in tertiary education, its ability to provide sufficient resources and its legal standing to offer the programme.
2. Due diligence identifies risks that cover the offshore partner's:
   - formal legal status
   - existing reputation, including compliance with laws in the host country
   - education interests and objectives
   - knowledge and experience in operating an education organisation
   - academic quality, reputation and standing (in-country and internationally)
   - existing cross-border partnerships
   - business plans, structure, and ownership, where appropriate
   - financial stability, strength, and probity
   - management and administrative capabilities
   - locations of operation, and the quality of buildings and facilities.

Contractual agreements

3. The New Zealand tertiary education organisation has a formal legal agreement with the offshore partner.
4. The contractual agreement defines how programme standards are maintained and identifies clear channels of authority, accountability, and executive action, so that collaborative arrangements are clearly set out and operate smoothly.
5. The agreement must be signed by the legally recognised signatories of the parties to the agreement, and must specify, as appropriate:
   - the names of the parties to the agreement
   - the allocation of responsibility for the management of quality systems to oversee and maintain standards
   - the procedures for resolving any differences that might arise between the parties to this agreement including, exit strategy arrangements and contract default provisions
   - procedures and responsibilities for securing approval and accreditation
   - procedures and responsibilities in respect of the management of the course, its ongoing monitoring of the provision for the implementation of changes to the course, and/or provision for unexpected programme closure
   - assessment and moderation arrangements
   - an indication of the wording which will appear on certificates awarded to learners who have met all the requirements of the course
   - responsibility for all administrative arrangements such as student enrolment, student welfare services, decisions relating to progress through the course, assessment, appeals, reporting of student results, and remuneration of monitors and moderators (if applicable)
   - financial aspects of contract
   - privacy/confidentiality arrangements
   - definition of the role, responsibilities delegated authority
   - legal jurisdiction of the contract

- fee refunds.

Programme design and delivery

6. Programme learning outcomes, content and academic workload (in terms of credit, level and duration), are consistent with the equivalent approved programme delivered in New Zealand.
7. Teaching and learning resources are of comparable quality, type and availability to those used in New Zealand; contextualised where appropriate; and encompass a positive approach to offshore learners' experiences and culture.
8. Teaching and learning methods enable successful outcomes for offshore learners, with explicit teaching and learning opportunities for offshore learners exposed to unfamiliar customs, cultural values, and language, with special regard to speakers of English as an additional language.

Assessment and moderation

9. Outcomes of assessment conducted offshore are consistent with New Zealand Qualifications Framework qualification definitions and level descriptors.
10. Assessments conducted offshore:
    - apply consistent assessment criteria to those used in New Zealand, but allow for appropriate adaptation to offshore learner contexts
    - ensure authenticity of student assessment work and security of qualification documents.
11. The awarding institution arranges for external moderation of examinations and assessments.

Academic and other staff

12. Offshore teaching staff, who are employed by the overseas partner or by the New Zealand institution, have comparable qualifications, experience and teaching skills to those delivering a comparable programme in New Zealand.
13. Staff selection, induction and ongoing training ensure that staff are prepared for offshore assignments, including awareness of legal responsibilities in the host country.

Student recruitment and entry

14. Accurately communicate the programme and student experience to potential offshore students.
15. Set fair entry requirements, ensuring learners who do not meet the entry requirements are not enrolled, and students who fail consistently are not re-enrolled.

Student Support and Complaints

16. Make comparable student support services available to offshore students, including academic support (independent study, IT and library facilities) and student welfare services.
17. Provide students with clear and up-to-date information, setting out:
    - contact details for staff accessible to students, who have capacity to provide support
    - the institution's responsibilities, by clearly identifying optional academic support activities and learning activities that are part of the programme, for example, tutorial sessions and web-based conferences
    - students' responsibilities, including their academic work-load in terms of credits, hours and/or duration of the programme
    - procedures for students to voice concerns, make complaints and lodge appeals.

Fee Refunds and Closures

18. Fee refund provisions for all offshore delivery are comparable to fee refund provisions in New Zealand and form part of the contract between partner organisations.
19. In the event of a programme closure, the New Zealand tertiary education organisation is responsible for providing a fair and reasonable set of alternatives for the students.

Quality assurance and management

20. Incorporate cross-border delivery within the New Zealand tertiary education organisation's ongoing quality assurance and quality management system.
21. Evaluate the quality and value of outcomes, and key processes that contribute to outcomes, for offshore learners, industry and communities.
22. Identify and meet all applicable local, regional, and national quality assurance requirements within the host country (outside New Zealand's quality assurance processes) for the organisation, the qualification or programme.

Proposed approach to applying the requirements to offshore education

Providers applying for accreditation to deliver their programmes offshore would need to provide evidence of meeting the *Offshore Education Quality Assurance Requirements*. In the application of these requirements, NZQA proposes taking a risk-based approach.

> Where the risks posed by offshore education arrangements are low, external quality assurance would be less intensive. Where there are higher levels of risk to a New Zealand tertiary education organisation and/or New Zealand's tertiary education system, external quality assurance would be more intensive.

Levels of potential risk would be evaluated according to interacting factors that include:

- the level of control the New Zealand tertiary organisation has over key delivery processes – for example programme design, staff delivering the programme, and assessment and moderation

- the degree of connectedness between the New Zealand institution and its offshore programme – distance provides challenges, but these can be mitigated by robust monitoring and regular communication with offshore staff maintained, for example, through web-based communication

- who awards the qualification – for example, if a New Zealand provider awards the qualification but an overseas provider delivers it, there are additional risks

- the tertiary education organisation's capability in off-shore delivery – for example a New Zealand tertiary education provider that plans a new offshore venture, but has other accreditations in offshore delivery

- the tertiary education organisation's quality assurance history – such as its academic audit or external evaluation and review results

> *note* - in the non-university sector, NZQA would only consider applications for offshore accreditation from tertiary education organisations with external evaluation and review ratings of at least Confident in educational performance and capability in self-assessment

- the scale of the proposed provision – for example a provider proposes an offshore programme that is larger in scale in relation to its current operations, which makes the risks potentially higher

- the known status of any offshore partner – for example whether the provider is registered or accredited with the appropriate regulatory authorities in the host county

- the nature of the relationship to the quality assurance body in the host country – for example where NZQA is confident that an offshore quality assurance body has covered NZQA requirements, then the risks are lower.

Consultation questions

2. Are there other important principles for quality assurance of offshore delivery besides those listed?

3. Are there additional risks that could be considered?

The risk-based approach is illustrated in the scenarios below:

Scenario	Probable risk assessment
New Zealand institution delivers (assesses, moderates) an offshore programme at its own satellite campus using its own academic staff. The New Zealand provider awards an NZQF qualification	There are risks posed through offshore provision. However, the NZ institution has direct control over key delivery processes and can mitigate risks posed by offshore delivery through having robust monitoring and clear channels of communication with offshore academic staff
New Zealand provider has a twinning agreement with an overseas provider allowing students to take an entire four year programme with the overseas provider in an overseas country. The New Zealand provider awards the qualification	The level of potential risk is higher in this scenario, considering the involvement of an overseas provider. The New Zealand provider has the accountability for the quality of the award and must manage the reputational risks through having robust contractual arrangements with the overseas provider

External quality assurance processes

The level of external scrutiny applied to applications for offshore programme approval and/or accreditation varies according to the level of potential risk.

In addition to the standard programme approval and accreditation and degree monitoring processes, higher levels of risk may warrant:

- an offshore evaluation visit as part of initial programme accreditation and/or ongoing external evaluation and review

- selection of offshore education as a focus area in the external evaluation and review of a non-university tertiary education organisation.

Quality assurance processes would take an evaluative approach by using inquiry questions to support initial programme approval and accreditation, for example:

Contractual arrangements - Inquiry questions

Has the New Zealand provider conducted due diligence on its overseas partner?

To what extent have they mitigated potential risks of off-shore delivery?

How well do the proposed contractual arrangements ensure clear allocation of responsibility between parties and responsible governance?

Inquiry questions would also be applied where there is ongoing quality assurance to evaluate the quality and value of programme outcomes, including degree monitoring and external evaluation and review.

For example, NZQA's tertiary evaluation indicators used in self-assessment and external evaluation and review[5] are designed to be flexible enough to include specific inquiry questions related to a focus area:

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[5] Applying to non-university tertiary education institutions, government training establishments and private training establishments.

Good practice indicators (standard)	Key inquiry questions (specific to cross-border education)
The entry information is appropriate to offshore learners, while ongoing academic support provided to off-shore learners supports their chosen learning pathway	How helpful is the entry information and academic support to learners in the overseas country? How appropriate is the academic support in terms of language and cultural sensitivities?

Detailed Principles, Issues and Risks underpinning Requirements

The following section outlines detailed principles, issues and risks providing the underpinning rationale for each area of the *Offshore Education Quality Assurance Requirements.*

OFFSHORE PARTNERS AND RELATIONSHIPS

Principles

A relationship with an offshore partner organisation protects the reputation of the New Zealand tertiary education organisation and the overall reputation for quality of New Zealand's tertiary education provision.

The partner organisation's objectives and interests are compatible with the strategic fit of the New Zealand tertiary education organisation.

Issues and Risks

Some offshore arrangements involve an overseas partner organisation. The development of new programmes, the establishment of a new delivery, or the formation of a relationship with a partner organisation can bring new challenges and issues for a provider delivering offshore.

Awareness of the unique nature of offshore delivery and overseas partnerships is important for managing potential risks and protecting reputation. The selection of an offshore partner organisation is a crucial component of the overall outcome of an offshore programme. The alignment of strategic objectives and interests between the New Zealand tertiary education provider and the offshore partner organisation(s) and the capacity and reputation of an offshore partner organisation are important for the long-term sustainability of an offshore educational project. Decisions around entering into offshore delivery should be based on robust evidence showing there is an opportunity worth investing in, and that the risk of programme failure in the longer term is accounted for.

Requirements - Partners and Relationships

1. The New Zealand tertiary education organisation must undertake a due diligence investigation of any offshore partner organisation, based on its experience in tertiary education, its ability to provide sufficient resources and its legal standing to offer the programme.
2. Due diligence identifies risks that cover the offshore partner's:
   - formal legal status
   - existing reputation, including compliance with laws in the host country
   - education interests and objectives
   - knowledge and experience in operating an education organisation
   - academic quality, reputation and standing (in-country and internationally)
   - existing cross-border partnerships
   - business plans, structure, and ownership, where appropriate
   - financial stability, strength, and probity
   - management and administrative capabilities
   - locations of operation, and the quality of buildings and facilities.

Consultation questions

4. How appropriate are the proposed requirements for offshore education involving an overseas partner?

5. Are there other, different requirements that should be included?

CONTRACTUAL AGREEMENTS

Principles

Partnerships are more likely to succeed when partners understand their rights and responsibilities. Partnerships built around mutual respect and trust and clear success factors will avoid the need to consider litigation. Contractual agreements will be directed by the needs of the organisations forming the partnership and will differ depending on the nature of the partnership

Issues and Risks

As with the selection of a partner, the formalisation of an arrangement or agreement is an important component of the success of a project. There are a variety of different forms of legal contracts that can be used for formalising a partnership. Examples include a Memorandum of Co-operation, a primary contract, or service level agreements. There is no single formula for the development of a contract and it will depend on the needs of the partners and the type of partnership that is developed. The long-term sustainability of a partnership will be built around respect and trust between partners and a clear indication of each partner's responsibilities and rights. A written contractual agreement that is legal binding is an indispensable for achieving this outcome.

Requirements - Contractual agreements

3. The New Zealand tertiary education organisation has a formal legal agreement with the offshore partner.
4. The contractual agreement defines how programme standards are maintained and identifies clear channels of authority, accountability, and executive action, so that collaborative arrangements are clearly set out and operate smoothly.
5. The agreement must be signed by the legally recognised signatories of the parties to the agreement, and must specify, as appropriate:
   - the names of the parties to the agreement
   - the allocation of responsibility for the management of quality systems to oversee and maintain standards
   - the procedures for resolving any differences that might arise between the parties to this agreement including, exit strategy arrangements and contract default provisions
   - procedures and responsibilities for securing approval and accreditation
   - procedures and responsibilities in respect of the management of the course, its ongoing monitoring of the provision for the implementation of changes to the course, and/or provision for unexpected programme closure
   - assessment and moderation arrangements
   - an indication of the wording which will appear on certificates awarded to learners who have met all the requirements of the course
   - responsibility for all administrative arrangements such as student enrolment, student welfare services, decisions relating to progress through the course, assessment, appeals, reporting of student results, and remuneration of monitors and moderators (if applicable)
   - financial aspects of contract
   - privacy/confidentiality arrangements
   - definition of the role, responsibilities delegated authority
   - legal jurisdiction of the contract
   - fee refunds.

Consultation question

6. Could the list of areas that should be covered in an agreement be shorter but still comprehensive enough? If so, what could be left out or combined?

PROGRAMME DEVELOPMENT, DESIGN AND DELIVERY

Principles

The curriculum of an offshore programme should be essentially the same as the same programme delivered in New Zealand, with appropriate adaptation to suit the local context and student group.

Issues and risks

Programme curriculum conveys expectations of a programme or qualification in terms of its learning outcomes and content. Learners, employers and others will expect consistency between curriculum and teaching materials used to deliver a comparable programme offshore, as in New Zealand. This consistency provides certainty of comparable outcomes for graduates in New Zealand and offshore.

However, where a New Zealand programme is taken in its entirety and dropped into an offshore context, it may not travel well. Offshore programme development may need to adapt aspects of the curriculum and delivery that do not readily transfer between countries and contexts. The infrastructure that supports delivery must meet the needs of offshore provision, including the quality of teaching and learning resources.

Requirements - *Programme design and delivery*

6. Programme learning outcomes, content and academic workload (in terms of credit, level and duration), are consistent with the equivalent approved programme delivered in New Zealand.
7. Teaching and learning resources are of comparable quality, type and availability to those used in New Zealand; contextualised where appropriate; and encompass a positive approach to offshore learners' experiences and culture.
8. Teaching and learning methods enable successful outcomes for offshore learners, with explicit teaching and learning opportunities for offshore learners exposed to unfamiliar customs, cultural values, and language, with special regard to speakers of English as an additional language.

Consultation questions

7. Are these the most appropriate requirements for design and delivery of offshore programmes?

8. Are there additional requirements for programme design and delivery that are specific to offshore education?

9. It has been suggested that providers must specify the language of delivery – what are the advantages and disadvantages of this proposed requirement?

ASSESSMENT AND MODERATION

Principles

Assessment of learning conducted offshore is consistent with comparable programmes in New Zealand.

The awarding institution is accountable for the quality of assessments that are conducted as part of an offshore programme and moderating the assessments to ensure consistency.

Issues and risks

Assessment is key to maintaining academic standards; "it drives students learning" and is inextricably linked to programme design and delivery.   In the interests of validity and fairness, assessment tasks and procedures should take account of the culture and circumstances of offshore learners.

Academic security issues can be more difficult to resolve in offshore delivery, although the plagiarism tends to diminish where learners are challenged to think critically.

Requirements - Assessment and moderation

9. Outcomes of assessment conducted offshore are consistent with New Zealand Qualifications Framework qualification definitions and level descriptors.
10. Assessments conducted offshore:
    - apply consistent assessment criteria to those used in New Zealand, but allow for appropriate adaptation to offshore learner contexts
    - ensure authenticity of student assessment work and security of qualification documents.
11. The awarding institution arranges for external moderation of examinations and assessments.

Consultation question

10. Are there other requirements for robust assessment of offshore students and/or moderation of offshore assessments? If so, what are they?

ACADEMIC AND OTHER STAFF

Principles

The awarding institution is accountable for the quality of academic and administrative staff delivering its programmes.

Offshore academic and supporting staff must be of comparable quality in terms of academic/teaching qualifications, industry and/or professional experience and teaching skills as those teaching the programme in New Zealand.

Issues and Risks

When teaching offshore, academic staff contend with complex professional challenges and demands, irrespective of whether they are recruited offshore or travel offshore from their usual teaching role.

Offshore teaching assignments demand awareness of the cultural contexts and sensitivities of the overseas country. In a sense, New Zealand staff working offshore are 'guests' of the host country and should conduct themselves accordingly. There are special pressures on academic and administrative staff that are recruited offshore, including salary relativities and differences in employment practices and norms between New Zealand and the host country.

Requirements - Academic and other staff

12. Offshore teaching staff, who are employed by the overseas partner or by the New Zealand institution, have comparable qualifications, experience and teaching skills to those delivering a comparable programme in New Zealand.

13. Staff selection, induction and ongoing training ensure that staff are prepared for offshore assignments, including awareness of legal responsibilities in the host country.

Consultation questions

11. Are there any other important considerations for offshore academic staff and administrators?

STUDENT RECRUITMENT AND ENTRY

Principles

Student recruitment and marketing processes and practices are fair and transparent, and provide a high quality student experience through evidence-based, systematic planning.

Issues and risks

Student recruitment and marketing should not only be focussed on simply increasing numbers. The New Zealand tertiary education organisation should develop a systematic long term plan to support the delivery of offshore provision, showing how the institution plans to ensure a quality experience and contribute to education outcomes for students in the host country.

Quality student recruitment and entry practices are well addressed in the New Zealand *Code of Practice for the Pastoral Care of International Students* (Code), much of which applies for offshore provision, for instance around communication and enrolment.. A number of requirements of the Code will not apply when the student is enrolled and studying in their home country, for instance requiring medical insurance, or immigration requirements.

Another issue relates to the quality of communications, especially where English is not a requirement for study. Students need to readily access information about operating procedures and policy of the institution as they relate to the student experience.

Requirements - Student recruitment and entry
14. Accurately communicate the programme and student experience to potential offshore students.
15. Set fair entry requirements, ensuring learners who do not meet the entry requirements are not enrolled, and students who fail consistently are not re-enrolled.

Consultation questions

12. Are there other important considerations for student recruitment and entry? What are they?

STUDENT SUPPORT AND COMPLAINTS

Principles

Offshore arrangements for student support are comparable to those at a New Zealand tertiary education organisation.

Support provided to offshore students should be consistent with their context and modes of learning, and the issues and/or difficulties they may experience.

Issues and risks

Offshore students find it helpful to have comprehensive information about the support services available to them, particularly technical assistance in relation to e-learning and language support.

In an offshore context, additional learning material and activities, mentoring and a range of teaching-learning methodologies are frequently needed to achieve learning outcomes. In particular, English language texts may be difficult for offshore students to access.

Specific difficulties can arise with establishing well-functioning procedures for students who make complaints such as academic grievances, refunds, general student rights (which might not be so obvious to students based offshore, for instance complaining about a programme/instructor).

Requirements - Student Support and Complaints

16. Make comparable student support services available to offshore students, including academic support (independent study, IT and library facilities) and student welfare services.
17. Provide students with clear and up-to-date information, setting out:
    - contact details for staff accessible to students, who have capacity to provide support
    - the institution's responsibilities, by clearly identifying optional academic support activities and learning activities that are part of the programme, for example, tutorial sessions and web-based conferences
    - students' responsibilities, including their academic work-load in terms of credits, hours and/or duration of the programme
    - procedures for students to voice concerns, make complaints and lodge appeals.

Consultation questions

13. Are these the most appropriate requirements for student support and complaints?

FEE REFUNDS AND CLOSURES

Principles

Provisions for fee refunds for offshore delivery are comparable, where possible, to provisions New Zealand tertiary education organisations have for programmes delivered onshore.

Comparable protection exists in the event of programme closure.

Issues and Risks

New Zealand tertiary organisations should take precautionary measures to ensure that partnerships have procedures and systems in place that protect the reputation of New Zealand education and protect students from unfair outcomes.

Fee refund provisions are important for protecting students. New Zealand tertiary education organisations may not be the responsible partner for the development of fee refund provisions but they should work to ensure that partnerships, through formal contracts, include fee refund provisions that would be comparable to fee refund provisions for onshore programmes. Precautionary measures include protection for students if an offshore programme or overseas partner closes.

Requirements - Fee Refunds and Closures

18. Fee refund provisions for all offshore delivery are comparable to fee refund provisions in New Zealand and form part of the contract between partner organisations.
19. In the event of a programme closure, the New Zealand tertiary education organisation is responsible for providing a fair and reasonable set of alternatives for the students.

Consultation questions

14. Should offshore education have to meet the same student fee protection requirements as education delivered in New Zealand?

15. In the event an offshore programme closes, should providers have to meet the same requirements to refund fees and place students in alternative programmes, as in New Zealand?

16. Another suggestion is that the fees for offshore delivery should be fair, should this also be included?

QUALITY ASSURANCE AND MANAGEMENT

Principles

A tertiary education organisation's quality management system needs to accurately reflect offshore delivery.

All quality assurance and management policies and procedures relating to offshore education should be complete, applied, understandable and consistent with actual practice.

Issues and Risks

Offshore delivery presents specific quality assurance and management challenges for New Zealand education organisations. The host country may have substantially different regulatory requirements. For example, NZQA's quality assurance framework is based on an evaluative approach, while some overseas systems are based on institutional audits.

New Zealand tertiary education organisations may need to enhance their quality management systems to integrate offshore delivery and this should be well considered and planned so that it blends with their established systems, and possibly an overseas partner's. Another challenge is to review the quality management system regularly to ensure that it remains current.

Requirements - Quality assurance and management
23. Incorporate cross-border delivery within the New Zealand tertiary education organisation's ongoing quality assurance and quality management system.
24. Evaluate the quality and value of outcomes, and key processes that contribute to outcomes, for offshore learners, industry and communities.
25. Identify and meet all applicable local, regional, and national quality assurance requirements within the host country (outside New Zealand's quality assurance processes) for the organisation, the qualification or programme.

Consultation questions

17. There has been discussion about whether the New Zealand tertiary education organisation must meet all of the host country quality assurance requirements? How important is this?

18. Are there other quality assurance and management requirements that should be included?

Consultation questions on additional areas for the proposed requirements

19. Besides the areas listed, are there other areas that are not covered in the proposed requirements?

20. It has been suggested that governance and management capacity, and marketing to potential offshore students should be included as separate sections in the proposed requirements? Do you agree?

21. Do you agree with a suggestion that governance and management capacity, and marketing to potential offshore students should be included?

Proposed Offshore Education Quality Assurance Requirements

Membership of the Sector Reference Group

Chair
Tim Fowler, DCE, Quality Assurance, NZQA

Members
- Penny Fenwick, Director, Universities New Zealand
- Don Campbell, Chief Executive, Whitireia Community Polytechnic
- Phil Ker, Chief Executive, Otago Polytechnic
- Edwige Fava, President, New Zealand Association of Private Education Providers (NZAPEP)
- Neil Miller, Executive Director, Independent Tertiary Institutions (ITI)
- Mark Hornby, Nominee, English New Zealand
- Janet Calder, Quality Improvement Manager, Te Wānanga o Aotearoa
- Karen Chalmers, Director, International and Policy, NZQA
- Paul Lister, Manager, Policy, International Division, Ministry of Education
- Murray Johnson, Principal Analyst, Tertiary Education Commission
- Kathy Maclaren, Manager, Service Delivery, NZQA (project working group nominee)
- Judith Brown, Manager, ITP Sector Relationship Management Unit, NZQA (project working group nominee)

In attendance:
- Penny Hoy-Mack, Senior Policy Analyst, DCE Advisory Unit, Quality Assurance Division, NZQA
- Alastair Johnstone, Policy Analyst, Strategic and Corporate, International Unit

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Offshore Education Questionnaire Results

Executive Summary

- 140 providers[6] responded to the questionnaire

- 28 providers are delivering offshore education

- Articulation and distance delivery are the main types of offshore education

- From the providers that responded, 2,955 have students studying offshore

- The main countries for offshore delivery are currently China and Tonga

- 58 providers are planning or investigating delivery of offshore education in the future

- Articulation, distance, and twinning are the main types of offshore education being planned or investigated.

Purpose

NZQA circulated a questionnaire on the current and future provision of offshore education to providers on 3 June 2011 and results were collected until 4 July 2011. The questionnaire sought an understanding of the scale and type of offshore education delivery and potential offshore delivery in the future.

Results

Response Rate

NZQA received 140 responses (18.8 per cent of providers). This represents a good cross-section of the tertiary education sector.

Table 1: Number of responses by provider type

Provider	No. Providers
PTEs	120
ITPs	10
Universities	5
Wānanga	2
GTOs	1
Course Owner	2
Total	140

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[6] Provider covers universities, institutes of technology and polytechnics, wānanga, private training establishments, government training establishments, and course owners.

Current Offshore Delivery

28 providers stated they were currently involved in offshore education. This represents 20 per cent of the providers that responded. Table 2 provides a breakdown by provider type.

Table 2: Number of providers delivering education offshore, by provider type

Provider	No. Providers
PTEs	15
ITPs	8
Universities	5
Wānanga	0
GTO	0
Course Owner	0
Total	28

Types of offshore provision

The most frequent types of offshore education delivery were distance and articulation. Combined they represent more than half of the different types of offshore education. Table 3 provides a breakdown of the type of offshore education.

Table 3: Number of providers involved in offshore education, by type of delivery

Type of offshore delivery	No. Providers
Articulation	11
Distance	12
Twinning	5
Double/Joint Degree	6
Satellite Campuses	2
Study Centre or Teaching Site	2
Franchise	0
Validation	0
Independent Institutions	0
Other	5[7]

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[7] This includes the provision of training materials, assistance with curriculum development, short courses, and delivery that could not be categorised.

The delivery of education offshore takes place in a number of different countries. The main countries are: China, Australia, India, South Korea, Tonga, Germany and Malaysia. The number of providers involved in a country is presented in Table 4.

The inclusion of a number of the countries in the list is reflective of a small number of students from a country often studying via distance learning.

Table 4: Number of providers involved in countries

No. providers	Countries
1	Uzbekistan, Afghanistan, Singapore, Bosnia and Herzegovina, Iran, Ireland, Romania, South Africa, Spain, Sri Lanka, Trinidad and Tobago, Zimbabwe, Bahrain, Hungary, Mongolia, Japan, Italy
2	Philippines, Fiji, United Arab Emirates, USA, Russia, Cook Island, Czech Republic, Vietnam
3	Switzerland, France, United Kingdom
4	Tonga, South Korea, Germany, Malaysia
5	
6	India
7	
8	Australia
9	
10	
11	China

Number of students

The questionnaire indicated that that there are currently 2,955 students studying with New Zealand providers offshore. The figure is likely to be higher as there were a number of incomplete results that did not allow for their inclusion in the total number of students. Table 5 provides a breakdown of student numbers by provider type.

It was not possible to identify the number of full-time equivalent students (EFTS) as there were a number of incomplete results for the question.

Distance delivery is usually associated with smaller groups of students and across a number of providers. Although, the results do not allow student numbers to be matched to delivery type or overseas country, it is possible to identify countries where there is a high number of students enrolled offshore. Combined, China and Tonga represent just under a third of all students.

Table 5: Number of students by provider type

Provider	No. students
ITPs	1449
PTEs	855
Universities	623
Wānanga	0
Other	0
Total	2955

Usefulness of current guidelines

The questionnaire asked providers how useful they found the existing NZQA guidelines on overseas delivery. Of the 28 education organisations involved in the delivery offshore, 24 provided an answer to this question. Table 6 provides a breakdown of responses on the assessment of the usefulness of current guidelines.

Table 6: Assessment of usefulness of current guidelines by provider type

Current requirements	No. Providers
Very Useful	0
Useful	7
Not Useful	7
Not aware of guidelines	10
Total	24

Of those 10 that were not aware of the guidelines, 70 per cent were private training establishments. The remainder of the providers that they were unaware of the guidelines were universities.

Involvement and cooperation with overseas quality assurance and regulatory bodies

The results indicate engagement with host country quality assurance and regulatory bodies is context and country specific. Providers that deliver in China, except those using distance delivery, work with the China Ministry of Education on delivery in China. This is also the case with some providers delivering in Malaysia, Vietnam, and Tonga.

It is common for providers in partnership with an overseas organisation to manage engagement with host country quality assurance bodies through the partner organisation.

Providers delivering offshore using distance delivery usually do not engage with host country quality assurance bodies.

Future provision

58 providers stated they were considered delivering offshore education (41.4 per cent of providers who responded). It is, however, difficult to develop a comprehensive picture of the planned offshore education delivery in the future as many providers stated that they were still in the exploratory phase. This is reflected in the results by the high frequency of responses that were not specific or the answer could not be categorised.

The most frequent type of offshore delivery planned for the future offshore delivery was articulation. 20 providers are considering offshore delivery through articulation and the next largest was 14 providers considering distance delivery and twinning, respectively. Table 7 provides a breakdown of future offshore education delivery by type.

Most providers currently involved in offshore delivery will focus on continuing to expand their existing types of provision, if they intending to increase offshore delivery, and may expand into some new countries or focus areas. The majority of the new future offshore delivery by providers not currently operating offshore is in the PTE sector. Table 8 shows the number of providers considered offshore delivery by provider type.

Table 7: Number of providers planning or investigation future offshore delivery by type of delivery

Type of delivery	No. Providers
Articulation	20
Distance	14
Twinning	14
Double/Joint Degree	5
Satellite Campuses	5
Study Centre or Teaching Site	2
Franchise	4
Validation	3
Independent Institutions	1
Other	5
Unspecified/uncategorised	20

Table 8: Future offshore delivery by provider type

Provider	No. Providers
PTEs	42
ITPs	9
Universities	5
Wānanga	2
Other	0
Total	58

Current Policies and Procedures

The questionnaire asked providers to identify if they currently had policies and procedures for delivery offshore including for contractual arrangements, partnerships and relationships, student support, fee refunds, and delivery in areas such as staffing, curriculum, academic standards, programme design. This information is presented in Table 9.

Overall, around 30 per cent of providers have specific policies and procedures in place for offshore delivery.

Providers currently delivering offshore were likely to have specific policies and procedures for offshore delivery with it ranging from 60 – 75 per cent.

The proportion of providers planning or investigating future delivery offshore with specific policies and procedures was lower and ranged from 48 – 57 per cent.

Table 9: Proportion of providers with specific policies and procedures for offshore delivery

	Contractual Arrangements	Partners and Relationships	Student Support	Fee Refunds	Delivery
All providers					
Yes	27.9	32.1	30.7	30.7	30.7
No	70.7	64.3	64.3	65.7	65.7
Providers delivering offshore					
Yes	75.0	75.0	64.3	60.7	67.9
No	21.4	17.9	32.1	35.7	28.6
Providers planning to deliver offshore					
Yes	48.3	56.9	51.7	51.7	53.4
No	48.3	37.9	41.4	43.1	44.8