# When 'onshore' looks like 'offshore': quality assurance with onshore partner providers

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### **Abstract**

An increasing number of Australian universities are offering students, particularly international students, opportunities to study for their awards at Australian locations other than their main campuses, through partner provider arrangements similar to those established for the delivery of offshore higher education. There is now considerable knowledge of the risks and challenges associated with the quality assurance of higher education provided through partner organisations offshore. The questions considered in this paper are whether there are different risks associated when the provision is onshore rather than offshore and, if so, how they might be addressed. The analysis indicates that Australian universities need to attend to similar issues for both offshore and onshore partnerships but need to give particular consideration to some aspects of the management of onshore partnerships, including the student experience. However, these partnerships can provide genuine and efficient alternatives to traditional on-campus learning.

#### **Keywords**

quality assurance, international, higher education, onshore partner providers

### Introduction

Some international university students in Australia do not need to ever set foot on their university's home campus. They study at one of the onshore partner providers of the university, usually in a capital city remote from the university's home campus. This paper explores the opportunities and challenges for universities in these types of partnerships, a recent development in the complex landscape of Australian higher education provision. Features of onshore partnerships are first considered, and then the opportunities that such partnerships provide. Subsequent sections of the paper examine general risks for higher education teaching partnerships and whether there are additional or different risks for onshore teaching partnerships. Some suggestions are then offered for improved quality assurance for onshore partnerships.

## Features of onshore partnerships

Australian higher education providers are divided for many purposes into:

- Universities and other institutions that have the authority to internally accredit their awards (referred to as self-accrediting institutions or SAIs, for example, in the National Protocols for Higher Education Approval Processes, MCEETYA 2007)
- Other higher education providers that are required to have their awards accredited externally (non self-accrediting institutions or NSAIs).

However, the ready categorisation of Australian higher education providers grows increasingly difficult. SAIs do not include only universities, but they do include public and private universities and branch campuses of overseas universities, for example Carnegie Mellon University in South Australia. Some universities offer both vocational and higher education awards (dual-sector institutions), some offer their programs in face to face, online and traditional distance education modes. Many have multiple campuses, some in other States and Territories than their main campus(es) and many offer programs offshore, through overseas campuses or through partner provider arrangements.

The NSAIs include institutions that offer primarily vocational qualifications, such as TAFE institutes. They also include a range of not-for profit institutions, including theological colleges such as the Australian College of Theology, and for-profit providers (Harman 2008). A number of these institutions now come under the umbrella of a parent company, such as Navitas or Study Group. There are multiple pathways for students among these various higher education providers and among vocational education providers and higher education providers.

An emerging arrangement is the use by some Australian universities of a partner provider arrangement to offer a particular university's bachelor and master degrees through study at locations other than the university's own campuses. In most cases, these arrangements are specifically targeted to international students. Some of these partner providers may have no other involvement in the provision of higher education, although they may offer English language or vocational education programs. The variety of possible configurations is similar to those found in offshore teaching partnerships and includes:

- partnering with another higher education provider, either a university or another institution
- partnering with another education provider, such as a provider of vocational education and training, and
- partnering with an organisation that has no particular involvement in education.

The impetus for these new arrangements is the popularity of capital cities such as Sydney, Melbourne and Brisbane among international students as places to live, study and work. Some universities have responded by establishing their own campuses (or mini-campuses) in the central business districts of capital cities, sometimes in the same state as their main campus and sometimes in the capital cities of other states. Central Queensland University, for example, has campuses in Brisbane, Sydney and Melbourne. It also has a campus on the Gold Coast, a location that is starting to rival some of the major capital cities as a desirable venue for international students. Such 'branch campus' arrangements are not the subject of this paper.

These new arrangements differ from the very large numbers of pathways and articulation agreements between universities and non-university providers of post-secondary education, under which students are eligible to enter a university program with advanced standing after completing foundation, diploma or other studies with the non-university provider. The difference lies in the fact that no articulation is required – students enrol as students of the university from the commencement of their studies and can complete the whole of their program with the partner.

They differ from twinning arrangements, in which students may commence their university studies at a partner provider location but are required to attend the university to complete their studies at bachelor or master level. A considerable number of Australian universities have entered into such arrangements onshore as well as offshore, including arrangements for students to gain exit qualifications, e.g. a diploma or graduate certificate, if they choose not to complete their studies at the university.

The partner provider arrangements for full degree programs also differ, to a greater or lesser extent, from the learning centres established by some universities to serve widely dispersed populations, particularly in regional areas. In this respect, the degrees of difference lie in the extent to which these centres serve a diverse student population (not mainly international students) and the extent to which the arrangements are managed by a contracted partner rather than by the university.

The number of universities that have contracted with partner providers to offer full degree programs at bachelor or master level in Australian capital cities is quite small. However, it is notable that of the seven institutions identified in the Bradley review as having the highest access rates for regional students (Commonwealth of Australia 2008 p34), five of these have entered into such partnerships. This suggests that while a central business district (CBD) location may be desirable for most universities wishing to attract international students, for regional universities it may viewed as be a business imperative.

So, this development can be seen as no more than a logical extension of the trend for institutions that are not based in central areas of the major capital cities to set up bases in one or more of the CBDs. And, as noted, it is entirely analogous to many universities' arrangements for delivery of programs outside Australia, where the university contracts with a third party. On the other hand, the emergence of these arrangements makes it timely to consider whether they present any specific quality assurance challenges.

# Opportunities through onshore partnerships

The onshore location of partner providers offers possibilities, both academic and enabling, that are often not feasible with offshore partnerships. These include the potential for students at the partner provider to visit their university's main campuses and for students at the main campuses to visit or study for at least part of their program in a CBD location, thus allowing students to experience learning with a range of groups of students. These advantages can apply to other forms of twinning or pathway partnerships but they are likely to be of most use when applied to partnerships where students might not otherwise have opportunities to experience a university's main campus.

Onshore partnerships can mean that cost is not a barrier to regular visits from main campus academics to the partner location and vice versa, which in turn can foster closer academic relationships and a scholarly culture through attendance at faculty meetings, examination boards and the like. It may be easier onshore than offshore to harmonise student administration and learning management systems and access to online or hard copy library resources.

One of the interesting—if not surprising—features of these onshore partnership arrangements is that Australian universities have not chosen to enter into cooperative partnership arrangements with other Australian universities seeking to offer opportunities to students to study in CBD locations. This is all the more striking as the contract academics who teach at one partnership often teach the same or similar courses at other partnerships. The reason of course is that universities are competing with each other for international student revenue. Also, any such collaborative arrangement might be seen as indicating that the quality of the programs from each individual institution is about the same.

However, it is not impossible to imagine some universities entering into a collaborative arrangement to lease and manage CBD facilities, provide resources and appoint teachers to teach across a range of courses offered by each university, or even to appoint a 'lead' university for some courses, with appropriate credit transfer arrangements to the others. Such an arrangement may have advantages of scale and might also assist in the maintenance of academic standards and the development of a scholarly culture through, for example, cross-moderation of assessment by the partnering universities.

# Risks and challenges for quality assurance of partnership arrangements

There is now considerable knowledge of the risks and challenges associated with the quality assurance of higher education provided through agent or partner organisations in other countries (Craft 2004; Knight 2004; Heffernan & Poole 2004; McBurnie & Ziguras 2007).

The known challenges for offshore provision of higher education by Australian universities working with non-university partners include: ensuring equivalence or comparability in academic standards and student outcomes; ensuring comparability in student learning; ensuring adequate pastoral care and academic skills support; limited facilities, especially library and social facilities; often limited opportunities for students to develop their English language proficiency; and regulatory compliance (Carroll & Woodhouse 2006; Stella & Liston 2008). Other issues include the lack of strong scholarly or research cultures at some offshore partner locations and the need or otherwise for students to be exposed to the academic and broader culture of the 'sending' country—or to a wide mix of cultures—during their studies, the last of these leading into a discussion of possible cultural imperialism in scholarship and teaching (Ziguras 2008).

Many of these challenges are now being quite well met by Australian universities, as their experience with offshore partnerships increases and their understanding of local regulatory requirements matures. Activities over the past decade, including the suite of good practice projects for transnational education auspiced by Universities Australia (AEI 2006) and entries in the Good Practice Database of the Australian Universities Quality Agency (AUQA 2009), mean there are many exemplars available across the Australian higher education sector. Universities have become better at collecting and analysing the comparative academic performance and outcomes of students studying at different locations and taking actions to address any marked differences. It is also evident from AUQA audit reports and other sources that Australian universities have withdrawn from substantial numbers of offshore teaching programs over the past few years (Armitage 2007). For some institutions, it has become apparent that the cost of providing these programs at an acceptable level of quality is not sustainable.

## Particular challenges for onshore partnerships

The question for this paper is whether there are any additional or different challenges and risks associated when the provision is onshore rather than offshore and, if so, how these might be addressed.

In considering this question, it should not be assumed that these types of onshore arrangements are inherently undesirable: as with much in higher education, it depends on how well they are done. Nor should it be assumed that a university education has to be provided on a full-scale campus with park-like gardens and 24-hour sporting clubs. Indeed, some universities in the United States have beginning to offer 'no frills' student learning, in an effort to keep down the costs to students of their education (Mytelka 2009; Masterson 2009). In Australia, the higher education sector is likely to need an expanded range of alternatives to traditional on campus university education if it is to meet the Australian Government's targets for participation and success of domestic students (DEEWR 2009a) and continue to be attractive to international students. Onshore partner provider arrangements can (at least in theory) be a useful addition to the range of good quality higher education provision.

It could be expected that Australian universities would therefore treat onshore partnership with the same amount of diligence and care that they mostly now give to the management (academic and administrative) of their offshore teaching arrangements. However, there is always likely to be the risk of a 'blind spot' among universities, if it is assumed that such partnerships resemble 'home campus' provision more than 'offshore' provision through partnership arrangements.

Most of the challenges mentioned above for offshore teaching partnerships apply to onshore partner provider arrangements, with some exceptions. One exception relates to local requirements for regulatory compliance, as the National Protocols for Higher Education Approval Processes (MCEETYA 2007) place no restrictions on SAIs in operating or exercising their authority to accredit their own programs anywhere in Australia. Other exceptions relate to business matters, such as the need to understand offshore arrangements for the repatriation of funds and taxations regimes.

There are however challenges that are more specific to onshore partnerships. These are compliance with the *Education Services for Overseas Students Act 2000* (ESOS Act), and student safety and security.

The ESOS Act applies to providers in Australia of education to international students. Under the National Code of Practice 2007, providers must comply with 15 standards 'that ensure their quality of education and professionalism is of a sufficiently high standard to enrol international students' (DEEWR 2009b). Universities with onshore partner provider arrangements need to ensure they have processes in place to ensure compliance with the National Code at the partner locations. This requirement may be particularly challenging for universities with partners that are not providers of education to international students in their own right (i.e. if they are not registered under the ESOS Act for their own programs), as these partners may have little knowledge or experience of the requirements and are likely to incur additional costs in meeting them, including the costs of adequate library facilities and personal welfare services.

Another matter for onshore provider partnerships concerns student safety and security for international students studying in Australian capital cities, a topical issue (e.g. Wade 2009). These students are students of the university, not of the partner provider, and they are in Australia. The university must be able to demonstrate that it has taken adequate measures to ensure their safety at all locations and to react quickly if issues arise at any of its teaching locations, not only for the security of students but also for the reputation of Australia as a host country for international students.

There are also some issues relevant to both onshore and offshore provider partnerships that are highlighted by onshore full degree partnerships. These include: compliance with the National Protocols for Higher Education Approval Processes if partner provider arrangements are very significant; professional accreditation; the performance of education agents of the partner; transparent communication to prospective students; and, as noted above, students' access to diverse cultural experiences.

The National Protocols for Higher Education Approval Processes (MCEETYA 2007) set out criteria that all higher education providers must meet and some additional criteria that must be met for self-accrediting authority and for university status. One particular criterion for university status is that the institution 'demonstrates a culture of sustained scholarship which informs teaching and learning in all fields in which courses are offered'. In general, we may take it that existing universities are likely to be able to demonstrate this culture on their own campuses, whether onshore or offshore. The presence of such a culture is difficult to demonstrate at partner provider locations, where the academic workforce may be contract-only and not paid or supported to develop their scholarship. If such partner teaching arrangements form only a small part of a university's overall scholarly or academic culture, this requirement can continue to be regarded as met.

Where partnership arrangements are a substantial element of provision, a matter that is more likely to occur onshore than offshore, universities will need to develop arrangements to demonstrate they continue to meet this criterion. That is, there is a question of scale. If say 95% of a university's arrangements for teaching and learning were provided through partners who are not required to meet this criterion in their own right, and the university has not made any arrangements to ensure such a culture at its partner locations, would a judgment be made that the university demonstrates an overall culture of sustained scholarship? Where is the tipping point? It may be impossible to say with any degree of certainty, but it is a matter that universities need to address if their partnership arrangements become substantial.

On this topic, there may be some specific academic quality assurance issues if the onshore partner is primarily a provider of vocational education, as the different pedagogical approaches of vocational and higher education will need to be taken into account by the university in considering its arrangements at the partner location. The Federal Government's plans for a future tertiary education system that seamlessly blends vocational and higher education will see greater attention to such matters and may assist in addressing this point.

Many university programs are externally accredited by professional associations, allowing graduates of such programs to apply for professional registration. However, not all professional associations have yet considered the implications of extending such professional accreditation to university programs that are taught through other partners. In these cases, students of the university at the partner provider will not have the same entitlement to seek professional registration. In other cases, professional associations may not be willing to accredit university programs taught through partner providers. Universities need to pro-actively address any issues with professional associations and ensure they provide accurate and clear information, without any possibility of misunderstanding, to prospective students.

Under the ESOS National Code, providers are responsible for ensuring that their education agents 'have an appropriate knowledge and understanding of the Australian international education industry and do not use education agents who are dishonest or lack integrity' (standard 4). This includes monitoring the activities of education agents, and may include for example, seeking feedback from students about the advice they were given prior to enrolment. This standard also make providers responsible for ensuring their agents have up-to-date and accurate marketing information, to ensure there is honest and transparent communication to prospective students. Onshore partner providers in many cases are contracted by universities to undertake marketing of the university's programs as part of the partnership agreement. In these cases, universities need to ensure that not only their own agents but also the agents of the partner provider are providing accurate and honest information about the university's programs at the partner provider, and that there are processes in place to monitor this. Although not strictly an ESOS issue, this point is important for offshore partnership arrangements as well, especially where offshore partner providers are themselves recruiting students from other countries. For example, some Malaysian partners of Australian universities now are recruiting students from across Asia and the Middle East.

For onshore partnerships, universities need to take particular care to explain to prospective students the expectations they must meet in regard to study, especially if the partner provider is recruiting large numbers of students who intend to migrate permanently to Australia. Although it may be impossible to tell at the outset how motivated prospective students are to engage seriously with their chosen field of study, at least the expectations should be made clear. (One challenge for universities in onshore partner provider arrangements is the likelihood of high attrition because some students decide after commencing their higher education studies that they wish to transfer to other, often vocational, programs.)

Another challenge that seems very evident in onshore partner arrangements, although applying to offshore partnerships and to some on campus programs, is to ensure a diversity of cultural experiences, including experience of Australian culture, for international students. If nearly all the students studying through an onshore partner provider come from just one or two countries, there may be advantages for student acculturation but there are also questions about the nature of the student experience that the university claims to and actually does offer to all its students and specifically to students based in Australia.

While the underlying principles of higher education quality assurance may be the same wherever a university offers its programs, there are some specific matters that require particular attention for offshore programs (Carroll & Woodhouse 2006 p87). That is, university quality assurance systems require modification for particular circumstances. This analysis indicates Australian universities need to be alert to similar issues for onshore and offshore partnerships but that some of the dynamics of onshore partnerships require particular consideration.

## Strategies for improved quality assurance

A risk for effective quality assurance for onshore teaching partnerships is the assumption by university staff that because students studying through these partnerships are based in Australia, their needs and expectations are the same as students at the main campus.

To mitigate this risk, a university may find it useful to consider what type of student experience, including both academic and enabling aspects, it desires its students to have and whether there should be any differences by student cohort. Clearly, some aspects of the experience of a large body of primarily international students at a CBD partner location will differ from those of students on-campus in a regional location or those studying online.

One approach to commencing this analysis is to do a 'similarities and differences' exercise among different student cohorts, by considering what needs to be the same and what should be different for student learning outcomes (Baird & Gordon 2009). The answer may be that nothing should be different, or it may be possible to explicitly plan for different levels of outcome. However, one would hope that the university aims to achieve similar degrees of student learning and academic outcomes for all students taking the same program (and the National Protocols imply this is the expectation). It is worth an institution considering very seriously the answer to this question on outcomes, because it has implications for the level of support and enabling services that need to be provided to different cohorts to achieve these outcomes.

Having undertaken this thinking, a further exercise can be undertaken to identify how various enabling and developmental aspects need to differ to achieve the desired student outcomes. An indicative checklist of possible 'similarities and difference' might include: student learning and academic skills support; opportunities for cross-cultural interaction and social experiences; opportunities for workplace learning and placements; counselling and personal support; facilities; support and development of academic staff; and other enabling aspects such as child care and appropriate timetabling. It is then possible to identify how quality will be assured for each element, including the setting of standards for service delivery and feedback loops. This approach can be applied to offshore as well as to onshore partner provider arrangements.

Universities should also consider what type of partner is most likely to provide a good fit with their goals for student learning outcomes at onshore partner providers, just as many do for offshore partnerships. For example, is the partner organisation an educational institution or is it a business with no particular connection to education other than through the proposed partnership? One specific point for onshore partnerships is whether the risks and additional resources and costs required to ensure ESOS compliance at partner provider locations could be reduced by partnering with an organisation that already provides education services to international students, and therefore is familiar with the requirements of the National Code. A further consideration is of course that of scale, and whether the partner provider has the resources and commitment to ensure adequate provision of facilities for student learning and welfare.

Further, a university should consider whether it is desirable to partner with an onshore provider that offers its own higher education awards, and therefore is required to satisfy registration and accreditation requirements under the National Protocols. At the least, one would hope that any university is able to ensure that the services and support provided to its students through offshore partnerships are comparable with those of such non-university higher education providers.

## Conclusion

For some Australian universities, offshore teaching partnerships are being replaced or supplemented by new onshore teaching partnerships. These arrangements could provide genuine and efficient alternatives to traditional on-campus learning and offer new forms of student experience. However, these partner provider arrangements need careful consideration of the costs to the institution of effective quality assurance, including the costs of compliance. They should be entered into after consideration of the nature of the student experience that the university desires for the cohort of students studying through the partner, and the resources required to support this experience. Universities would do well to consider how they can benefit from the opportunities presented by such partnerships while ensuring the quality of the education they provide to all their students.

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