

Audit of overseas provision

Sheffield Hallam University and KBU International College, Malaysia

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Introduction

The Quality Assurance Agency for Higher Education

1 The primary responsibility for academic standards and quality in United Kingdom (UK) higher education rests with individual universities and colleges. The Quality Assurance Agency for Higher Education (QAA) checks how well they meet their responsibilities, identifying good practice and making recommendations for improvement. QAA also publishes guidelines to help institutions develop effective systems to ensure students have high-quality experiences.

2 Many universities and colleges in the UK offer their higher education programmes to students wishing to study outside this country. This is a significant and growing area of activity: data published by the Higher Education Statistics Agency indicates that almost 100,000 students were studying for UK higher education (HE) awards entirely outside the UK in the 2007-08 academic year, either at overseas campuses directly run by UK institutions or through collaborative arrangements that UK institutions have made with foreign partners. QAA reviews both collaborative arrangements and programmes delivered on overseas campuses through a process called Audit of overseas provision. We conduct Audit of overseas provision country by country. In 2009-10 we conducted an Audit of overseas provision in Malaysia. The purpose of the audit was to provide information on the way in which a group of UK universities and colleges were maintaining academic standards and the quality of education in their provision in Malaysia. The reports on the individual audits will be used in the preparation of an overview report.

The Audit of overseas provision process

In April 2009, QAA invited all UK higher education institutions (HEIs) to provide information on their provision in Malaysia. On the basis of the information returned, QAA selected for audit visits 10 UK institutions with provision in that country. These institutions produced a briefing paper describing the way in which their provision (or a subset of their provision) in Malaysia operated, and commenting on the effectiveness of the means by which they assured quality and standards. In addition, each institution was asked to make reference to the extent to which the provision was representative of its procedures and practice in all its overseas activity. Institutions were also invited to make reference to the ways in which their arrangements met the expectations of the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice)*, particularly *Section 2: Collaborative provision and flexible and distributed learning (including e-learning)*, published by QAA in 2004.

4 Audit teams visited each of the 10 UK institutions to discuss their provision in Malaysia between November 2009 and February 2010. The same teams visited Malaysia in March 2010 to meet some of the staff responsible for managing and delivering the provision, and to meet students. During the visits to institutions in Malaysia, discussions were conducted with key members of staff and with students. The audit of Sheffield Hallam University was coordinated for QAA by Mrs S Patterson, Assistant Director, Reviews Group. The audit team comprised Professor B Anderton and Mrs E Barnes, with Mrs S Patterson acting as audit secretary. QAA is particularly grateful to the UK institutions and, where applicable, to their partners in Malaysia for the willing cooperation they provided to the team.

Higher education in Malaysia

5 According to UNESCO's *Global Education Digest*, there were about 750,000 students enrolled in higher education institutions in Malaysia in 2009. The institutions can be broadly divided into two types: public and private. Public institutions, which comprise 20 public universities, 27 polytechnics and 57 community colleges, are government-funded; private institutions, which include universities, university colleges and colleges, receive no public funding. The UNESCO *Global Education Digest* states that two thirds of students in Malaysia are enrolled in public institutions. 6 Executive responsibility for higher education in Malaysia resides with the Ministry of Higher Education, which was separated from the Ministry of Education and established as a full ministry under a Federal Government Minister in 2004. Among the various departments and agencies under the purview of the Ministry of Higher Education is the Malaysian Qualifications Agency (MQA). The MQA is the single higher education quality assurance agency in the country, whose scope covers both public and private higher education providers. The MQA is responsible for accrediting higher education programmes and for maintaining a definitive list of accredited programmes - the Malaysian Qualifications Register (MQR) - which includes programmes provided in collaboration between Malaysian and overseas partners, and programmes delivered at overseas campuses in Malaysia. Students studying unaccredited programmes are ineligible for student loans, and institutions providing unaccredited programmes are not allowed to recruit overseas students to them.

7 In addition, the MQA is responsible for maintaining the Malaysian Qualifications Framework, an instrument that develops and classifies all Malaysian higher education qualifications, from certificates to doctorates. The Act which created the MQA also provides for the conferment of a self accrediting status to 'mature' institutions that have well established quality assurance mechanisms. To achieve self accrediting status, the institution must undergo an institutional audit. If it is successful, all qualifications it offers are automatically recorded on the MQR. At the time of the audit, the MQA was conducting the first round of institutional audits.

Section 1: Background to the collaborative link

Nature of the link

8 This report, written in April 2010, considers the collaborative arrangement which was established in 2004 between Sheffield Hallam University (the University) and KBU International College (KBU, the College) in Malaysia. The collaboration began with delivery at KBU of the BEng (Hons) Electrical and Electronic Engineering (EEE), and BSc (Hons) Computer and Network Engineering (CNE) programmes. In 2005 the BA (Hons) Accounting programme was added to the collaboration. The BSc (Hons) Business Information Systems was also validated but has never recruited. All of the programmes operate as 3 plus 0 franchises of programmes which run on-campus at the University, with all three levels of the programme being delivered by KBU. There is an option for students to transfer to the same programme delivered on campus at the University at the beginning of year two or year three.

9 The history of the University can be traced to the merger of three colleges, Technology, Commerce, and Art and Design, into Sheffield Polytechnic in 1969. A change of name to Sheffield City Polytechnic came with further mergers with three teacher training colleges during the 1970s. Sheffield City Polytechnic was incorporated in 1989 and went on to become Sheffield Hallam University, with the authority to award its own degrees, in 1992.

10 KBU is a private-sector higher education institution (HEI) established in 1990 by First Nationwide Group, which owns the purpose-built campus within the township of Bandar Utama, Petaling Jaya, from which the College operates. KBU has links with two other UK universities and with several other international institutions. Its vision is 'to be a premier private higher education institution offering multidiscipline quality programmes at certificate, diploma, degree and postgraduate levels to both local and international students'. It has three academic schools: Engineering and Computing; Business, Hospitality and Tourism Management; and Design; and two centres: Matriculation Studies and Languages.

11 At the time of the Audit of overseas provision, the University had overseas collaborative arrangements in Malaysia with two partners, involving a total of 23 programmes: India with five partners, involving eight programmes; Sri Lanka with one partner involving five programmes; and Hong Kong with three partners, one of which is being taught out, involving seven programmes. The University considers Malaysia to be a key area of collaborative activity and therefore established a Malaysia Steering Group, chaired by the Pro Vice-Chancellor (Academic Development) to advise on strategic developments, and to provide oversight of collaborative partnerships in Malaysia and across South-East Asia. The University has drawn on its experience of running collaborative arrangements in Malaysia, dating back to 1999, in its approach to the partnership with KBU.

12 At the time of the audit, the EEE programme had intakes to year one (level 4) in both September and January and has students on all three levels. The January intake follows an accelerated programme so that students are able to join a unified year two (level 5) the following September. In the academic year 2008-09 there were 230 students on the EEE programme: 58 at level 4; 99 at level 5; and 73 at level 6. In the academic year 2009-10 the level 4 September intake was 36, plus about 20 further students in January 2010, with 64 students in level 5 and 92 students in level 6, making a total of around 212 students. At the time of the Audit of overseas provision, the CNE programme had recruited only one cohort of six students, which was in its final year (level 6), with two further students having transferred to study on-campus at the University. In the academic year 2009-10, the Accounting programme was in its second year of operation at KBU and had 34 year one (level 4) and 24 year two (level 5) students.

13 Discussion of the CNE programme with senior staff at the University and at KBU established that the programme was still in approval but that recruitment had been disappointing. The University indicated that normally an intake of 20-25 students would be required for a programme to be considered viable and that recruitment to the CNE programme would be reviewed. The matter of recruitment to the KBU programmes does not seem to have been discussed centrally at a senior level in the University, and it was senior staff at KBU who made the decision, following the initial small cohort, that numbers were too low to allow a further group to be recruited, and notified the University accordingly. The University may wish to consider whether there would be benefit in more institutional-level involvement in decisions about the viability of programmes in partner institutions.

The UK institution's approach to overseas collaborative provision

14 As the awarding body, the University retains responsibility for the academic standards and quality of its collaborative provision. A typology for collaborative arrangements provides guidance on the types of relationships in which the University will engage and the disposition of responsibilities within such relationships.

15 The University's International Strategy 2005-10 sets out key principles and strategic objectives for overseas collaborative activity. There are also policy and faculty statements in relation to collaborative provision, which, at the time of the Audit of overseas provision, were being reviewed in the light of the University Corporate Plan 2008-13. The principal features of the University's stated approach to collaborative provision are:

- collaborative provision should, so far as possible, be integrated with on-site provision
- transnational provision with a small number of selected partner organisations with a comparable mission and status is regarded as mainstream, not additional, University activity
- risk is managed through diversification across a number of countries
- international developments are designed to be managed on a full economic cost basis.

16 The University's Academic Board, supported by the Academic Development Committee (ADC), has overall responsibility for academic standards and quality in collaborative provision. At faculty level, faculty academic boards are supported by a Faculty Quality and Standards Management and Enhancement Committee in the Faculty of Arts, Computing, Engineering and Sciences (ACES), and an ADC in the Sheffield Business School (SBS). Management responsibility for collaborative provision rests with the Deputy Vice-Chancellor at University level, and with a nominated Assistant Dean at faculty level.

17 The University undertakes annual Corporate Visits to partner institutions, which involve staff at the most senior levels in the University. Documentation relating to the Corporate Visit in March 2009 confirmed that there were discussions between senior staff from the University and from KBU and consideration of more strategic matters relating to the management and development of the collaboration. The audit team considers the programme of Corporate Visits to be a feature of good practice in the management of overseas collaborative provision that demonstrates institutional commitment to the development of the partnership.

Section 2: Arrangements for establishing the link

Selecting and approving the partner organisation

18 The academic and business cases for establishing a new collaborative arrangement are normally made by the sponsoring faculty using a standard University Outline Proposal Form for inclusion of new proposals into faculty business plans. Since KBU was considered by the University to be a strategically significant development, senior management was involved in the development of the partnership from an early stage.

19 KBU was originally in partnership with another UK University, which had discontinued its engineering provision, and the College therefore needed to find a replacement partner as a matter of urgency. Senior staff at KBU explained that they had sought a partner where the curriculum fit would be close to that of the programmes KBU had previously operated, since this would avoid the requirement to start again with local external approval processes. KBU found this fit in the Sheffield Hallam programmes and contacted the University with a proposal to form a collaborative partnership for the delivery of the EEE and CNE programmes.

20 The University investigated local requirements for recognition as part of the original due diligence enquiries. The National Accreditation Board (LAN in its Malaysian acronym) gave approval for the EEE and CNE programmes in 2005, and the Accounting programme in 2008. Since those original approvals, the Malaysian Qualifications Agency (MQA), successor to LAN, has been established, and KBU applied to MQA for accreditation for the EEE programme. MQA visited KBU as part of the accreditation process in August 2009; senior staff at KBU informed the audit team that the MQA review report had been received and that no conditions had been imposed. The University confirmed that, in accordance with MQA regulations, KBU would apply for MQA accreditation for the CNE and Accounting programmes when the students were in the final year of the programmes, that is in 2010 for CNE and in 2011 for Accounting.

21 Institutional approval is based on a pro forma which includes a risk assessment summary grid. The pro forma is comprehensive in its coverage of areas to be considered, and the completed pro forma for KBU demonstrated that the initial proposal for the partnership had been carefully prepared and was well evidenced. For the initial approvals, staff from the University visited KBU to review staffing, learning resources, and approaches to teaching and learning. It was agreed that the University would continue with the quality assurance arrangements established by the previous validating body. The Chief Executive Officer of KBU visited the University and had discussions with senior staff members of the University on KBU's plans and toured the facilities of the University.

22 The institutional approval exercise involved a subgroup of the University Approval Panel visiting KBU in December 2004. In accordance with standard University procedures, the subgroup included a member, external to the University, with expertise in the prospective subject area. The panel report to Academic Board showed comprehensive consideration of the academic and financial implications of the potential new partnership. The report also recommended taking up references from an existing UK HEI partner of KBU. Malaysian recognition requirements were considered as part of the approval process.

Programme approval

The delivery of programmes through a collaborative arrangement is subject to University validation through a Collaborative Standing Panel (CSP) process. Approval involves University staff with experience of collaborative provision, and external subject experts. The validation proposal is prepared jointly by University subject staff and staff from the partner institution. An approval panel event was held at the University in December 2004 for the EEE and CNE programmes, with the Head of School from KBU attending as a member of the course team presenting the proposal. Audit team discussions with staff at KBU confirmed that they had been involved in the preparation of the approval documentation, supported by staff from the University.

Recommendations from validation panels go forward to the University's Academic Board for approval. Conditions of approval are reported to Academic Board, and the chair and secretary of the CSP ensure that conditions are met before the collaborative programme runs. Validation conditions for the EEE and CNE were signed off by the chair of the CSP in accordance with the stated procedures.

25 The Accounting programme was approved at a validation event held in November 2005, with a video-conferencing link enabling staff from KBU to participate. The same external panel member was employed as for the validation of the EEE and CNE programmes, although the programme to be franchised was in a different subject area. Initially, the approval was for a 2 plus 1 arrangement but, very soon after the first approval, with the Malaysian Ministry of Higher Education having changed its policy in allowing colleges to apply to conduct 3 plus 0 instead of 2 plus 1 in the first instance, KBU requested the University convert the arrangement to a 3 plus 0, with all three levels delivered by KBU. The University approved the change through chair's action by the chair of the CSP, which was reported to Academic Board in August 2006. There was no academic involvement external to the University in the approval. The audit team reviewed documentation setting out criteria for the use of chair's action outside a formal panel meeting, which post-dated the approval of the 3 plus 0 Accounting programme at KBU. The University indicated that the criteria which would cover the use of chair's action in this particular case were the need for urgency on a 'business critical proposal' where it would not be possible to wait for a full panel to convene, and the approval of new or additional delivery arrangements for an existing validated course provision. There was no evidence of a documented procedure for approval of changes to approved collaborative provision by chair's action.

The audit found that the University's standard procedures for institutional approval and programme delivery were sound and took due account of the expectations of the *Code of practice*. In the case of institutional approval of KBU, and the validation event for the delivery of the CNE and EEE programmes, the processes were implemented and conducted with care and in accordance with the stated requirements.

27 The approval of the Accountancy programme was less secure, with the process having been completed without any external subject-specialist input. The approval of the delivery of the final stage of the programme was undertaken outside the University's standard procedures, and on the basis of limited experience of the collaborative partner's delivery of the earlier stages of the course. The University took into account KBU's extensive experience of delivering a similar programme with another UK partner. The audit team recognises the pragmatism of the approach and that the approval had been conducted with integrity. The team also notes that criteria for such an approval by chair's action are now in existence and should provide for a more systematic approach in the future. Nevertheless, the team would suggest that the use of chair's action to approve significant changes to approved collaborative provision should not be considered to be a routine procedure, given the potential risk to academic quality and standards.

The audit found that there was significant confusion and ambiguity around the professional, statutory and regulatory body (PSRB) accreditation status of the programmes operating at KBU. The commentary provided for the audit stated that the KBU-based EEE and

CNE programmes had the same PSRB accreditation as the on-campus versions of the programmes. The University also stated that it was seeking accreditation for the Accounting degree at KBU from the Association of Chartered Certified Accountants (ACCA), which accredits the on-campus provision. On campus, the Institution of Engineering and Technology accredits the EEE programme and the British Computer Society accredits the CNE programme. Students on the EEE and CNE programmes who had transferred from KBU to study their final year at the University were aware of the UK PSRB accreditations of the on-campus programme, but believed that they would be of limited value in the Malaysian employment market.

Audit team discussions with senior staff of the University failed to establish clarity about whether PSRB accreditations also applied to the programmes delivered at KBU. The University subsequently provided information that the PSRB accreditations for the EEE and CNE programmes only applied to the on-campus versions of the programmes. The University also reported that ACCA had granted the same exemptions for the Accountancy programme at KBU as for the on-campus version of the programme, except for negotiation of exemptions related to local variations based on Malaysian law and taxation.

30 Discussions with staff and students at KBU found a different perception and understanding of the PSRB status of the programmes. Staff reported that the key recognition for engineering students was that of the Board of Engineers Malaysia, but that three-year degree programmes no longer gave eligibility for full membership and so students would need to gain a master's level qualification to qualify. Students on the relevant programmes at KBU were clear that this was the case. Students on the Accounting degree expected to receive the same exemptions as students at the University and were not aware that exemption to take account of local variations had still to be secured.

The Corporate Visit to KBU in March 2009 resulted in an action point for the University to clarify the exemptions available from ACCA and to do so as soon as possible, but the situation was still unclear at the time of the present audit. The ACCA database for KBU International College lists exemptions for a BA (Hons) Accounting and Finance programme in collaboration with another UK University, but no reference to any exemptions for the Sheffield Hallam University BA (Hons) Accounting as the two local variant modules are not yet in approval. Publicity material produced by KBU also states that the Sheffield Hallam BA (Hons) Accounting is accredited by the Chartered Institute of Management Accountants (CIMA), but there is no reference to KBU International College on the CIMA database.

32 Enquiries in the course of the audit did not find a consistent and authoritative position on the accreditation status of the Accountancy programme offered in collaboration with KBU. The question of professional accreditation and recognition of qualifications has implications for students' career aspirations and employment prospects. The University should therefore clarify the situation as a matter of urgency and ensure that all publicly available information about professional body recognition for the programme, and that provided to staff and students at both the University and KBU, records accurately the accreditation status of the programme.

Section 3: Academic standards and quality of programmes

Day-to-day management

33 There are separate Memoranda of Agreement for each of the programmes, which define roles and responsibilities in relation to the management of the collaboration. There is a link tutor for each programme who is the key point of liaison between the University and KBU. The University Link Tutor Handbook provides comprehensive guidance on the role, which is defined as implementing the operational provisions of the collaborative course/programme agreement. The role may differ in practice depending on the nature of the collaboration, so the University Partnership Support Unit draws up an agreement which defines the responsibilities of the link tutor in line with the character of each specific collaborative arrangement. 34 The Link Tutor Handbook identifies both University and faculty level training to support its link tutors. At University level, at one stage there was a Link Tutor Forum to induct new tutors and to update existing tutors and facilitate the sharing of good practice. The Forum fell into abeyance because of the difficulty of bringing link tutors together, and from 2009 the University instituted a 'Link Tutor's Update' newsletter. At faculty level, the ACES faculty, responsible for the EEE and CNE programmes, holds regular local Link Tutor Forums. The Sheffield Business School, responsible for the Accounting provision, has too few link tutors to justify such an arrangement, and uses informal briefing mechanisms.

35 The link tutor for the EEE and CNE programmes normally visits KBU biannually. There is annual visiting in the case of the Accounting provision. There is no guidance or requirement for link tutor reporting on their visits, nor any indication of where any such reports might be considered in the University. In discussions with the audit team, senior staff at KBU confirmed that they had received copies of link tutor reports. The University may wish to consider whether there is scope for a more systematic approach to link tutor reporting to contribute to the enhancement of the provision overall.

36 The range of duties set out in the Link Tutor Handbook is very extensive, incorporating oversight of academic standards and the quality of learning opportunities, the latter including approving new staff and staff development and checking that the agreed arrangements for provision of learning resources are in place. Link tutors are also asked to confirm the continued appropriateness of student support and guidance mechanisms, and to ensure proper application of the University's quality assurance mechanisms. The tutors also make sure that the student records at KBU are maintained and interface appropriately with the University's record systems. Finally, the tutors are responsible for monitoring the accuracy of publicity and marketing materials, including information received by students about their course and regulations.

37 There is clear evidence that the link tutors for the KBU provision are discharging these broad-ranging duties effectively. It was apparent to the audit team from discussions with staff and with students at both KBU and the University that the two link tutors were well known and well regarded, and that they played an important role in representing the University. The audit team has some reservations about the potential for overreliance on the link tutors in supporting the collaborative arrangement; there is no doubt about the enthusiasm, effectiveness and commitment of the current link tutors, but the University may wish to consider the need to have a wider understanding of the relationship within the University and to establish contingency arrangements to deal with any disruption to current link tutor arrangements.

In addition to the link tutor arrangements, there is also contact between module leaders at the University and their opposite numbers at KBU. Teaching staff at KBU confirmed that they had been given the email address of the module leader at the University but that it had been up to KBU staff to establish contact. Notwithstanding that the need to strengthen module leader linkages was recognised in the action plan for the Annual Quality Review for the academic year 2007-08, KBU staff indicated to the audit team that, generally, these arrangements had worked well; staff confirmed that they usually received a quick response when they contacted staff at the University. Staff at KBU are also able to access University teaching materials for modules. At the time of the audit, no teaching staff from the University had visited KBU.

As KBU students are fully enrolled students of the University, a full student record of them is maintained by the University. As students of the University, they have access to its electronic learning resources, including the University's virtual learning environment (VLE). Students who met the audit team and who had studied for two years at KBU before transferring to the University reported that they had only used these resources since coming to the University. By contrast, in meetings with the audit team, current students at KBU confirmed that they used both University and KBU electronic learning resources and that they had been trained in the use of the former. Initial problems with access to the VLE for EEE and CNE staff at KBU have been resolved satisfactorily and the staff now have full access to the University's electronic learning resources. Staff teaching on the Accounting programme at KBU reported that, through the Annual Quality Review process, they had raised the issue of access to University electronic learning resources, and that the University was moving to rectify access problems.

In discussions with the audit team, students reported that their experience of learning and teaching in years one and two of the programmes was that contact hours were high, at around 21 hours per week, and that a fairly didactic approach was taken to delivery. By contrast, in year three, there was a strong emphasis on project work and the approach to learning and teaching was more student-centred.

41 The University checks the appropriateness and adequacy of student support arrangements as part of validation; ongoing oversight of these arrangements is one of the link tutor's responsibilities. The University considers that KBU provides student support services commensurate with the requirements for support of both local and international students, the latter being evidenced by the content of the KBU International Student Guide. Students at KBU look primarily to their lecturers for academic and personal support, and staff maintain an 'open door policy' which makes them very accessible. In their final year students have a project supervisor who they are required to meet weekly. The audit found local arrangements for student support were effective and operating in accordance with the University's requirements.

42 Student representation and feedback are gathered through regular staff-student meetings, course committees and informal meetings with the University link tutor, student module evaluations, and informal meetings with KBU staff. Link tutors are the main conduit of communication between the University and the students at KBU. They meet all the students or, in the case of the larger programmes, student representatives, on a regular basis without any KBU staff present.

43 There are twice-yearly course committee meetings held at KBU involving staff and student representatives, and minutes of these meetings are made available to the University. Students do not receive any training for their role as student representatives but are briefed by the College Course Coordinator on their roles and responsibilities. Students also complete module and staff evaluation questionnaires for KBU; there was no evidence of the University drawing on the outcomes of local evaluations in its management of the provision. Overall, students were satisfied that their voice was heard and that senior KBU staff responded to them, and they were able to quote examples of how KBU had dealt with issues which they had raised.

Arrangements for monitoring and review

44 Collaborative provision is subject to the University's Annual Quality Review (AQR), which involves programme-level staff at KBU and the University link tutors completing a comprehensive Collaborative Provision Course Level AQR template. Initially, AQR was supported by the use of a KBU 'Programme Standards and Quality Report' pro forma, which had been inherited from the previous validating agent, but the Sheffield Hallam AQR pro forma was adopted for the monitoring exercise from the academic year 2008-09. The AQR report draws on staff and student feedback, student performance statistics which the University collates from its student records system, and external examiner reports. The AQR document includes an evaluative report, quality improvement action plan and link tutor commentary. Staff at KBU confirmed that they were involved in the preparation of the AQR reports. The University's Academic Standards and Quality Enhancement Portfolio has oversight of the AQRs and monitors satisfactory completion of the process.

45 Individual AQR reports are brought together in a faculty collaborative AQR overview report. AQR reports for the academic year 2008-09, in draft form at the time of the audit, differed in layout and presentation but covered broadly similar themes, including generic features of good practice, areas for improvement, and updating of the faculty action plans for collaborative provision. The faculty AQR overview report is considered and agreed by the ACES faculty Quality and Standards Management and Enhancement Committee and the SBS faculty ADC. Faculty overview reports feed into the University's institutional overview of collaborative provision as part of the University's Annual Profile of Quality and Standards. Reporting to both Academic Development Committee and to Academic Board is on a by-exception basis of issues not resolved at faculty level.

46 The content of the programmes at KBU is the same as the on-campus equivalents, with some variations to take account of local conditions; for example, there are modules on the Accounting programme covering Malaysian law and taxation. The programmes at KBU will be subject to the same processes for modification and review and revalidation as the host programmes when the normal period for review is reached. Programme review at KBU will be harmonised with review and revalidation of the cognate programmes within the University. While the detailed procedures for review are yet to be defined, the University anticipates convening a hybrid panel drawn from the University Standing Panel, to include members with collaborative expertise. Staff at KBU indicated they did not expect to have an involvement in any redesign of the curriculum of the programmes. KBU provides feedback indirectly to the University via AQR reports and module reports, which inform curriculum development.

47 The University does not currently have a mechanism for review of collaborative partners as distinct from the delivery of programmes of study, but is developing a methodology to support such institutional review. The audit team saw a draft of the University's Collaborative Partnership Review, which, if approved by ADC and Academic Board, would take effect from the academic year 2010-11. In the view of the team, the proposals for collaborative partnership review appear sound and, if implemented in accordance with the stated requirements, should strengthen central assurance and oversight of the management of collaborative provision

Staffing and staff development

48 Staff teaching on the programmes franchised to KBU are appointed by the partner but approved by the the University at the time of initial validation through scrutiny of staff curricula vitae. Changes subsequent to the initial approval are approved by University through the link tutor. Staff are appointed by KBU in accordance with the guidance provided by MQA; all staff are qualified to master's level while the proportion of part-time staff is maintained below the MQA-specified ceiling of 40 per cent of total staffing. Staff are appointed to a subject area and they teach on a range of programmes in this area, not just the Sheffield Hallam University programmes

49 Communication between University and College staff teaching on the programmes is maintained by email, telephone and by video-conferencing, as well as through the University's annual Corporate Visit to Malaysia. Teaching staff at KBU maintain regular contact with module tutors at the University through email and also have access to electronic versions of teaching materials.

50 There is no formal statement by the University of any commitment to provide staff development, or any specification of entitlement for KBU staff for development from the University. Nonetheless, the audit found evidence of many staff development initiatives supported by the University. Examples cited by the University were predominantly pedagogic or regulatory in nature, including role-playing, case studies and sessions on research-informed teaching. Staff at KBU also spoke about a range of staff development opportunities provided by the University, including a masterclass in Accountancy for staff, discussion of assessment of students, a workshop on approaches to teaching and learning, and a seminar on course administration. There are plans for further staff development to support KBU staff in delivery of the level 6 Accounting modules in the academic year 2010-11. Teaching observations are a normal part of link tutor visits. At the time of writing, no KBU teaching staff had visited the University, but all those whom the audit team met expressed a wish to do so. The audit found that the University's provision of staff development in support of the operation of the collaborative programmes provided effective support to the delivery of the programmes. At the time of the audit the research involvement of KBU staff was focused on consultancy and industry-based projects. Discussions at the Corporate Visit in March 2009 established the need to identify areas for opportunities for the development of research and scholarship at KBU, including financial support for KBU staff. The University is planning to create a development fund which would support KBU staff to undertake higher-level qualifications and doctoral-level studies with the University, an initiative that the audit team would encourage the University to pursue in the interests of developing the partnership further.

Student admissions

52 Admission to the programmes is governed by the admissions policy of the University, which is carried through to the admissions criteria specified in the validation documentation. KBU has operational responsibility for admissions and recruitment processes, including making offers to students according to the validated admissions criteria, with oversight by the link tutors. Although the Link Tutor Handbook gives link tutors responsibility for overseeing the application of admissions criteria, in practice they focus on non-standard admissions, including accreditation of prior learning (APL). University staff are not involved in the induction of students at KBU. In the course of their visits the link tutors tell students about the University and the learning opportunities it provides.

53 The admissions process is managed by the Registrar at KBU and academic staff are not involved. The validation documents for each programme specify the English language requirements for entry. Students with whom the audit team met had a variety of backgrounds in relation to English language development, including an SPM English language qualification, study of English as part of a Foundation Studies programme offered by KBU, and an intensive three-month programme in the KBU Language Centre as preparation for taking the IELTS test. Teaching staff at KBU reported no problems with students' English language competence.

54 Articulation arrangements for the programmes were approved at the time of the validation of the programmes for delivery at KBU. In the case of the EEE and CNE programmes, successful completion of the KBU Foundation Certificate in Engineering, Science and Technology supports entry to year one (level 4) of each degree programme. In the case of Accounting, successful completion of the KBU Foundation Certificate in Business Administration supports entry to year one (level 4), while successful completion of the KBU Diploma in Business Administration supports direct entry to year two (level 5) of the Accounting degree. Audit team enquiries about the approach to maintaining the curriculum match between the feeder and receiving programmes established that there was no systematic and reciprocal way in which either party would be notified of and respond to curriculum changes. It appears that the University relies on the link tutors becoming aware of such changes and alerting the University. The team considers that the lack of a structured means of maintaining the alignment of the programmes has the potential to have an adverse effect on students' transition from one programme to the other as there might be gaps in the students' knowledge. The University may wish to establish formal mechanisms to ensure the maintenance of the curriculum match should either the University or a partner institution make changes to the provision subsequent to the original validation.

Assessment requirements

55 The programmes franchised to KBU operate within the framework of the University's standard assessment regulations. Assessment processes are agreed at validation, and set out in the Definitive Course Document and the Memorandum of Agreement. The link tutor has responsibility for ensuring that the partner understands and implements the agreed processes

56 The briefing paper stated that students undertook assessment tasks that were identical or equivalent to those on the host course at the University. In the case of the Accounting programme, modules based on the Malaysian taxation and legal systems have been substituted for the English equivalents, but the learning outcomes remain unchanged. Otherwise, both

examination and coursework assessments on the Accounting programme are identical to those taken by students studying on-campus at the University.

57 In the case of the EEE and CNE programmes, examinations are set by the University; in year one there are two start dates at KBU and separate examinations are prepared by the University for the second cohort. There is evidence of an increasing amount of local customisation of assessments at KBU, and a preference to set group-based rather than individual assignments, while retaining the same learning outcomes. Initially, these local coursework assessments were subject to prior moderation and approval by the University, but at the time of the audit this was no longer the case. The locally devised assessments are uploaded on to the KBU virtual learning environment and could be accessed by the link tutor.

58 The approach to project work differs between the EEE and CNE programmes at KBU and on campus. In the final year, students at KBU have the option to choose either an individual or a group-based project, with assessments based on individual contribution in the latter case. This approach differs from the on-campus delivery at the University, where only individual projects are permitted. There are occasionally live industry-based projects at KBU, about which the students were very enthusiastic, but the majority of students undertake simulated projects.

59 The EEE/CNE link tutor report for October 2009 recorded a request from KBU that staff be permitted to set their own examinations, to be moderated by University staff and the external examiner. The link tutor report indicated that this was in alignment with the initial agreement and would happen for level 5 with effect from the academic year 2009-10. The audit team noted the Definitive Course Document for the EEE programme at KBU anticipated giving KBU staff freedom to develop their own coursework assessments as the relationship developed, subject to moderation by the University, and to contribute questions towards the setting of examination papers by the University at levels 5 and 6. The Memorandum of Agreement does have the provision for subsequent changes to the Definitive Course Document to be approved by the University. The audit team anticipated that the University would need to extend the Definitive Course Document to empower KBU to set their own examinations in their entirety in order to formally allow KBU to set its own level 5 examination papers.

Discussion with staff at KBU and at the University established that, to safeguard the integrity of assessments, examinations were scheduled for the same day as for students on the home provision. With regard to the question of the operating across different time zones, staff stated that examinations were scheduled for the morning at the University and the afternoon at KBU, so that there was minimal opportunity for any collusion to take place between students at the different locations. Given the speed and range of electronic communications, the University may wish to give further consideration to whether the current approach to the scheduling of examinations provides sufficient security for the assessment process.

61 Students whom the audit team met said that they found the assessment regime heavy. They confirmed that coursework assessments were marked and returned promptly, usually within two weeks, and that the written feedback on coursework was generally helpful and informative.

62 KBU staff mark and moderate all assessments on the EEE and CNE programmes, and the link tutor undertakes a 'post-moderation' check on a sample of work. At the time of the audit, the University was re-marking all assessed work on the Accountancy programme once first marking was completed by KBU staff. In discussion with the audit team, subject-specialist staff at the University and at KBU reported that the programme would move to the same system of moderation as the EEE and CNE programmes as the collaboration matured. While there was no evidence that academic standards were not being maintained in the assessment of students, the audit team came to the view that the present arrangements involved a substantial amount of delegation of authority to a partner institution. The team considers that it would be prudent for the University to monitor carefully whether the present level of delegation of authority, both of the setting of assessments and of marking and moderation, provide it with sufficient oversight to be assured that academic standards are, and will continue to be, maintained. 63 Assessment results are considered at a pre-examination board at KBU, which also considers claims of extenuating circumstances, before going forward to the Subject Assessment Board at the University. Ideally, subject-level results from KBU are considered at the same board as the results for on-campus students, but delays in marking and/or moderation have prevented this on occasion. Assessment results for all students go forward to the common Awards Assessment Board, and the University compares performance across campuses.

64 The University has provided KBU with copies of the University procedures for appeals against decisions of the assessment boards, and KBU is responsible for ensuring that students have access to these procedures. KBU is also required to provide a complaints procedure, but students reported that if they had cause for concern they would raise issues with their lecturers in the first instance, and found that matters were resolved without recourse to the formal procedures. Students were aware of issues associated with academic dishonesty and how allegations of plagiarism would be dealt with, but they were unaware of what penalties might result should an allegation of plagiarism be upheld. Details of such penalties are included in the induction programme and student handbooks.

External examining

65 The University uses the same external examiners to cover the programmes on campus and at KBU in order to assure consistency of academic standards between the two versions of the programme. Processes for the appointment, induction and ongoing briefing of external examiners are the same for all University awards, including those offered as part of collaborative provision. The University has a policy that external examiners visit KBU on a regular basis, and the external examiner for the EEE programme visited KBU in July 2009 and met both staff and students, and also attended the pre-examination board. Staff at KBU reported that they had found this visit a valuable experience. The requirement that external examiners visit KBU is identified as a feature of good practice in the audit.

66 While the specification of procedures for external examining was sound, the audit team found some irregularities in their application. The external examiners for EEE and CNE programmes were not asked to visit KBU or report on the provision in the academic year 2007-08, and for CNE also for the academic year 2008-09. Instead, level 5 work for the academic year 2007-08 was available when the EEE external examiner visited KBU in the academic year 2008-9, and level 5 work from the academic year 2008-9 would be available to the CNE external examiner at the visit in the academic year 2009-10. Such retrospective arrangements for the external moderation of assessment outcomes in the KBU franchised provision do not align with normal practice in the University. The audit team came to the view that the practice was unsatisfactory and had the potential to weaken the University's stewardship of the academic standards of the provision. Should the University continue with this approach it should keep it under active review to confirm the continued security of academic standards in the collaborative provision. The team was informed that the University was arranging for external examiners to visit KBU annually and, during their visits, to moderate both level 5 and level 6 assessed work.

67 Subject external examiners produce separate reports for the on-campus and KBU versions of the programme on a standard pro forma. There is a standard question which asks external examiners with responsibility for collaborative provision to make any additional comments about the academic standards of student work and the quality of learning opportunities; they are not specifically asked to make comparisons between the academic standards achieved by students on the collaborative and on-campus versions of the programme. External examiner reports seen by the audit team did not include explicit comment on comparability of academic standards between the home and the collaborative provision. The University does have data which permit comparisons to be made between the relative performance of the two groups. KBU staff confirmed that they saw external examiner reports. The briefing paper stated that the University and KBU would liaise on responses to any issues arising from the external examiner reports, but KBU staff whom the audit team met said that they were not involved in responses to external examiner reports.

Certificates and transcripts

As the KBU students are fully enrolled students of the University, the University prepares certificates and transcripts from its own student records system. The Academic Transcript/Diploma Supplement states the location of study and names the collaborative organisation. The degree certificates do not identify the place of study. Students who are Malaysian nationals are required to undertake the study of three compulsory MQA subjects unless they are exempted on the basis of previous studies. This MQA requirement is clearly communicated in publicity material produced by the College, and the College will not issue the Sheffield Hallam degree certificates to students who are Malaysian nationals until they meet the MQA compulsory subjects requirement. This approach does, however, create the situation that students have met the requirements laid down by the University for the award of a degree but are prevented from gaining certification for this award.

Section 4: Information

Student information (oversight by UK institution)

69 Information for prospective students is provided via the KBU College website and in hard copy. As noted above, confirmation of the accuracy of the material is the responsibility of the link tutor. Students whom the audit team met confirmed that the pre-entry information they had received was accurate, and that some aspects of the provision had exceeded their expectations in terms of the overall learning experience and their own levels of attainment.

70 KBU produces a student handbook for each programme, which is submitted to the link tutors for comment. The handbook includes information about the course and curriculum, course management and assessment matters. Link tutors on the EEE and CNE programmes have access to the KBU VLE, which enables them to monitor information being given to students at the module level. The Accounting programme does not currently use the VLE, but the link tutor oversees hard copy of module material.

71 The audit found that the arrangements to ensure the accuracy and appropriateness of student information were satisfactory.

Publicity and marketing

72 Under the Memoranda of Agreement between the University and KBU, publicity and marketing procedures must be agreed between the two parties within the guidelines of the University's policies, and KBU undertakes to use only those publicity materials which have received the prior written consent of the University. Link tutors have practical oversight of compliance with this part of the Agreement. During their visits to KBU they review the accuracy of information published by the College; they also monitor electronic material, including that on the KBU website, on an ongoing basis. The marketing departments at the University and at KBU have direct links, and a joint marketing plan for the collaborative arrangement is under development. The audit found the arrangements for securing the accuracy of publicity material to be sound and operating as intended.

Section 5: Student progression to the UK

Although the franchised programmes are all 3 plus 0, there is a facility for students to transfer to study at the University from the start of either year two or year three. The audit team met a group of students who had transferred into year three of one of the EEE or CNE programmes on campus at the University. The students said that they had made the decision to transfer to the University in order to gain overseas experience and a change of study environment, and they believed that gaining such experience would enhance their job prospects. The briefing paper stated that students who wished to transfer to study at the University were interviewed by the link tutor and that, if there was any doubt about their English language competence, they were tested by the University TESOL Department. As the students would be eligible to study years two and three at KBU, subject to meeting progression requirements, without a further appraisal of their facility with the English language, the requirement to demonstrate sufficiency of competence in English language to study the same programme on-campus at the University seemed inconsistent to the audit team.

75 The students who had transferred reported that they had not been subject either to an interview or any testing of their English language competence prior to making the transfer, although they had discussed their decision with the link tutor. University staff with whom the team met confirmed that meetings with students prior to them transferring to the University were more in the nature of counselling sessions than interviews. Students at KBU whom the audit team met said that they were well briefed on the opportunity to transfer to study on campus at Sheffield, that if they wished to do so they would be made an unconditional offer by the University, and that they believed the process of transfer would be straightforward. The team asked staff at KBU whether they believed students who had completed their programme of studies at Sheffield might face 're-entry problems', particularly with regard to employability in Malaysia, and particularly because KBU provided significant levels of employability skills and awareness inputs as part of its delivery of the University's programmes. Senior staff told the team that they planned to offer seminars to returning students to help them re-enter the employment market in Malaysia.

Conclusion

76 The University's partnership with KBU is one where, in the main, policies and procedures are well established and understood by staff of both institutions at the point of delivery. The processes for the assurance of academic standards and quality are sound and draw on the guidance in relevant external reference points. In general, the provision meets the expectations of the *Code of practice*. University staff maintain good working relationships with colleagues through visits, reinforced by electronic communication in between times. The link tutors play a crucial role in the success of the operational management of the partnership. There is scope for greater involvement of central staff in oversight of the collaborative provision.

77 In considering the partnership between Sheffield Hallam University and KBU International College, the audit team identified the following positive features:

- student access to the University's e-learning resources and, more generally, the quality of the learning environment that supports students
- the arrangements for providing students with opportunities to feedback on their learning experience
- involvement of staff at KBU in the process of Annual Quality Review
- the programme of Corporate Visits that demonstrates institutional commitment to the development of the partnership
- involvement of external examiners with staff and students through the annual visit to KBU.

78 The audit team also identified the following points for consideration by the University as it develops its partnership arrangements:

- whether there would be benefit in more institutional-level involvement in decisions about the viability of programmes in partner institutions
- the need to clarify the position relating to accreditation and exemptions by UK and local professional, statutory and regulatory bodies in relation to the provision at KBU

- specifying limitations on chair's action in respect of approvals and modifications of collaborative provision
- the need to avoid over-reliance on link tutors to maintain the relationship between the University and KBU
- the need for formal mechanisms to ensure the maintenance of the curriculum match should either the University or a partner institution make changes to the provision subsequent to the original validation
- given the speed and range of electronic communications, give further consideration to whether the current approach to the scheduling of examinations provides sufficient security for the assessment process
- monitor carefully whether the present level of delegation of authority, both for the setting of assessments and for marking and moderation, provides it with sufficient oversight to be assured that academic standards are and will continue to be maintained
- implement the planned arrangements to allow timely moderation of assessed work at KBU by the external examiners.

79 The briefing paper guided the audit team to an understanding of the origins and current management of the partnership. The findings of the audit are that in nearly all areas the courses are operating in accordance with the procedures set out in the briefing paper and associated documentation. Given that the link is representative of the principles governing the operation of the institution's overseas collaborative arrangements, the audit would also support a more general conclusion of confidence in the University's stewardship of academic quality and standards in its overseas collaborative provision.

Appendix A

Sheffield Hallam University's response to QAA's report on its collaborative provision with KBU International College, Malaysia

The University welcomes the report on its collaborative arrangements with KBU International College Malaysia and the positive features identified by the audit team, in particular that the processes for the assurance of academic standards and quality are sound and draw on the guidance in relevant external reference points.

The link with KBU is representative of the principles governing the operation of the University's overseas collaborative arrangements, and it is therefore especially pleasing to note the auditors' conclusion that the audit findings would support a more general conclusion of confidence in the University's stewardship of academic quality and standards in its overseas collaborative provision.

The University also welcomes the constructive comments provided by the audit team and is addressing the issues identified for further consideration to strengthen the existing arrangements.

The University is committed to ensuring that all graduates of its BA (Hons) degree in Accounting, whether delivered at Sheffield Hallam or at KBU, can easily access the appropriate professional body examination exemptions. It is currently working through the required processes with KBU and the ACCA in the expectation that all of the possible exemptions will be in place for the first graduates of the KBU course in the summer of 2011, and will be seeking the same outcome in respect of CIMA exemptions, again in time for the first graduating cohort in summer 2011.

The University seeks to support students by seeking award exemption accreditation (ACCA or CIMA) for its awards, but it should be noted that students can apply individually to the professional bodies for the relevant exemptions for the award.

The University confirms that:

- arrangements are now in place to enable external examiners to moderate assessed work at levels 5 and 6 at KBU
- it will monitor carefully the present level of delegation of authority, both for the setting of assessments and for marking and moderation at KBU, to confirm that it provides sufficient oversight to be assured that academic standards are and will continue to be maintained
- the criteria for use of chair's action in approval now specify limitations in respect of approvals and modifications of collaborative provision.

Appendix B

Final student numbers 2009-10

BSc (Hons) Computer and Network Engineering Level 6: 6

BSc (Hons) Electrical and Electronic Engineering Level 4: 54 Level 5: 63 Level 6: 91

BA (Hons) Accounting Level 4: 34 Level 5: 24

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