



# **Audit of overseas provision**

**University of Wales and TCA College, Singapore**

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## Introduction

1 This report considers the collaborative arrangement between the University of Wales and TCA College, Singapore.

### The Quality Assurance Agency for Higher Education

2 The primary responsibility for academic standards and quality in 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.

3 Many universities and colleges in the UK offer their higher education programmes to students wishing to study outside the UK. This is a significant and growing area of activity: data published by the Higher Education Statistics Agency indicates that over 408,000 students were studying for UK higher education awards entirely outside the UK in the 2009-10 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. Audits are conducted country by country and in 2010-11 we conducted an Audit of overseas provision in Singapore. 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 Singapore. The reports on the individual audits will be used in the preparation of an overview report.

### The audit process for overseas collaborative links

4 In November 2009 QAA invited all UK higher education institutions to provide information about their provision in Singapore. On the basis of the information returned, QAA selected for audit visits 10 UK institutions with provision in that country. These institutions produced briefing papers describing the way in which their provision (or subsets of their provision) in Singapore 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)*, originally published by QAA in 2004. An 'amplified' version of Section 2 was published by QAA in October 2010.

5 Audit teams visited each of the 10 UK institutions between September and November 2010 to discuss their provision in Singapore. The same teams visited Singapore in January 2011 to meet some of the staff responsible for managing and delivering the provision, and to meet students. The audit of the University of Wales' provision was coordinated for QAA by Mr M Cott, Assistant Director, Reviews Group. The audit team comprised Mrs M Drowley and Professor D Timms (auditors), with Mr M Cott acting as audit secretary. QAA is particularly grateful to the UK institutions and their partners in Singapore for the willing cooperation that they provided to the team.

## **The context of collaborative provision with partners in Singapore**

6 In Singapore, responsibility for higher education resides with the Higher Education Division of the Ministry of Education. The Higher Education Division oversees the provision of tertiary and technical education as well as registration of private schools, including foreign providers. The Singapore higher education landscape currently comprises four publicly-funded autonomous universities, a private institution offering publicly-subsidised part-time degree programmes, five polytechnics, an institute of technical education, an institute of technology, two arts institutions, several foreign universities' branch campuses, and a number of private education institutions.

7 In September 2009 the Singapore parliament passed the Private Education Act to strengthen the regulatory framework for the private education sector. Under this Act, the Ministry of Education has established an independent statutory board, the Council of Private Education, with the legislative power to implement and enforce the new regulatory framework. The new regulatory regime overseen by the Council of Private Education includes a strengthened registration framework called the Enhanced Registration Framework, and a quality certification scheme called EduTrust.

8 The Enhanced Registration Framework spells out the strengthened legal requirements in the areas of corporate governance, provision of quality services, student protection and information transparency that all private education institutions operating in or from Singapore must meet. While private education institutions were previously required to obtain one-time registration with the Ministry of Education and could be de-registered only under extreme circumstances, the Private Education Act has introduced a renewable validity period for registration with the Council of Private Education, which can range from one year up to four years, and has provided the Council with the powers to impose a range of graduated penalties on errant private education institutions, including suspension, nonrenewal or revocation of registration or EduTrust certification.

9 EduTrust is a voluntary certification scheme which provides a trust mark of quality. It replaces the previous CaseTrust for Education scheme, which was mainly focused on protection of fees paid by students, adding a number of student welfare and academic standards for all students, whether local or overseas, as well as soundness of finances and school administration requirements. As with CaseTrust, EduTrust is mandatory for private education institutions wishing to enrol overseas students. EduTrust certification is one of the Immigration and Checkpoints Authority's prerequisites for the issue of a Student's Pass. Further information on higher education in Singapore is contained in the overview report.

## Section 1: The background to the collaborative link

### Nature of the link

10 The link is between the University of Wales (the University) and TCA College, Singapore (TCA). TCA was originally an acronym for Theological Centre for Asia, but TCA College is now the institution's legal name. In October 2007 the University approved the delivery of six programmes by TCA and the first students were enrolled in April 2008.

11 The following programmes have students currently registered.

Programme	Students 2009-10
PG Diploma in Counselling	45
DipHE in Creative Arts	21
BA (Hons) Theology	46
MTh in Applied Theology (Ministry)	7

12 A DipHE in Counselling and Theology, and an MTh in Theology were also validated in 2007, but have never run. All the awards are offered on either a full-time or part-time basis.

13 TCA is part of the Trinity Christian Centre, used for worship and related activities. The Trinity Christian Centre (TCC) houses the College and appoints its Board of Directors. Originally, TCA was a Bible college for the provision of ministerial training at Bachelor of Theology level and above, established to meet the demand for theological education through the medium of Chinese (Mandarin). The College remains strongly religious in its orientation, its 'statement of faith' declaring that 'TCA College is committed to the authority of the Bible as the inspired written Word of God, the absolute infallible rule for faith and conduct.'

### The UK institution's approach to overseas collaborative provision

14 The University's commitment to collaborative activity is considerable, and there are over 20,000 students studying a range of subjects at some 130 centres in 30 countries on four continents. Almost 1,000 students are registered on University-validated provision at eight collaborative centres in Singapore, of whom 119 are studying at TCA College. The University publishes its collaborative register to the general public on its website.

15 The TCA partnership is considered by the University to be representative of its procedures and processes for overseas and UK collaborations.

16 The Briefing Paper stated that the Taught Degree Board has procedures in place to assess the quality and standards of TCA's management of the University's awards during the validation process and on a continuing basis. Overall responsibility for quality assurance is formally with the University's Academic Board. The Taught Degree Board has delegated responsibility for approval, monitoring and review of taught degrees at collaborative centres.

17 The Taught Degree Board is supported by a standing committee, which has a particular focus on the identification and dissemination of good practice, and of areas for development and enhancement. This was called the Quality Assurance and Enhancement Committee, but it was renamed the Learning and Teaching Committee from 2010-11. Until 2010, the Taught Degree Board also had a Finance and Planning Committee (a body whose sole concern was the business aspects of collaborative work, and which had no academic remit), but the duties of this Committee have now been subsumed into those of

the Committee for Global Education which reports directly to the University's Council. In this report, references to Taught Degree Board and Learning and Teaching Committee include predecessor committees.

18 The University Council recently established an academic faculty to support the University's work in collaborative provision. It will be headed by the Pro Vice-Chancellor (Learning, Teaching and Enhancement) and is made up of three schools (Business and Law; Science, Technology, Environment and Medical Sciences; and Arts and Humanities), each headed by a dean. The posts are in the process of being filled, and qualifications for the appointments include significant experience of collaborative provision. Each dean will be supported by two senior lecturers/lecturers, who will be full-time staff of the University, and by staff from a collective entity, called in the Briefing Paper the 'Alliance', consisting of the University of Wales; Glyndŵr University; Swansea Metropolitan University; Trinity University College; the University of Wales Institute, Cardiff (UWIC); the University of Wales, Trinity Saint David, and the University of Wales, Newport. Faculty staff will support collaborative centres by acting in a range of quality assurance roles, such as chairing validation and review exercises and developing staff in their subject areas.

19 Administration of partnerships is through the University's Validation Unit. Each collaborative centre is allocated an institution officer who deals with information about the students (such as registration, credit transfer, matriculation, processing dissertations, recording results, and producing certificates) and a validation officer, who attends meetings at partner institutions to advise on procedural and regulatory matters and provides general administrative support, including issuing agreement documents, reviewing annual monitoring reports, and managing the appointment of moderators and external examiners.

20 Following some adverse publicity about collaboration with a US institution in 2008, the University reviewed its collaborative partnerships with the help of external consultants, focusing on 'the element of risk to the University's awards and reputation arising from its collaborative activities'. This review resulted in 32 recommendations, many, but not all, of which the University accepted. The review had a strong influence on the University's Strategic Plan 2010 to 2014, which brings together its purposes and objectives for collaborative activity and the arrangements for management described previously. The Plan states that the University 'exists to serve Wales and its people', which includes 'interacting with the rest of the world, through collaborative academic provision', among other high level aims. In relation to 'Validation and Collaborative Provision', the first objective listed is 'to enhance [the University's] standing as a national award-granting University in an international context', although the Plan acknowledges that 'there is necessarily a focus on income generation.' The Plan projects growth in collaborative student numbers of six per cent annually.

21 The University stated that its collaboration with TCA is in furtherance of the mission outlined in the Strategic Plan. On the basis of the documents relating to the establishment of TCA as a partner, which are discussed in Section 2, the audit team formed the view that the University's approach to collaboration in 2006 had been permissive rather than selective, operating to admit partnerships not obviously undesirable rather than to identify partners aligned with the University's mission and ethos. The new Strategic Plan has the potential to provide a strategic direction for the University's collaborative activities that is not evident in some former practice. While a copy of the new Plan had been sent to TCA, and it is published on the University's website, no-one from the University had discussed its implications and impact with TCA. The University should consider how it can ensure that its partners are briefed on the consequences of major strategic developments within the University.

22 The Validation Unit's Quality Handbook: Policies and Procedures (the Handbook) is updated annually (it is now in its 17th version), and covers the whole range of quality assurance activities relating to collaborative partners on a life-cycle basis, running from initial vetting, through validation, monitoring, review, amendments to terms of approval, to withdrawal of validation. The Handbook is accompanied by a comprehensive collection of appendices, including guidance for validation teams, arrangements for assessment and external examining, the roles of moderators, and much other detail. The information is reproduced on the University's website. The provisions of this Handbook are common to all the University's collaborations, and agreements made between the University and collaborating institutions bind partners to its regulations and procedures. The Handbook provided a clear and readily available blueprint for the management of the University's partnerships. The audit team identified the comprehensiveness of the Validation Unit's Quality Handbook as a positive feature of this partnership.

23 A 'President' manages TCA on behalf of the Trinity Christian Centre Board. TCA has four schools: Creative Arts, Counselling, Divinity, and Leadership. Each school has a dean. There is also a TCA 'Dean of Students'. The President, the deans of schools, the Dean of Students and the Registrar form the 'Deans' Committee', which 'formulates, implements and reviews the overall policies of the College.' Each school has a programme committee, made up of faculty members. The Programme Committee makes proposals to the Deans' Committee for amendments to programmes.

24 The University requires TCA to appoint 'programme leaders'. The TCA programme leaders are appointed on a subject rather than an award basis. Currently, programme leaders for Creative Arts, Theology, and Counselling are in post: TCA has appointed its deans to fulfil these roles. TCA is also required by the University to have a Joint Board of Studies, consisting of TCA and University representatives responsible, among other things, for annual monitoring; an admissions committee; a board of examiners; and a superintendent of examinations. The TCA Deans' Committee serves as the Admissions Committee and the Graduation Committee. The TCA Joint Board of Studies has no formal relationship with the programme committees.

25 The University has historically offered awards in a wide range of languages in addition to English and Welsh. However, following the advice of the recent internal review, the University has decided that it will in future 'only consider applications in languages of key strategic importance...and in which it has its own expertise', and will withdraw from programmes offered in other languages. One of the languages of 'key strategic importance' is Mandarin.

26 According to the Briefing Paper, all the TCA awards are delivered and assessed in English, except the two theology programmes which are offered 'also' in Mandarin. The initial validation report states that it is proposed that 'the two theology programmes (MTh and BA)' would also be offered in Mandarin. Some members of the University stated to the audit team that programmes had been delivered and assessed in Mandarin. However, none of the programme specifications for the TCA programmes mentions the possibility of delivery in Mandarin, and all stipulate conventional English language requirements for entry. Of the two years of external examiner reports available, none mention Mandarin delivery. The team confirmed with TCA that, to date, all tuition and assessment in University-validated programmes at TCA had been in English, due to the potential compromise to standards and translation expenses for students that would arise from Mandarin delivery. No threat to standards had therefore arisen, but, nonetheless, the University should ensure that responsible staff are in possession of the facts about the delivery of programmes in partner institutions.

## **Professional, statutory and regulatory bodies**

27 All private education in Singapore is subject to the provisions of the Private Education Act (2009). The Council for Private Education is charged with regulating the provision of the Act through a scheme for registration. However, according to the Briefing Paper, TCA does not need Council for Private Education registration due to its status as a 'Religious School'. The University did not permit TCA to recruit until this exempt status was confirmed.

28 The Briefing Paper made no mention of professional body recognition for TCA programmes other than the potential requirements of the Council for Private Education. However, the audit team was informed by TCA that the Postgraduate Diploma in Counselling is now recognised by the Singapore Association for Counselling (SAC). In fact, TCA's intention to seek SAC accreditation was indicated as early as the initial 'vetting' report on the partnership. The matter was discussed at the TCA Joint Board of Studies in July 2010, and TCA stated that they had informed the University about registration in October 2010. The audit team noted that under the Private Education Act, institutions 'providing education in accordance with religious beliefs' are exempted from the requirement for registration with the Council for Private Education, provided that they offer 'no other education'. Prima facie, registration with SAC appeared to compromise TCA's Council for Private Education exemption, since the course was not 'religious' by definition, although it appeared the University had not considered the implications for Council for Private Education registration.

## **Section 2: Arrangements for establishing the link**

### **Selecting and approving the partner organisation (or agent)**

29 The University stated in its Briefing Paper that, in considering applications from potential partners, it pays close attention to the ability of the proposed partner to meet its standards and requirements; is legally competent to enter into a contract; and is financially stable. The University has a 'vetting procedure' to consider these academic and business aspects, under which TCA was required to submit an initial 'vetting document', accompanied by supporting documentation. On this basis, the University conducted a preliminary vetting visit, with a resultant report for the Taught Degree Board.

30 However, the TCA 'vetting' report included no 'due diligence' element of a kind that could provide, for instance, an authoritative view of financial stability. The report included no reflection on the relationship of the University's educational aims with those of TCA or vice versa, although it did include a statement that a link with the University would help TCA achieve its mission, to become a 'Christian University'. The report includes a section headed 'Justification of proposal', which ostensibly covers benefits to both the institution seeking validation and the University, but in this case covers TCA exclusively. The only benefit to the University is identified in the 'Further information/comments' section, a single paragraph of about 150 words, which refers to an existing link with another UK university (the home institution of the vetter) for PhD study: an association with TCA would 'complement this nicely'. There is no reference to a business case for the link, beyond the statement in 'Further information/comments' that the College appears 'well-resourced, efficiently-run and ambitious', and two or three single-word judgements in an appended risk matrix. Although the report bears the signature of the University 'vetter', its content (including such indications as possessive adjectives) implies that it was composed by the applicant institution, with no more than a short concluding comment by the vetter.

31 The report therefore provided scant information to inform a 'due diligence' judgement, had little objectivity by definition, and did not mention TCA's religious position,



a cultural factor potentially material to the proposed relationship of the partners. The University stated that some of the detailed requirements of 2010 did not apply when the TCA link was established in 2006, that more information, such as audited accounts, is now required from a new partner, and that the procedure is now more robust. The audit team confirmed that the list of requirements in the latest version of the Handbook is comprehensive, and, if satisfactorily fulfilled, would provide a reliable basis for a judgement by the Taught Degree Board on the financial and legal standing of a proposed partner. The University should ensure that the new requirements for due diligence are properly conducted at the vetting stage of partner approval, and reflected in reports that inform Taught Degree Board decisions.

32 On the basis of the 'vetting' report, the Taught Degree Board authorised a validation event, and required specifically that the event should consider and advise on the security of the link with the parent company, namely the Trinity Christian Centre. This matter is not in fact mentioned in the validation report, but was followed up independently. The validation event focused on the capacity of the proposed partner to deliver the programmes proposed.

## Programme approval

33 Once the Taught Degree Board agrees to go forward with validation, moderator(s) are designated, according to the Briefing Paper, on the basis of expertise, knowledge and experience. Two moderators were put in place for TCA; one for the Theology and Counselling schemes, one for the Arts scheme. The University accepted a recommendation in the vetting report that the moderators be appointed from the home institution of the vetter, although in future, moderators will be from the University Faculty or from the Alliance institutions. The moderators' period of office is five years. The moderator and staff in the Validation Unit assist the institution to prepare validation documentation, against guidelines in the Handbook. The guidelines include reference to programme specifications, subject benchmark statements, and *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ). The institution submits a draft validation document which is reviewed formally by the moderator designate, who provides feedback and confirms whether the document (with revisions as recommended) is ready for a validation panel. The Validation Unit checks for compliance with the University requirements and regulations.

34 The Briefing Paper stated that the University regards validation as 'a process of internal and external peer scrutiny'. A single event typically covers approval of the partner and the validation of all programmes. Validation events include meetings with senior management, teaching staff, and students. Learning resources are reviewed and a learning resources questionnaire completed. Reports written to a template are drafted by officers from the Validation Unit.

35 The validation panel is appointed by the University. The chair for the TCA Validation Panel was a member of the Taught Degree Board, but under new regulations panel chairs must be members of the University Faculty. The moderator may not be a member of the panel, as of 2009-10, but this was permissible formerly, and both TCA moderators were members of the Panel that validated the TCA awards in September 2007. On the basis of the event, the Panel recommended validation of a Diploma in Counselling and Theology, a Diploma in Creative Arts, a BA in Theology, a Postgraduate Diploma in Counselling, an MTh in Theology and an MTh in Applied Theology (Ministry).

36 A marine biologist chaired the Validation Panel; the other members were two theologians, a specialist in religious education, and a specialist in creative arts. Although the titles of two of the five awards included 'counselling', no specialist in this or any closely related area was included. The University stated that 'in principle' panel membership covers

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all subjects under consideration, but 'broad subject expertise' would be sufficient. The audit team considered that the panel for TCA did not meet the demand for 'broad subject expertise' even under a liberal interpretation of the phrase. Given that almost half of TCA's registered students are studying on the counselling programme, the omission was potentially damaging. The University should ensure it includes on validation panels specialists for all disciplines relevant to proposed programmes.

37 The Vice Chancellor of the University stated that if doctrine started to influence 'academic objectivity' in a course, then the University would withdraw from the partnership. The University stated that validation is the method by which such objectivity is assured, and that in its procedure the emphasis is on academic rigour, regardless of faith.

38 The audit team discussed the matter of 'academic objectivity' at some length with TCA managers, teachers and students. The team was able to satisfy itself that, by the kinds of tests that might be applied by non-specialists, TCA's courses constituted 'education not indoctrination', a phrase used by a member of TCA staff. The courses encompassed religious views in addition to those implied in the College's mission statement. The Librarian confirmed that the range of books in the library went far beyond the narrowly doctrinal. Staff and students came from many points on the Protestant Christian spectrum. Students described a curriculum with broad coverage. The College also referred to the contribution of the external examiners, who were not appointed by reference to their religious affiliations. In addition, Singapore Association for Counselling accreditation for the PG Diploma in Counselling implied that the professional body recognised the capacity of graduates to provide professional services to Singapore's entire community, which is rich and various in faiths.

39 The University stated that in the case of TCA, bibliographies were checked to ensure that even in the theological courses, alternative views to those implied in TCA's 'statement of faith' were represented. However, the validation report does not refer to TCA's declared fundamentalist beliefs. The report shows that the panel did indeed require 'some details of the module descriptors, particularly learning outcomes and bibliographies' to be amended, and advised that the bibliographies should include 'works representing a wider spectrum of opinion' although does not state the nature of the limitations. Where there are prima facie reasons to believe that 'academic objectivity' may be compromised by programmes proposed for validation, the University should ensure that validation panels and validation reports openly address them.

40 The programme specifications seen by the audit team appear generally to be in line with the guidelines published by QAA, and make explicit reference to relevant subject benchmark statements. However, in relation to the DipHE in Creative Arts, the subject benchmark referenced is Theology and Religious Studies. In the light of this, the team queried whether the programme is appropriately named. However, the University stated that requirements were made at validation to make the curriculum sufficiently broad to make the title of the award meaningful. The University considered that, although the practical work undertaken in the course uses the church environment, the skills learned are transferable to non-religious creative arts venues.

41 The report of the validation event was received by the Validation Board on 12 October 2007 for subsequent approval by Academic Board. Following the meeting of conditions set by the Validation Panel in January 2008, the first students were enrolled in April 2008. A post-validation visit was conducted by one of the moderators in January 2009, which produced a report following up matters raised by the Validation Panel.

42 A limit is set on the extent of change permissible in any programme; this is kept under review by the moderator. A new programme or a substantial programme revision

requires a new approval event. No major change has been proposed in the TCA awards since validation.

### **Written agreements with the partner organisation (or agent)**

43 An agreement document which regulates the collaboration is signed with each collaborative centre after it meets the conditions set at the validation event and before it is permitted to enrol students.

44 The Agreement is governed by the laws of England and Wales and identifies the obligations of both parties. It covers a range of issues, such as the term of the collaboration, admission requirements, quality assurance requirements, assessment arrangements, financial arrangements and advertising and marketing requirements. The Agreement allows the University to keep the performance of the Collaborative Centre under continual review and to terminate any arrangement if the institution is breaching a significant term of the Agreement. The Agreement spells out both parties' obligations (with particular reference to students) in the event of termination.

45 The agreement with TCA meets the expectations of precept A10 of the *Code of practice, Section 2*.

46 In the view of the audit team, the detail and explicitness of the University's written procedures provide a comprehensive framework for the creation and management of collaborative links, which may not have been in place at the time of the establishment of the partnership with TCA. However, the deficiencies in the validation procedure as applied to TCA lay in execution, more than in principle. Lack of specialists meant that the Validation Panel was not in a position to give the Taught Degree Board authoritative advice on the validity of the counselling courses, and the report was not explicit about the relationship of TCA's religious position to the contents of the programmes proposed. In these circumstances, the audit team was unable to see how the report could provide a reliable basis for approval by the Taught Degree Board, whatever the facts about the courses themselves. The University should ensure that the objectives of its procedures are achieved in practice, as well as in principle.

## **Section 3: Academic standards and the quality of programmes**

### **Day-to-day management**

47 The University stated that the moderator is 'the key academic contact' for those managing programmes in partner institutions, and the only member of University academic staff available to module tutors in partner institutions. Although the moderator for the creative arts programme is a specialist in the area, a single moderator with expertise in theology was appointed to cover both the theology programmes and the counselling programme, which is at postgraduate level. The moderator appointed had no academic qualification or experience in counselling or a related discipline, such as psychology. Although the University stated that the course was 'more theologically grounded than psychologically grounded', the audit team noted that the subject benchmark statement referred to in the PG Diploma programme specification is Psychology, and the external examiner for the PG Diploma is a Professor of Psychological Studies and head of a university psychology department. Recognition by the relevant Singaporean professional, statutory or regulatory body appeared to confirm that the course was on the spectrum of psychology-related, rather than theology-related

programmes. Staff at TCA were emphatic that the counselling course was primarily related to psychology, not theology.

48 The audit team noted that some important aspects of the role of the moderator, as described by the Handbook, require subject expertise: approving amendments to schemes of study, checking that assessments are set at the correct level, approving dissertation proposals, and other matters related to what the Handbook calls 'academic integrity'. There was every sign that the moderator for creative arts was performing a valuable and valued role in relation to such matters; however, the TCA counselling staff stated that, for subject advice, they looked to the local external examiner instead. The University should ensure that moderators have subject expertise relevant to the programmes for which they are responsible.

49 The audit team was informed that moderators usually visit twice yearly. The Handbook states that up until the first Quinquennial Review, partners will normally require at least two visits per annum to the validated institution by the moderator. The first Quinquennial Review is scheduled for 2012-13. The duties of the moderator include submitting 'both an Annual Report and a Mid Term Visit Report'. Although the Handbook includes a template for a moderator's 'Mid Term Visit Report Form', no example of a completed form was provided to the audit team. The rubric on the template used for the 'Validated Centre Moderator's Report Form' states that it is a report 'of each Examination Board', which is annual. TCA confirmed that, after the first year, moderators visited and reported annually. The audit team concluded that the frequency of visits by the moderator(s) was not in accordance with the intentions of the University.

50 Previously, a moderator produced a single report covering the examination of all the awards for which he or she was responsible; from 2009-10, a separate report for each award was required: thus, in the latest round, the moderator for the DipHE in Creative Arts produced one report; the moderator for BA (Hons) Theology, MTh in Applied Theology and PG Diploma in Counselling, three. The intention of the University was to achieve greater clarity about which remarks applied to which programme. Nonetheless, in the narrative sections of the reports for BA Theology, MTh in Applied Theology and PG Diploma in Counselling, some 48 of the 65 lines of narrative were identical, although it should be acknowledged that in some cases the 'narrative' line was a single word. Of the 12 questions put, the answers to eight were identical; the answers to three more included substantial parts reproduced in all three reports; the answers to one question only were significantly different in each case. The duplication and the limited information in some moderators' reports did not seem to meet the University's intentions. The University should ensure that moderators' reports properly provide the information required.

51 Student records are kept by the University. TCA is required to transfer accurate and timely student registration data for the University Student Records System. Student data on retention and progression, and statistical data on achievement are collated, compared and discussed at the Committee for Global Education and the Taught Degree Board. The University is developing systems to facilitate the analysis of data on entry requirements, student retention and progression using its own student records system and report writing tool; in consequence, collaborative centres are now required to provide additional information on admission qualifications as part of their registration transfer.

52 The Student Engagement section in the Handbook sets out the University's expectations in respect of student representation at institutions and provides an overview of the purpose of student representatives, and the principles for appointment and induction. Centres must establish a staff-student liaison committee, whose role is explained in the Handbook. The TCA 'Student Council' met regularly with the Dean of Students and appeared to be functioning effectively.

53 The Validation Unit recently established its own Student Survey (based on the National Student Survey). This invites students to complete an online feedback questionnaire, which provides the Validation Unit with direct feedback from students. Details of the results and feedback are made available on the University's website and discussed at the Taught Degree Board, Learning and Teaching Committee and Pro Vice-Chancellors' Forum. TCA staff and students showed no awareness of this survey.

## **Arrangements for monitoring and review**

### **Annual monitoring**

54 The Validation Unit has a system of continuous monitoring, using a spreadsheet updated regularly by Validation Unit staff with the intention of predicting, recording and monitoring risk (using a traffic light system) in a number of designated categories. TCA was designated amber under 'University of Wales concern' while the investigations regarding Council for Private Education registration were taking place, but its status has now returned to green.

55 Annual monitoring is by collaborative centre, and Annual College and Course Review (ACCR) covers all programmes in a centre. ACCR requires centres to report on key performance indicators, including student recruitment, entry requirements, retention, progression, withdrawal and achievement. Centres must also comment on the quality and enhancement of student learning opportunities, student feedback (including mechanisms for collecting and responding to it), staffing and staff development, and the quality of interaction with the University. ACCR reports are the means by which centres respond to recommendations made in the external examiner and moderator reports. Supporting documentation must accompany the report, including CVs of new staff, and committee minutes. ACCR also includes an action plan for key issues arising in the review period (which may include features of good practice for dissemination). The Briefing Paper stated that Validation Unit staff work with centres to ensure consistency between the presentation and content of ACCRs. Detailed guidance notes were distributed in summer 2010, supported by a session at an Administrative and Quality Conference put on by the Validation Unit. TCA had been unable to attend, however.

56 The Joint Board of Studies considers the ACCR report for the latest complete academic year, as well as proposed changes to schemes, implementation of recommendations by external examiners/moderators, and any other matter referred to the Joint Board of Studies by the University. Moderators and external examiners are members of the Joint Board of Studies, which is usually timed to follow an examination board. The University intends that student representatives be included in Joint Board of Studies meetings, although it appears that TCA was not at first aware that students should be represented, and no student was present at the first meeting in July 2009. Students were, however, present at the second meeting in July 2010. Since external examiner reports are included in ACCR reports, and are discussed at the Joint Board of Studies, representative students have an opportunity to see the external examiner reports. The Joint Board of Studies meeting facilitates the compilation of the ACCR report for the current academic year, which is typically submitted to the University in the following November.

57 As with moderators' reports, from 2009-10 the University required that separate sections of the reports be compiled for each programme; thus in 2009-10 four sub-reports were prepared: one for creative arts, two for the theology programmes, and one for the counselling programme. However, more than two-thirds of the content of the four reports was identical, and even in sections that were different, the differences often consisted simply

of name or number changes. As with the requirements for separate moderators' reports, the new arrangements did not seem to be working as the University had intended. The reports were not self-critical or (except in relation to external examiners' reports) action-oriented. The 2008-09 ACCR report includes some examples of matters raised by the Student Council, with responses made by TCA management. However, the 2009-10 report, while it included sections on how student feedback was obtained, had no indication of the results or what TCA did in response. In addition, the audit team noted that the ACCR report for the previous year, a complex and relatively large document, was tabled at the Joint Board of Studies in July 2010 and not distributed beforehand, a problem noted by the moderators, which TCA promised to remedy in subsequent years. At the time of the audit visit, the 2009-10 report had yet to be considered by the Validation Unit or University committees, where these defects may be identified.

58 ACCR reports are made available to moderators, external examiners and Validation Unit, as well as designated members of the Learning and Teaching Committee. Any issues of interest or concern are then referred to a meeting of the Learning and Teaching Committee where appropriate action can be discussed and determined. Excepting the determination of TCA's exemption from Council for Private Education registration, no such matter has been referred to the Committee.

### **Periodic review**

59 The University's system of Quinquennial Review includes consideration of whether or not a partnership shall be renewed. Current arrangements are that Quinquennial Review resembles approval, but is informed by the outputs of the quality assurance processes for the previous five years. Panels are chaired by an independent member of the Taught Degree Board (or, now, Faculty) and assessors who have not been involved with the programme previously form the panel membership. The external examiners and moderators are interviewed by the Review Panel. The panel's investigations include the effectiveness of the University moderators. The TCA partnership is too recent to have been subject to review.

### **Staffing and staff development**

60 CVs of staff teaching and assessing on University-validated schemes are provided (and evaluated) as part of validation documentation, and collaborative centres are contractually obliged to provide updated CVs in an appendix to the Annual College and Course Review.

61 The moderators for TCA have conducted staff development sessions at each of their visits; these sessions have been video-recorded for the benefit of members of staff (particularly part-time staff) who were unable to attend. TCA confirmed that they had found these sessions valuable.

62 The Validation Unit also establishes and manages conferences in Wales and Singapore; some focused on subjects (such as theology) others on themes (such as student engagement). The University has established an online teacher training programme open to all staff, and a pilot teaching fellowship initiative, whereby five staff from collaborative centres delivering validated schemes will each be awarded a £5,000 prize for providing students with a particularly positive learning experience.

## Student admissions

63 Admission requirements and recruitment limits are set out in each agreement document. The University's arrangements are in accord with the *Code of practice, Section 10: Admissions to higher education*.

64 Credit transfer applications must be approved by moderators. Where a qualification is not listed in the University's protocols, the application must be approved by the Special Cases Committee, a standing committee of the Taught Degree Board. The Validation Unit works closely with UK NARIC in order to establish acceptable equivalent qualifications.

65 Moderators are required to approve each application for accreditation of prior learning (APL), or accreditation of prior experiential learning (APEL) and are members of each centre's admissions committee.

66 There is an English language requirement of IELTS 6.0 for undergraduate awards and 6.5 for postgraduate, although the Briefing Paper stated that 'permitted variances' are permissible in certain subjects, such as art and design.

## Assessment requirements

67 The University has an overarching framework for assessment in its Regulations, which are binding for all programmes. Academic Board is responsible for approving the Regulations following recommendations from the Taught Degree Board. Within this broad framework, collaborative centres produce scheme-specific regulations to determine, for example, progression rules, attendance requirements and assessment requirements. They are provided with guidance in the Handbook. Internal assessment regulations and strategies for individual modules are presented in validation documentation and transferred to the Student Handbook.

68 Assessment tasks are set by TCA staff. All examination papers (including re-sit) and coursework (where the assessment contributes more than 50 per cent towards the module mark) that contribute to the final award of a scheme require the approval of the external examiner prior to printing.

69 The University issues detailed notes of guidance for invigilators and candidates and can provide University answer booklets for centres' use. At the end of each assessment period, the superintendent of examinations is asked to confirm that the assessments have been conducted in line with University requirements and the *Code of practice*, published by QAA. TCA has met this requirement.

70 Student work is marked by staff at TCA in accordance with the University's double marking/internal moderation guidelines provided in the Handbook; external examiners are then required to confirm the standard of marking before the marks can be formally ratified at the examining board meeting and then released to students.

71 Examination board meetings are held at least once a year and are attended by the external examiners, the moderator (who is not a member), the validation officer and internal examiners. The University has minimum requirements for attendance by internal examiners at examination boards.

## External examining

72 The use of external examiners is stated by the University to be central to its system for monitoring academic quality and standards. Nominations for the appointment of external examiners follow the University's standard procedures (which have been mapped to the *Code of practice, Section 4: External examining*) and are considered by the Taught Degree Board. Newly appointed external examiners are provided with induction literature in addition to the option of a face-to-face session with the relevant moderator and/or validation officer.

73 The University states that it appoints (at least) one UK-based and one locally-based external examiner for all of its validated provision overseas. This provides language expertise in cases where the scheme is not taught and assessed in English, and gives the University access to advice on local issues and requirements. For the 2009-10 round of assessments, TCA had four externals: two from the UK and two from Singapore. The University stated that one of the Singapore externals is fluent in Mandarin, although since there is no teaching or assessment in Mandarin, this skill is not called upon.

74 External examiners complete their reports on a standard template which includes questions on the programme's compliance with external reference points and equivalence to other degree schemes with which they are familiar. Collaborative centres' responses to reports are provided in the Annual College and Course Review and followed up at the Joint Board of Studies. The audit team noted that the reports from one of the Singapore-based externals for 2008-09 and for 2009-10 were almost identical. The relevant moderator recognised that this was the case and had provided further briefing subsequent to the submission of the second report. There was a significant difference in the fullness and coverage of the reports from UK-based and Singapore-based external examiners, the latter tending to be less detailed. The University should ensure that overseas-based external examiners are fully briefed on their responsibilities.

75 External examiners' reports for TCA programmes generally confirm that standards are satisfactory, although one examiner commented that there may have been some grade inflation due to the nature of the marking scheme and to TCA's historic immersion in the USA culture of marking. Some examiners commented in relation to 2008-09 assessments that this was the first set of results to be considered, and a period of 'bedding in' was to be expected. The Annual College and Course Reviews for 2008-09 and for 2009-10 gave accurate accounts of the external examiners' comments, and seemed to propose appropriate actions to deal with them.

76 The Validation Unit also produces a detailed annual overview report of general and specific issues identified in the reports of external examiners and moderators (together with the action taken in response to such issues) which are considered independently by the University's Academic Board. This report is also considered by the Taught Degree Board and the Annual Meeting of Moderators and is circulated to all collaborative centres, moderators and external examiners, where specific items are drawn to their attention.

## Certificates and transcripts

77 Once the candidates have been admitted to their degrees (in absentia), degree certificates and diploma supplements (which contain all the information expected on a transcript) are produced and sent to collaborative centres for distribution to students.

78 The place of study is recorded on the diploma supplement and the certificate states that the certificate and diploma supplement must be considered together.



79 As with the establishment of the link and the validation of the programmes offered within it, the University's Handbook offered a solid framework for the management of the quality and standards of programmes offered by partner institutions. However, the audit team found that requirements stated in the Handbook, particularly as they related to the capacities and activities of the moderators, were often only partially fulfilled, or a degree of flexibility permitted that meant that the University's intentions could not be properly realised.

## **Section 4: Information**

### **Student information**

80 Information for prospective students on the programme of study is produced and distributed by TCA.

81 From 2009-10, the University obtains email addresses for all students and each student is sent confirmation of registration by email. Details on accessing the online Library are provided to each student as part of their registration confirmation.

82 The Student Handbook is submitted as part of the annual submission of course documentation. There is guidance in the Quality Handbook on what it should contain.

83 The audit team noted that the Student Handbook had erroneously included Bangor University among the 'Alliance' institutions. The Handbook made no mention of procedures for complaints, although University staff stated that, at induction, students are directed to the University website, where complaints procedures are specified. A link to the relevant University site is included on the TCA website.

84 Procedures for unfair practice and academic appeals are explained in student handbooks and are managed by TCA within the University's guidelines.

85 TCA students may complain directly to the University using the Student Complaints Procedure, although the University encourages complaints to be resolved at TCA if possible. However, the TCA Student Handbook makes no reference to any facility for complaint, either to TCA itself or the University.

86 Meetings with students are arranged at all validation and review visits. Moderators (sometimes accompanied by validation officers) arrange to meet students privately on an annual basis. The outcomes of the meetings are recorded in moderators' reports. The reports seen by the audit team confirmed that these meetings usually take place, although one moderator stated that she was unable to meet students on one visit.

### **Publicity and marketing**

87 The Validation Unit produces guidelines for the production and approval of publicity material (including information on websites) and has dedicated officers with responsibility for checking such material. On an annual basis, collaborative centres submit a pro forma to confirm that all publicity has been produced in accordance with the University's requirements. Dedicated Validation Unit staff monitor materials published by partners on their websites on a continuous basis.

88 The audit team concluded that the University had generally effective arrangements for ensuring that students were provided with accurate information about courses leading to University awards in partner institutions.

## Section 5: Student progression to the UK

89 The link does not include a formal arrangement for students to undertake part of their studies in the UK.

### Conclusions

90 In considering the partnership between the University of Wales and TCA College, the audit team identified the following positive feature:

- the comprehensiveness of the Validation Unit's Quality Handbook (paragraph 22).

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

- ensure that partners are briefed on the consequences of major strategic developments within the University (paragraph 21)
- ensure that responsible staff are in possession of the facts about the delivery of programmes in partner institutions (paragraph 26)
- ensure that the new requirements for due diligence are properly conducted at the vetting stage of partner approval, and reflected in reports that inform Taught Degree Board decisions (paragraph 31)
- include on validation panels specialists for disciplines relevant to all proposed programmes (paragraph 36)
- where there are prima facie reasons to believe that 'academic objectivity' may be compromised by programmes proposed for validation, ensure that validation panels and validation reports openly address them (paragraphs 38-46)
- ensure that moderators have subject expertise relevant to the programmes for which they are responsible (paragraph 48)
- ensure that moderators' reports meet the University's intentions (paragraph 50)
- ensure that overseas-based external examiners are fully briefed on their responsibilities (paragraph 74).

92 On the basis of their scrutiny of TCA's own documentation, and meetings with TCA management, staff and students, the audit team formed a positive view of TCA's management of the standards of the courses, and the quality of the students' learning experiences.

93 As far as the University's oversight of the link with TCA is concerned, the audit team found significant shortcomings in the arrangements for the establishment of the partnership and in its ongoing management. Some of these problems may be overcome, at least in principle, by the revisions to procedure described in the latest Quality Handbook, including the new arrangements for preliminary scrutiny of partners. However, some aspects of the operation, even of new arrangements, suggested that the University is not always able to guarantee that a modified procedure will result in modified practice. The University should now concentrate on the effective execution of its intentions rather than the refinement of paperwork.

## **Appendix A**

### **The University of Wales' response to QAA's report on its collaboration with TCA College Singapore**

The University of Wales is disappointed with the findings of the review with respect to what is, in the University's view, a generally successful (and relatively nascent) partnership with TCA College.

However, the University takes all recommendations made by QAA and its review teams very seriously. We will therefore be working very hard and promptly to ensure that each of the recommendations made by the Panel is reviewed thoroughly and that demonstrable action is taken to further improve and strengthen the University's policies (and the implementation thereof) for safeguarding the quality of its awards made at collaborative centres.

Significant measures are already underway, as part of our constant drive to review and augment our processes. These include a root and branch upgrading of our due diligence procedures, a review of each of our existing partnerships (being undertaken by specially commissioned external experts) and the strengthening of our procedures for the review of reports submitted by external examiners, moderators and our collaborative centres.

The recommendations made by the Panel will be helpful to ensure that our reviews are relevant and precisely targeted on those areas of our work which require specific attention in order to ensure that our procedures remain fit for purpose and that our validation work is of the highest quality.

## **Appendix B**

### **Student numbers for 2010-11**

BA (Hons) in Theology

Year 1 - 32

Year 2 - 9

Year 3 - 7

Diploma in Creative Arts

Year 1 - 4

MTh in Applied Theology (Ministry)

Year 1 - 5

Postgraduate Diploma in Counselling

Year 1 - 45

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