

**Are Standards-based Quality Systems a Threat to the Internationalization of
Teaching and Learning?**

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Abstract

This paper explores the current shift in Australia's higher education system moving to a more explicit, standards-based quality system and its potential impact on international partnerships in teaching and learning, particularly in Asia. The new Tertiary Education Quality and Standards Agency and the underlying Higher Education Standards Framework have the potential to threaten a large number of transnational or cross-border programs delivered outside of Australia. With over one hundred and fifty thousand tertiary students studying Australian programs in Asia, the impact could be significant. It would also be significant for countries that leverage of Australian Universities to build human capacity within their country. The paper highlights the current practice of assuring equivalent and comparable academic standards in transnational education and explores how shifting to a more precise standards framework will require more explicit demonstration of standards across teaching, learning and student outcomes. If equivalent or comparable standards were to be achieved across the whole standards framework, it is likely to constrain the opportunities for internationalization and the formation of new transnational partnerships.

Keywords: tertiary education quality, standards framework, transnational

Introduction

Australia's higher education system is undergoing considerable change. Since publication of the *Review of Australian Higher Education* (Bradley et al., 2008), otherwise known as the Bradley Review, there has been increasing emphasis and debate on the notion of standards in higher education. The review stated that, "Australia must enhance its capacity to demonstrate outcomes and appropriate standards in higher education if it is to remain internationally competitive and implement a demand driven funding model" (p.128). The review also recommended a need for clarification and agreed measurements of standards and for institutions to demonstrate their processes for setting, monitoring and maintaining standards. In essence there was seen to be a need for institutions to explicitly demonstrate their standards for the sake of public accountability. As a consequence of the Bradley Review, the Tertiary Education Quality and Standards Agency (TEQSA) was legislated in March 2011 and established in July 2011 with responsibility for implementing a new Higher Education Standards Framework. This framework has five components and aims to specify more precisely the standards expected from institutions. Institutions are expected to demonstrate achievements against those expectations.

The more precise nature of the standards framework, in particular the teaching and learning component of the framework, will require institutions to demonstrate a whole range of teaching and learning standards. These standards will be assessed and judged in a number of ways, using both qualitative and quantitative indicators. The precise criteria for assessing teaching and learning standards has yet to be fully defined but TEQSA's decision to move away from institutional audits (Lane, 2011) suggests that

more emphasis will be placed on a range of quantitative data and benchmarked against institutional and national expectations.

The standards of teaching and the standards of students' learning will obviously focus on teachers and students in Australia. However, what has yet to be publically discussed is that it will also affect teachers and students who teach or study in Australian programs outside of Australia. These are students studying in Australian transnational programs. With nearly one hundred thousand students studying in Australian higher education in transnational programs (plus a further fifty thousand vocational education students), the need to demonstrate precise measures of teaching and learning standards may have considerable ramifications. If the current policy continues to mandate equivalent or comparable standards, a more precise, standards-based quality system may restrict the ability for Australian institutions to engage in transnational partnerships. It may also constrain the types of partnerships and the way in which curriculum, teaching and assessment is done.

This paper provides some background to the current regulation of transnational education and in particular the notion of equivalent and comparable standards. It will then address the new Higher Education Standards Framework and explore the implications for Australian transnational education.

Australian Transnational Education

The growth of transnational education, also known as cross-border education, since the 1990s has coincided with the growing demand for internationally recognised qualifications, the globalisation of professions and changing socio-economic

circumstances in Asia (McBurnie and Ziguras, 2007). Australia has been well positioned to tap into this growth. While many students choose to travel to Australia to study, many stay in their home country, or travel to a third country to enrol in an Australian program. Some of these students may be studying at an Australian offshore campus, and some may be enrolled at an institution that is in partnership with an Australian institution. In either case, transnational students are typically enrolled in an Australian program and upon successful completion will receive an award from the Australian institution. For the purposes of this paper I will use UNESCO's definition of transnational education as,

...all types and modes of delivery of higher education study programs, or sets of courses of study, or educational services (including those of distance education) in which the learners are located in a country different from the one where the awarding institution is based. Such programs may belong to the education system of a State different from the State in which it operates, or may operate independently of any national education system (UNESCO, 2001, p.2).

In 2009 Australian Universities were offering 889 transnational programs delivered outside of Australia with the majority of programs based in Singapore, Malaysia, China, Hong Kong and Vietnam (Universities Australia, 2009). The nationality of students enrolled in those programs also followed the same pattern of countries (AEI, 2010). This means that the majority of students studying Australian transnational were based in their own country of nationality. Currently, Australian higher education enrolls over 100,000 students in transnational programs and is forecast to reach over

400,000 by 2025 (Bohm et al., 2002). With such a significant number of students, the regulation of quality and standards is critical.

The pursuit of transnational partnerships in the 1990s was largely for commercial reasons. Partnerships were established with little understanding of the risks involved and with little regulatory or legal framework (McBurnie and Ziguras, 2007). Currently, the risks and benefits of transnational education are more widely known and it is recognized that institutions need to be more strategic in their approach to developing new transnational partnerships (Connolly and Garton, 2007). Since the 1990s there has been significant development in the quality assurance of transnational programs and cross-border regulation. There are a range of national and international protocols, guidelines and codes of practice, but because they span different sovereignties, they are often voluntary.

The regulation of Transnational Education

Transnational education crosses social and cultural boundaries as well as the more obvious geographical and national boundaries of sovereignty. Students in Australian transnational programs are both national and international in relation to the host country of study, but few are Australian. Most of the academic staff teaching the programs are unlikely to be Australian. Students, institutions and staff are bound across, and sometimes between, different national regulatory frameworks, protocols and codes of practice. As a result, transnational education creates complex and dynamic tensions in the assurance and demonstration of quality and standards. These tensions vary between the host and awarding country depending on the mix of stakeholders and development of each regulatory system (Verbik and Jokivirta, 2005).

Different regulatory systems assert different levels of control over the assurance of standards in their home country or upon their home-based institutions.

Over time, there has been greater recognition of different regulatory systems and a drive towards the mutual recognition of national quality assurance and regulatory systems. In turn this has driven the development of common or similar regulatory systems. The internationalization of higher education, and with it the internationalization of quality assurance, has had an isomorphic effect on national quality regulatory systems (Van der Wende, 1999, McBurnie and Ziguras, 2007). Supranational agencies like the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) and the European Network for Quality Assurance (ENQA) have emerged. While they are sharing best practice and developing quality assurance guidelines there is a sense that these supranational agencies are also driving a convergence of quality systems and a shared understanding of standards.

Nevertheless, these isomorphic effects also have the potential to create conflict. Regulatory systems are generally national in their scope and are designed to protect national interests. For transnational education, different stakeholders have different views. Some have even considered transnational education a threat to national standards. As Adam (2001) states,

Significant numbers of institutions view transnational education as some sort of threat to standards and their existence. The scale and intensity of the threat is misjudged as it is currently confined to certain sectors of educational provision. However, its rapid expansion is likely to continue unabated and so will its impact. It needs to be subject to

appropriate quality control mechanisms before the problems intensify. Governments and institutions in importing countries must consider why their students choose imported education. Fear of transnational education should not translate into ineffective protectionism (p.47).

The general response to the growth of transnational education in the 1990s was for host countries to increase the regulation of foreign providers or partnerships with foreign awards. However, strategies of tight regulatory protectionism had to be balanced with trade liberalization to ensure that the host country continued to attract high quality foreign institutions. This was a difficult balancing act and so it became apparent that the best way to protect and uphold standards was to have tighter regulation for institutions who award the qualifications (Harvey, 2004, Knight, 2005). In other words, the Australian regulation of standards took precedence over any regulation of a country in which it was being delivered. This does not negate the need for host country regulation but ultimately the awarding institution is more likely to pay attention to their home regulatory system.

Australian Protocols and transnational standards

In Australia, the development of a robust quality assurance and regulatory system has been acknowledged as a critical factor in its success of transnational education (AVCC, 2005a). Whilst the quality assurance of transnational education has largely been dealt with at an institutional level, the institutions are governed by a national regulatory system. Through the National Protocols of Higher Education Approval Processes, Codes of Practice, the Educational Services for Overseas Students (ESOS) Act, and the work of the Australian Universities Quality Agency (AUQA), Australia

has been able to develop a transnational quality framework that is considered best practice (Ilieva and Goh, 2010).

In particular, it is the National Protocols of Higher Education Approval Processes, which provided the initial settings for transnational education. Protocol section 4.2 stated that if a program is delivered in an offshore campus operated by the Australian university, “standards should be equivalent” to those in Australia. Alternatively, if a program is delivered with a third party provider offshore, “standards should be comparable” to those delivered in Australia (DETYA, 2002).

The regulation of Australian transnational education reveals the complexity and ambiguity of standards in higher education. There is no explicit description within the Protocols as to what types of standard it is referring. Nor is there any explicit information about the definition or level of tolerance within the notion of equivalence or comparability. This ambiguity raises further questions about who sets, maintains, and assesses standards since it assumes that the standards in Australia are appropriate to be delivered in another country.

In April 2005, the Australian Vice Chancellors Committee (now known as Universities Australia) developed a Code of Practice for the provision of international students, which included guidelines for transnational education. The guidelines suggested use of comparability rather than equivalence, broadly following the UNESCO and OECD codes of practice developed in the same year. The AVCC code suggested that, “the quality of academic provision and academic support services offered under the arrangement are comparable” (AVCC, 2005b, p.5). Comparability

is tied directly to academic provision and academic support services.

At the same time as the publication of the AVCC Code of Practice, the Australian government published a discussion paper titled *A National Quality Strategy for Australian Transnational Education and Training* (DEST, 2005). Whilst the paper highlighted the success of Australian transnational programs, it also raised concerns over the transparency of Australian and institutional quality assurance, accountability and questioned the equivalence of courses/programs. In May 2005, the AVCC responded to the discussion paper, suggesting that the government failed to recognize existing quality assurance measures and requested clearer definitions of ‘equivalent standards’.

A key element of the discussion paper is that qualifications obtained offshore are equivalent to those delivered onshore in Australia. This idea of equivalence needs to be appropriately defined. Australian universities already address the need for equivalence between onshore and offshore courses through adherence to Protocol 4.2. The university interpretation of this protocol is that the equivalence is between programs offered by the same institution. The Department of Education, Science and Training needs to confirm that its interpretation of equivalence, for the purposes of this paper, is equivalence between programs offered by the same institution” (AVCC, 2005a, p.7).

In this instance, the AVCC was suggesting that equivalent standards were represented by the fact the programs/curriculum were equivalent and therefore complied to the same quality assurance mechanisms.

By November 2005 an agreed Transnational Quality Strategy was published which provided a framework for the planning and implementation of programs offshore (AEI, 2005). The Transnational Quality Strategy focused on three areas:

- Better communication and promotion of Australia's quality assurance systems.
- Improved data collection to inform future strategies.
- A strengthened quality framework that protects and promotes the quality of Australian transnational education.

The publication did not respond directly to AVCC's concern of defining equivalency but was more explicit on the issue. "Courses/programs delivered within Australia and transnationally should be equivalent in the standard of delivery and outcomes of the course, as determined under nationally recognized quality assurance arrangements" (p.1). Without any significant debate, the notion of equivalent standards shifted from *courses/programs* in May 2005, to the *delivery* and *outcomes* of the courses/programs by November 2005.

The broad policy statements that developed over 2005 gave significant room for interpretation and ambiguity. Between the National Protocols and the Transnational Quality Strategy there was no clear policy as to what types of standards needed to be equivalent or comparable and how they should be measured. There seemed to be no real understanding of where these different types of standards sit on a spectrum between equivalency and comparability. The confusion was highlighted in October 2006 in a government commissioned report summarizing a study of fifteen transnational programs in Australian institutions (IEAA, 2006). The report

highlighted poor understanding and definitions of terms such as ‘equivalence’, ‘comparable’, ‘benchmarks’, or ‘standards’ and recognized that terms are often used interchangeably. It went further to suggest that quality assurance in transnational education was a core concern for all stakeholders, and there was a lack of understanding of how the processes of quality assurance effectively worked with a diverse range of transnational programs and partnerships to ensure standards were maintained.

Equivalency and comparability of standards

Equivalency and comparability of standards are central components of the Australian regulatory system for transnational education, however, it is difficult to ascertain whether these concepts refer to programs, teaching, learning outcomes, student support and/or experiences. The national *Transnational Quality Strategy* suggests that delivery and outcomes should be equivalent or comparable depending on whether it is an Australian campus or a partnership (AEI, 2005). Not only is there a need for clarification on what the essential anchor points are for demonstrating standards, but also there is also a need for understanding the acceptable tolerance within equivalent and comparable standards.

Research on the interpretations of equivalence and comparability across a sample of eighty-five participants within Australian transnational partnerships revealed that these terms were used in a variety of ways. “Comparability was generally used to signify similarity (e.g. It is not of equal standard but is not far off) whereas equivalence was used to indicate equality or sameness (e.g. It is of same standard)” (Sanderson et al., 2010, p.3). The research suggested that the terms equivalency and

comparability were used in reference to standards, programs, assessment, student experiences and learning outcomes. The activities of assessment were used most frequently when questioned about standards in transnational education. Thus, the processes of assessment were considered the most valid and reliable reference points for assuring and demonstrating standards. This supports the view that assessment and the moderation of assessment in transnational education is the most effective way to demonstrate the standards of graduates (Thompson-Whiteside, 2011a). Moderation allows for informed judgments and a contextualization of standards.

Considering the variety of delivery models in transnational education, it is difficult to suggest that any standards could be equivalent considering that the students are different, the lecturers are different, the resources and learning environments are different, and the social and cultural surrounding are different. I suggest the wording of *equivalent standards* in transnational education is a misnomer.

Also implicit within the notion of equivalent standards is that one standard is higher or better than the other. Presumably in this instance, the National Protocols imply that the Australian standards are superior to offshore ones. The notion of equivalency and the assumption that Australian campuses are superior to their offshore ones fails to recognize the complexities of transnational education and ultimately is unproductive in generating mutually beneficial, long-term, sustainable partnerships. Since good partnerships are critical to the success of transnational education (Heffernan, 2005) the notion of comparability, rather than equivalence, provides a more appropriate framework of mutual respect and an appropriate level of flexibility. “The use of comparability recognises the extent of engagement of importing countries in the

transnational endeavor. This goes some way to constructing transnational education as a mutually productive and reciprocal engagement” (AEI, 2008, p.13). However, it is also acknowledged that comparability leaves open the potential for too much interpretation and needs to be constrained.

The use of comparable standards, rather than equivalent standards, also allows for contextualization of curriculum and teaching which is seen to positively meet the specific needs of a diverse group of learners and good teaching practice (Leask, 2007). The UNESCO/OECD Guidelines support the view that institutions are to “ensure that the programs they deliver across borders and in their home country are of comparable quality and that they also take into account the cultural and linguistic sensitivities of the receiving country” (UNESCO, 2005, p.15). It suggests that the contextualization of curriculum and teaching and learning practices are pedagogically and culturally appropriate. This, in turn, creates a range of tensions because if the curriculum or teaching is not equivalent or similar, is it possible to demonstrate equivalent or comparable standards? The presumption is that because the curriculum content is not the same, it is inferior. As Woodhouse and Carroll note, “Higher education is a construct in which the method of delivery, which is heavily influenced by its context, is inseparable from the quality of the outcome. Such a position brings into sharp relief the methods by which we seek to ensure ‘equivalence’ of student learning outcomes. These methods are still heavily influenced by notions of ‘identity’ such as common curricula and centralized examination marking” (Woodhouse and Carroll, 2006, p.85).

These opposing views are also expressed by transnational students who have clear expectations that curriculum should be equivalent, yet contextualized to meet their needs. If for example, the content is too Australian-centric, transnational students have shown to be critical in student feedback (McLean, 2006). The result of this has been a universalizing of content.

Removing location-specific content is often necessary to avoid confusing offshore students, but by trying to universalize a course, lecturers run the risk of abstracting curriculum from real-world contexts, and thereby elevate the status of 'universal' to many locally and culturally bound ways of thinking, communicating and working. The question we are faced with is why, despite the widespread agreement on the desirability of adapting and tailoring transnational programs to suit specific student groups, does it seem to happen so rarely (McBurnie and Ziguras, 2007, p.65).

Transnational students also want teaching standards to be equivalent to Australian standards, yet flexible to meet their needs (Leask, 2006). When the home regulatory system dominates, an institution is torn between meeting the demands of its transnational students, providing what is known to be good practice, and ensuring standards are near to equivalent by delivering exactly the same curriculum in the same way. The notion of contextualization suggests that standards are moving away from equivalency and therefore inferior. Navigating between notions of equivalency and comparability for different types of standards entails risks for the institutions that could potentially lead to a loss of reputation, loss of commercial return and closure of a program. For some institutions, the low-risk approach means simply having

equivalent standards across as many dimensions as feasibly possible. While equivalent standards in transnational education may reduce the potential risk for the awarding institution, it may not necessarily suit the needs of the host institution or its students.

Shifting interpretation of transnational standards

For the past eight years the Australian Universities Quality Agency (AUQA) has had the task of auditing transnational education and ensuring compliance with the National Protocols. The audits provided a public assurance of quality. The fact that transnational education has the potential for being ‘high-risk’, and that programs being delivered in another country provide significant signals about the quality of Australian education, the government felt that AUQA should scrutinize transnational activities more closely. In 2003 the Australian government allocated funding to audit transnational programs, which included visiting partnerships overseas as well as speaking to staff and students. Since 2003, AUQA has conducted between two and four transnational audits for every university that has programs offshore.

Greater levels of scrutiny in transnational education had had some effect on universities. It is no coincidence that since AUQA began auditing transnational education in 2003, the number of transnational programs dropped significantly. In 2003, Australian universities reported 1569 transnational programs. In 2007 this had dropped to 1002 and in 2009 to 889 programs (Universities Australia, 2009). Despite this, the number of students enrolled in these programs continued to rise between 2003 and 2009. This suggests that there was a consolidation and withdrawal of programs with low enrolments. Media reports suggested the withdrawal was largely

due to potential reputational risk and the lack of commercial return (Armitage, 2007). Of the programs that remained, AUQA auditors largely agreed that Australian transnational education was comparable with their home institutions (Woodhouse and Stella, 2008).

While there are considerable differences in opinion about the assurance of quality and the effectiveness of external auditing (Anderson, 2006), AUQA audits were useful in that programs and appropriate standards could be contextualized. The audits provided a forum to consider informed judgments and different interpretations of academic standards. The diverse social and cultural settings for transnational education make it important to contextualize standards.

Recent changes in Australia's regulatory system raises a number of questions of how transnational standards will be interpreted in the future. Since 2011, AUQA has been replaced with the Tertiary Education Quality and Standards Agency (TEQSA) and is developing a Higher Education Standards Framework. The Higher Education Standards Framework (DEEWR, 2011) has five components:

- Provider Registration Standards
- Information Standards
- Qualification Standards
- Teaching and Learning Standards
- Research Standards

Subsumed within Provider Registration Standards is a sixth element called Provider Category Standards. This section will also contain a revised set of National Protocols.

These will describe the principles that govern each type of higher education institution and provide a set of minimum standards. It is unclear at this stage whether the notion of equivalence for offshore campuses and comparability for third-party partnerships in transnational education will remain. Information standards deal with the collection and publication of data. A website called 'myuni' is planned for launch in 2012 and will contain a range of information relating to standards. Qualification standards largely revolve around a revised Australian Qualifications Framework describing the expected graduate outcomes at different levels of education. Underneath this may be the development of subject-level standards described as learning outcomes but this is yet to be confirmed. This would broadly follow the UK benchmark statements that provide external reference points for setting and assessing standards in institutions at the subject level. Teaching and learning standards is perhaps the most difficult and contentious area. The setting and assessment of teaching and learning standards is opaque and complex. It is not clear for example, whether standards will be set according to institutions' own missions and goals, against national or international standards (Thompson-Whiteside, 2011b). Lastly there are research standards, which are likely to be assessed through the Excellence in Research Australia (ERA) initiative, which collects research data to assess research performance within institutions.

While many of these standards are under development it is clear that by withdrawing from an auditing process TEQSA will be relying much more on quantitative data and performance indicators. A range of these potential indicators can be seen from Table 1.0 extracted from Coates (2010). The integrity and reliability of this data becomes

paramount. As Coates argues, “it is vital that indicators are valid, relevant to key phenomena, stable across contexts, transparent, non-trivial, responsive to change, auditable, efficient to collect, preferably readily available, as simple as possible, quantifiable and generalisable” (p.6).

Table 1.0 Indicators of education quality extracted from (Coates, 2010).

	Outcomes	Processes	Inputs
Higher Education Learners	<ul style="list-style-type: none"> • Graduation rates • Graduate destinations • Learning outcomes • Graduate capabilities • Work readiness • Satisfaction 	<ul style="list-style-type: none"> • Student engagement • Retention and Progress 	<ul style="list-style-type: none"> • Entry levels • Entry pathways • Student diversity • Student characteristics • Student aspirations
Higher education Teachers	<ul style="list-style-type: none"> • Teaching experience • Teaching resources 	<ul style="list-style-type: none"> • Teaching processes • Course management • Support systems 	<ul style="list-style-type: none"> • Staff characteristics • University enculturation • Educational resources • Curriculum
Higher education institutions	<ul style="list-style-type: none"> • Institutional growth • Institutional reputation • Community engagement 	<ul style="list-style-type: none"> • Academic governance • Academic management • Academic culture • Staff development • Quality systems 	<ul style="list-style-type: none"> • Institutional characteristics • Institutional resources • Industry engagement • Graduate capabilities • Work readiness • Satisfaction

The problem in using a range of these indicators for transnational education is the highly contextualized nature of teaching and learning. The reliance of quantitative indicators in transnational education raises potential problems for transnational education for a number of reasons.

First, the collection of data in transnational education is poor (Garrett and Verbik, 2004, Verbik and Jokivirta, 2005). The fact that students are based offshore from Australia means that the Australian government relies heavily on individual institutions collecting the data. In some cases institutions will collect enrolment data centrally but quite often the collection of data is done in individual departments. While Australian institutions typically report enrolment data to the government there is a lack of data concerning teaching and learning. Until now the public assurance of quality was done through an auditing process and largely focused on institutional processes. As a result the quality assurance of transnational education has largely been framed around institutional processes of teaching, assessment and the moderation of assessment. Most of these processes do not necessarily involve the collection of data. As a result there is little comparative data analysis between offshore students and onshore students.

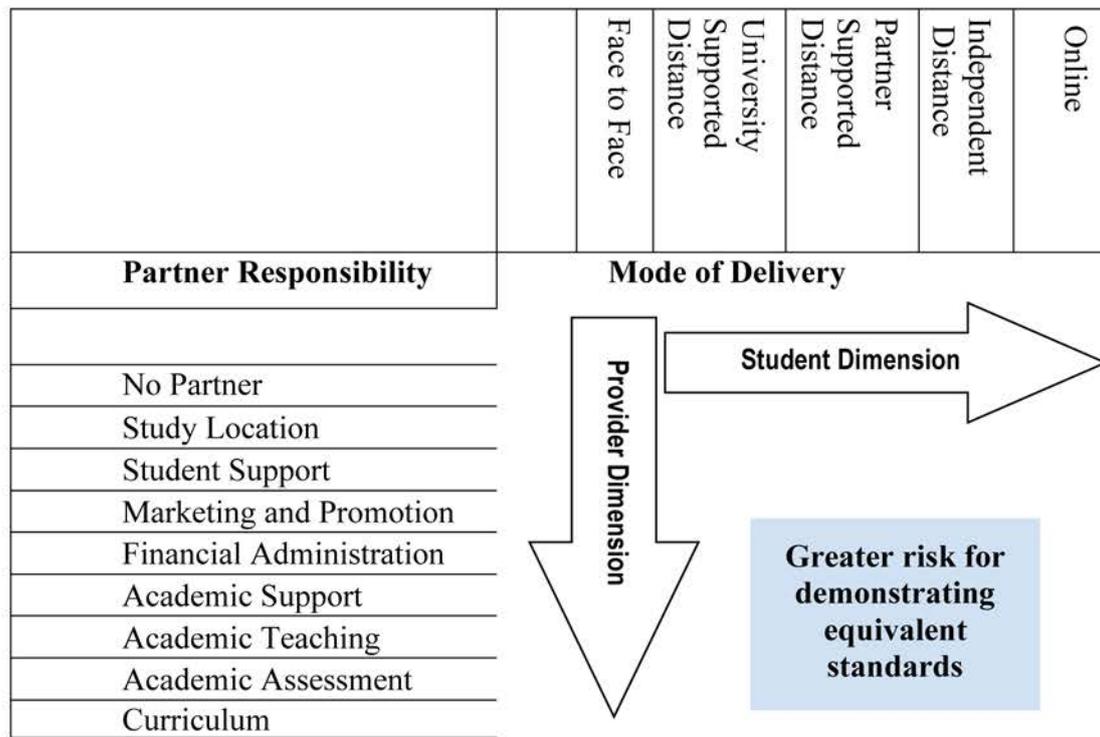
Second, one could argue that even if the data were to be collected, it would be invalid to compare offshore students with onshore students. Comparing data across culturally and socially diverse settings, across different locations is bound to be complex. Some indicators are likely to be equivalent but others are likely to be different and these differences can have multiplying affects. The processes of teaching and learning are dynamic, complex processes and not easily measurable as discrete activities. Even if some standards were stable or equivalent, it does not necessarily mean that all the

other standards would be equivalent. For example, if entry standards and curriculum were equivalent, it does not necessarily mean that teaching, learning or graduate standards are equivalent. Comparisons of teaching and learning standards using purely quantitative data have the potential to be misinterpreted.

Third, the emphasis on quantitative data has the potential to create a situation of absolutes. If data between onshore and offshore students are compared and not equivalent then one is presumed to be inferior. There is no contextualization of the data. Of course, if the policy settings (e.g. the Provider Registration Standards and the National Protocols) allow for comparable standards then the question is what difference is acceptable? How does one interpret the differences that inevitably will occur in the data?

The shift towards a more precise, quantifiable assessment of standards has potential ramifications for transnational education that has to be fully understood. Where audits allowed for a contextualization of standards, a standards-based architecture that is more 'light-touch' and data driven has the potential to highlight differences that exist for very good reasons. If equivalent data between onshore and offshore shows equivalent standards, then logically, data that shows significant differences suggests notions of one having inferior standards to the other. Ensuring equivalent data between onshore and offshore is likely to be more difficult depending on the mode of delivery, the level of autonomy and the amount of contextualization that takes place in the classroom. By examining the Two Dimensional Typology in Figure 1.0 developed from Davis, Olsen and Böhm (2000), it is likely that a data-driven standards framework will become more risky for transnational education in the bottom right quadrant.

Figure 1.0 Two dimensional model of transnational education extracted from (Davis et al., 2000).



The result is likely to drive institutions away from certain international partnerships, and certain types of transnational delivery models. Australian institutions are likely to want greater control and certainty over their teaching and learning standards. Where transnational programs have high levels of involvement from third party providers, in the form of teaching, the contextualisation of curriculum, and/or assessment, the risks of demonstrating equivalency in a data-driven standards framework, are likely to be greater.

Conclusion

The recent shift in Australia away from quality assurance and auditing of institutions, to a more precise standards-based framework has considerable implications for Australian transnational education. A standards framework that relies heavily on the comparison of data has implications to drive institutional behaviour away from certain forms of international collaborations and types of transnational delivery. The comparison of data does not sufficiently allow for interpretations and a contextualisation of complex teaching and learning processes in different cultural settings. When policies require equivalent standards in transnational education, then the risks for transnational may be too high. Even if policy settings allow for comparable standards, any differences in data will be considered a risk to standards. The notion of difference and the desire to reach equivalency fails to recognize the complexities of transnational education and ultimately is unproductive in generating mutually beneficial, long-term, sustainable partnerships. To minimise any potential differences, Australian institutions are likely to constrain the types of international partnerships, the types of transnational delivery and reduce the number of programs. This in turn will have implications for countries that use transnational education as a way of capacity building. It is likely to restrict access to Australian higher education for students in those countries.

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