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ROLE OF NAAC IN IBCS: A COMPARATIVE STUDY OF QUALITY FRAMEWORKS IN INDIA, UAE, MALAYSIA, AND CHINA

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It's said that a wise person learns from his mistakes. A wiser one from others' mistakes. But the wisest of all learns from others' successes

~ John C Maxwell

INTRODUCTION

The first university of the Americas: the National University of San Marcos in Lima, Peru, was established on May 12, 1551, by a royal decree issued by Spanish King Charles V. With the definition of Transnational Higher Education (TNHE) as "the mobility of an education program or higher education institution/provider between countries," this was one of the first examples of transnational education (Paniagua et.al., 2022). According to data compiled by the Cross-Border Education Research Team (C-BERT), there are approximately 333 International Branch Campuses (IBCs) currently operating worldwide, with around 58 having ceased operations till date. These 333 international branch campuses operating around the world, representing 39 home countries and located across 83 host countries (CBERT, 2023). Opportunities for student recruitment, income generation, and strategic institutional and research partnerships are seen by nations and institutions that export IBCs. On the other hand, IBC importers see an opportunity to meet labour market demands, avert the loss of human capital, and rapidly increase higher education capacity (Mackie, 2019).

A notable trend among mature and successful IBCs is their prioritisation of educational quality over revenue generation. Studies involving interviews with representatives from these established IBCs consistently showed the following trends - that close and positive collaboration with regulatory authorities in both, the home and host countries was a key part of their operational model, and many of these IBCs regarded the employability of their graduates as a principal metric of success (Garrett et.al., 2017)

According to All India Forum to Right to Education (AIFRTE) arrival of foreign universities

in India should not be opposed if the same is done with the intent of developing educational and cultural exchanges between nations, which has been a tradition that was historically encouraged by Indian leaders such as Mahatma Gandhi and Rabindranath Tagore (AIFRTE, 2014). The exchange of knowledge has been a vital feature of its engagement with the world throughout the history of India. However, current framework established by the World Trade Organization (WTO) has ensured that the reasons behind which foreign universities seek to enter India has considerably changed (AIFRTE, 2014). Cross-Border education is now classified as a tradable service under WTO regime, thereby making the primary incentive out to be profit making, rather than the dissemination of knowledge. More importantly, the WTO framework does not mandate that only high-quality, well-established institutions expand abroad (AIFRTE, 2014). Any provider can establish a university — potentially even a substandard one — in its home country and subsequently set up branch campuses in foreign jurisdictions (AIFRTE, 2014). Supporting this concern, an early World Bank survey documented that several prestigious universities from developed countries had established low-quality campuses in less developed nations (AIFRTE, 2014). Some studies state that there is a persistent chance that students will be exposed to subpar services and/or dishonest providers because many nations' systems are still not designed to handle the difficulties presented by cross-border education (UNESCO-APQN, 2006). Therefore, there is a need for more national initiatives, improved international collaboration, and more open information on cross-border education and quality control (UNESCO-APQN, 2006). Similarly, a recent report also state that most students in developing nations won't receive an education of the same standard as those in wealthy countries (Kumaravelu, 2017).

A study based on data from C-BERT's International Campus Listing, the QS World University Rankings 2022, and the Times Higher Education World University Rankings 2022 further highlights the quality issue (Supriya, 2024). The analysis revealed that only four universities ranked among the global top 25 have established branch campuses abroad (Supriya, 2024). Of these, only the New York University (NYU) operates comprehensive international campuses offering education and research opportunities across multiple disciplines. The other three institutions maintain small branch campuses abroad which generally specialised only in a single field of study (Supriya, 2024). As a result, this data suggests that the likelihood of leading global universities establishing full- fledged campuses in India is minimal, and in the event that they choose to enter India, their presence may be limited to specialised centres offering professional courses to a restricted cohort of students (Supriya, 2024).

One of the riskiest and most untested ways to enter global higher education markets is through an international branch campus. IBCs are topic of interest worldwide, but not much is known about this internationalization option (Girdzijauskaitė & Radzeviciene, 2014).

This research is therefore aimed at doing a comparative study of the quality regulatory frameworks of IBCs in Republic of India, Malaysia, People's Republic of China, and the United Arab Emirates. Apart from India, the other three countries have been chosen because, according to current available CBERT data (CBERT, 2023), they are in the top list of host countries for International Branch Campuses.

Research Questions

1. Whether there's any potential gaps in current IBC regulations in India that may impact the successful integration of foreign Institutions into India's higher education system?
2. How effective is the Quality Assurance measures taken by India in case of International Branch Campus compared to the UNESCO guidelines of Quality assurance for cross border education?
3. How different is the regulatory frameworks for International Branch Campus in India when compared to other IBC destinations, such as U.A.E, Malaysia and China?

A COMPARATIVE STUDY OF QUALITY FRAMEWORKS OF INDIA, U.A.E., MALAYSIA AND CHINA INDIA

Today, IBCs are growing fast in India. Over fifty international colleges have applied to open campuses in India as of right now (Chauhan, 2025). IBC differs from the already existing foreign universities in India like Yale University, University of California, University of Cambridge, etc. in India which lack physical presence and are established through partnerships or Collaborations with India Universities (Sen, 2023). The two key regulations governing branch campuses in India are the University Grants Commission (Setting up and Operation of Campuses of Foreign Higher Educational Institutions in India) Regulations, 2023¹, and the International Financial Service Centres Authority (Setting up and Operation of International Branch Campuses and Offshore Education Centres) Regulations, 2022.²

¹ UGC (Setting up and Operation of Campuses of Foreign Higher Educational Institutions in India) Regulations, 2023 – Applicable to institutions established outside Free Economic Zones. Notified on 2nd November 2023.

² IFSCA (Setting up and Operation of International Branch Campuses and Offshore Education Centres) Regulations, 2022 – Applicable to institutions operating within GIFT City (India's Free Economic Zone). Notified

As of 2024, Deakin University (Australia), University of Wollongong and the University of Southampton (UK) are the foreign universities with branch campuses in India. The Deakin's and Wollongong's campuses are located in GIFT City, Gujarat, and Southampton's in the Delhi National Capital Region (Chauhan, 2024) Thus Deakin and Wollongong University will fall under IFSCA regulations, while Southampton University falls under UGC regulations.³

Quality Provision For IBCs In UGC And IFSCA Regulations

- ***Eligibility Criteria***

UGC Regulation

In the case of UGC regulations, there are two criteria⁴. A foreign university willing to establish a campus in India has to satisfy any of the two conditions. However, in both these criteria, UGC hasn't clearly specified which global rankings it is referring to.

IFSCA Regulation

Under IFSC regulations, a foreign university, in order to set IBC, has to satisfy four conditions⁵. Again, in these conditions, the terms 'global overall ranking' and reputed institution remain vague as these terms can be subjective.

Another concern is that studies (Kayyali, 2023) indicates university rankings, despite their widespread use, have numerous issues. They overlook crucial factors like teaching quality, community service, and student success in favor of statistics like research output, faculty size,

on 12th October 2022.

³ Thus, a Foreign campus in India can be set under both IFSCA regulation and UGC regulations. However, the key differences between campuses under both these regulations are under UGC regulations, the foreign university can establish more than one campus in India, and also under UGC regulations, two different foreign universities can collaborate together and set up their campus in India. However, these two options are not available for IBCs set under IFSCA regulations. Another key difference between the two regulations is that IFSC, being a financial zone, offers opportunities for courses in financial management, fintech, science, technology, engineering, and mathematics (STEM).

⁴ Eligibility.- 1)The Foreign Higher Educational Institution intending to establish campuses in India shall fulfil any of the following criteria at the time of application, that- a) it should have secured a position within the top five hundred in the overall category of global rankings at the time of application, as decided by the Commission from time to time; or (b) it should have secured a position within the top five hundred in the subject-wise category of global rankings at the time of application or should possess outstanding expertise in a particular area, as decided by the Commission from time to time. (2) In the case of two or more than two Foreign Higher Educational Institutions intending to collaborate to establish campuses in India, each Foreign Higher Educational Institution should meet the eligibility criteria.

⁵ Eligibility :- (1) In case the Applicant is a Foreign University, it should have secured a position within Top 500 in global overall ranking and / or subject ranking in the latest QS World Universities ranking. (2) In the case of Foreign Educational Institution, the Applicant should be a reputed Institution in its home jurisdiction. (3) The Applicant shall satisfy the Authority about its financial capability to establish and ensure the continuity of the proposed activities in GIFT IFSC. (4) The Applicant shall undertake to put in place suitable infrastructure and facilities to conduct the courses including research programmes in the permissible subject areas.

and citations (Kayyali, 2023). The strategies might be ambiguous and unjust, frequently giving preference to large, wealthy universities while neglecting regional issues or goals. Hazelkorn (2018) states that international university rankings mostly assess reputation and research success rather than the quality of instruction or student learning. Although most institutions' primary goal is to teach, this is hard to quantify and compare across nations. This has been attempted to be improved by initiatives like national surveys and assessment programs, but no approach is yet completely trustworthy (Hazelkorn, 2018). The rankings frequently make use of faulty metrics that don't accurately represent teaching quality, such as faculty-to-student ratios or notable awards (Hazelkorn, 2018). She contends that rankings shouldn't be used to assess the quality of education because they can mislead and even hurt students (Hazelkorn, 2018).

- ***Quality Assurance and Accreditation***

UGC Regulation

With regard to quality assurance, UGC regulations mandate that foreign universities submit the latest accreditation or quality assurance report from a recognized body⁶. This provision means that regulation calls for home accreditation to make sure that the quality imparted by these institutions is similar to their campus in the host country. However, the term 'recognized body' is again not defined and remains vague

- At the time of initial approval:

At the time of initial approval, a standing committee will assess the application of the university based on merit, credibility, programs, educational opportunities, and infrastructure⁷, and in case of a Foreign Higher Educational Institution possessing outstanding expertise in a particular area, the Standing Committee shall consider its strengths, outstanding contribution,

⁶ (3) The Foreign Higher Educational Institution shall upload the following documents along with the application on the University Grants Commission portal, namely:- (a) permission by the Governing Body or Board, by whatever name called, for establishing campuses in India; (b) information on the proposed location, infrastructural facilities, fee structure, academic programmes, courses, curricula, availability of faculty and financial resources for setting up and operations of campuses in India, and any other details that may be sought; (c) an undertaking to the effect that- i. the quality of education imparted by it in its Indian campus is similar to that of the main campus in the country of origin; and (d) the latest Accreditation or Quality Assurance report from a recognized Body; and (e) any other document as specified in the application portal.

⁷ (4) The Commission shall constitute a Standing Committee to examine matters related to the setting up and operation of campuses of Foreign Higher Educational Institutions in India. (5) The Standing Committee shall assess each application on merit, including the credibility of the educational institutions, the programmes to be offered, their potential to strengthen educational opportunities in India, and the proposed academic infrastructure, and make recommendations thereof.

research capacities, institutional history, institutional prestige and influence, and professional recognition within the areas, among others.⁸

However, the regulation doesn't provide any information about the members of this newly formed committee.

- Post-approval:

Through provision (10) of the regulation, an appointed commission is given the power to visit the campus and check the overall quality⁹. However, the criteria the Commission is taking into account to assess the overall quality is not mentioned in the regulation. Similarly, there is no transparency regarding who the members of the Commission are.

In addition to these provisions, there is provision (19) of the regulation, which states that foreign higher education institution shall undergo a quality assurance audit and submit the report to the Commission. However, there is no information on which body should be conducting such an audit.

Thus, from the analysis of these provisions, it is clear that foreign universities in India lack host accreditation due to the lack of proper quality checks by a recognized quality assurance body within the country (India).

IFCSA Regulation

- At the time of registration

IFSCA mandates that a foreign university submit the latest quality assurance report from a recognized quality assurance agency in the applicant's home jurisdiction.

- Post-approval / registration

The regulation vested IFSCA with the right to inspect and assess quality¹⁰. According to the provisions, the IFSCA can appoint an inspecting authority to undertake the inspection of the foreign campus. However, the members of this Authority are not known, and also it cannot be

⁸ (5) The Standing Committee shall assess each application on merit, including the credibility of the educational institutions, the programmes to be offered, their potential to strengthen educational opportunities in India, and the proposed academic infrastructure, and make recommendations thereof.

⁹ 10. Power to visit. - The Commission shall have the power to visit the campus and examine its operations to ascertain the infrastructure, academic programmes and overall quality and suitability.

¹⁰ Inspection:- (1) Authority shall have right to inspect at all times, including after the grant of in-principle approval and before the grant of registration, to ascertain the infrastructure, quality and suitability of the IBC or OEC. (2) For the purposes of the inspection, the Authority may appoint one or more persons as, "Inspecting Authority" to undertake the inspection of the IBC or OEC. (3) The Inspecting Authority may take help of such persons or professionals as he may deem fit and it shall be the duty of the IBC or OEC to extend full co-operation to the Inspecting Authority or persons authorised by him.

considered as a quality assurance body.

Thus, the IBCs in Gift City, too, lack host accreditation which might affect the process of continuous improvement of these universities.

- Power to remove difficulties and relax strict enforcement of the regulations

This is an additional provision found in IFSCA Regulations¹¹, which gives power to authority to relax further or to avoid the strict enforcement of the existing regulations, including those relating to quality.

Need for Host Country Quality Assurance and Accreditation- Case Study of Deakin University

Deakin University is the first international university in the world to open a teaching campus in India. The university's academic standards is aligned with Australia's national accreditation body, the Tertiary Education Quality and Standards Agency (TEQSA)¹².

TEQSA's Obstacles And Challenges Of Cross Border Higher Education And Its Quality Assurance

TEQSA faces several challenges in regulating cross-border higher education (CBHE) provided by Australian institutions. One of the primary difficulties is determining whether the student learning outcomes for courses delivered outside Australia align with those required by the national Threshold Standards for the same course of study offered within the country (Al-Sindi, 2015). Another challenge is obtaining accurate information about the full range of a provider's cross-border activities. Additionally, there is the issue of overseas stakeholders, including governments and regulatory or quality assurance agencies, fully understanding Australia's higher education regulation and quality assurance framework (Al-Sindi, 2015). Some countries, such as China, do not recognize Australian awards, further complicating matters (Al-Sindi, 2015). Other challenges include understanding the legislative and regulatory provisions in different countries, having adequate resources to carry out thorough assessments of cross-border activities (including site visits), and dealing with language and cultural differences that

¹¹ 18. Power to remove difficulties and relax strict enforcement of the regulations:- (1) In order to remove any difficulty in the application or interpretations of the provisions of these regulations, the Authority may issue clarifications through guidance notes or circulars. (2) On an application, received along with non-refundable processing fees mentioned in reg. 16 (2) (iv) above, the Authority, may for the reasons to be recorded in writing, relax the strict enforcement of any of the provisions of these regulations.

¹² For more details refer <https://www.deakin.edu.au/about-deakin/locations/campuses/gift-city-india>

can affect everything from interpreting documentation to conducting interviews and facilitating effective communication between agencies (Al-Sindi, 2015). Finally, access to partner institutions and delivery sites, including physical and learning facilities, is often restricted, adding to the complexity of regulation (Al-Sindi, 2015).

A COMPARATIVE STUDY OF QUALITY FRAMEWORKS OF INDIA, U.A.E., MALAYSIA AND CHINA

- *As Global Education Hub*

United Arab Emirates

The UAE has a huge and rapidly expanding inbound student population. Compared to major international study destinations like the United States, the United Kingdom, or Australia, the United Arab Emirates has less international students overall due to its small size. However, its inbound mobility ratio of 48.6 percent surpasses that of all major destinations and is undoubtedly among the greatest in the world (Kamal et.al., 2018). According to UNESCO data, the number of international students pursuing degrees in the United Arab Emirates increased from 48,653 in 2011 to 77,463 in 2016 (Kamal et.al., 2018). As of March 2023, U.A.E. is home to approximately 30 international branch campuses, according to the updated C-BERT list (C-BERT, 2023).

Malaysia

Over the past decade, Malaysia has emerged as a prominent destination for quality and affordable higher education in Asia, with a vision to become a developed, high-income nation through global educational partnerships. This ambition was outlined in the National Higher Education Strategic Plan laid down in 2020.

Malaysia, which gained independence from Britain in 1957 and has a population of around 34 million, has five universities ranked among the QS Top 300 Global Universities. It is recognized by UNESCO as the 12th most popular destination for international students, hosting over 200,000 foreign students, compared to India's 35,000 (Shahani, 2019). As of March 2023, Malaysia is home to approximately 15 international branch campuses, according to the updated C-BERT list (C-BERT, 2023).

China

A report by the Center for China and Globalization (2017) highlights China as the world's

largest source of students studying abroad, with many choosing destinations like the USA, Canada, Australia, Japan, South Korea, and the UK. However, a significant number of Chinese students are also returning home after studying abroad, driven by improved job opportunities. In 2015, around 70% of students who went abroad came back to China (Frezghi, 2019). Mei and Xu (2009) noted that the Chinese government not only supports students studying overseas but also encourages their return to contribute to the country's economy and education system. Graduates from Western universities often enjoy an advantage in the Chinese job market, particularly in universities and international companies.

At the same time, China has seen an increasing number of international students choosing to study there. From 1978 to 2012, about 2.3 million foreign students studied in China, and by 2017, this number had grown to 442,773, with students mainly coming from countries such as South Korea, the USA, Thailand, Pakistan, Russia, and Kazakhstan (Frezghi, 2019). This growth is largely due to efforts by Chinese universities and the government to attract international students by offering scholarships and expanding programs taught in English (Frezghi, 2019). This reflects the growth and global expansion of Chinese higher education, which aims to improve its quality and enhance its international competitiveness.

As of March 2023, China is home to approximately 47 international branch campuses, according to the updated C-BERT list (C-BERT, 2023).

- ***Background/ Landscape Of IBC***

United Arab Emirates

International branch campuses (IBCs) in the UAE are established within and outside free zones, and the regulatory frameworks for both these categories differ (Mackie, 2019)

Malaysia

Higher education in Malaysia is divided into public and private institutions. Public institutions, which are government-funded, include public universities, polytechnics, and community colleges. Private higher education institutions (PHEIs) encompass private universities, private university colleges, foreign branch campuses, and private colleges. As of 2011, the country had 25 universities, 22 college universities, 5 branch campuses, and 403 colleges registered with the Private Higher Educational Institution Management Sector (PHEIMS) (Shah, 2015).

In Malaysia, branch campuses fall under the Private Higher Educational Institutions Act 1996,

meaning they are regulated and treated the same as private higher education institutions¹³.

China

A report by the Department of Education under the Australian Government (2024) states that the Chinese education system facilitates international education partnerships through the formal framework of Chinese- Foreign Cooperation in Running Schools (CFCRS), which spans from preschool to higher education. CFCRS operates in two forms: Joint Institutes and Joint Programs. Australia is one of the most popular partners in this system, with over 10 CFCRS joint institutes and around 150 joint programs running in China.

A critical aspect of China's protective policy is the requirement that all providers of Transnational Education (TNE), including International Branch Campuses (IBCs), collaborate with a local Chinese organization (Mackie, 2019). This policy creates opportunities for various TNE arrangements, such as joint programs, articulation agreements, and distance education. Some of these joint ventures, known as "joint venture institutions," are considered IBCs by C-BERT and are legally autonomous entities co-owned and operated by Chinese and foreign higher education providers (Mackie, 2019). The Ministry of Education in China refers to these institutions as CFCRS institutions (Mackie, 2019).

TNHE has been promoted in China, particularly in less developed regions, as a means to enhance the country's higher education system. China has loosened its rules in the last decades in an effort to draw in prestigious international universities, particularly those that provide courses in science, engineering, and information technology (He, 2016 as cited in Yang 2023). These partnerships were valued even if the institutions lacked legal autonomy (Yang, 2023). The information that is currently available, however, mostly represents institutions that were authorized in particular years and does not accurately reflect continuous policy changes (Yang, 2023).

- *Quality Assurance and Accreditations*

United Arab Emirates

The Commission for Academic Accreditation (CAA) is tasked with ensuring quality at most institutions, including IBCs. However, IBCs located in free zones, which are special business

¹³ Section 23 of the Act states that: Except as is expressly provided under sections 21 and 22 all provisions of this Act shall apply to a private higher educational institution with the status of a University or University College or a branch campus thereof or a branch campus of a foreign University or University College established under this Part

areas with their own set of regulations and quality assurance bodies, are not required to adhere to the CAA's standards. For example, in Dubai, KHDA is the quality assurance agency for IBCs in Dubai.

Quality Assurance of IBC outside free Economic Zones

In U.A.E. the Commission for Academic Accreditation (CAA) is the federal accrediting body tasked with ensuring quality at both domestic and private institutions, including IBCs (Creatrix, 2023).

According to the Country report by Quality Assurance Agency (QAA, 2017), CAA has developed standards for institutional licensure and program accreditation since 2001. The Standards for Licensure and Accreditation outline the requirements institutions must meet to obtain or renew licensure and accreditation. These requirements apply to the entire institution and cover various aspects such as mission and governance, quality assurance, curricula and teaching methods, faculty, student services, learning resources, physical and financial resources, research, and community engagement. According to the Standards for Institutional Licensure and Program Accreditation (2019) published by CAA, U.A.E regulations also mandate the establishment of a local advisory board with community members and expectations for collaboration between the CAA and the parent institution's accrediting bodies to conduct joint visits and reviews²⁵. The branch is required to publish handbooks for students, faculty, and staff, along with other relevant policies and procedures.

In order to receive institutional licensure, a university must prove that it satisfies a number of requirements, such as having strong plans and strategies for carrying out its goal, adequate financing, facilities, and qualified personnel, and effective leadership. For new universities, this license is granted for a period of three years, during which they must show they can offer quality programs and maintain strong policies (CAA, 2019). After this initial period, the university must apply for renewal, providing evidence that it continues to meet the required standards and deliver high-quality education. Renewals can be granted for three, five, or seven years (CAA, 2019).

On the other hand, program accreditation pertains to certain academic programs, like degrees or courses. A university might pursue accreditation for certain programs to make sure they adhere to accepted criteria after obtaining its institutional license (CAA, 2019). Until a program has received accreditation, universities are not allowed to promote it or accept students (CAA, 2019). After the program has graduated its first cohort of students, the accreditation is revisited and renewed to ensure it continues to meet high standards and international expectations (CAA,

2019).

Quality Assurance of IBC within free Economic Zone- A case study of Dubai

In the early years, there was no structured quality assurance system for IBCs operating in Dubai's free zones. To address this gap, the Knowledge and Human Development Authority (KHDA) introduced guidelines in 2008 to oversee quality within Dubai's academic free zones, such as Dubai International Academic City (DIAC) (Mackie, 2019). These guidelines required that an IBC's programs meet the same quality as those at the home institution but did not set specific quality thresholds. Each free zone had its own regulations, and local authorities, such as Technology, Electronic Commerce and Media (TECOM) in DIAC, decided which IBCs could operate. Once approved, these institutions often faced minimal or no ongoing quality checks (Mackie, 2019). But as the number of complaints about subpar institutions increased, the KHDA realized that a stronger system of quality assurance was needed. As a result, the University Quality Assurance International Board (UQAIB) was established, whose main objective is to guarantee that IBCs provide instruction on par with that of their home campuses (Kinsler, 2017).

Dubai has specific processes to ensure that institutions provide quality education to students. The KHDA assures higher education quality in two key ways. The first method is through the University Quality Assurance International Board (UQAIB). Institutions located in Dubai's Free Zones are granted academic authorization by KHDA through this quality assurance system (KHDA, 2024). UQAIB uses a validation model to ensure that the academic programs delivered in Dubai are the same accredited programs taught at the institution's home campus (KHDA, 2024). All higher education institutions in Dubai's Free Zones must undergo the UQAIB quality assurance process (KHDA, 2024). The second method involves CAA. Institutions operating outside the Free Zones in Dubai must be licensed and accredited by the CAA. These institutions can apply for accreditation through the federal Ministry of Higher Education and Scientific Research via the CAA's website (KHDA, 2024).

Problems caused by the Validation Model adopted in Free Economic Zone- A case study of Dubai IBC

Students, private university administrators, and the federal and provincial governments are among the stakeholders who are unhappy with the UAE's fast growth of subpar private universities. From the perspective of the government, the rise of these institutions has led to the operation of many universities with low academic standards, which in turn has impacted

the reputation of the UAE as an educational destination. This issue also raises concerns about the long-term economic competitiveness of the country, as the graduates of these low-quality institutions may not possess the knowledge and skills necessary to succeed in the UAE's labour market (Buckner, 2022). Furthermore, degrees earned at institutions within Dubai's Free Trade Zones (FTZs) often do not have recognition beyond the emirate or for federal employment. While not all graduates are concerned about this, those who apply for jobs in government agencies or want to work outside the emirate encounter challenges. Given that it reduces the demand for their degrees, leaders at private universities are similarly unhappy about this lack of recognition (Buckner, 2022). Additionally, CAA-accredited universities do not recognize degrees from non-CAA institutions, further complicating the situation for graduates of private universities (Middle East Business Intelligence, 2011).

The country report of U.A.E. by QAA (2017) states that the voluntary nature of obtaining CAA Licensure and Accreditation for universities in the free zone has created another set of challenges, as qualifications from non-CAA licensed institutions are not automatically recognized at the federal level. The report further states that in Dubai, qualifications granted by KHDA-approved institutions are recognized by both the public and private sectors for purposes such as employment and further study. However, the absence of federal recognition affects graduates' ability to work in federal public organizations across the UAE or continue their education at CAA-licensed institutions, and it may even hinder international recognition of their qualifications QAA (2017). In order to address this issue, numerous international organizations that operate in Dubai's free zones have voluntarily applied for CAA accreditation and licensure QAA (2017). As students want for credentials recognized globally, this lack of wider acceptance is a serious concern for universities that predominantly serve international or expatriate students QAA (2017). According to the FAQs answered by KHDA (2023) to mitigate these issues, UQAIB has joined the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and follows international guidelines to ensure quality, complementing the role of the CAA in maintaining high standards.

Malaysia

The Malaysian Qualifications Agency (MQA) is a statutory body established under the Malaysian Qualifications Act 2007, responsible for implementing the Malaysian Qualifications Framework (MQF). The MQF is a unified system of post-secondary qualifications in Malaysia. MQA oversees the quality assurance and accreditation of higher education institutions and programs in the country, while also working to promote the

international recognition of Malaysian qualifications through partnerships with other countries and international organizations. IBCs were granted greater autonomy, provided they adhered to the Malaysian Qualifications Agency's (MQA) quality assurance frameworks—specifically, the Code of Practice for Programme Accreditation (COPPA) and the Code of Practice for Institutional Audit (COPIA) (MQA, 2009 as cited in Hou, 2018).

In collaboration with the Ministry of Education and other stakeholders, MQA aims to enhance the quality of higher education in Malaysia (COPIA, 2009). The agency offers a range of services to institutions, including accreditation, program evaluation, and quality assurance, and is dedicated to supporting lifelong learning and the development of a skilled workforce (COPIA, 2009). MQA involves a lengthy institutional accreditation process (Creatrix, 2023) and also focus on program accreditation (COPPA, 2019; Kinser, 2017).

China

The management of TNHE institutions is supervised by the national government, and the emphasis on quality has replaced a more laissez-faire attitude. Initially, China relied on the foreign university's home country to ensure quality, but now it has established its own quality assurance agency and an evaluation system for TNHE programs. The China Academic Degrees and Graduate Education Development Centre (CDGDC) leads this evaluation process, which involves self-assessment, report reviews, and onsite visits. Programs failing to meet the standards may be prohibited from enrolling new students or even closed (Yang, 2023). In addition to meeting China's regulations, these programs must also obtain approval from their home countries' quality assurance systems, which results in the application of both the "duplication" and "home accreditor" quality assurance models. China's approach to regulating education quality is strict, and TNHE programs often have to modify or expand their course content to comply with both Chinese requirements and those of their home institutions (Yang, 2023).

The Ministry of Education (MoE) in China emphasizes several key considerations when evaluating foreign partnerships for Chinese-Foreign Cooperation in Running Schools (CFCRS) programs. According the country report of People's Republic of China by QAA (2017), the MoE is cautious about serial partnerships, where a single foreign provider operates many joint programs with different Chinese partners, as it believes this could stretch the provider's resources and negatively affect quality. When evaluating applications for additional partnerships, the MoE assesses whether the provider can guarantee adequate resources, including qualified faculty (QAA, 2017). There is also a reluctance to approve new joint

programs if the foreign partner already operates a similar program, as this could suggest a lack of commitment to the existing partnership. Furthermore, the MoE encourages joint programs to spend the majority of time in China. CFCRS programs are also encouraged to focus on areas that align with provincial and national development needs. Programs in fields that are oversaturated, such as business, finance, and management, are not prioritized (QAA, 2017). In line with the goal of improving opportunities in less developed regions, TNE programs in Central and Western China are particularly encouraged, though the most developed regions still account for the majority of new joint programs. The MoE strongly favors partnerships with high-quality overseas institutions or those with a strong reputation in the relevant subject area, particularly top-ranked foreign universities and programs (QAA, 2017).

In China, the Ministry of Education (MoE) oversees the overall quality of education, but it delegates responsibilities to various agencies depending on the type and level of education. For postgraduate and Chinese-foreign joint programs at all levels, the China Academic Degrees and Graduate Education Development Centre (CDGDC) is responsible (QAA, 2017). In the case of vocational and sub-degree joint programs, the China Education Association for International Exchange (CEAIE) takes charge. CEAIE also provides a voluntary accreditation program aimed at enhancing the quality of these partnerships. After testing its evaluation process in four provinces, the CDGDC developed a nationwide system to review CFCRS programs. Each program is required to submit a self-evaluation report to the CDGDC annually (QAA, 2017).

The evaluation of Chinese-Foreign Cooperation in Running Schools (CFCRS) programs can lead to three possible outcomes. The first is "Qualified," meaning the program meets all required standards. The second is "Conditionally qualified," where the program has some issues that need to be addressed within a specific time frame in order to maintain its approval. The third outcome is "Unqualified," indicating that the program fails to meet the standards, which could result in its approval being paused or revoked entirely (QAA, 2017).

- ***Collaborations***

United Arab Emirates

The Commission for Academic Accreditation (CAA) conducts its review procedures based on several international guidelines and standards. These include the Guidelines of Good Practice from the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), the Guidelines for Quality Assurance from the European Association for Quality Assurance in Higher Education (ENQA), and the common core standards for quality review

endorsed by the Arab Network for Quality Assurance in Higher Education, ANQAHE (Standards for Institutional Licensure and Program Accreditation, 2019). Institutions that receive Institutional Licensure and Program Accreditation from the CAA are also encouraged to seek program accreditation from relevant international professional associations, where applicable (Standards for Institutional Licensure and Program Accreditation, 2019). Additionally, institutions may pursue affiliations with overseas institutions. In recent years, there has been a rise in the establishment of branch campuses in the UAE and joint programs with foreign institutions. To align standards internationally and enhance efficiency, the CAA is increasingly collaborating with other accrediting agencies and professional associations to conduct joint or concurrent reviews (Standards for Institutional Licensure and Program Accreditation, 2019).

Malaysia

MQA also collaborates with international quality assurance agencies such as INQAAHE, Asia-Pacific Quality Network (APQN), International Qualifications Assessment (IQA), ASEAN Young Quality Assurance Officers Network (AYQON), and ASEAN Quality Assurance Networks (AQAN), etc to facilitate the mutual recognition of qualifications (<https://www.mqa.gov.my>).

China

In 2012, the UK's Quality Assurance Agency (QAA) and the CDGDC entered into an agreement to enhance mutual understanding and cooperation. Their collaboration began with the QAA's review of UK transnational education (TNE) in China from 2012 to 2013, during which they exchanged data and allowed CDGDC staff to participate in review visits as observers (QAA, 2017). This partnership has continued to grow, expanding into broader international initiatives such as the Cross-border Quality Assurance Network (CBQAN). More recently, this collaboration led to the creation of the Beijing Statement, developed by the British Council and the China Education Association for International Exchange (CEAIE) as part of a broader education-focused cooperation between the UK and China (QAA, 2017).

CEAIE is a member of both CIQG and INQAAHE and collaborates with quality assurance agencies from partner countries, such as the QAA, TEQSA, High Council for the Evaluation of Research and Higher Education (HCERES), New England Association of Schools and Colleges (NEASC), The Accreditation Organisation of the Netherlands and Flanders (NVAO), and Australian Skills Quality Authority (ASQA), to engage in joint quality assurance activities

(CEAIE, 2016). In 2015, CEAIE, alongside the French Embassy and French quality assurance agencies HCERES and Commission des titres d'ingenieur (CTI), launched a "Quality Label" project aimed at improving the quality of Chinese-French joint institutions (CEAIE, 2016). Additionally, CEAIE and ASQA carried out a pilot joint accreditation initiative for joint institutions and programs offered by vocational colleges in China (CEAIE, 2016).

International Examples Of IBC Failures Caused Due To Inadequate Quality Standards In Host Country

The case of Raffles Vietnam's closure in 2012

Raffles Vietnam was forced to shut down its educational activities in 2012 after the Vietnamese government discovered that the firm was providing unapproved and unrecognized university-level courses, which ended up affecting 800 students (Ives, 2012). Since they were punished for illegally recruiting students, other foreign-affiliated organizations like ILA Vietnam and ERC Vietnam additionally bore the brunt of this crackdown (Ives, 2012). The sudden enforcement left students and new graduates to question the validity of their qualifications (Ives, 2012).

While some critics attributed the actions of the government to long-standing regulatory issues, others saw them as preferential treatment for local institutions (Ives, 2012). Raffles Vietnam ultimately had its business license cancelled although they appealed the ruling.

The case highlighted the inconsistent application of quality assurance standards and the greater challenge experienced by foreign organizations in negotiating Vietnam's complicated higher education regulations (Ives, 2012).

The decline of American branch campuses in Japan

Nearly 20 branch campuses were established in Japan during the 1980s and the 1990s, primarily by American universities. However, a number of these schools ended up closing after finding it difficult to meet enrolment targets and deal with Japan's regulatory framework, among other reasons (Hamanaka, 2012).

The primary reason for their failure was that the Japanese academic establishment did not formally recognize them. As a result, graduates from these overseas branch campuses were not eligible for postgraduate study in Japan since they were not regarded as university graduates (Hamanaka, 2012).

Warnborough College: A Case of Unaccredited Degrees and Quality Failures

Warnborough College, operating from rented space at All Hallows College in Dublin, was criticized for offering expensive degrees lacking official recognition from Ireland's education authorities (Phelan, 2008). Its qualifications were deemed "worthless" by the National Qualifications Authority of Ireland, and the misuse of All Hallows' name and imagery led to the termination of its rental agreement. Warnborough, previously known as "Warnborough University," was forced to change its name due to a violation of the 1997 Universities Act (Phelan, 2008). The case highlights the importance of robust quality assurance and proper accreditation in higher education.

The failure of Washington University of Barbados

Washington University of Barbados, a medical school that opened in 2017, closed the following year because it was not properly accredited and was involved in a scandal (Virgin Islands News Online, 2018). The university shut down in less than two years, leaving many young Indian students stranded without food, electricity, water, or money (Virgin Islands News Online, 2018).

FINDINGS

Commercialization of Higher Education

The growing commercialization of education is a significant worry as more foreign universities open their doors in India. After India offered to expand higher education services under the General Agreement on Trade in Services (GATS) in 2005, several committees and meetings raised concerns about this issue (Standing Committee on Human Resource Development, 2010; Central Advisory Board of Education (CABE), 2005; Yashpal Committee, 2009). Education may become less about learning and more about making money as a result of the increasing number of international universities in India. Despite their claims of high-quality instruction and global exposure, these universities frequently prioritize financial gain. This may widen the wealth disparity among students and establish an unjust system in which merit is subordinated to money. As top students and faculty transfer to well-funded foreign colleges, Indian state universities—which already have limited funding and resources—may encounter further difficulties. Additionally, international colleges may not meet India's social, cultural, and developmental needs; instead, they might teach in ways that are more appropriate for their own nations. In addition to harming long-term objectives like inclusive growth, equality, and nation-building, this could erode the mission and character of Indian education. Therefore,

even though international universities might have certain benefits, their admission should be strictly regulated to prevent education from becoming a business and to safeguard principles like equity, equality, and national advancement.

Absence of Quality Assurance and Host Accreditation of IBCs in India

In the context of cross-border education, the importance of host nation accreditation and quality assurance is crucial. The UNESCO Guidelines for Quality Provision in Cross-Border Higher Education emphasize the significance of national quality assurance organizations. As this research discusses, several case studies from throughout the world, including India, have also shown its significance.

Countries like China, Malaysia, and the United Arab Emirates (U.A.E.) have host country accreditation systems for international branch campuses, according to the researcher's comparative analysis of regulatory frameworks in (At first, some branch campuses in the U.A.E. lacked host country accreditation, which raised quality concerns that were eventually resolved by regulatory changes, as covered in the case study of the Dubai branch campus). Additionally, these three nations maintain program- accreditation in addition to providing institutional accreditation/ licensure to guarantee that IBCs' educational programs meet host country standards.

Maintaining vast networks and collaborations and networks with international organizations is a crucial criterion for national quality assurance authorities under the UNESCO Guidelines on Quality Provision (UNESCO- OECD, 2005). However, India does not yet have a formal host accreditation system for IBCs. Despite being widely acknowledged as one of India's top quality assurance agencies, the National Assessment and Accreditation Council (NAAC) does not currently accredit offshore campuses in India (<https://www.naac.gov.in/index.php/en/>). NAAC's applicability in this situation is not just the researcher's opinion; it has been suggested in previous policy documents and expert discussions (Standing Committee on Human Resource Development, 2010; CIBE, 2005).

In accordance with UNESCO's guidelines, NAAC has formed a large number of international collaborations and networks (<http://naac.gov.in/index.php/en/about-us/collaborations>). These networks put NAAC in a position to interact with home country regulatory agencies in an efficient manner, spot differences between the frameworks for quality assurance in the home and host countries, and bridge such gaps. Furthermore, by facilitating the mutual acceptance of accreditation and qualifications, these international connections might increase the appeal of Indian universities to international students.

In India, the existing regulatory framework for IBCs lacks clarity and openness, which runs contradictory to the UNESCO Guidelines' principles. Further threats to the quality assurance of IBCs operating in India may arise from specific regulatory measures, such as Regulation 18(1) of the IFSC regulations, which grants extensive authority to eliminate restrictions and the strict implementation of current norms.

Lack of proper host accreditation might even affect the recognition/ equivalence of these foreign degrees within the country and abroad.

SUGGESTIONS

The Higher Education Commission of India (HECI) Bill of should be passed, according to the researcher. This measure will eliminate the current special benefits enjoyed by international universities and treat them on an equal footing with Indian universities. India currently has a large number of regulating agencies, including the AICTE, NAAC, and UGC. These bodies frequently fail to coordinate, which causes misunderstandings and overlaps in functions. The passing of the bill will help to increase transparency and decrease the autonomy of these bodies by unify all of these regulations under a single framework. However, the HECI has faced significant delays, despite assurances provided by the Ministry of Education on the floor of the Parliament in 2019. As recorded in the Parliamentary panel on government assurances' report dated December 14, 2023, the ministry initially attributed the delay to the need to align the draft HECI Bill, 2019 with the recommendations outlined in the National Education Policy (NEP), 2020 (Vishnoi, 2024). However, even after redrafting, the Bill remains entangled in extended consultation processes, and the objective of instituting HECI remains unfulfilled even years later (Vishnoi, 2024). However, despite the irregular regulatory system, IBCs have begun operating in India, and the country is rapidly opening doors to more such institutions. The current political situation in the country appears to be an obstacle to this, and the researcher fears that, like the HECI Bill of 2010, the HECI Bill of 2019 may also lapse.

The researcher further suggests that the newly formed accreditation body under HECI should coordinate and collaborate with quality assurance agencies and recognition bodies both within the country and internationally. India is country which is currently suffering due to heavy brain drain (Kullu, 2024) easier and clearer recognition process will help in preventing such brain drain.

Another suggestion is to introduce programme-level accreditation in India for courses offered by International Branch Campuses (IBCs). Like other IBC-hosting countries, India should establish a dedicated programme accreditation body to ensure that approved courses not only enhance employability but also contribute to the country's Sustainable Development Goals (SDGs). For instance, in a country like India, a course on luxury brand management may have limited relevance, whereas a course focused on the latest technologies in sustainable farming would be more aligned with national development goals.

CONCLUSION

India currently has the advantage of having joined the global trend of creating international education hubs later than many other nations. India now has the chance to gain insight from the achievements and failures of countries that have hosted international campuses for more than ten years because of this delay. India can follow the best practices used by top locations for international branch campuses (IBCs) instead of making the same mistakes twice. The researcher believes that creating robust and trustworthy quality assurance mechanisms domestically is the best strategy to keep education from commercialization.

This research has shown that while India is making ambitious strides toward internationalizing its higher education system by welcoming foreign universities, it is still at a formative stage when it comes to developing robust, globally-aligned regulatory and quality assurance frameworks. Comparative analysis with Malaysia, China, and UAE reveals the importance of experience, statutory clarity, accreditation rigor, and policy foresight in managing IBCs effectively. India must tread carefully to ensure that its openness does not result in the commodification of higher education or the influx of substandard institutions. By learning from international best practices and strengthening its institutional capacity for oversight and quality assurance, India can create a regulatory environment that fosters academic excellence, protects students, and enhances its status as a global educational hub.

The path forward is clear: India must prioritize quality over quantity, collaboration over commodification, and student welfare over institutional profit. With strategic foresight and regulatory integrity, India can transform IBCs into instruments of educational diplomacy, capacity building, and national pride.

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