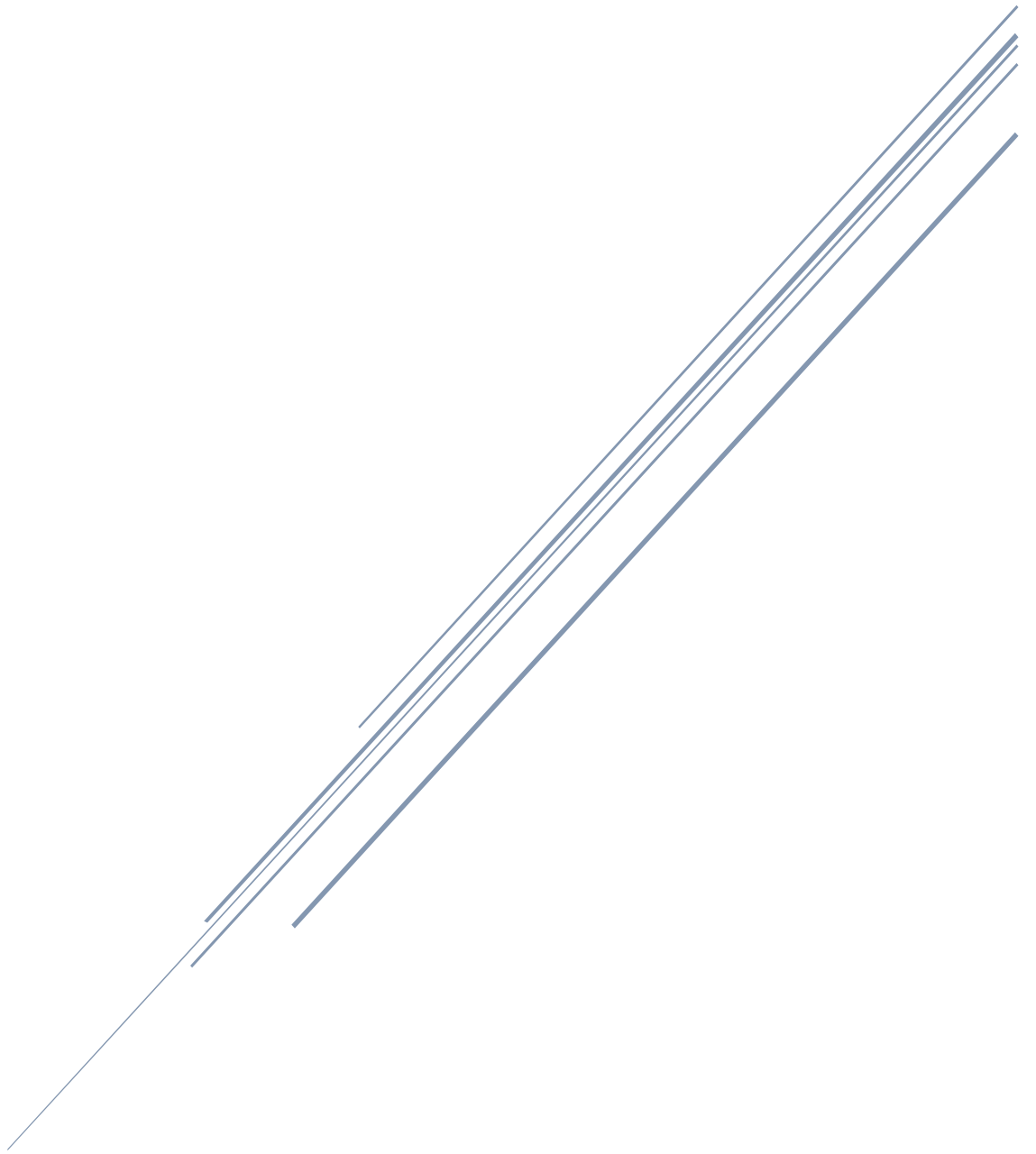


Policy and strategy evaluation for transforming Malta to an international education hub



Acknowledgements

The research presented in this report was conducted on behalf of Education Malta following the initiative of Mr Charles Zammit whom I would like to thank for his continued support and guidance.

I would like to express my gratitude to the Hon. Minister for Education and Employment Mr Evarist Bartolo for his warm welcome and support during this project.

I would like to extend my thanks to the following people who have spent a significant amount of their valuable time to contribute information and data of critical importance for this research:

- Dr Mario Vella, Governor, Central Bank of Malta.
- Mario Galea, CEO, Malta Enterprise.
- Fiona Maxton, UK Deputy High Commissioner, Malta.
- Dr Frank Fabri, Permanent Secretary, The Ministry for Education and Employment.
- Godfrey Vella, Chairman, National Commission for Further and Higher Education.
- Ingrid Eomois, Director of the British Council Malta.
- Marisa Xuereb, Managing Director, Raesch Quarz Ltd.
- Kevin J. Borg, Director General, The Malta Chamber of Commerce, Enterprise and Industry.
- Nathalie Farrugia, Malta Enterprise.
- Philip Lingard, Consultant, London School of Commerce.

And last but by no means least, special thanks to Liane Portelli Castillo for the excellent coordination and organisation of all activities and meetings.

Dr Vangelis Tsiligiris - PhD, FHEA, FCMI

Malta, March 2018

Executive Summary

This report presents a policy and strategy evaluation of the environment in Malta to transform the country into an international education hub.

There are three sections to this report representing three key strategic aims: an evaluation of Malta's higher education policy environment, an evaluation of Malta as a Transnational (TNE) host country, and, thirdly, a provision of strategy recommendations extending from the higher-level strategy model down to the specific strategic actions. Below is a summary of the key findings and recommendations for each of these three aims.

Aim 1: Evaluate Malta's international higher education policy environment

The key findings and policy recommendations, in the context of the British Council framework, of this report are:

- Malta, in terms of its policy environment for international student mobility, is 8th amongst the 39 countries in the British Council (BC) database of where national governments can provide an enabling environment to their higher education institutions to internationalise and attract international students. The country surpasses major destination countries of international students, such as the UK, US, Turkey, and China.
- Although a small country, Malta scores very high in the BC framework for TNE. Out of 39 countries, Malta is 6th, behind countries with advanced policy framework and mature higher education markets, such as the UK and Netherlands.
- Malta is 16th amongst 39 countries in its support for international research engagement. In the context of its size and available resources, Malta scores satisfactory above larger countries and those with more resources.
- Certain policy improvements can strengthen further the very strong policy environment of Malta:
 - The development of a more comprehensive internationalisation strategy for higher education.
 - Prioritising the promotion and management of inbound and outbound mobility scholarships.
 - The development of a framework/guidelines on how HEIs should engage with international agents.
 - The development of a code of practice for teaching and assessing international students.
 - Develop and adopt a post-approval quality assurance cycle that will seek to monitor key aspects of education provision (i.e. teaching competency of academic staff, internal quality assurance process in regard to fairness and consistency of assessment policies).
 - The development of a national research assessment/review framework
 - Explore the scope for Enterprise Malta to consider offering incentives to researchers and academics.

Aim 2: Evaluate Malta as a TNE host country

The adapted Porter Diamond Model (PDM) for the evaluation of TNE host countries (Tsiligiris, 2018) is used to evaluate Malta as a host country for TNE activities. The model consists of four dimensions: 1) Factor conditions; 2) Related supporting industries, 3) Demand conditions; and 4) Context of firm rivalry. Each dimension is composed by different indicators, which refer to critical factors for the success of TNE provision.

Factor conditions

This dimension considers factors that will promote the sustainable development, in terms of student attainment and quality assurance, of TNE in a host country. Some of the key critical factor in this respect are: 1) English language proficiency; 2) Quality of secondary education; 3) Quality of human capital; and 4) IT infrastructure. In this respect, the key findings are:

- Wide usage the English language in the country.
- Quality of secondary education (in terms of PISA scores) is lower than major TNE exporting countries such as the UK.
- Very high quality of human capital.
- Advanced IT infrastructure.

Related supporting industries

The existence of successful networks of supporting industries will create a positive spillover effect and reassure the efficient and cost-effective supply of inputs. For TNE the key supporting industries relate to the availability of human talent and the capacity to conduct research and innovation activity locally. The key findings are:

- Malta is ranked 26 out of 127 countries, and 16 out of 36 European countries in the Global Innovation Index.
- There is a high employment rate for higher education graduates.
- The share of doctoral students in the total number of tertiary education students is the lowest (0.9%) in the EU.

Demand conditions

Demand conditions refer to the factors that shape the demand for TNE in the host country. Predicting the course of the demand for any product or service is a complex and dynamic process. And even more so for TNE, which is a highly-complex market. The factors which are included in the adapted PDM to evaluate the demand conditions in Malta are: 1) inbound and outbound mobility of students; 2) Capacity of domestic HE system; and 3) Demographic trends. The key findings are:

- Inbound mobility increased from 4.1 in 2011 to 8.8 in 2016. Outbound mobility has decreased from 10.8 in 2011 to 8.8 in 2016.
- There are 5 universities (levels 5-8), 31 higher education institutions (levels 5-8), and 41 further and higher education institutions (levels 1-8).
- Across the period of the next 20 years (2020-2040), Malta's population of 13-18-year-olds is expected to stay stable as proportion of the total population.

Context of firm rivalry

The context of firm rivalry will determine the competitiveness of Malta's higher education sector. Specifically, for TNE, this refers to the government regulation for TNE, the recognition of TNE qualifications, the ease of doing business, and the income per capita. The key findings are:

- The national legislation allows the establishment of foreign institutions with degree awarding powers in the context of the National Qualification Framework (levels 5 to 8).
- Any TNE qualification, which has been approved by the National Commission for Further and Higher Education (NCFHE), is fully recognised under the Malta Qualifications Framework (MQF).
- Malta is in position 84 out of 190 countries in the overall score World Bank's ease of doing business.
- The GPD per capita of Malta is \$25,145, which as % to the GPD per capita of key TNE host and exporting countries compares as follows: 265% Malaysia; 48% Singapore; 310% China; 58% Hong Kong; 723% Egypt; 62% UK; 44% US; and 51% Australia

In summary, the country possesses a strong set of factor conditions - e.g. the wide use of English, the quality of human capital, and high quality IT infrastructure – that create a positive environment for the development of TNE and generally the presence of foreign higher education institutions. Similarly, the context of firm rivalry includes a very supporting national legislation for TNE and an efficient and transparent framework for the recognition of TNE qualifications. In conjunction with the welcoming environment for foreign investments, the favourable factor conditions and firm rivalry create the prospects for innovative forms of TNE (i.e. combining different forms of TNE, exploring blended modes).

Based on the findings from the application of the PDM, TNE exporting countries can consider Malta as a potential TNE host country for advanced models of TNE, such as international branch campuses (IBCs). However, due to the large number of providers in the country, the restricted size of the local student market, and the limited availability of physical space, there needs to be careful consideration of the size and the portfolio of academic programmes of any new IBCs.

Online/distance learning is another area of TNE where Malta has clear advantages as host country. There is a clear legal framework for the accreditation of online/distance learning programmes in the context of the Malta Qualification Framework.

Aim 3: Provide strategy recommendations extending from the higher-level strategy model down to the specific strategic actions

Considering the presence of a strong internationalised business community, Malta could adopt a strategy that would utilise the business community in the country to create higher education and research programmes that would be attractive to local and international students. This strategy is based on the knowledge triangle and has two key priorities: 1) boost the employability and working experience of graduates through the integration of experiential learning and work opportunities in academic programmes; and 2) seek to promote research and innovation activity which will contribute to the development of a knowledge-based economic model. A range of strategic actions is proposed as follows:

Development of provision

- Selective development of smart international branch campuses by foreign universities with global reputation. Smart IBCs are branch campuses with flexible organisational structures that would utilise small scale physical infrastructure and rely more on information technology. These IBCs should offer academic programmes in subjects of strategic importance to the Maltese economy and where there is significant business activity. According to the Central Bank of Malta (2016), this includes the services sector and specifically tourism, health, retailing, banking and financial services, maritime, aviation, professional services, back-office administration, information technology and gaming.
- Seek to integrate experiential learning and opportunities for working experience across all HE programmes.
- Develop Masters and PhD programmes which are co-funded by businesses, HEIs, and the government. These programmes should be branded as being supported by a consortium of private and public organisation.
- With the support of businesses, prioritise the development of business incubators inside HEIs. These should aim to commercialise and monetise the research outcomes of the co-funded PG and PhD programmes.

All previous points represent the need to a wider strategy that will seek to essentially help fund the development of IHE/ HE and match industry and education needs.

Marketing

- The government needs to work together with the accredited HEIs in building the brand of Malta as a destination of international students. This requires a coordinated effort which should be based on a common marketing strategy that will look to identify the country's unique selling points (USP) as destination for international students. In addition, this marketing strategy needs to identify the target origin countries of international students by adopting a cost-benefit analysis.
- Facilitate a central system of applications for entry to undergraduate and postgraduate programmes.

Quality and student experience

- Capture the feedback of home and international students via an annual student experience survey. The outcomes of the annual student experience survey can be used to inform plans for improvements at institutional and sector levels. Also, the evaluations of students for the different HEIs can be used to inform the decision-making process of prospective students.
- Create national ombudsman services for students and identify a process for reporting and resolving student complaints.

Table of Contents

EXECUTIVE SUMMARY	2
INTRODUCTION	10
PART ONE: EVALUATION OF MALTA'S HIGHER EDUCATION POLICY	13
METHODOLOGY.....	13
DATA COLLECTION	13
STRUCTURE.....	13
A. INTERNATIONAL STUDENT MOBILITY	14
B. TRANSNATIONAL EDUCATION (TNE).....	19
C. INTERNATIONAL RESEARCH ENGAGEMENT.....	23
POLICY RECOMMENDATIONS	26
PART TWO: EVALUATION OF MALTA AS TNE HOST COUNTRY	28
METHODOLOGY.....	28
DATA COLLECTION	28
STRUCTURE.....	28
A. FACTOR CONDITIONS.....	29
B. RELATED SUPPORTING INDUSTRIES	31
C. DEMAND CONDITIONS.....	33
D. CONTEXT OF FIRM RIVALRY	35
SUMMARY OF FINDINGS.....	36
PART THREE: STRATEGY RECOMMENDATIONS	38
STRATEGY MODEL.....	39
STRATEGIC ACTIONS.....	41
REFERENCES	42
APPENDIX	45

Table of figures and tables

Figure 1.1 - International students in Malta (UNESCO IoS).....	14
Figure 1.2 - International student mobility policy environment in Malta	15
Figure 1.3 - How Malta compares to other countries on International student mobility	16
Figure 1.4 - Transnational education policy environment in Malta	19
Figure 1.5 - How Malta compares to other countries on TNE?	20
Figure 1.6 - International Research Engagement in Malta	23
Figure 1.7 - How Malta compares to other countries on international research engagement	24
Figure 2.1 - The adapted Porter Diamond Model for the evaluation of TNE host countries.....	28
Figure 2.2 - Internet users (per 100 people)	30
Figure 2.4 - Employment rate by attainment level (tertiary).....	31
Figure 2.5 – Inbound and outbound mobility ratios, Malta (2011-2016).....	33
Figure 2.6 - % of 13-18-year-olds per 100 total population.....	34
Figure 3.1 - The knowledge triangle	39
Figure 3.2 – A higher education strategy for Malta based on the knowledge triangle	40
Table 1.1 - Tertiary students enrolled in formal education by ISCED level of study: 2014/2015	14
Table 2.1 - Pisa scores	29
Table 2.2 - Human capital index.....	30
Table 2.3 - GDP per capita Malta vs. TNE exporting and host countries	36

Introduction

International higher education (IHE) is a highly competitive market. Encompassing the cross-border mobility of students, academic staff, institutions and academic programmes. It is a vast market which generates multiple benefits for its participants. These benefits include economic revenue from fees and other student expenditure for host countries, cross-cultural experiences for staff and students, and the development of a global reach for higher education institutions.

International student mobility is the segment of the IHE market which attracts most of the attention by governments and higher education institutions (HEIs). This is primarily due to the obvious economic benefits for national economies and HEIs in host countries. For example, in 2015/16 international student mobility, including EU students, contributed £22.6 billion to the UK economy (HEPI, Kaplan & London Economics, 2018). Most of the focus is on international students, which in EU countries are defined as 'non-EU students'. The reason for this is that fees for non-EU students tend to be higher in comparison to fees for Home and EU students. This explains why the benefit of hosting non-EU HE students in the UK is 14.8 times greater than the total cost (HEPI, Kaplan & London Economics, 2018).

In 2017, there were approximately 4.5 million higher education students who studied outside their home countries (OECD, 2017). Various organisations and researchers agree on the estimation that the total number of internationally mobile students will grow to 8 million by 2025 (OECD, 2017). The tangible economic benefits and the expectations for further market growth are the key factors for the intensity of the competition amongst countries and HEIs in taking share of the international student mobility market.

In the recent past, several countries have expressed their ambition in becoming international education hubs (i.e. Singapore, UAE, and Malaysia). This was a result for the expectation for a growing international student mobility market and fast economic development of countries in East Asia, which are major home countries of international students (Knight, 2013). Also, there has been an improvement in the quality and capacity of HEIs in non-western countries. Indicative of this is the presence of several HEIs from non-western countries in the top 100 of The Times Higher Education World University Rankings¹. Another trend in international student mobility is the decision of students to study abroad but close to home (University of Oxford, 2017).

As result of these dynamics, HEIs in traditional destination countries of international students (e.g. US, UK, Australia) sought to expand their overseas presence through transnational education (TNE). For example, the UK has been a world leader in TNE provision with 701,010 registered TNE students and a net figure of approximately 385,000² TNE students in 2015/16.

¹ https://www.timeshighereducation.com/world-university-rankings/2018/world-ranking#!/page/0/length/25/sort_by/rank/sort_order/asc/cols/stats

² This figure includes the students registered for the Oxford Brookes University/ACCA BSc (Hons) Degree in Applied Accounting. These students have up to ten years to complete the programme and are reported in the student statistics for each of these years. As such, the TNE student numbers of Oxford Brookes are artificially high, thus distorting the total number of UK TNE students. Hence, the net figure, which is excluding the Oxford Brookes TNE students, is used as a more accurate reflection of the UK TNE market. According to [UniversitiesUK](#), in

Also, major sending countries of international students (e.g. Malaysia, China, Hong Kong, India) have used TNE arrangements to develop the capacity of their local HE system to reverse brain-drain. Some of these countries (e.g. China and Malaysia) have managed to develop their capacity and become major destinations of international students.

Malta has the ambition of becoming an international education hub, with a priority to expand its share of international students. Considering the megatrends summarised in the previous paragraphs, Malta needs to evaluate its readiness to compete in the global higher education market and, particularly its attractiveness to TNE exporting institutions as a potential TNE host country. The findings of this assessment should be used to develop a comprehensive strategy for higher education with key objective to strengthen the country's position in the global HE market.

This report has the following three aims:

1. To evaluate Malta's international higher education policy environment – this refers to the three pillars of international higher education: 1) international student mobility, 2) transnational education, and 3) cross-border research collaboration. The outcomes of this evaluation will inform the British Council online database and provide a clear comparison of Malta's higher education policy against the other countries in this database.
2. To evaluate Malta as a host country for TNE activities. The outcomes of this analysis, will be by Malta and TNE exporting institutions to explore potential TNE collaborations and identify the optimal models.
3. To provide strategy recommendations extending from the higher-level strategy model down to the specific strategic actions.

The report has three parts, each tackling one of the above aims.

PART ONE

Evaluation of Malta's Higher Education Policy

PART ONE: Evaluation of Malta's Higher Education Policy

The first aim of this project is to evaluate Malta's international higher education policy environment – this refers to the three pillars of international higher education: 1) International student mobility, 2) Transnational education, and 3) Cross-border research collaboration.

Methodology

To evaluate the country's higher education policy environment, the study adopts the "National Policies Framework" by British Council. This framework has been used to assess the higher education policy environment in 38 countries across the world, and the findings are published in the report series "The Shape of Global Higher Education". Additionally, British Council maintains the "Global Gauge"³, an online active database with the scores/ranking of these countries.

The BC National Policies Framework is an index-based framework which evaluates the international higher education policy environment in three categories: A) International student mobility; B) Transnational education; and C) International research engagement. Each category is assessed against a range of qualitative indicators⁴ using a scale from 0 to 1 (0= criteria not met; 1=criteria fully met). The framework involves 37 qualitative indicators in total.

Data collection

The data was collected through 1) personal interviews with key stakeholders (e.g. Ministry of Education, NCFHE, the national quality assurance authority⁵, local TNE providers, HEIs, and businesses); and 2) policy documents, academic literature, and research reports. All data was verified by Education Malta and relevant stakeholders.

Structure

This first part of the report presents and discusses the findings for each of the three categories of the BC framework. In each of sections (A-C) in this part, there is a consideration of the key scores and a comparison with the 38 countries already in the BC Global Gauge database. At the end of this part there is a summary of the policy recommendations which derived from the evaluation of the international higher education policy environment of Malta.

³ <https://www.britishcouncil.org/education/ihe/knowledge-centre/global-landscape/global-gauge>

⁴ See appendix for the full list of indicators.

⁵ National Commission for Further and Higher Education (NCFHE)

A. International Student Mobility

International student mobility refers to the outbound and inbound flows of students for education purposes. Outbound mobility is when students from one country (i.e. Malta) going abroad to study, and inbound mobility when foreign students come in a country to study. Inbound mobility is associated with economic benefits for the host country (i.e. rent, consumption, travel) and the education providers (i.e. fees for international students) (Kritz, 2015). Therefore, this is the most lucrative part of the global higher education market and universities and countries compete to gain a share of the international mobile student population.

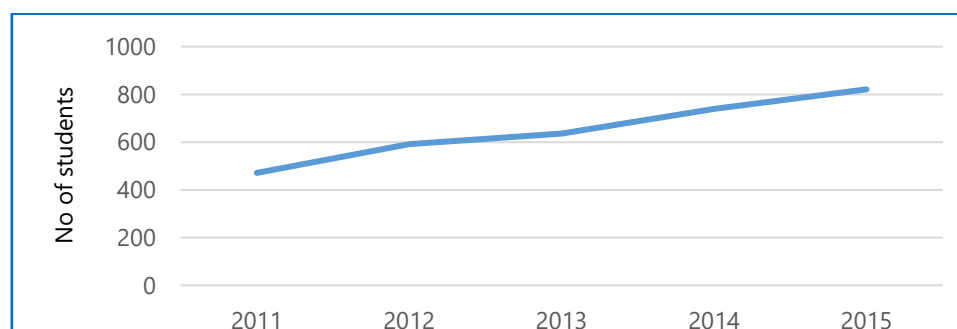
According to the recent data⁶ from the Maltese National Statistics Organisation (NSO), in 2014/15 there were 13,214 students in Maltese tertiary education⁷. Most of these students are Maltese (12,398, 93.8%). There are 819 international and EU students (6.2%) and most of them (469, 3.5%) are from the EU. Therefore, the Maltese higher education student population is mostly local.

Table 1.1 - Tertiary students enrolled in formal education by ISCED level of study: 2014/2015

	ISCED 5	ISCED 6	ISCED 7	ISCED 8	Total	
Maltese	2,456	6,802	3,038	99	12,397	94%
EU	42	148	269	10	469	4%
Europe other	10	28	24		62	0%
America	1	8	25	1	35	0%
Africa	11	17	51	3	82	1%
Asia	17	23	131		171	1%
Total	2,537	7,026	3,538	113	13,214	100%

As figure 1.1 below shows, the number of international students⁸ in Malta has been growing in the past years. However, as the data from NSO reveals, this remains a small proportion (i.e. 6.2%) of the student population in the country, and consists mostly of EU students.

Figure 1.1 - International students in Malta (UNESCO IoS)



⁶

https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_C4/Education_and_Information_Society_Statistics/Documents/2016/News2016_202.pdf

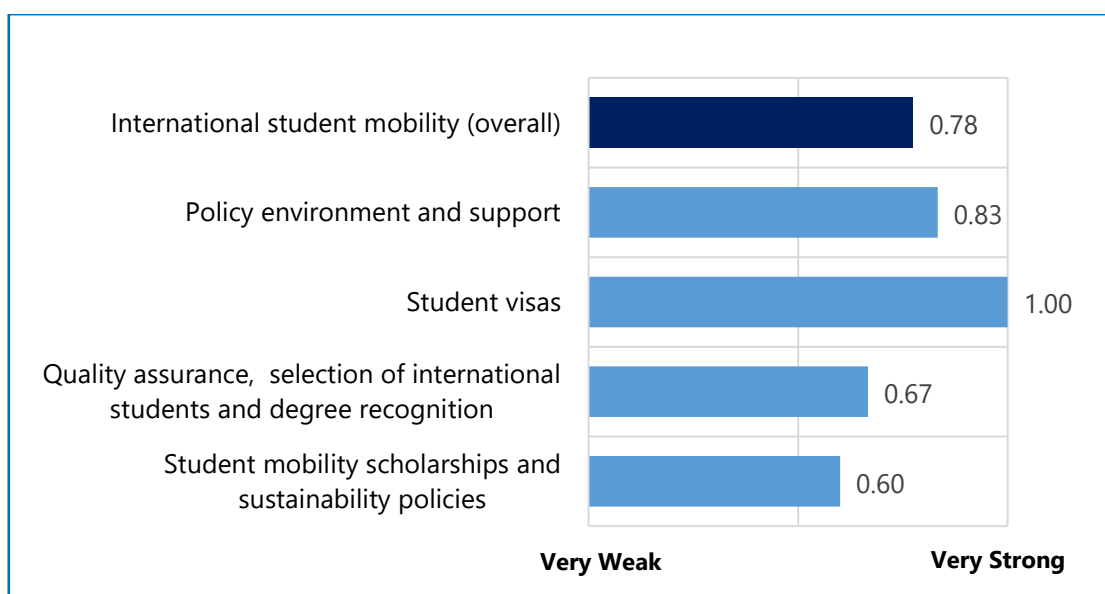
⁷ ISCED 5: Short-cycle tertiary education; ISCED 6: Bachelor's or equivalent level; ISCED 7: Master's or equivalent level; ISCED 8: Doctoral or equivalent level.

⁸Definition of international students: Students who have crossed a national or territorial border for the purpose of education and are now enrolled outside their country of origin.

The BC framework assesses the “international student mobility” category through four indicators: 1) Policy environment and support; 2) Student visas; 3) Quality assurance, selection of international students and degree recognition; and 4) Student mobility scholarships and sustainability policies.

Despite the low number of inbound students, Malta has very strong policy and regulatory frameworks on aspects related to international student mobility, as shown in figure 1.2 below. This is primarily because of the participation of Malta in the European Higher Education Area (EHEA) and particularly in the Bologna and Erasmus initiatives. As other studies have found (Ilieva *et al.*, 2017), EU countries benefit enormously by the European Union legislation and funding programmes in developing an efficient national policy and regulatory framework for higher education.

Figure 1.2 - International student mobility policy environment in Malta



International student mobility: Malta compared to other countries

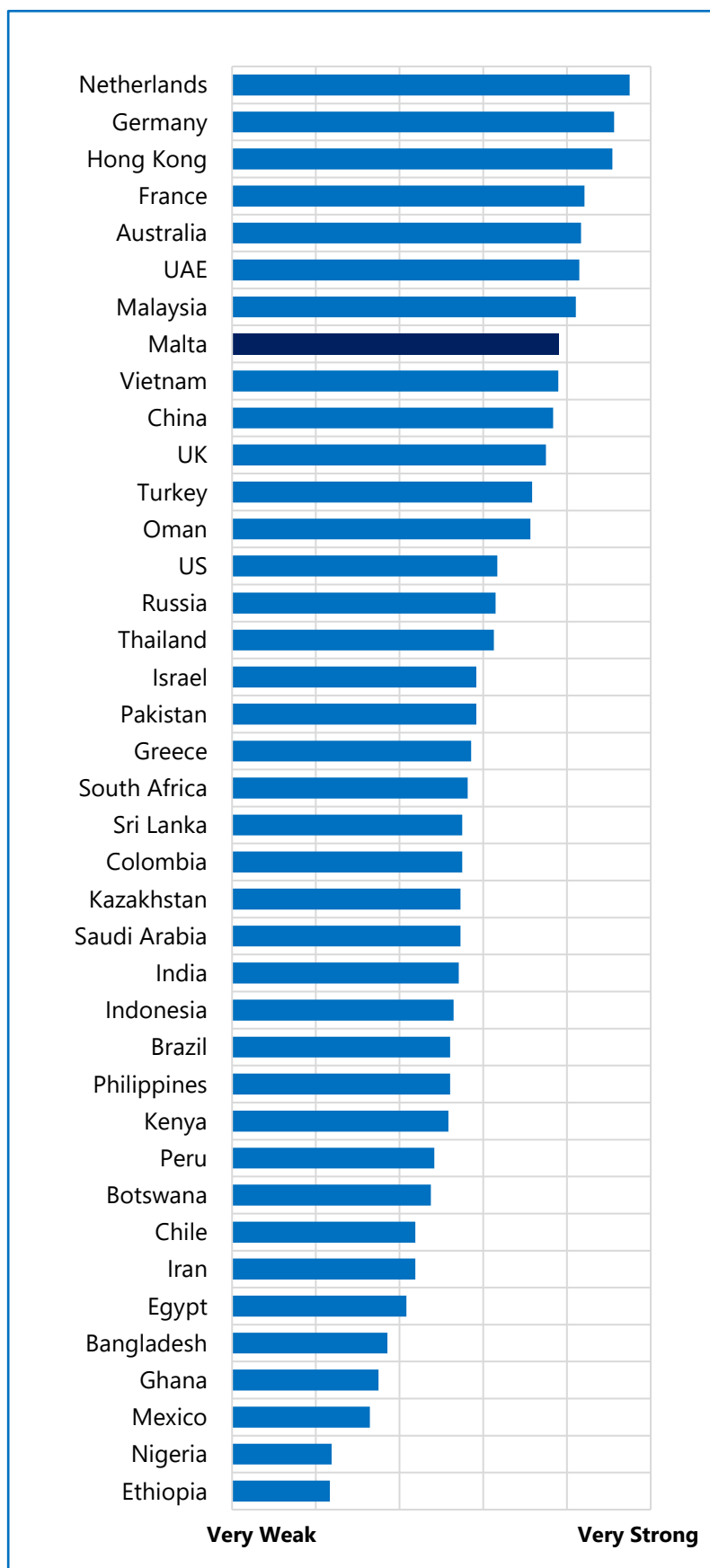
Malta, in terms of its policy environment for international student mobility, is 8th amongst the 39 countries the BC global gauge database. The country surpasses major destination countries of international students, such as the UK, US, Turkey, and China.

Malta's high position in this category is an outcome of: 1) the country's participation in the EU, and 2) a coordinated effort by all key stakeholders (e.g. government, businesses, HEIs) to promote international student mobility.

The participation in the EU creates a favourable policy framework for international student mobility. This is exemplified in visa policies and scholarships for inbound and outbound mobility.

Additionally, the country has adopted a consistent approach seeking to internationalise its higher education. The national qualifications framework, and the simplified process for the recognising of foreign qualifications are some examples of this approach. These are discussed further in the next pages.

Figure 1.3 - How Malta compares to other countries on International student mobility



Policy environment and support

In recent years, the Maltese Government has made a consistent effort to raise the visibility of Malta as a potential destination for international students. This includes the creation of "Education Malta", an organisation tasked with the promotion of internationalisation of higher education, in the context of inbound student mobility, and development of TNE. Although it does not have a physical presence abroad, represents the country at international higher education conferences and marketing events.

As with several other countries who are embarking on an effort to promote their higher education sector to international students, the Maltese Government has developed a range of strategic objectives around international student mobility and capacity building (e.g. via TNE). However, a more comprehensive and cohesive internationalisation strategy is still to be developed.

There is a clear fee structure for home/EU and international students. Undergraduate education is free for Maltese students. For EU students, undergraduate education is free or subject to a low semester fee (e.g. €300-€450). International student fees are in the range of €8,500-10,800 for undergraduate and €10,800-€26,000 for postgraduate programmes.

The National Statistics Office (NSO) collects and publishes data on the enrolments of international students⁹.

Student Visas

The country has a very clear and well-presented policy on visas for international students. Like other EU countries, Malta benefits from being a member of the EU where mobility of students, both EU and international, is facilitated by common policies, like Schengen. Also, There are no diplomatic or political restrictions on the provision of international student visas to study in Malta. In terms of the living and working environment for international students, Malta has policies¹⁰ in place, which, subject to specific requirements, allow international students to work part-time. Considering that Malta has a shortage of labour force, there are several initiatives¹¹ by the government to provide employment opportunities to international students after their graduation.

Quality assurance, selection of international students and degree recognition

Overall the country has a strong HE quality assurance framework managed and enforced by the National Council for Further and Higher Education (NCFHE). NCFHE monitors all programmes delivered in the country by both public and private providers. A code of practice for assessing teachers and teaching exists through NCFHE and ELT. Nevertheless, a binding code of practice for teaching and assessing international students is currently unavailable.

⁹

https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_C4/Education_and_Information_Society_Statistics/Pages/Student-Enrolments.aspx

¹⁰ <https://jobsplus.gov.mt/employers-mt-MT-en-GB/employing-persons/fileprovider.aspx?fileId=2785> [p.16]

¹¹ <https://www.gov.mt/en/Life%20Events/Moving-to-Malta/Pages/Moving-to-Malta.aspx>

The Malta Qualification Framework (MQF) provides higher education institutions with a very clear and transparent framework for assessing the qualification of foreign students. In addition, the Malta Qualifications Recognition Information Centre (MQRIC¹²) provides clear guidance to holders of foreign qualifications on how to recognise them in the context of the MQF. The participation of Malta in the EHEA and the existence of a detailed national qualifications framework, creates a very efficient environment for the evaluation of foreign qualifications. In turn, this creates a favourable environment for international student mobility and transnational education (i.e. progression and articulation arrangements).

Student mobility scholarships and sustainability policies

Malta offers a range of scholarships for foreign students. These are part of the commonwealth scholarships programme, EU mobility programmes, and government initiatives. Similarly, Malta offers a range of outbound scholarships for Maltese students. These are primarily in the context of Erasmus programme and similar EU funding programmes. There is the potential to improve the presentation and management process of both inbound and outbound scholarships (i.e. one-stop shop for scholarships, removing expired scholarship calls¹³).

One of the indicators in the BC framework concerns the policies (e.g. by way of quotas, grants or scholarships) available to avoid the displacement of low-income or marginalised domestic students by foreign students. Maltese students can use several government initiatives to ensure access to higher education. For example, the government is using the Endeavour Scheme¹⁴, which allows Maltese students to apply for level 7 or 8 programmes in Malta or abroad.

The country has two official languages (Maltese and English) and there is a strong policy agenda to promote the learning of foreign language in primary and secondary education. For example, a range of foreign languages (e.g. Arabic, French, German, Italian, and Spanish) is embedded in the curriculum of mid-school (years 7-8) and secondary education (years 9-11). This creates an environment of cross-cultural awareness, which in turn helps in developing a sustainable environment for international students in Malta.

International recruitment agents play an important role in the recruitment of international students. For example, 53% of international students in Australia and 38% in the UK are recruited through agents (Grant Thornton, 2016). Malta does not have an extensive international student population and HEIs in the country primarily recruit locally. As such, there is no developed framework or guidelines on how HEIs should engage with international recruitment agents. In the future, and considering the strategic aspiration of the country to increase the population of international students in its HEIs, there is the scope to consider developing guidelines on recruitment of international students via international agents. This will mitigate the potential institutional and country reputation risk across borders.

¹² <https://ncfhe.gov.mt/en/services/Pages/All%20Services/mqric.aspx>

¹³ Some example of the website that could be improved or/and consolidated in one: a) <https://edumalta.gov.mt/en/aum-scholarships> & b) <http://education.gov.mt/en/education/myScholarship/Pages/default.aspx>

¹⁴ <https://education.gov.mt/en/education/myScholarship/Pages/ENDEAVOUR%20Scholarship%20Scheme.aspx>

B. Transnational Education (TNE)

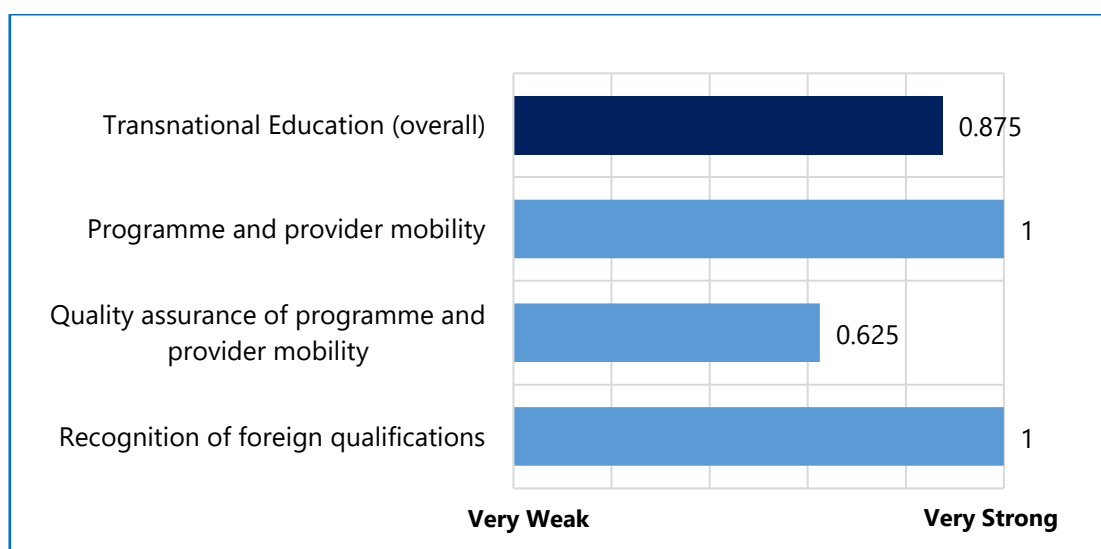
Transnational education refers to the provision of education programmes in a country different to the one of the awarding institution (Ilieva *et al.*, 2017:p.18). This includes distance/online programmes, international branch campuses, franchising, validation, double/dual degrees, joint degree programmes, and articulation/progression agreements. Several countries (e.g. Malaysia, Singapore, UAE) use TNE as a way to develop the capacity of their higher education, tackle brain drain, and increase inbound mobility of international students (British Council & DAAD, 2014).

According to HESA¹⁵, in 2016/17 Malta¹⁶ had 3,660 students studying on UK TNE (4.4% increase from 2015/16). Malta is amongst the top TNE host countries for UK TNE in the EU. However, this should be considered in the context of the overall number of UK TNE students in the EU which is not very high.

The BC framework includes three indicators for the assessment of a country's TNE policy framework, these are: 1) Programme and provider mobility; 2) Quality assurance of programme and provider mobility; and 3) Recognition of foreign qualifications. Each indicator consists of a range of criteria¹⁷ and contributes equally to the overall category score.

As shown in figure 1.4, Malta has an overall score of 0.88/1 which implies a "very strong" TNE policy framework. The lowest value is in the "quality assurance of programme and provider mobility"; however, it must be clarified that this is primarily due to the low score in one of the criteria¹⁸ that relates to the monitoring of overseas presence of Maltese HEIs. This should be considered in the context of the capacity of the Maltese HE sector and the strategic aspirations of HEIs in the country, which do not include the establishment of presence overseas.

Figure 1.4 - Transnational education policy environment in Malta



¹⁵ Higher Education Statistics Agency UK.

¹⁶ <https://www.hesa.ac.uk/data-and-analysis/students/chart-5>

¹⁷ See appendix for the full list of criteria per indicator.

¹⁸ "Monitoring of domestic institutions overseas"

TNE - Malta compared to other countries

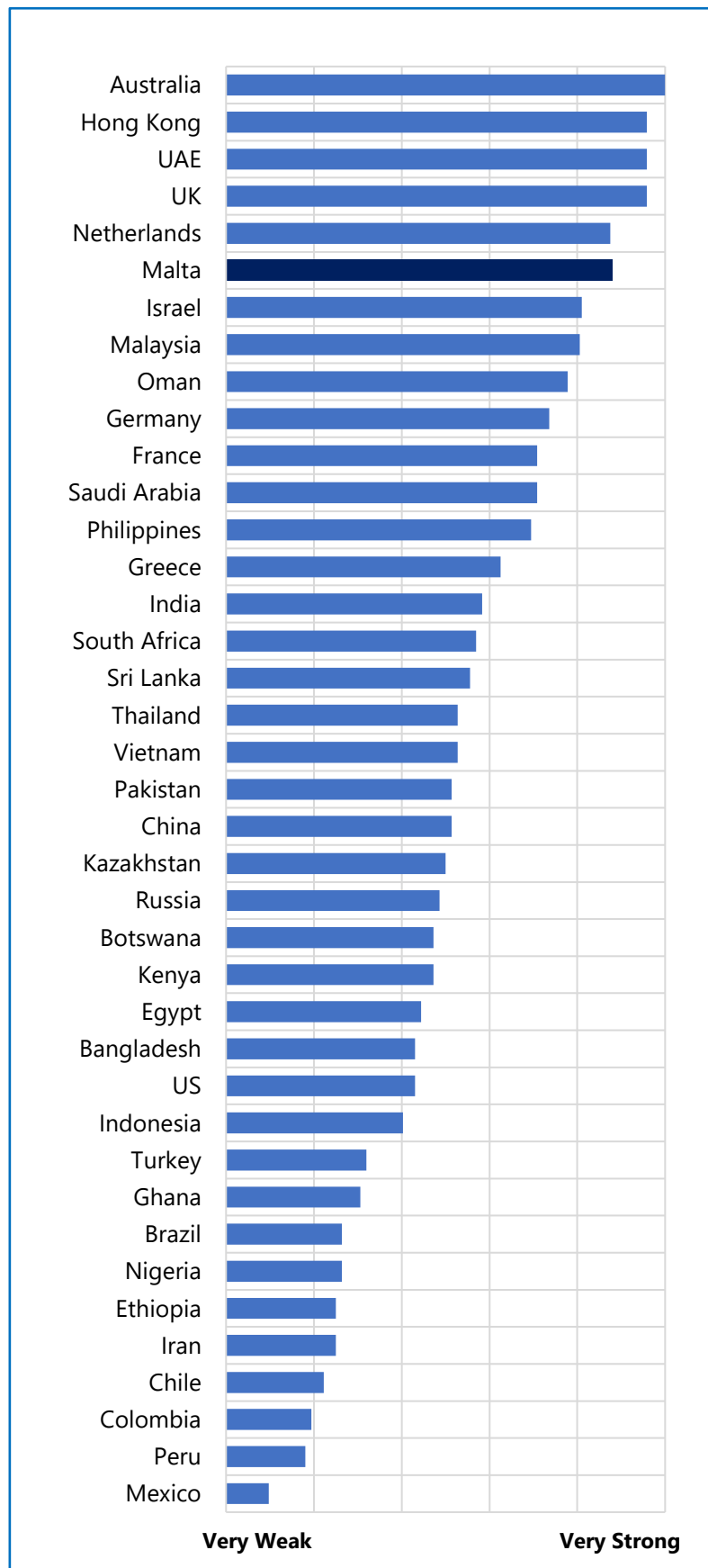
Although a small country, Malta scores very high in the BC framework for TNE. As shown in figure 1.5, out of 39 countries, Malta is 6th, behind countries with advanced policy framework and mature higher education markets, such as the UK and Netherlands.

Also, despite the fact that Malta is not amongst the major TNE host countries, it has a very strong TNE engagement. This surpasses the score of several major TNE host countries, like Malaysia – the world’s major TNE host country – and Greece, which is the major TNE host country in EU.

Malta is a unique case of TNE host country. The international experience (Tsiligiris, 2014; Illieva et al, 2017) shows that in a TNE host country, it is the market that develops first, and policy framework follows. In Malta, there is a very strong (favourable) policy environment for TNE, despite that the size of the existing market is not large.

Malta has developed a number of progressive policy arrangements (e.g. online/distance education accreditation) which create a range of opportunities for TNE exporting institutions. Furthermore, through these arrangements, Malta can develop distinctive characteristics as TNE host country.

Figure 1.5 - How Malta compares to other countries on TNE?



Programme and provider mobility

Malta has a welcoming regulatory environment for the provision of transnational education. Specifically, foreign providers are allowed to establish their teaching and research provision in the country and, most importantly, accredit their programmes under the national qualification framework. These are the different categories of licences¹⁹, available to domestic and foreign providers: a) university, b) higher education institution, c) further education institution, d) further education centre, and e) tuition centre. Also, the regulations allow domestic institutions to set up their teaching and research entities abroad.

The existing regulatory framework allows foreign providers to offer their programmes through the full range of TNE modes. For example, a foreign provider can establish a branch campus, a partner supported delivery arrangement, or an online/distance learning provision.

It is worth noting that Malta has a framework in place for the accreditation, and recognition in the MQF, of online/distance education programmes. This in itself can be a major competitive advantage of the country in attracting foreign providers who want to use Malta as their base for online education provision.

Quality assurance of programme and provider mobility

Malta has an advanced quality assurance framework for transnational education, covering all the major TNE models (e.g. IBC, partner supported delivery, online/distance learning). The legal regulations are clear, transparent and they appear to be evenly enforced. For example, the NCFHE website²⁰ includes all the regulations and relevant documentation. In addition, the NCFHE adopts an open and transparent approach aiming to resolve any issues, which emerge during accreditation. During an interview with NCFHE, it became apparent that the organisation adopts a constructive approach when assessing applications for accreditation of new programmes and establishments. For example, NCFHE provides advice on how institutions can rectify problems in complying with the regulatory requirements. Such an approach is of critical importance for the success of foreign institutions willing to operate in the country.

There is an initial quality approval process for programmes and providers, and NCFHE maintains a register of all approved programmes and providers. However, there is not a formal quality assurance monitoring cycle following the initial approval process. Instead, approved providers are self-regulated regarding their compliance with the NCFHE regulations. To this regard, the country, and especially HEIs, will benefit from the adoption of a post-approval quality assurance cycle that will seek to monitor key aspects of education provision (i.e. teaching competency of academic staff, internal quality assurance process in regards to fairness and consistency of assessment policies).

Recognition of foreign qualifications

Recognition of TNE qualifications by host countries is an oft-cited issue (Hou, Morse & Wang, 2015; Tsiligiris, 2015). Some major TNE host countries (for example Greece and China)

¹⁹ for full details see: Subsidiary Legislation 327.433, available here: <https://ncfhe.gov.mt/en/resources/Pages/legislation.aspx>

²⁰ <https://ncfhe.gov.mt/en/Pages/default.aspx>

impose prohibitive requirements for the recognition of foreign higher education qualifications, which are obtained through TNE (Tsiligiris, 2015). Often this causes TNE programmes to be perceived as of inferior value in comparison to the HE programmes offered by domestic HEIs (Mellors-Bourne, Jones & Woodfield, 2015).

Malta does however provide a clear and efficient framework for the recognition of foreign qualifications, including those obtained via TNE. As mentioned earlier in this report, Malta has a well-developed national qualifications framework²¹, which is aligned to the European Qualifications Framework (EQF). As such, workload hours are defined in ECTS and ECTS credits, where 1 credit is 25 hours of learning (of which a minimum of 5 hours of direct contact teaching).

The Malta Qualifications Recognition Information Centre (MQRIC²²) is the body responsible for the recognition of foreign qualifications. It is part of the European Network of Information Centres (ENIC) and acts as the country's National Agency for the recognition and comparison of international qualifications and skills (NARIC).

The full integration and recognition of TNE qualifications in the context of the national qualifications framework allows employers, and generally the labour market, to understand how these qualifications compare to the qualifications offered by the domestic HEIs. Also, NFCHE maintains a publicly available register of all approved providers and courses, which allows employers to understand the TNE landscape in the country.

²¹ See appendix, and here: <https://ncfhe.gov.mt/en/Pages/MQF.aspx>

²² <https://ncfhe.gov.mt/en/services/Pages/All%20Services/mqric.aspx>

C. International Research Engagement

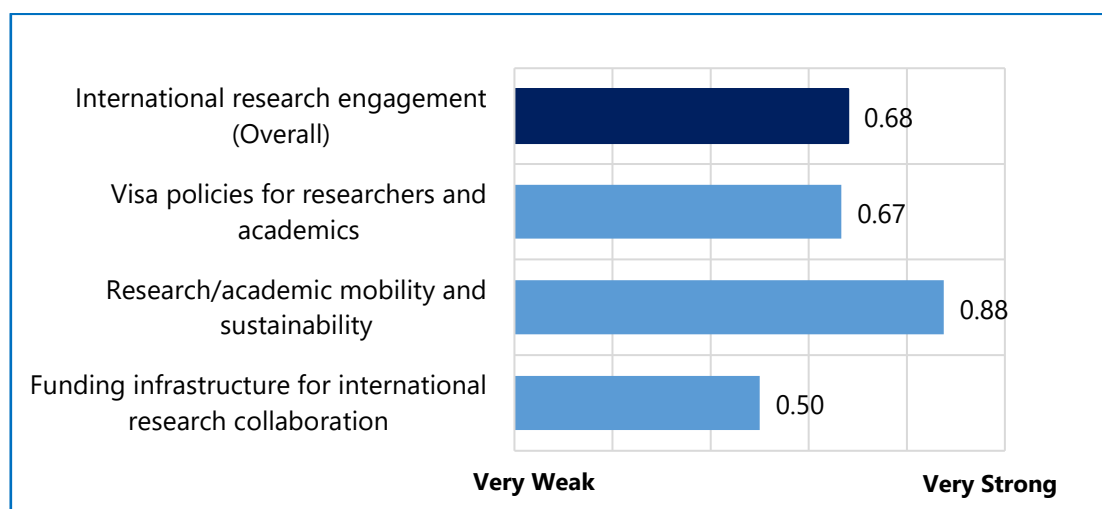
Research is one of the core activities of higher education institutions. It is widely accepted that research plays a paramount role in economic development, academic excellence, and innovation (Ratten, 2016). Research is becoming more international; it is indicative that today one in five scientific papers published is an outcome of international research collaboration (Witze, 2016). By expanding their international research collaboration, HEIs seek to develop their global presence and position in the various international rankings while this creates multiple benefits for stakeholders at regional and national levels.

There is no clear data on the international research outlook of Malta. This is, partially, due to the absence of a national research assessment framework. It is worthy of note that Malta is a small country with limited resources available to local HEIs pursuing research. However, the University of Malta and other major HEIs in the country, do provide evidence of international research engagement²³.

The BC framework includes three indicators for the assessment of a country's international research engagement, these are: 1) Visa policies for researchers and academics; 2) Research/academic mobility and sustainability; and 3) Recognition of foreign qualifications. Each indicator consists of a range of criteria²⁴ and contributes equally to the overall category score.

The application of BC's framework reveals that the country provides strong support for international research engagement. In figure 1.6 below, the highest score is in the "research/academic mobility and sustainability" and specifically where Malta provides a range of inbound and outbound research funding opportunities. Malta is able to do this by being a member of the EU and participate in the EU research funding programmes. The weakest score (0.5/1) is observed in the "Funding infrastructure for international research collaboration" indicator. This is due to the absence of a clear national research assessment/review framework.

Figure 1.6 - International Research Engagement in Malta



²³ <https://www.um.edu.mt/research>

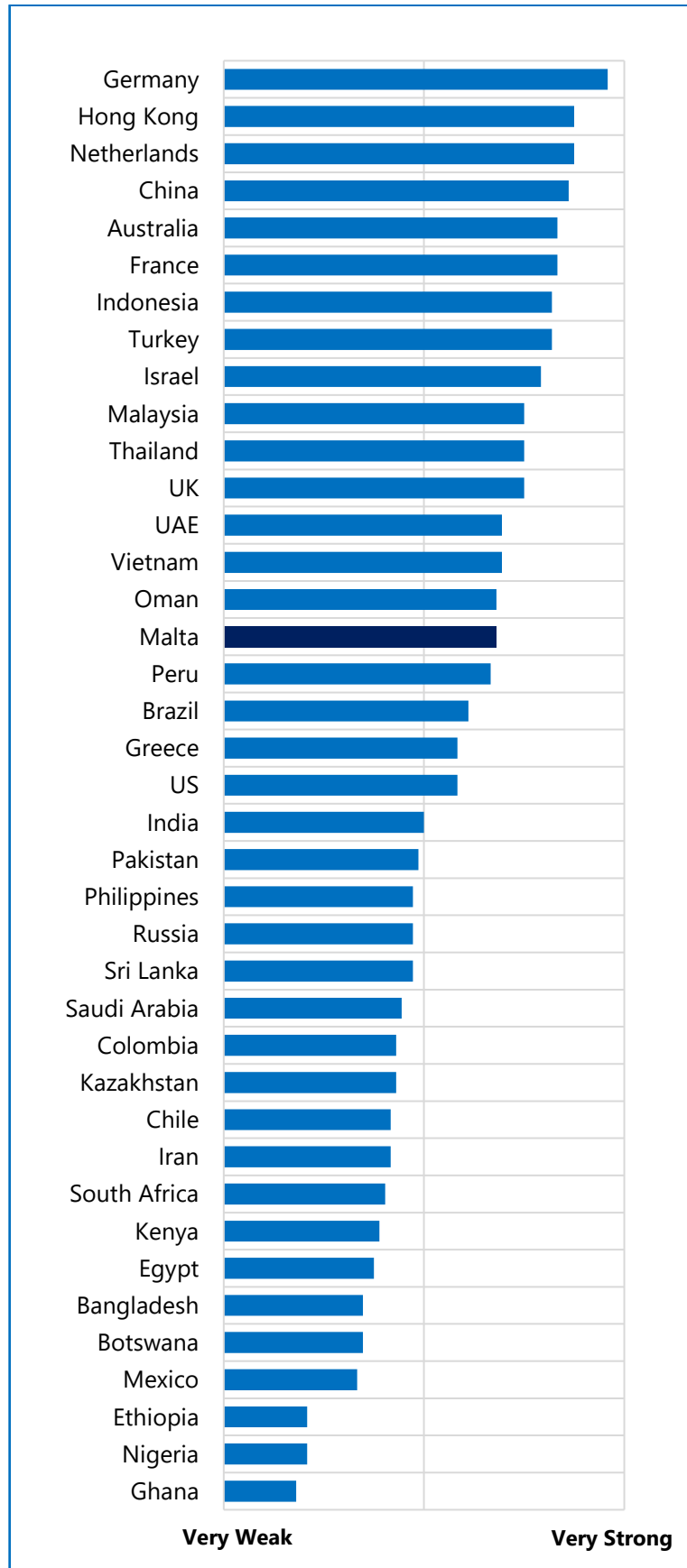
²⁴ See appendix for the full list of criteria per indicator.

International Research Engagement – Malta compared to other countries

As presented in figure 7, Malta is 16th amongst 39 countries in its support for international research engagement. In the context of its size and available resources, Malta scores satisfactory above larger and more resource-rich countries. Like the other two categories (e.g. international student mobility, TNE), Malta has a development policy framework, despite the small size of research activity. Also, the score of Malta is impacted by specific issues (e.g. lack of research assessment framework) rather than an overall weak international research support.

Note that most countries above Malta have a sizable higher education sector which includes a number of research-focused HEIs. This creates the need for a more formal monitoring of research outputs which leads to the development of a national research assessment framework. As such, one would expect that the position of Malta will improve as the higher education of Malta grows to include research oriented HEIs.

Figure 1.7 - How Malta compares to other countries on international research engagement



Visa policies for researchers and academics

Malta has a strong policy agenda for attracting human capital, of appropriate quality and quantity to satisfy the growing demand from domestic and foreign businesses in the country. Although there is a transparent and clear visa policy for researchers and academics, there are no specific policies that promote the inbound mobility of research and academic staff.

Enterprise Malta offers several incentives to foreigners to invest in the country²⁵. However, there are no incentives for individual researchers or academics.

All visa procedures are clearly presented in the website Identity Malta²⁶, which aims to simply the administrative procedures involved in matters relating to passports, identity documents, visas and other.

Research/academic mobility and sustainability

As a member of the European Union, Malta participates in several European research and mobility programmes, such as Erasmus. These programmes promote inbound and outbound mobility of teaching and research staff. Most of these programmes are for public HEIs and the University of Malta manages the bulk of them.

Malta offers a range of support programmes for students and researchers from low-income countries.

In an effort to prevent 'brain drain', Malta offers incentives to local and foreign businesses when they recruit Maltese employees. However, there is no clearly articulated policy to tackle brain drain. To note, Malta does not suffer from brain drain. Instead, the strong demand in the employment market creates a shortage of labour in the country.

Funding infrastructure for international research collaboration

Malta collaborates with the Joint Research Centre of the European Commission²⁷ and offers funding programmes to promote international collaboration in research. Additionally, Enterprise Malta provides²⁸ a range of funding opportunities for international research collaboration.

There is no clear national research assessment/review framework. The University of Malta is conducting some research assessment at national level.

²⁵ <https://www.maltaenterprise.com/support>

²⁶ <https://identitymalta.com/>

²⁷ https://ec.europa.eu/jrc/sites/jrcsh/files/jrc_country_leaflet_mt_en.pdf

²⁸ <https://www.maltaenterprise.com/support>

Policy Recommendations

The following policy recommendations relate to the British Council framework and how Malta can improve further its strong position in this.

International Student Mobility

- Develop a more comprehensive internationalisation strategy for higher education.
- Seek to improve the promotion and management of inbound and outbound mobility scholarships.
- Develop a framework/guidelines on how HEIs should engage with international agents.
- Develop a code of practice for teaching and assessing international students

Transnational Education

- Develop and adopt a post-approval quality assurance cycle that will seek to monitor key aspects of education provision (i.e. teaching competency of academic staff, internal quality assurance process in regard to fairness and consistency of assessment policies).

International Research Engagement

- Develop a national research assessment/review framework.
- Explore the scope for Enterprise Malta to consider offering incentives to researchers and academics.

PART TWO

Evaluation of Malta as TNE host country

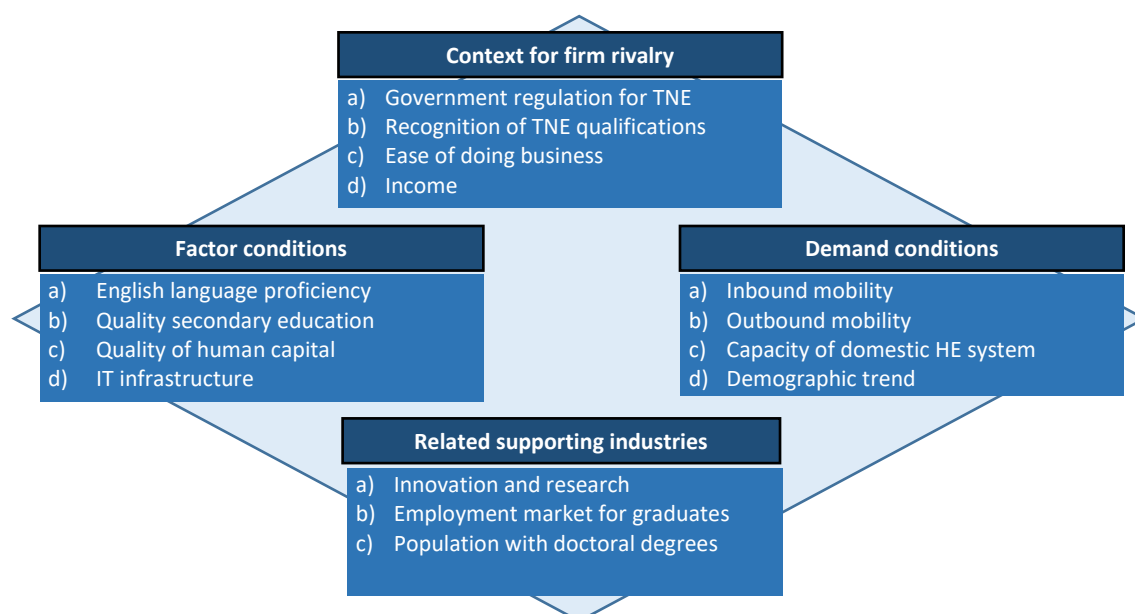
PART TWO: Evaluation of Malta as TNE host country

The aim of this section is to evaluate Malta as a host country for TNE activities. The outcomes of this analysis, could be used by Malta and TNE exporting institutions to explore potential TNE collaborations and identify the optimal models.

Methodology

The adapted Porter Diamond Model (PDM) for the evaluation of TNE host countries (Tsiligiris, 2018) is used achieve this aim. The model, as shown in figure 2.1 below, consists of four dimensions: 1) Factor conditions; 2) Related supporting industries, 3) Demand conditions; and 4) Context of firm rivalry. Each dimension is composed by different indicators, which refer to critical factors for the success of TNE provision. Additionally, each indicator refers to wider context factors that affect the competitiveness and efficiency of Malta's higher HE market. To facilitate the discussion and conclusions, where possible, Malta is compared with the UK and Greece, respectively major TNE exporting and importing countries.

Figure 2.1 The adapted Porter Diamond Model for the evaluation of TNE host countries



Data collection

The data used in each of indicators of the model is publicly available and comes from reliable sources. These include organisations such as UNESCO, United Nations, the World Bank, Eurostat, and Malta's National Statistics Office. Also, data was collected via personal interviews with key stakeholders (e.g. Ministry of education, NCFHE, Enterprise Malta).

Structure

This part includes four sections (A-D) one for each of the dimensions of the PDM. Each section includes the findings from the application of the PDM to evaluate Malta as host TNE country. Where possible, each part includes a comparative discussion between Malta and other TNE host and exporting countries.

A. Factor Conditions

This dimension considers factors that will promote the sustainable development, in terms of student attainment and quality assurance, of TNE in a host country. Some of the key critical factor in this respect are: 1) English language proficiency; 2) Quality of secondary education; 3) Quality of human capital; and 4) IT infrastructure.

English language proficiency

Research has shown that the level of English language knowledge in a TNE host country is a critical factor for the success of TNE activities (Wilkins & Urbanovič, 2014). Malta is not listed in the EF EPI ranking which is the recommended measure of English language proficiency. However, English is one of the two official languages of Malta, and according to the Eurobarometer²⁹, 88% of the population speaks English. Indicative of the wide use of English in the country is the fact that all government information is published in both Maltese and English. The wide usage of English in Malta, implies that TNE exporting institutions could provide programmes in English, which is often a challenge in some TNE host countries (e.g. see for example Greece where most programmes are offered in Greek). Additionally, international students perceive Malta as an English speaking country, which is a factor that improves the prospects for inbound student mobility.

Quality secondary education

Student presage factors and primarily the previous education experience will have a significant impact on the educational process outcomes. This applies without exception to all levels of education, including TNE (Tsiligiris, 2015). In TNE, therefore, the secondary education standards of students will affect the success and sustainability of programmes offered across borders. Assessing the quality of education is a complex and debated topic (Finnie & Usher, 2005). To allow the comparisons in between countries in a consistent and standardised manner, this model uses the OECD PISA scores to evaluate the quality of secondary education. As shown in table 2.1 below, the quality of Malta's secondary education is comparable to this of Greece, which is one of the major TNE host countries for UK, the major exporting country of TNE. Although PISA scores are not fully reflective of the quality of the secondary education, there is some indication for a potential weakness in reading ability and, to a lesser extent, in science literary and maths. This might imply the need for additional pre-course preparatory arrangements to reassure the required minimum standards for entry in TNE programmes.

Table 2.1 - Pisa scores³⁰

	Malta	OECD Average	UK	Greece
Science literacy	465	493	509	455
Maths	479	490	492	454
Reading	447	493	498	467

²⁹ http://ec.europa.eu/commfrontoffice/publicopinion/archives/ebs/ebs_386_sum_en.pdf

³⁰ <http://gpseducation.oecd.org/CountryProfile?primaryCountry=MLT&treshold=10&topic=PI#>

Quality of human capital

Appropriate quality human capital is a key resource required for the development and successful delivery of HE and TNE (Stafford & Taylor, 2016). For example, lack of high quality human capital imposes restrictions on the types of TNE that can be pursued in a TNE host country. Malta ranks 41 out of 130 countries in the human capital index with an overall score of 66.13. Overall, Malta scores high in the quality of human capital and is amongst the top high-income countries in this regard. As such, there is no restriction on the availability of quality human capital required to support the full range of TNE models.

Table 2.2 - Human capital index³¹

	Score (0=worst; 100=best)	Rank (out of 130 countries)
Overall	66.13	41
Capacity	74.1	42
Deployment	60.4	91
Development	68.8	44
Know-how	61.2	30

IT infrastructure

The availability of IT infrastructure is of critical importance for the support of administrative and teaching activities in HE and TNE (Lawton & Jensen, 2015). In the past 5 years, Malta experienced an inflow of IT-based (i.e. gaming) and financial services businesses (Grech, 2016). This trend coupled with the strategic aspiration of the country to become an IT-based economy, explain the existence of a strong IT infrastructure. Some examples of these are presented in figures 2.2 and 2.3 below. In terms of internet users per 100 people, Malta compares to the average of the EU and the OCED member countries. In terms to the average internet speed, Malta is close to the average of OECD and EU member countries. The strong IT infrastructure, coupled with the favourable policy environment for the accreditation and recognition of online programmes, indicates that Malta is suitable TNE host country for online/distance learning provision.

Figure 2.2 - Internet users (per 100 people)³²

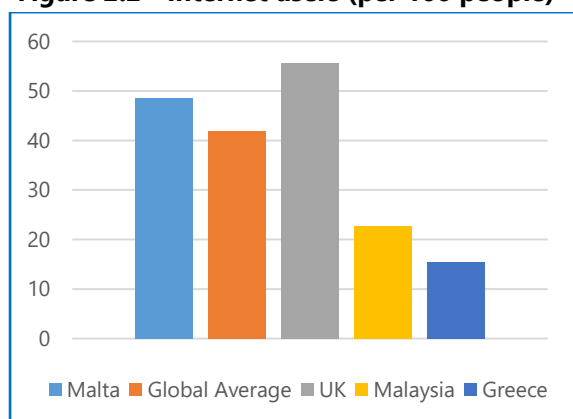
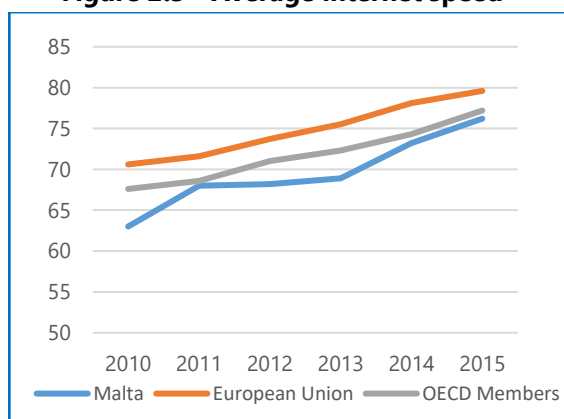


Figure 2.3 - Average internet speed³³



³¹ <https://www.weforum.org/reports/the-global-human-capital-report-2017>

³² http://data.un.org/Data.aspx?d=WDI&f=Indicator_Code%3AIT.NET.USER.P2

³³ <http://www.speedtest.net/global-index>

B. Related Supporting Industries

The existence of successful networks of supporting industries will create a positive spillover effect and reassure the efficient and cost-effective supply of inputs. For TNE the key supporting industries relate to the availability of human talent and the capacity to conduct research and innovation activity locally.

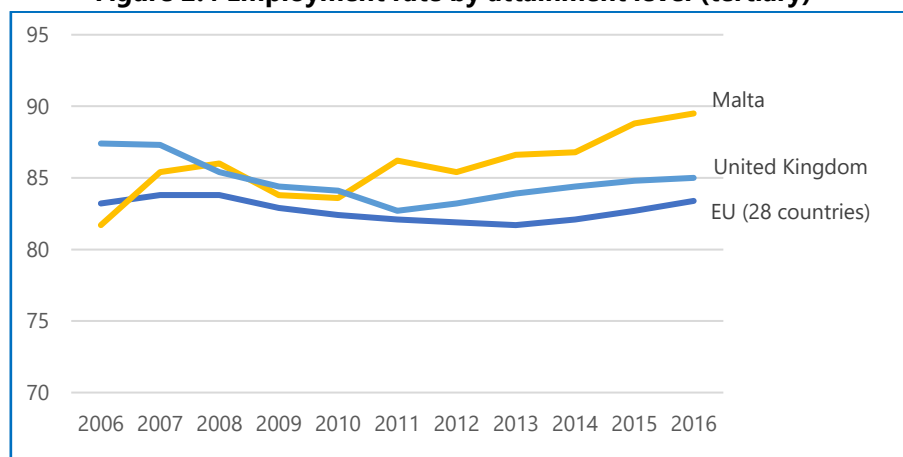
Innovation and research

Innovation and research activity tend to attract international businesses and global talent (Dutta, Lanvin & Wunsch-Vincent, 2017). In turn this develops a positive environment in which foreign universities can materialise valuable synergies with businesses. Hence the capacity of a TNE host country to conduct innovation and research will impact the sustainability of TNE activities. Using the Global Innovation index³⁴ to evaluate the innovation and research readiness; Malta is ranked 26 out of 127 countries, and 16 out of 36 European countries in the Global Innovation Index. Also, Malta is amongst the top 10 countries with the highest Innovation Efficiency Ratios. Overall, the findings from the Global Innovation Index, indicate that there is a very positive innovation and research environment in Malta. This indicates that Malta is a suitable host country for TNE activities encompassing innovation and research aspects (i.e. level 8 programmes, IBC with local research activity).

Employment market for graduates

The employment conditions in a country will impact the employability of graduates which is a key determinant of “value for money” for students (Tomlinson, 2016). A country where there is strong demand for graduates, may experience more demand for higher education programmes that lead to the award of a foreign university. Often this is seen by students as a way to differentiate and gain a competitive advantage in the employment market. As shown in figure 2.4 below, Malta experiences an employment market with high employment rate of higher education graduates. This reflects what all key stakeholders highlighted during the personal interviews, that there is a shortage of skilled labour in the country.

Figure 2.4 Employment rate by attainment level (tertiary) ³⁵



³⁴ <https://www.globalinnovationindex.org/>

³⁵ http://ec.europa.eu/eurostat/data/database?node_code=tsdec430

Population with doctoral degrees

The availability of academic and research staff in the TNE host country is key determinant of the range of TNE activities that can be pursued (Lindsay & Antoniou, 2016; British Council & DAAD, 2014). Malta has the lowest share (0.9%)³⁶ in the EU of doctoral students in the total number of tertiary education students. Additionally, according to Eurostat³⁷, Malta's tertiary education attainment rate is 19.2%, which is lower to the average of EU countries (27.7%) and the UK (38.7%). This might impose restrictions on the availability of local academic and research staff. Nevertheless, it should be noted that Malta is the home of many international companies and attracts highly skilled people from the EU and other countries around the world.

³⁶ http://ec.europa.eu/eurostat/statistics-explained/index.php/Tertiary_education_statistics

³⁷ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=edat_ifse_03&lang=eng

C. Demand Conditions

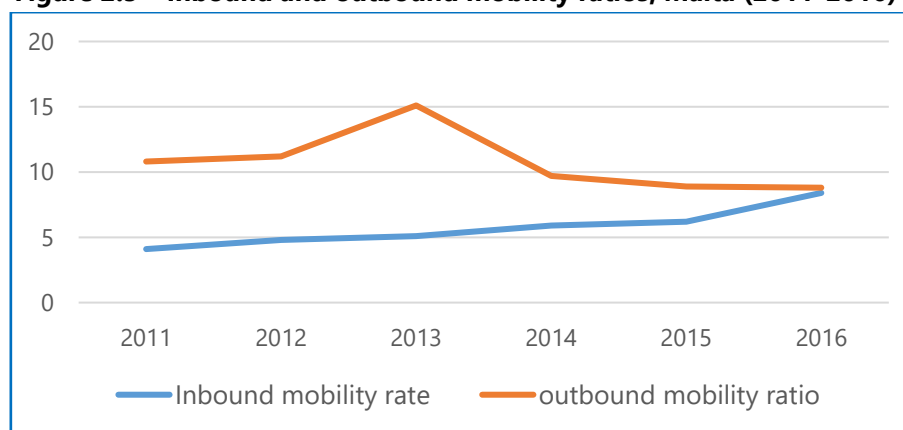
Demand conditions refer to the factors that shape the demand for TNE in the host country. Predicting the course of the demand for any product or service is a complex and dynamic process. And even more so for TNE, which is a highly-complex market. The factors which are included in the adapted PDM to evaluate the demand conditions in Malta are: 1) inbound and outbound mobility of students; 2) Capacity of domestic HE system; and 3) Demographic trends.

Inbound and outbound mobility³⁸

A key driver for the development of TNE is the demand/supply gap in the provision of higher education (Tsiligiris, 2014). Certain forms of TNE (e.g. Franchising, Validation) are suitable where there is shortage of supply of higher education provision. As the capacity of the local HE system develops, TNE models should shift towards physical presence (e.g. branch campuses). Also, whether a country is an exporting or importing country of international students, it will determine the type of TNE arrangements. To measure this, the model adopts the UNESCO inbound and outbound mobility ratios.

Malta had been in the past an exporter of students to other countries. In 2011, for every 100 enrolled in the domestic tertiary education, approximately 11 students studied abroad. In 2016, which is the most recent available data, this was down to 8.8 students. At the same time, since 2011, Malta has seen an increase in the number of inbound students. In 2011, for every 100 students enrolled in the country's tertiary education, there were 4.1 foreign students. In 2016, this has gone up to 8.4 foreign student per 100 enrolments.

Figure 2.5 – Inbound and outbound mobility ratios, Malta (2011-2016)³⁹



The above findings indicate Malta is slowly becoming a destination country for international students. Also, there are evidence to show that the capacity of the local higher education system is expanding.

³⁸ Inbound mobility: Number of students from abroad studying in a given country, expressed as a percentage of total tertiary enrolment in that country. Outbound mobility ratio: Number of students from a given country studying abroad, expressed as a percentage of total tertiary enrolment in that country

³⁹ Data from UNESCO: <http://data.uis.unesco.org/index.aspx?queryid=173>

Capacity of domestic HE system

Linked to the inbound/outbound mobility of students, the capacity of the local higher education system affects the intensity of the competition and determines the type of TNE activities to be pursued (HE Global, 2016; McBurnie & Ziguras, 2007).

There are five institutions accredited as universities in Malta:

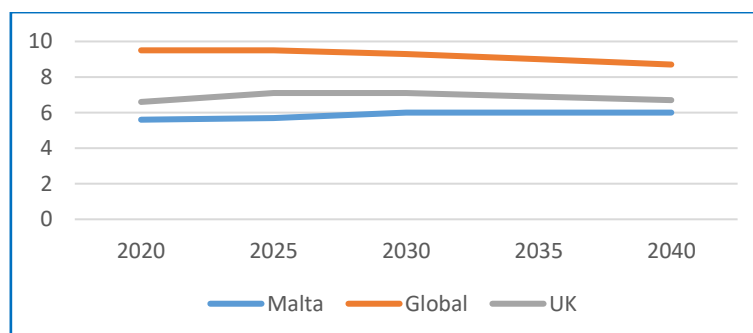
1. American University of Malta
2. Barts and The London School of Medicine and Dentistry
3. European Graduate School
4. Middlesex University – Malta
5. University of Malta (self-accrediting institution)

The University of Malta is the largest of these institutions in terms of premises, number of students and academic staff. Also, there are 33 Higher Education Institutions and 41 Further and Higher Education Institutions⁴⁰. These institutions are eligible to offer course from MQF level 1 to level 8. Within these institutions, is the Malta College of Arts, Science & Technology (MCAST), which is a public HEI. It has to be noted that a several of these institutions are small and offer a limited range of courses in levels 1 to 4. Also, several of these institutions offer vocational courses in specialised subjects (i.e. aviation, dance) and English as foreign language. The evidence show that Malta's HE system has extensive capacity which is scattered across different areas and types of providers.

Demographic trend

Demographics play a key role in the course of determining current and future demand for higher education (Sa, Florax & Rietveld, 2004). The indicator used in the adapted PDM to measure the demographic trend is the percentage of 13-18-year-olds per 100 total population. The data gathered is about the expected % of population in 13-18 years age range over a period of 20 years (2020-2040). Malta's expected rate is compared to the Global average and the UK rate. As shown in figure 2.6 below, Malta is slightly below the UK rate (5.6% vs 6%) but substantially lower than the global average (5.6% vs. 9.5%). Across the period of the next 20 years, Malta's population of 13-18-year-olds is expected to stay stable as a proportion of the total population. Overall, there are no evidence to support an expectation of a potential demographic expansion in the local demand for higher education.

Figure 2.6 - % of 13-18-year-olds per 100 total population



⁴⁰ This excludes government bodies which are not offering education programmes but are obliged to be accredited. The full list of licensed institutions is available here: https://ncfhe.gov.mt/en/register/Pages/list_licensed_institutions.aspx

D. Context of firm rivalry

The context of firm rivalry will determine the competitiveness of Malta's higher education sector. Specifically, for TNE, this refers to the government regulation for TNE, the recognition of TNE qualifications, the ease of doing business, and the income per capital.

Government regulation for TNE

The national legislation for the establishment and operation of TNE will impact the intensity of the competition in the host country (McBurnie & Ziguras, 2007). Malta has a laissez-faire approach towards TNE. The national legislation allows the establishment of foreign institutions with degree awarding powers in the context of the National Qualification Framework (levels 5 to 8). This provides a very favourable environment for the development of TNE. This explains the large number of providers across different levels within the tertiary level (5-8). Several of these providers use TNE arrangements – the majority is franchising and validation.

Recognition of TNE qualifications

A critical factor of success and survival of TNE activities is the recognition of TNE qualifications (Wilkins, 2016; Hoare, 2012). One of the most attractive elements of Malta's policy environment is the clear and simplified recognition process of TNE qualifications. Any TNE qualification, which has been approved by the NCFHE, is fully recognised under the MQF. Consequently, foreign institutions can explore the full spectrum of TNE models, including online/distance learning provision. Additionally, the recognition of TNE qualifications creates the potential for innovation in TNE development by combining different models.

Ease of doing business

Administrative and other processes often act as barriers to entry in the development of TNE (Tsiligiris, 2015). "Ease of doing business" is a universal indicator used to assess a country's administrative and regulatory environment. Malta is in position⁴¹ 84 out of 190 countries in the overall score World Bank's ease of doing business. This reflects the welcoming environment for foreign investment and business activity, including higher education.

Income

One of the key drivers for the development of TNE is the inability of local students to bear the financial cost of studying abroad. As an economical alternative, they choose to study locally on a foreign programme offered through a TNE arrangement. This implies restrictions for the exporting and importing institution in setting fees at the same level as the home campus. The greater the difference in the income between the TNE exporting and host countries, the greater would be the pressure to set fees at a lower level. The GDP per capita⁴² in Malta is \$25,145 and it compares as shown in table 2.3 below in relation to the GDP per capital of major 1) TNE host (Malaysia, Singapore, China, Hong Kong, Egypt) and 2) TNE exporting (UK, US, and Australia) countries.

⁴¹ <http://www.doingbusiness.org/data/exploreeconomies/malta>

⁴² <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD>

Table 2.3 - GDP per capita Malta vs. TNE exporting and host countries

Country	GDP per capita	Malta GDP per capita as %
Malta	25,145	
Malaysia	9,508	265%
Singapore	52,962	48%
China	8,123	310%
Hong Kong	43,741	58%
Egypt	3,477	723%
UK	40,367	62%
US	57,638	44%
Australia	49,755	51%

Considering the GDP per capita, and the wider positive economic environment in Malta, TNE exporting countries might consider advanced modes of TNE (e.g. international branch campus and other forms of physical presence). These models are resource intensive and therefore have higher start-up costs, hence fees should be higher than other forms of TNE (e.g. franchising, validation).

Summary of findings

The country possesses a strong set of factor conditions - e.g. the wide use of English, the quality of human capital, and high quality IT infrastructure – that create a positive environment for the development of TNE and generally the presence of foreign higher education institutions. Similarly, the context of firm rivalry includes a very supporting national legislation for TNE and an efficient and transparent framework for the recognition of TNE qualifications. In conjunction with the welcoming environment for foreign investments, the favourable factor conditions and firm rivalry create the prospects for innovative forms of TNE (i.e. combining different forms of TNE, exploring blended modes).

Based on the findings from the application of the PDM presented in part B above, TNE exporting countries can consider Malta as a potential TNE host country for advanced models of TNE, such as international branch campuses (IBCs). However, due to the large number of providers in the country, the restricted size of the local student market, and the limited availability of physical space, there needs to be careful consideration of the size and the portfolio of academic programmes of any new IBCs.

Online/distance learning is another area of TNE where Malta has clear advantages as host country. There is a clear legal framework for the accreditation of online/distance learning programmes in the context of the Malta Qualification Framework.

PART THREE

Strategy recommendations

PART THREE: Strategy recommendations

The aim of this part is to provide strategic recommendations that will shape Malta's strategy to become an international higher education hub. These recommendations reflect on the findings from the previous two parts of this report and the wider evaluation of the international higher education market.

Increasing the inflow of international students is a strategic priority for Malta. As has been mentioned earlier in the report, recruiting international students is a very competitive process as more countries are aspiring to become study destinations for international students. To formulate an effective strategy for the recruitment of international students, one needs to comprehend the key factors that drive their decision-making process. According to the relevant literature (Beine, Noël & Ragot, 2014; Mazzarol & Soutar, 2002; Caruso & Wit, 2015; Kritz, 2015), some of the key factors that drive the decision of international students are⁴³:

1. Availability of programmes taught in English.
2. Employability prospects for graduates. This refers to employment opportunities after graduation, either in the country where the degree is awarded, or abroad.
3. Reputation of the programme and the institution.
4. Reputation of the country as an international student destination.
5. Overall cost (i.e. fees, housing, recreation)
6. Safety and wellbeing.

Malta needs to avoid adopting a mentality of *"if we build it, they will come"*, which is usually adopted by countries who aspire to become education hubs. Instead, Malta needs to capitalise of its strengths which relate to key factors above that drive the decisions of international students. For example, most of higher education programmes in Malta are taught in English as English is one of the official languages in the country. Also, there is a thriving business community which creates a sustained demand for graduates. Malta has an advanced policy and regulatory framework, which promotes all forms of transnational education. This could attract foreign universities who can contribute in developing and strengthening further the reputation of Malta as destination for international students.

The main challenges for Malta in becoming an international education hub are: 1) its remote location⁴⁴; 2) the large number of existing HE and FE providers; and 3) the limited physical space.

Malta will need to adopt a higher education strategy that will reflect the country's advantages aligned with the priorities of international students and international higher education. This strategy will require significant effort and resources. However, subject to a coordinated strategy that will involve all key stakeholders, it is an objective that other countries have achieved in the medium term (2-3 years).

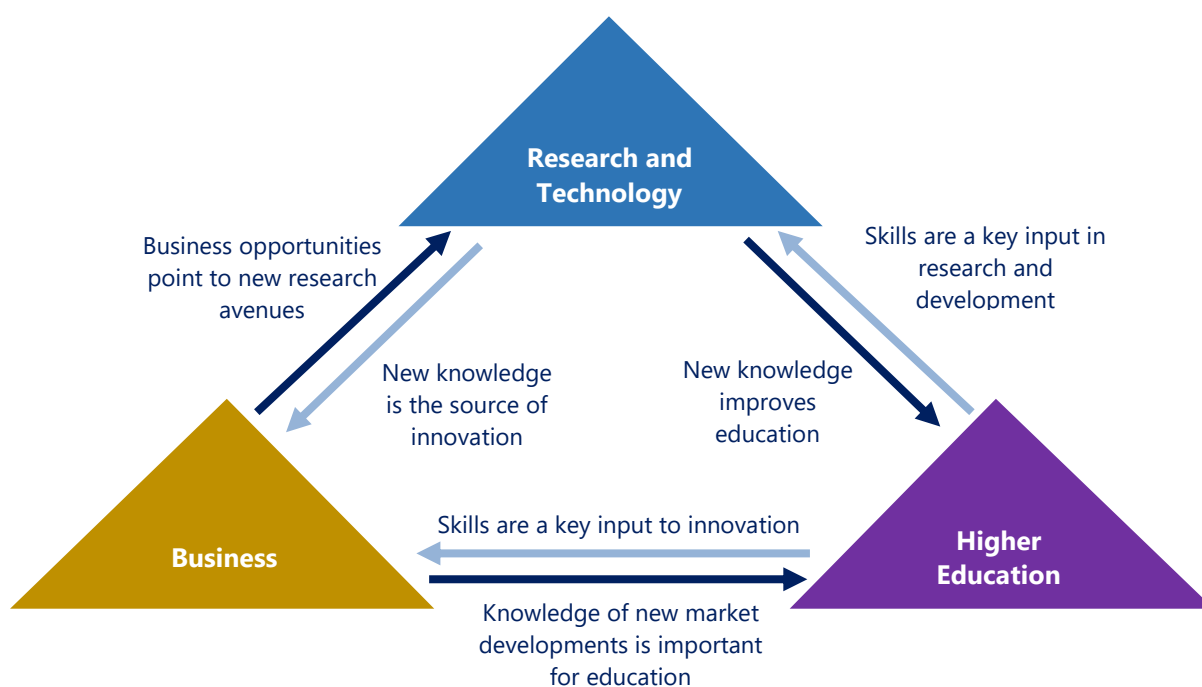
⁴³ In no particular order

⁴⁴ Malta is connected to most European capital cities with direct flights. However, there are no direct flights with countries in Asia, Africa, or America. This might impose some restrictions to international student mobility.

Strategy model

One option Malta could use to develop an innovative strategy for higher education is by reflecting on the knowledge triangle. The knowledge triangle (figure 3.1) is used by the European Commission⁴⁵ to describe the connections between the three pillars of a knowledge-based society and economy. These three pillars are: 1) Education; 2) Research and technology; and 3) Innovation. The three pillars interact and depend on each other to create added value and contribute in the development of a knowledge-based society and economy.

Figure 3.1 – The knowledge triangle



Considering the presence of a strong internationalised business community, Malta could adopt a strategy that would utilise the business community in the country to create higher education and research programmes that would be attractive to local and international students.

An outline of the proposed higher education strategy for Malta is outlined in figure 3.2 below. This has two key priorities: 1) boost the employability and working experience of graduates through the integration of experiential learning⁴⁶ and work experience opportunities in academic programmes; and 2) seek to promote the research and innovation activity which will contribute to the development of a knowledge-based economic model.

Employability and, more importantly, employment opportunities play an important role to international students' decision about study destinations (Ripmeester, 2016). Developing higher education programmes encompassing employment opportunities and experiential

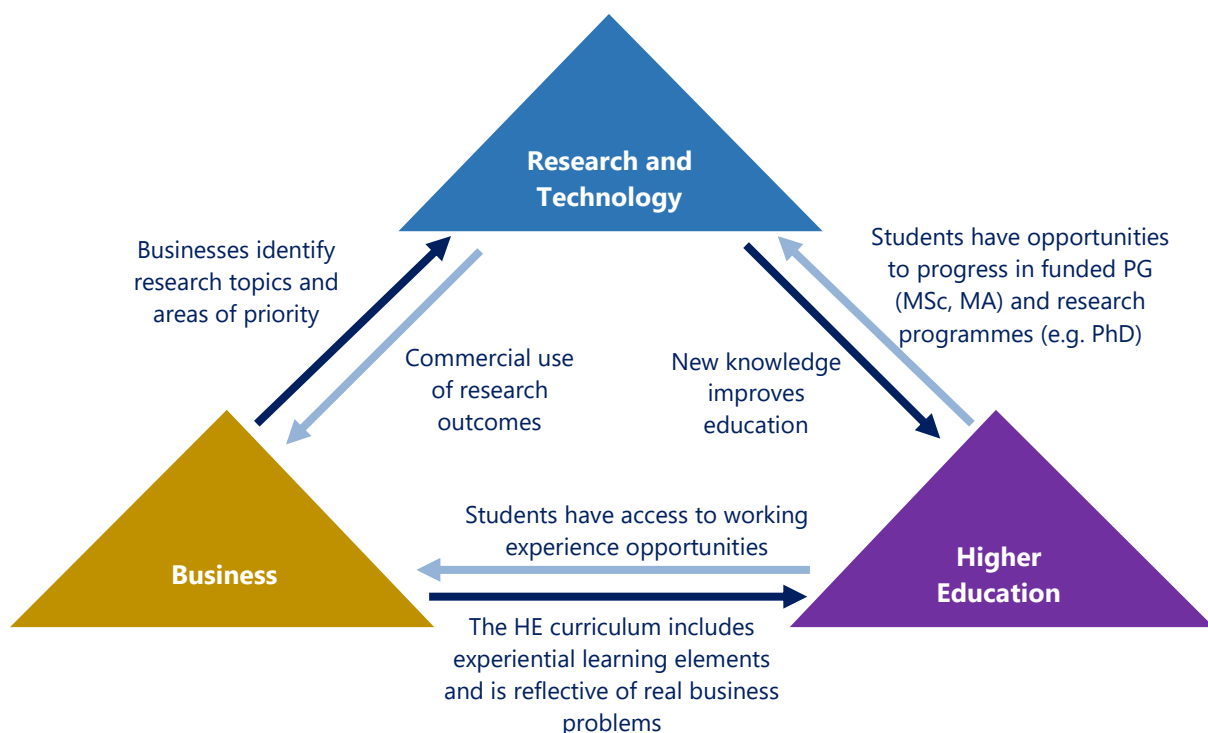
⁴⁵ https://ec.europa.eu/education/policy/higher-education/knowledge-innovation-triangle_en

⁴⁶ Experiential learning can be summarised as "learning by doing". It involves immersing learners in a real-world experience where they are asked to apply the theory. Reflection is of critical importance to develop new skills, attitudes, and ways of thinking (Kolb, 2014).

learning elements, will allow Malta to create a competitive higher education provision proposition for international students. For example, an attractive curriculum proposition would be that higher education programmes include teaching and assessment components which are based on real business problems. Similarly, higher education programmes could provide students with opportunities to gain work experience (e.g. internships, placements). By creating a closer link between higher education and businesses, graduates will have increased employment prospects. Considering the significant influence of employment prospects for the decision of prospective students, Malta would provide an attractive value proposition to local and international students.

Another key priority of this strategy should be to promote research activity and increase the number of postgraduate and doctoral students in the country. Research is central to the knowledge triangle as it plays a key role in promoting innovation and advancing knowledge which is used to update the curricula of higher education programmes (EIT, 2012). At the same time, research outputs are a key driver for improving institutional and country reputation in international higher education. To achieve this, within the context of a knowledge triangle model, the government needs to prioritise the development of postgraduate (e.g. MSc, MA) and research (e.g. PhD) programmes which would be co-funded by 1) Businesses, 2) HEIs; and 3) the government. In this way, PhD programmes will become attractive to high-performing local and international students. This is would not be only because they are fully funded, but primarily due to their innovative design that is fully reflective of the knowledge triangle and allows students to see the connection between the three pillars and the potential benefits by this interaction. The existence of these programmes will facilitate the bidirectional flow of outputs between HE, research, and businesses which is essential for a knowledge-based economy.

Figure 3.2 – A higher education strategy for Malta based on the knowledge triangle



Strategic actions

Below is a list of specific strategic actions which derive from the strategic model proposed in the previous section.

Development of provision

- Selective development of smart international branch campuses by foreign universities with global reputation. Smart IBCs are branch campuses with flexible organisational structures that would utilise small scale physical infrastructure and rely more on information technology. These IBCs should offer academic programmes in subjects of strategic importance to the Maltese economy and where there is significant business activity. According to the Central Bank of Malta (2016), this includes the services sector and specifically tourism, health, retailing, banking and financial services, maritime, aviation, professional services, back-office administration, information technology and gaming.
- Seek to integrate experiential learning and opportunities for working experience across all HE programmes.
- Develop Masters and PhD programmes which are co-funded by businesses, HEIs, and the government. These programmes should be branded as being supported by a consortium of private and public organisation.
- With the support of businesses, prioritise the development of business incubators inside HEIs. These should aim to commercialise and monetise the research outcomes of the co-funded PG and PhD programmes.

Marketing

- The government needs to work together with the accredited HEIs in building the brand of Malta as a destination of international students. This requires a coordinated effort which should be based on a common marketing strategy that will look to identify the country's unique selling points (USPs) as destination for international students.
- Facilitate a central system of applications for entry to undergraduate and postgraduate programmes.

Quality and student experience

- Capture the feedback of home and international students via an annual student experience survey. The outcomes of the annual student experience survey can be used to inform plans for improvements at institutional and sector levels. Also, the evaluations of students for the different HEIs can be used to inform the decision-making process of prospective students.
- Create national ombudsman services for students and identify a process for reporting and resolving student complaints.

References

- Beine, M., Noël, R. & Ragot, L. (2014) Determinants of the international mobility of students. *Economics of Education Review*. [Online] 41, 40–54. Available from: doi:10.1016/j.econedurev.2014.03.003.
- British Council & DAAD (2014) *Impacts of transnational education on host countries*. [Online]. pp.1–76. Available from: https://www.daad.de/medien/hochschulen/projekte/studienangebote/2014_e003_tne_study_final_web.pdf
- Caruso, R. & Wit, H. de (2015) Determinants of Mobility of Students in Europe Empirical Evidence for the Period 1998–2009. *Journal of Studies in International Education*. [Online] 19 (3), 265–282. Available from: doi:10.1177/1028315314563079.
- Dutta, S., Lanvin, B. & Wunsch-Vincent, S. (2017) *Global Innovation Index 2017*.
- EIT (2012) *Catalysing Innovation in the knowledge triangle*. [Online]. Available from: http://eit.europa.eu/fileadmin/Content/Downloads/PDF/Key_documents/EIT_publication_Final.pdf
- Finnie, R. & Usher, A. (2005) *Measuring the quality of post-secondary education: Concepts, current practices and a strategic plan*. [Online]. CPRN= RCRPP. Available from: http://rcrpp.org/documents/35988_fr.pdf
- Grant Thornton (2016) *Recruiting international students. Higher Education report 2016*. [Online]. pp.1–12. Available from: <https://www.grantthornton.ie/globalassets/1.-member-firms/ireland/insights/publications/grant-thornton---recruiting-international-students.pdf>
- Grech, A.G. (2016) *Understanding the Maltese economy*. Valletta, Central Bank of Malta.
- HE Global (2016) *The Scale and Scope of UK Higher Education Transnational Education*. pp.1–102.
- HEPI, Kaplan & London Economics (2018) *The costs and benefits of international students by parliamentary constituency*. [Online]. pp.1–87. Available from: <http://www.hepi.ac.uk/wp-content/uploads/2018/01/Economic-benefits-of-international-students-by-constituency-Final-11-01-2018.pdf>.
- Hoare, L. (2012) Transnational Student Voices Reflections on a Second Chance. *Journal of Studies in International Education*. [Online] 16 (3), 271–286. Available from: doi:10.1177/1028315311398045.
- Hou, A.Y.-C., Morse, R. & Wang, W. (2015) Recognition of academic qualifications in transnational higher education and challenges for recognizing a joint degree in Europe and Asia. *Studies in Higher Education*. [Online] 1–18. Available from: doi:10.1080/03075079.2015.1085010.
- Ilieva, J., Tsiligiris, V., Killingley, P. & Peak, M. (2017) *The shape of global higher education (vol. 2): international mobility of students, research and education provision*. pp.1–40.

- Knight, J. (2013) *International Education Hubs: Student, Talent, Knowledge-Innovation Models*. 2014 edition. New York, Springer
- Kolb, D.A. (2014) *Experiential learning: Experience as the source of learning and development*. London, FT press
- Kritz, M.M. (2015) Why Do Countries Differ in Their Rates of Outbound Student Mobility? *Journal of Studies in International Education*. [Online] . Available from: doi:10.1177/1028315315587104
- Lawton, W. & Jensen, S. (2015) *An early-warning system for TNE. Understanding the future global network connectivity and service needs of UK higher education*. [Online]. pp.1–31. Available from: https://community.jisc.ac.uk/system/files/17659/JR0030_PS-TNE-DOC-092%20V3.0%20080115_Summary-External_FINAL_0.pdf
- Lindsay, V. & Antoniou, C. (2016) Applying foreign entry market strategies to UK higher education transnational education models. *Perspectives: Policy and Practice in Higher Education*. [Online] 20 (2–3), 51–58. Available from: doi:10.1080/13603108.2015.1062058
- Mazzarol, T. & Soutar, G.N. (2002) “Push-pull” factors influencing international student destination choice. *International Journal of Educational Management*. [Online] 16 (2), 82–90. Available from: doi:10.1108/09513540210418403
- McBurnie, G. & Ziguas, C. (2007) *Transnational education: issues and trends in offshore higher education*. New York, Routledge.
- Mellors-Bourne, R., Jones, E. & Woodfield, S. (2015) *Transnational education and employability development*. [Online]. pp.1–70. Available from: <https://www.heacademy.ac.uk/sites/default/files/resources/TNE%20and%20employability%20development.pdf>
- OECD (2017) 00000. *Education at a Glance 2017*. Education at a Glance. [Online]. OECD Publishing. Available from: doi:10.1787/eag-2017-en
- Ratten, V. (2016) International Collaboration and Knowledge Transfer among Universities and Firms Affecting Regional Competitiveness. *Thunderbird International Business Review*. [Online] 58 (1), 91–93. Available from: doi:10.1002/tie.21724.
- Ripmeester, N. (2016) Internationalisation and Employability. In: Elspeth Jones, Robert Coelen, Jos Beelen, & Hans de Wit (eds.). *Global and Local Internationalization. Transgressions: Cultural Studies and Education*. [Online]. SensePublishers. pp. 121–127. Available from: doi:10.1007/978-94-6300-301-8_17.
- Sa, C., Florax, R.J. & Rietveld, P. (2004) Determinants of the regional demand for higher education in the Netherlands: A gravity model approach. *Regional Studies*. 38 (4), 375–392.
- Stafford, S. & Taylor, J. (2016) Transnational education as an internationalisation strategy: meeting the institutional management challenges. *Journal of Higher Education Policy*

- and Management*. [Online] 38 (6), 625–636. Available from:
doi:10.1080/1360080X.2016.1202811.
- Tomlinson, M. (2016) The impact of market-driven higher education on student-university relations: Investing, consuming and competing. *Higher Education Policy*. 29 (2), 149–166.
- Tsiligiris, V. (2015) *Cross-border higher education and quality management*. Ph.D. [Online]. Birmingham City University. Available from:
<http://ethos.bl.uk/OrderDetails.do?did=1&uin=uk.bl.ethos.638451>
- Tsiligiris, V. (2014) *Transnational Education vs International Student Mobility: Substitutes or Distinct Markets?* [Online]. pp.1–53. Available from:
http://www.obhe.ac.uk/documents/view_details?id=952.
- University of Oxford (2017) *International Trends in Higher Education 2016-17*. [Online]. pp.1–24. Available from:
http://www.ox.ac.uk/sites/files/oxford/trends%20in%20globalisation_WEB.pdf
- Wilkins, S. (2016) Establishing international branch campuses: a framework for assessing opportunities and risks. *Journal of Higher Education Policy and Management*. [Online] 38 (2), 167–182. Available from: doi:10.1080/1360080X.2016.1150547
- Wilkins, S. & Urbanovič, J. (2014) English as the Lingua Franca in Transnational Higher Education Motives and Prospects of Institutions That Teach in Languages Other Than English. *Journal of Studies in International Education*. [Online] 18 (5), 405–425. Available from: doi:10.1177/1028315313517267
- Witze, A. (2016) Research gets increasingly international. *Nature News*. [Online] Available from: doi:10.1038/nature.2016.19198

Appendix

A. The British Council framework

International student mobility	
Policy Environment and support for international student mobility	
Internationalisation strategy	Has the ministry of education (or equivalent) produced a detailed international higher education strategy (e.g. covering student mobility, research collaboration, development goals)?
Dedicated body	Is there a dedicated body (or bodies) promoting the internationalisation of higher education?
Overseas presence	Does the ministry of education or dedicated internationalisation body have a significant overseas presence, e.g. by way of overseas representative offices or participation in conferences, trade fairs and marketing events?
Bilateral agreements	Over the past five years, has the government made efforts to sustain or increase the number of bilateral agreements/MoUs signed between itself and foreign education ministries on the topic of collaboration in higher education?
Fees for foreign students	Do public institutions have the authority to charge different fees to foreign students?
Data collection and monitoring of internationalisation	Does the government monitor and produce data on the internationalisation of its higher education system, e.g. by producing data on international students and faculty mobility, programme and provider mobility and research collaboration?
Student Visas	
Student visas	Are procedures for foreign students to obtain visas clear, transparent and consistent?
Visa procedures for international students	Do restrictions exist on foreign students and researchers to obtaining entry visas, e.g. depending on country of origin?
Living / working environment for international students	Do policies exist to make it easier for foreign students to come and live in the country, such as concerning employment (including post study employment opportunities), bringing spouses?
Fees for foreign students	Do public institutions have the authority to charge different fees to foreign students?
Quality Assurance, selection of international students and degree recognition	
Entry / selection criteria for international students	Are education institutions provided with timely information, support and guidance by academic recognition bodies (or other bodies) to help select appropriately qualified foreign students for entry?
Code of practice for teaching / assessing international students	Are there national bodies or other systems in place to monitor, revise and advise on institutions' procedures for teaching and assessing foreign students, e.g. by way of best-practice surveys, advisory bodies or networks?
Foreign degree recognition	Is the process taken by national academic recognition bodies in recognising foreign qualifications clear, transparent, and consistent?
Student mobility scholarships and sustainability policies	
Inbound scholarships / access to student loans for international students	Do scholarship programmes for foreign students exist, are they well-publicised and are they available at all levels of study?
Outbound scholarships / access to student loans for study abroad	Do scholarship programmes for studying abroad exist, are they well-publicised and are they available at all levels of study?
Anti-displacement policies	Does the state actively seek to avoid the displacement of low-income or marginalised domestic students by foreign students, e.g. by way of quotas, grants or scholarships?
Foreign language and intercultural competence policies	Does the government have policies in place to promote second language competence and intercultural awareness?
Policies / guidelines for engagement with recruitment agents	Are there policies or procedures in place to advise local institutions on how best to engage with international agents for the recruitment of international students?

Transnational education	
International mobility of academic programmes and HEIs	
Setting up operations by foreign institutions	Can foreign institutions set up their own legally recognised teaching/research entities?
Cross border programme provision	Do regulations exist to allow for the provision of cross-border programmes by foreign providers, e.g. by way of twinning, programme articulations and distance learning?
Clarity and application of regulations for foreign institutions	Are legal regulations for foreign institutions clear, transparent and evenly enforced?
Domestic institutions abroad	Are public domestic institutions permitted to set up legally recognised teaching/research entities abroad?
Quality assurance of programme and provider mobility	
Monitoring of foreign institutions	Do national quality assurance agencies regularly monitor, and if appropriate, accredit the cross-border activities of foreign institutions (e.g. distance learning, programme collaboration, branch campuses) in the home country of the quality assurance agency?
Monitoring of domestic institutions overseas	Do national quality assurance agencies advise, monitor and accredit the cross-border activities of domestic institutions' (e.g. distance learning, programme collaboration, branch campuses)?
Enforcement action	Are national quality assurance agencies active at enforcing their standards and requirements, either for foreign institutions, domestic institutions overseas, or both if appropriate?
Collaboration with regional / international QA agencies	Do national quality assurance agencies take an active part in international collaboration on quality assurance standards, e.g. by adopting the UNESCO/Council of Europe 'Code of Good Practice in the Provision of Transnational Education' and by taking part in regional and international networks?
Recognition of TNE qualifications	
Recognition of TNE qualifications	Do national academic recognition bodies make efforts to recognise TNE qualifications, e.g. by way of guidelines or TNE code of good practice?
Collaboration with regional / international recognition agencies	Do national academic recognition bodies take an active part in attempts to improve recognition procedures across borders, e.g. by signing up to UNESCO regional conventions; the Bologna Process, and, where appropriate, by establishing bilateral agreements on degree recognition?
Communication with labour market	Do national academic recognition bodies work to provide clear and timely information to the labour market and other professional bodies on the comparability of foreign / TNE qualifications?

International Research Engagement	
Visa policies for researchers and academics	
Academic visas	Are there any special visas or policies in place to make it easier for foreign teaching faculty and researchers to gain employment?
Visa procedures for academics	Are procedures for foreign teaching faculty and researchers to obtain visas clear, transparent and consistent?
Living / working environment for academics	Do policies exist to make it easier for foreign faculty and researchers to come and live in the country, such as concerning employment, bringing spouses?
Funding for academic/research mobility and sustainability	
Outbound academic programmes	Do funding programmes exist for teachers and researchers to undertake posts abroad?
Inbound academic programmes	Do funding programmes exist to allow foreign teachers and researchers to undertake posts in the home country?
Anti-brain-drain policies	Does the government actively seek to counteract brain drain by attracting outbound students and scholars to return home, e.g. by offering employment or by linking return to funding?
Government engagement in IHE capacity-building	Does the government engage in development projects to support capacity-building in international higher education either at home or abroad, e.g. by offering grants to students from low-income countries/regions or by investing in technical capacity-building projects
International research engagement	
Inclusion of international research in national assessment/review	Is research produced via international collaboration included in the national research assessment/review?
Funding of international research collaboration	Do funding programmes exist to promote international collaboration in research...addressing issues of global importance...agreements between national and foreign funding bodies....

B. The Maltese Qualifications Framework

8	Doctoral Degree	
7	Master's Degree Post-graduate Diploma Post-graduate Certificate	
6	Bachelor's Degree	
5	Undergraduate Diploma Undergraduate Certificate	VET Higher Diploma Foundation Degree
4	Matriculation Certificate Advanced Level Intermediate Level	VET Diploma (iv)
3	General Education SEC Grade 1-5	VET Level 3 (iii)
2	General Education Level 2 SEC Grade 6-7	VET Level 2 (ii)
1	General Education Level 1 School Leaving Certificate	VET Level 1 (i)
B	Introductory Level B*	
A	Introductory Level A*	

* These are not yet included in legislation

Annotations

- i. A Full VET Level 1 qualification should enjoy the same parity of esteem as a Full Secondary School Certificate and Profile (SSC&P) Level 1.
- ii. A Full VET Level 2 qualification should enjoy the same parity of esteem as 4 Secondary Education Certificate (SEC) subjects at Grade 6 and 7.
- iii. A VET Level 3 Qualification should enjoy the same parity of esteem as 6 Secondary Education Certificate (SEC) subjects at Grades 1 to 5.
- iv. A VET Diploma should enjoy the same parity of esteem as the Matriculation Certificate.

MQF Levels	EQF Levels	QF/EHEA Levels	TQF Levels
8	8	3 rd cycle	10
7	7	2 nd cycle	9
6	6		8
6	6	1 st cycle	7
5	5	Short cycle	6
4	4		5
3	3		4
2	2		3
2	2		2
1	1		1
Introductory Level A			
Introductory Level B			