

ODL in an International Context: Trends, Prospects and Challenges



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By Sir John Daniel, Asha Kanwar (Commonwealth of Learning) & Stamenka Uvalić-Trumbić (UNESCO)

Introduction

Thank you very much for the honour of inviting me to give this public lecture during my visit to Namibia. It is very good to be back in your country, which I last visited at the beginning of last year when I was Assistant Director-General for Education at UNESCO. At the time I was most impressed by the work of Namibia Polytechnic and it is a pleasure to be part of your 10th anniversary celebrations.

Dr Jan Alberts suggested the title ODL in an international context: trends, prospects and challenges. This suits me nicely. With the help of two co-authors I want to focus on a manifestation of open and distance learning which is at the same time a trend, a prospect and a challenge.

That manifestation of ODL is cross-border education, sometimes also known as transnational education. I shall ask the simple question, what does cross-border higher education mean for the developing world? I have prepared this public lecture with Asha Kanwar, my colleague at the Commonwealth of Learning who leads our work in higher education, and my former colleague Stamenka Uvalić-Trumbić, of UNESCO's Division of Higher Education.

We shall begin by asking what cross-border higher education is. Then our key question is whether cross-border higher education can help developing countries provide higher education for their citizens. To do so it has to meet three challenges: the three 'A's of accessibility, availability and affordability.

So we shall first examine trends in higher education by recalling the Declaration of the 1998 World Conference on Higher Education. This will set the scene for looking at the reality of cross-border HE in three very different developing countries on three continents: India, Jamaica and Sierra Leone. We shall conclude from these cases that cross-border HE is today making a negligible contribution to the provision of higher education that is accessible, available and affordable in developing countries.

How might this unfortunate situation change for the better? The work of C.K. Prahalad, in his book, *The Fortune at the Bottom of the Pyramid*, provides some pointers. They challenge cross-border education radically to change its cost structures and approaches in order to serve millions of people who are now deprived of higher education.

How might such radical changes occur? The electronic delivery of services is changing business models dramatically. Electronic delivery could transform cross-border HE - provided that it exploits the breakthrough of open source software in the management of learning and the use of learning objects.

Finally, assuming that cross-border providers can rise to the challenge, governments will have to create quality assurance and accreditation frameworks for some potentially very large providers. We shall point to recent work by UNESCO and the OECD to show how they could do this. That is the plan. Now back to the beginning.

What is Cross-Border Higher Education?

First, what is cross-border higher education? UNESCO and the OECD, in their *Guidelines for Quality Provision in Cross-Border Higher Education*, state that:

'Cross-border higher education includes higher education that takes place when students follow a course or programme of study that has been produced, and is continuing to be maintained, in a country different from the one in which they are residing. Cross-border higher education may include higher education by private and/or for-profit providers.'

Clearly the term 'cross-border' implies an acceptance of national borders. This in turn implies recognition of the roles and responsibilities of national governments within their jurisdictions for overseeing the national HE system. The border is also a symbol for the special political, social and cultural identity found within the national space.

National sovereignty over higher education has been reinforced by the General Agreement on Trade in Services (GATS) of the World Trade Organisation. The prospect of trade in higher education services has alarmed some academics and heightened awareness - and also fear - of cross-border HE, which is clearly a spin-off of globalisation. Some worry that cross-border higher education, like other manifestations of globalisation, will have a harmful impact, on developing countries

Cross-border higher education can originate from various sources, not just from conventional or open universities, but also from media companies, multinational companies, corporate universities, networks of universities, professional organizations, and IT companies[1].

The GATS, the General Agreement on Trade in Services, recognises four modes of trade. First there is consumption abroad, where students travel to another country to study, as all three co-authors of this paper once did. Second, there is the presence of natural persons, which in academic terms means visiting

scholars or teachers. Although people cross borders in both cases, neither of these traditional forms of academic exchange falls within the UNESCO/OECD definition.

That focuses on the other two forms of trade, defined by the GATS as cross-border supply and commercial presence, but better known to us as distance education and the establishment of branch campuses. These are the forms of cross-border higher education that have created a polarised debate by raising fears of cultural imperialism and loss of sovereignty.

This is the debate that I want to engage with you. What does cross-border higher education mean for developing countries? Could it not be that cross-border education might help developing countries to address the huge challenge of expanding higher education? At a time when age participation rates in HE in the industrialised world approach 50% or more, APRs in many developing countries are still in single figures. Cross-border higher education could, in theory, help to increase access and keep in the country some young people who might otherwise migrate abroad to study and stay there.

What is the reality? First, what are the priorities of developing countries for higher education? Second, what does the evidence tell us about the contribution of cross-border HE to these priorities?

Priorities for Higher Education in the Developing World

The most comprehensive statement about the priorities for HE in the developing world came from UNESCO's 1998 World Conference which attracted 4,000 people - including 130 ministers - from 182 countries.

The Conference adopted a World Declaration on Higher Education for the Twenty-first Century and a Framework for Priority Action for Change and Development in Higher Education.

These proposed an international agenda for development that stressed the core missions and values of higher education; notably equitable access, the advancement of knowledge through research, and the need better to define long-term options for higher education in promoting relevance and quality. The Conference concluded that higher education had to embark on the most radical shake-up in its history.

For the developing world the challenge begins, as it usually does, with demography. Forecasts indicate a population of 7 - 8 billion people in the developing countries in 2025 - more than half of them young people.

We have already crossed the threshold of 100 million students worldwide, and numbers are forecast to grow to 125 million before 2020. But this forecast may be too modest. China has recently doubled enrolments in higher education in a short period. Today the five largest national systems of higher education (China, U.S.A., India, Russia and Japan) account for 53.1 million students, which is more than half the world total.

The challenge of absolute numbers is made worse by the great discrepancy between the proportions of

people in developing and developed countries who have access to higher education. 40-50% age participation rates are becoming the norm in developed countries, whereas in some developing countries, especially in sub-Saharan Africa, APRs remain below 5%.[2] Yet people in developing countries want higher education.

Furthermore, here in Africa we have seen a strong renewal of commitment to HE in recent times. As President Mbeki of South Africa said late last year: '...our entire continent remains at risk until the African university, in the context of a continental reawakening, regains its soul'.

Can Cross-Border HE Help?

This brings us to the key question: can cross-border higher education help meet the challenge of rising demand? Or will cross-border higher education, like the failed expectations of the dotcom frenzy, become a casualty of too much hype and too little performance?

History is instructive. In the 1980's many low-end American universities established branch campuses in Japan, but because of lack of interest from the locals they 'quietly folded their tents... and melted away'. South Africa was likewise an attractive destination for foreign providers in the mid 1990's. But today, of the 38 foreign providers who moved in, only two survived South Africa's strict new accreditation procedures .

Let us look at the cases of three other countries, on three continents, that are positioned at various points on the development spectrum: India, Jamaica and Sierra Leone

Despite having the third largest HE system in the world[3], India can only provide access to 7% of the 18-23 age group. For India to catch up with its neighbours Thailand and Singapore that have APRs of 20% and 34% respectively, it has to find cost-effective mechanisms for expanding access.

Open and distance education is a good way of reaching out to large numbers and today 23% of all HE enrolments in India are in distance education; specifically in 11 open universities and 102 dual-mode institutions. The government's target is that by 2010, 40% of all HE participation will be through distance education. The number of privately managed institutions is also increasing in India, especially in professional disciplines.[4] However, on current trends the target of 14 million students, or a 10% APR by 2007/8, will elude India. Yet the additional market of 5 million students should be tempting for major providers. Could cross-border provision respond to this market?

The number of cross-border providers in India has indeed increased from 27 in 2000 to 114 in 2004. But note that a third of these institutions are not recognised or accredited in their country of origin. An equal number of their Indian collaborators are not part of the formal higher education system either.

Even when the foreign providers are universities, they are not in the premier league and have lowly reputations in their own countries. Neither branch campuses nor franchise agreements have had much success. The only exceptions are 61 twinning and articulation arrangements that allow students to go to

the source country in the final year and stay on for employment purposes.[5] With such figures it is little wonder that cross border HE is a non-issue in India. The enrolments it attracts are negligible in the Indian context

In Jamaica the existing tertiary institutions cater to 14.7% of the conventional age group. The average APR for the Caribbean region is 18%. [6] Jamaica has announced plans to double access to tertiary education by 2010 in three ways: by increasing the provision of distance education; by expanding franchised qualifications from the University of the West Indies to local community colleges; and by collaboration with universities outside the Caribbean.[7]. Existing unmet demand opens the door for cross-border tertiary education and 31 providers are already in the country.[8]

Sierra Leone, a country recently emerged from conflict, has one university (with four constituent colleges) and six teacher training colleges and polytechnics. As well as these public institutions there are private technical and vocational institutions.

The total number of enrolments at the University of Sierra Leone was 5445 in 2002-3; with 5394 in the six other tertiary education institutions put together.[9] The gross tertiary enrolment rates for Sierra Leone are 2.0 %. [10] Comparing this with the 4% enrolment figure for Africa, the National Education Master Plan rightly envisages the need for the 'reorganization and expansion of tertiary education by 2007'. Enrolments are already growing rapidly.

Despite limited facilities and an infrastructure wrecked by eleven years of Civil war, Sierra Leone can also be an attractive destination for cross-border providers. Some are already in the country, such as the little-known St Clement's University, an offshore company registered in the Turks and Caicos Islands in the Caribbean, which offers courses in Management, Information Technology and Development Studies. Providers from the UK, USA and Australia advertise distance learning courses at degree level in the local papers.

What common features emerge from these three country summaries? First, huge unsatisfied demand calls for expansion of access. Second, for-profit cross-border providers are active. Third, these providers are of low quality despite the high costs of their offerings. They tend to cater to an affluent market and have low numbers of enrolments.

Data regarding enrolments in cross-border provision are hard to find and are usually underestimates. The UK's HE Statistics Agency, HESA, recorded 101,645 enrolments of UK transnational delivery (by franchise, branch campuses, and distance learning) in 191 countries across the world in 2002-3.

Even if the absolute numbers have a margin of error, looking at their distribution across the world probably gives a fair picture of where cross-border providers concentrate their efforts. The highest numbers of cross-border students were living in well-developed countries: as measured by their rankings in UNDP's Human Development Index. The largest UK numbers were found in Hong Kong SAR (26th place in the HDI) followed by Singapore (28th) and Malaysia (58th). These are also the main markets for Australian cross-border providers. By contrast, enrolments were 1203 in India, 777 in Jamaica and less

than 100 in 30 African countries taken together (excluding South Africa).[11]

We conclude that cross-border enrolments in countries with low rankings on the Human Development Index are minimal. Indeed, given the unmet demand in those countries, they are practically negligible.[12] The obverse of the coin is that there is now significant and successful cross-border activity among the developed countries. Yet cross-border provision from the developed to the developing world is insignificant.

Our title asked 'what does cross-border higher education mean for developing countries?' From this evidence no developing country should fear cross-border higher education. Instead they should be angry that a possible contributor to the expansion of their higher education systems is not delivering. What can be done to make cross-border HE more relevant?

Can Cross-Border HE do better?

One encouraging sign is the growing exports from one developing country to another. The University of South Africa, UNISA, seems set to become a major provider across Africa - as you in Namibia know very well - and India's Indira Gandhi National Open University, IGNOU, is already targeting niche markets of the Indian diaspora in the Middle East and elsewhere. Cross-border activities now show a north-south divide; but can they become a global phenomenon?

For cross border provision to help the developing world it needs a new approach that addresses the three 'A's' of accessibility, affordability and availability. [13]

Accessibility

Access to quality higher education continues to be a major challenge in the developing world. Decreasing public spending and increasing demand have set the stage for a diverse range of providers, including rogue providers. Countries like India with large and well-developed distance education systems will not provide easy and sustainable pickings for overseas providers. For different reasons, neither will countries with inadequate infrastructure and low bandwidth such as Sierra Leone.

That is because access to higher education also requires access to the technology and allied infrastructure through which education is delivered.

Only 1% of African people are online and 50% of them are in South Africa. Access to technology in Bangladesh is 0.1%. So what success can online provision have in sub-Saharan Africa and South Asia? Despite the great need to throw open access, cross-border education has yet to capture the imagination of the developing world. Today it is peripheral and insignificant.

Affordability

Costs are a major deterrent. Yoshida[14] has shown that conventional distance education is well developed in Asia and costs much less than traditional education. Foreign providers with higher costs cannot compete with local education provision. To succeed, cross-border providers must devise a business model that can take them beyond the elite to reach out to the masses.

The early history of the African Virtual University illustrates this point. At first it delivered programmes by satellite sourced from outside the continent at high cost. This proved not to be viable. Eventually the AVU had to establish itself in Africa and create partnerships with local universities in order to expand its enrolment. The presence of a market does not ensure consumption, because products have to be designed so that needs are converted into sustainable demand.

India has transformed higher education from an elite system to a mass system aimed at the needs of a vibrant democracy. Instead of bucking this trend, overseas providers should flow with the mainstream of national developments. We shall suggest how they might do this in a moment.

Availability

The subjects offered by cross-border providers are limited and liberal education is often a casualty of the demand for more market-driven courses. Programmes are mostly in the areas of Business and Information Technology. Students from different cultures and linguistic backgrounds study the identical courses as in the country of origin, with no recognition of social, cultural and ethnic diversity.

When asked to identify its needs in tertiary education, Samoa listed 'agriculture, health and social development'. St Kitts and Nevis says that its priorities include 'courses built on culture, heritage, health care, teacher training, natural environment and industries'. [15] Cross border education provision will become relevant only when it endeavours to respond to such country priorities.

Responding effectively requires strong partnerships between the overseas provider and local institutions, not just in logistics, but more importantly in determining the content, its relevance and the methods of delivery. For example, the University of West Indies offers a programme in Tourism and Hotel Management, which is a priority area for the region. The cross-border providers do not.

Similarly, a national publicly-funded institution in Sierra Leone offers Peace Studies and Conflict Resolution, not the overseas providers. Unless providers take national priorities into account, they will always be vulnerable to the charge of 'academic dumping'. Cross-border providers could identify niche areas - just as the Tamil Virtual University has done by offering Tamil language courses to the Tamil diaspora from Kuala Lumpur to California.

Cross-Border Education at the Bottom of the Pyramid

Cross-border education should learn from the findings of C.K. Prahalad and his colleagues about 'The Fortune at the Bottom of the Pyramid'. Addressing themselves to multi-national corporations, they point out that there are four billion poor people in the world who aspire to better lives. They urge these corporations to look at their globalisation strategies through a new lens of inclusive capitalism since, 'for companies with the resources and persistence to compete at the bottom of the world economic pyramid, the prospective rewards include growth, profits and incalculable contributions to humankind' (P&H, p1).

Looking at these four billion people through the lens of tertiary education, we note that if they were to achieve an APR of 35% there would 150 million additional students to serve, far more than total current enrolments worldwide. Higher education would, however, face the same challenge as business in serving these people.

It would require 'radical innovations in technology and business models'; changing from the ideal of "bigger is better" to 'an ideal of highly distributed small scale operations married to world-scale capabilities'; and 'helping people improve their lives by producing and distributing products and services in culturally sensitive, environmentally sustainable and economically profitable ways'. Business has found that it requires multiple partners to operate successfully in this environment. Likewise higher education providers would need partnerships with local government authorities, communities, NGOs and financial institutions.

Fortunately one development is greatly helping both business and education to serve the poor. The growing availability of telephone and Internet connections is uniting the world's rich and poor and transforming the digital divide into a digital dividend. Communication links are altering dramatically the way that poor villages in the developing world function. There is a huge opportunity for HE providers, including cross-border providers, to develop new business models and bring education to millions.

By establishing economies of scope they would be able to reach out to the Bottom of the Pyramid and achieve economies of scale. As Prahalad says 'We have proved to the world that if you build a market for the rich, the poor wouldn't participate. If you build a market for the poor, the rich would participate'. [16]

Just as cheap shampoo sachets and brand names can appeal to the poor constituencies, low-cost, high quality and need-based education can reach out to the millions that live below the poverty line but still aspire to education and training for a better future. Costs are critical in developing economies and cross-border providers must address that challenge.

New Technologies for Cross-Border Education

Fortunately, a series of developments in the ways that technology is used hold the promise of making the dramatic reduction in educational costs that is required. These developments combine steadily widening access to information and communications technology, which we call connectivity, with new ways of using connectivity in education. We refer not simply to eLearning, but to the blossoming of the Free Open

Source Software movement and its application to eLearning.

Institutions wishing to introduce eLearning now have available a range of open source Learning Management Systems, which is the term for software platforms that support eLearning. Even more importantly, teachers and institutions around the world are creating and sharing learning materials and courses for use on these platforms, which are known generically as 'reusable learning objects'.

This combination of expanding connectivity and the growing reservoir of open education resources is a revolution and you can learn more about it on the COL website. (See, for example, www.col.org/lor). Previously the use of technology in developing countries often resulted in a transfer of wealth to the developed world: the rich got richer and the poor became poorer. Those days could soon be over. This is not the place to explore in detail how greater connectivity allied to open education resources could reduce the cost and expand the availability of education. In Namibia you have a wonderful example of that change taking place in SchoolNet Namibia.

We believe that this is a route that could open up education to the billions of people at the bottom of the pyramid. Much of this work will, rightly, be done by local providers. However, such a huge market will most likely spark a massive expansion in cross-border provision. How will governments ensure the quality of such provision on their territories? To this we now turn.

The Future of Quality Assurance in Cross-Border Higher Education

Cross-border higher education will not help developing countries unless it is accessible, available, affordable, relevant, and of acceptable quality. Many developing countries lack quality assurance mechanisms. Where they do exist, as in India, they are not properly equipped to cope with cross-border provision. Even though an impressive national agency like the Higher Education Quality Committee in South Africa deals with foreign providers and approves the setting up of branch campuses, distance education from abroad still eludes its grasp.

South Africa has 1408 such students, mostly with UK providers, but as yet there is no procedure for monitoring and quality assuring their programmes. Distance education and online provision is hard to identify and document. So how does one protect students from dubious deliverers and spurious suppliers? Let us look at the three countries we spoke of before: India; Jamaica and Sierra Leone.

India has the National Assessment and Accreditation Council as well as the National Board of Accreditation to accredit its HE and professional institutions. The All India Council for Technical Education, which is responsible for professional institutions, has developed regulations to control the entry of foreign providers into the market for technical education. They require the foreign institution to be accredited in its home country and to give an undertaking that the diploma or degree will be recognised in its country of origin. Furthermore, the foreign provider must partner with an accredited Indian university or institution. India's University Grants Committee has not yet issued its regulations for foreign HE institutions.

The University Council of Jamaica has a dual mandate: it both accredits and has the power to confer degrees and diplomas. All tertiary institutions operating in Jamaica must register with it. Registration includes assessing the staff and support services both in Jamaica and, through a visit to the home campus, in the country of origin.

The Tertiary Education Council in Sierra Leone has the mandate to ensure standards. It hopes to evolve into a Quality Assurance Agency which could possibly regulate the entry of foreign providers such as St Clement's University.

These examples show that much of the developing world still needs to develop regulatory mechanisms for protecting both systems and students. In particular, existing regulations have difficulty coping with the multiple manifestations of distance education.

How can national bodies be equipped to deal effectively with this increasingly complex and diverse phenomenon? What is the role of regional and international bodies in maintaining quality provision? What should be the coordination mechanisms between national and international bodies? How will information be generated and shared?

You know far more than I do about the situation in Namibia, but it seems to me that your country has made a good start in answering some of these questions. I understand that the Namibia Qualifications Authority has a list of 141 private and foreign providers that have applied for accreditation. Although the private providers are Namibian many of their courses, which are mostly in IT, Business and Administration come across the border from elsewhere. The Namibian Qualifications Authority has the mechanisms in place, through its fourteen criteria for accreditation, to ensure that quality is not compromised and that students are not defrauded.

To help other countries address these challenges, in the specific context of cross-border provision, UNESCO is mapping needs and current initiatives for capacity building in the related domains of quality assurance, accreditation and the recognition of new types of qualifications for the labour market.[17]

This mapping reveals major regional variations. All regions display an emerging concern for quality assurance that, sadly, is not matched by adequate human, institutional and financial resources. Moreover, the terms quality assurance, accreditation, registration, licensure, and qualifications recognition are often confused.

Nonetheless, developing countries feel that it is urgent to develop a common understanding of terms and to gain better insights into the different models, criteria and procedures for quality assurance. This will enable them to develop policies for inclusion in national reforms and legislation.

The UNESCO review identified some key preconditions for efficient capacity building in quality assurance. Support from government is essential, as is involving the principal stakeholders at the national level, notably higher education institutions, academic staff and students. The process must also embrace new types of provision of higher education, such as private institutions, distance education, and cross-

border operations. Above all, capacity-building must have a long-term perspective.

A trend to greater regionalisation, accompanied by the ineluctable thrust towards global interconnectedness, is clearly reflected in all reviews. Thus Asia and the Pacific see the need for a nodal point for research and development, as well as a registry for regional expertise. Sub-Saharan Africa has a regional capacity-building strategy employing South-South co-operation so that more sophisticated systems can coach their less advanced neighbours. In the Caribbean, through CARICOM, and in Southeast Europe, there are proposals for the establishment of sub-regional accreditation agencies, even though national sovereignty is jealously guarded in both places.

In all this an overriding prerequisite is to change mentalities by promoting a 'quality culture' that can overcome the traditional resistance to change from the academic community. The continuous involvement of key players and consistent government support are essential for this.

The big challenge for UNESCO and other international organisations is to develop a global response to such diverse regional and national requirements, knowing that the interests of local, regional and global educational communities converge on some topics and diverge on others. The changing role of the nation-state, multiple identities, new dimensions of multiculturalism and international education[18] all make fresh demands on international organisations to redress inequalities and shape new 'supranational policy', through regulation and redistribution.

Cross-border higher education must be placed in the larger context of policy formulation within the "complex web of relationships that extend beyond the nation-state" and embrace other emerging terms and concepts such as 'supranational policy' and 'cosmopolitan democracy'[19].

This demanding environment is the context for the joint work of UNESCO and the OECD on Guidelines for Quality Provision in Cross-Border Higher Education. It arose from UNESCO's on-going work of reviewing the regional conventions on the recognition of traditional qualifications in order to adapt them to new realities.

The Guidelines - which will be further discussed at the 33rd session of UNESCO's General Conference in October, recognise the importance of national authority and the diversity of higher education systems. They present higher education as a vital means for expressing a country's linguistic and cultural diversity, nurturing its economic development and strengthening social cohesion. In addressing six major stakeholders in higher education[20] the guidelines provide examples of good practice that stakeholders can examine and adapt to their own regional and national realities.

The effectiveness of the Guidelines largely depends on strengthening the capacity of national systems to assure the quality of higher education. They are already used by some countries, such as Nigeria, for developing national guidelines in QA and may also be of relevance for Namibia in the same way. Further support to capacity building in quality assurance carried out by UNESCO, by other multilateral organisations and by bilateral donors will sustain and complement the Guidelines.

Exchanging information among a wide range of stakeholders is a good foundation for capacity-building. It also empowers learners and promotes quality 'literacy' when it is shared with students, employers and parents. Data-bases, publications, knowledge repositories for decision-makers on policy issues in higher education, and electronic forums to promote communities of interest in QA and QR are all part of the process.

The policy debates they generate encourage the dialogue across borders that is a prerequisite for the solid international frameworks of quality assurance that can be catalysts of change.

Conclusion

It is time to conclude. We have asked what cross-border higher education means for the developing world. We answer that developing countries need not fear cross-border higher education because for them it is, as yet, insignificant. They ought instead to urge cross-border providers to help them, particularly in catering to the educational needs of their poorest people.

To respond to such a call cross-border providers will need dramatically to cut costs, improve efficiency and become more relevant. Fortunately, combining expanding connectivity with open education resources could allow them to do just that. To prepare for the subsequent explosion of enrolments, countries and regional bodies should strengthen their quality assurance systems. In this, the guidelines for cross-border higher education recently developed by UNESCO and the OECD will be of great service.

It has been a privilege to address you and I hope that our examination, in a global context, of an important trend in open and distance learning has connected in some way with your own concerns and challenges here in Namibia.

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[11] qtd in Richard Garrett, 'Does Crossborder HE make sense for Africa?' Paper for the 11th General Conference of the AAU, Cape Town, February 2005, p 15

[12] (UK Education flourishes most in high HDI countries (65,139) followed by medium HDI countries (33, 534) and finally low HDI countries (2662). Jamaica is ranked 78, India 127 and Sierra Leone 175 in the Human Development Report 2003.

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[15] COL commissioned Report on the Virtual University for Small States of the Commonwealth, 2005.

[16] Times of India, Dec 27, 2004

[17] Initiated by the 2nd Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications, a review of capacity needs and current initiatives for satisfying them covered Africa, the Arab States, Asia and the Pacific, Latin America, the Caribbean, the Mediterranean countries, and South-East Europe.

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[19] Ibid.

[20] Governments, higher education institutions, quality assurance bodies, qualifications recognition and credential evaluation bodies, students' bodies and professional bodies