



Department for
International Trade
国际贸易部

Online higher education provision in China

Understanding opportunities for UK
providers

February 2022

CONTENTS

1. Executive Summary.....	3
2. Introduction and Methodology.....	5
3. The domestic distance learning environment.....	6
3.1 Fully distance learning programmes.....	6
3.2 Distance learning as part of traditional university programmes	14
4. Overseas distance learning provision in China.....	19
4.1 Official recognition of overseas distance learning qualifications.....	19
4.2 Scale of overseas universities' distance learning students in China.....	21
4.3 Partnership and delivery models for UK distance learning qualifications	23
4.4 Profile of students enrolled on overseas distance learning programmes.....	29
4.5 Challenges for UK institutions providing distance learning programmes.....	31
5. Employer and student perceptions of distance learning in China.....	35
5.1 Student perceptions of overseas distance learning programmes	35
5.2 Employer perceptions of overseas distance learning programmes.....	42
6. Conclusions and recommendations	47

1. EXECUTIVE SUMMARY

- Distance learning has played an important role in China's higher education system long before the Covid-19 pandemic. In 2020 more than 8.5 million students in the country were enrolled on distance learning HE programmes, including 3.1 million studying bachelor's degrees and a further 5.4 million on diploma-level programmes. These figures do not include the millions of students whose courses were temporarily moved online during the pandemic.
- However, the number of Chinese students studying UK distance learning programmes is far smaller, standing at only 3,240 in the 2019/20 academic year (again excluding students forced online due to Covid). Distance learning students make up a much smaller proportion of Chinese students enrolled on UK programmes compared to their share of the domestic Chinese HE system.
- Government recognition is the biggest challenge for UK distance learning programmes in China. Qualifications awarded through overseas universities' distance learning programmes are currently not recognised by the Ministry of Education, which means that these degrees cannot be used to gain employment at government departments, state-owned companies, or other companies or institutions that confirm employees' degrees through the Ministry of Education's degree verification system. This lack of official recognition does not prevent private employers from accepting overseas distance learning qualifications.
- During the pandemic period the Ministry of Education has relaxed its policy on accepting qualifications earned through distance learning, allowing students enrolled at overseas universities to study online if it is not possible for them to go abroad. But the Ministry has been very clear that this applies only to students admitted to traditional full-time face-to-face programmes; programmes designed as distance learning from the start will not be recognised.
- Interviews with Chinese employers and with institutions offering online qualifications show that many employers do not see distance learning qualifications as comparable with those earned through traditional degree programmes. This is both because they see the courses themselves as being of lower quality – due to reasons such as less contact between students and academics – and also because distance learning programmes from Chinese universities tend to be much less selective than full-time on-campus programmes from the same universities when recruiting students.
- Employers had little familiarity with overseas distance learning programmes, and their opinions towards these qualifications varied. Some had negative preconceptions, while others – especially multinational companies – commented that they expected overseas distance learning courses to be higher quality than those from Chinese institutions. It is common for HR departments to filter potential employees' CVs for an MoE-approved degree, which would cause difficulties for applicants whose only degree is from an overseas distance learning programme but would allow those who earned a master's degree or second undergraduate degree through distance learning.
- Students who enrol on overseas distance learning programmes tend to be at the middle to senior management level and work in multinational companies, which people in the sector attribute to this type of company having a higher degree of recognition of these qualifications. They almost entirely enrol on master's degree

programmes and are generally self-funded, although a few companies do offer partial funding. Business-related subjects are the most common, with MBA courses being especially common. A second relatively prominent group of distance learning students is foreign citizens who are currently working in China, especially but not only British students; this group of students are looking for internationally-recognised qualifications and are not as concerned as local citizens about Chinese government recognition.

- Some UK institutions cooperate with partners or their own China-based entities to offer local support to students enrolled on distance learning programmes. An example is the University of Manchester, which runs in-person workshops for MBA students via its China Centre in Shanghai; to comply with Chinese laws these modules are optional and do not count for course credit. Similarly the University of London's international programmes are supported by local teaching partners, all of whom are universities. This local support is again entirely optional; all assessment and all compulsory parts of the programme are carried out by the UK university.
- Observers expect distance learning to expand over time, partly due to strong Chinese government support for the sector as well as technological advancement and lessons learned through the Covid-19 pandemic. However, while some expect an increase in blended learning, they do not expect entirely-online courses to displace traditional face-to-face degrees any time soon.
- For overseas distance learning programmes the main hurdle will continue to be government recognition. There are no current plans to recognise online distance learning programmes, but China intends to promote its own education overseas and bilateral agreements to recognise distance learning qualifications may play a role in this strategy over the medium to longer term. Chinese government officials also see quality assurance as an important area for development and see cooperation with partners such as the UK's QAA as a way to develop knowledge and address challenges in both countries.

2. INTRODUCTION AND METHODOLOGY

This market report was researched and written in order to help the UK higher education sector better understand the situation and potential for distance learning higher education provision in mainland China.

The report first provides an overview of China's domestic distance learning system, briefly describing the historical development of this kind of educational programme, the current scale and growth trends in distance learning in the country, the providers delivering this form of higher education, and the relevant regulations surrounding programmes of this type.

It then goes on to discuss distance learning provided by overseas universities to students in mainland China. Section 4 of the report discusses the market context and relevant regulations governing UK and other overseas universities' distance learning programmes within the country, the scale of students following overseas HE programmes through distributed and flexible learning models, and discusses the different models followed by UK universities. This section includes short case studies of several universities' activities in China, including locally-delivered support for distance learning students and cooperation with Chinese partners.

Section 5 discusses employer and student perceptions of distance learning in China. Information on student perceptions is based on interviews with UK HEIs as well as a student survey conducted by the Open University of China examining attitudes towards both domestic and international distance learning programmes, while the findings on employer perceptions are based on discussions with representatives of both domestic companies and multinational companies operating in China. Finally the report concludes with conclusions and recommendations for UK higher education providers considering offering distance learning courses to Chinese students.

While the report briefly touches on the situation of students forced to study remotely due to the Covid-19 pandemic, the main focus of the current research is on programmes designed specifically for distance provision. Unless otherwise stated, all figures refer to programmes designed as distance learning as opposed to those which were originally intended to be based on in-person study.

The scope of this report includes all forms of distance-based learning, including blended programmes as well as purely online delivery. However, detailed information on blended learning is not always available. For example, many students registered with the Open University of China are supported through local study centres, but official statistics do not draw a clear distinction between this and pure online study. Efforts have been made to be clear about the delivery models used when possible, especially for UK provision.

The contents of this report are based on a combination of analysis of primary and secondary source documents, including relevant government policy announcements and published statistics from both Chinese and UK authorities, as well as interviews with relevant higher education institutions, government officials and employers and a student survey conducted by the Open University of China. Wherever possible, sources of information are cited.

3. THE DOMESTIC DISTANCE LEARNING ENVIRONMENT

3.1 Fully distance learning programmes

Distance learning in China has a long history, with Renmin University approved to carry out correspondence courses in 1951¹ while the China Central Radio and Television University – now the Open University of China – recruited its first students in 1979² and – along with its regional branches – became the only institution in China offering higher education programmes through distance learning.

In 1998 China's Ministry of Education announced its Modern Distance Education Initiative as part of a wider Action Plan for Promoting Education in the 21st Century. One of the major effects of this initiative was to open up distance learning provision to four traditional higher education institutions, a total which quickly grew to include 67 different universities with physical campuses as well as the institution now known as the Open University of China.

The institutions involved were all among China's most prestigious universities, with 62 of the 67 now being members of the World Class Universities and Disciplines initiative which aims to identify and support universities with the potential to reach a world-class standard either overall or within specific subject areas. More recently the number of traditional universities offering distance learning programmes has decreased slightly, with five of these 67 universities suspending recruitment to new online programmes. These five institutions are all among China's most prestigious institutions, including Tsinghua University and Peking University which are generally regarded as the top two universities in China; Zhejiang University and Harbin Institute of Technology which are members of the elite "C9 league"; and Sun Yat Sen University which is a member of the World Class Universities and Disciplines initiative at the institution level.

Rather than recruiting students as part of their general recruitment scheme, universities' distance learning students are enrolled in separate continuing and online education colleges and recruited through a separate system which is generally regarded as less competitive than the Gaokao-based standards for conventional undergraduates.

In 2012 five provincial-level branches of China's distance-learning system – including Beijing, Shanghai, Jiangsu, Guangdong and Yunnan – were upgraded to independent university status and renamed as Open Universities. At the same time the Central Radio and Television University was also renamed as the Open University of China.

These five independent provincial open universities have degree-awarding powers in some subject areas but continue to teach students on Open University of China programmes in other subject areas. As of 2017 a little over a third of bachelor's degree students across all five institutions were enrolled on the provincial university's own programmes while the majority were still studying for an Open University of China

¹ Ding, Niu & Han, *Research on distance education development in China*; British Journal of Educational Technology, 2010

² Open University of China, 2021

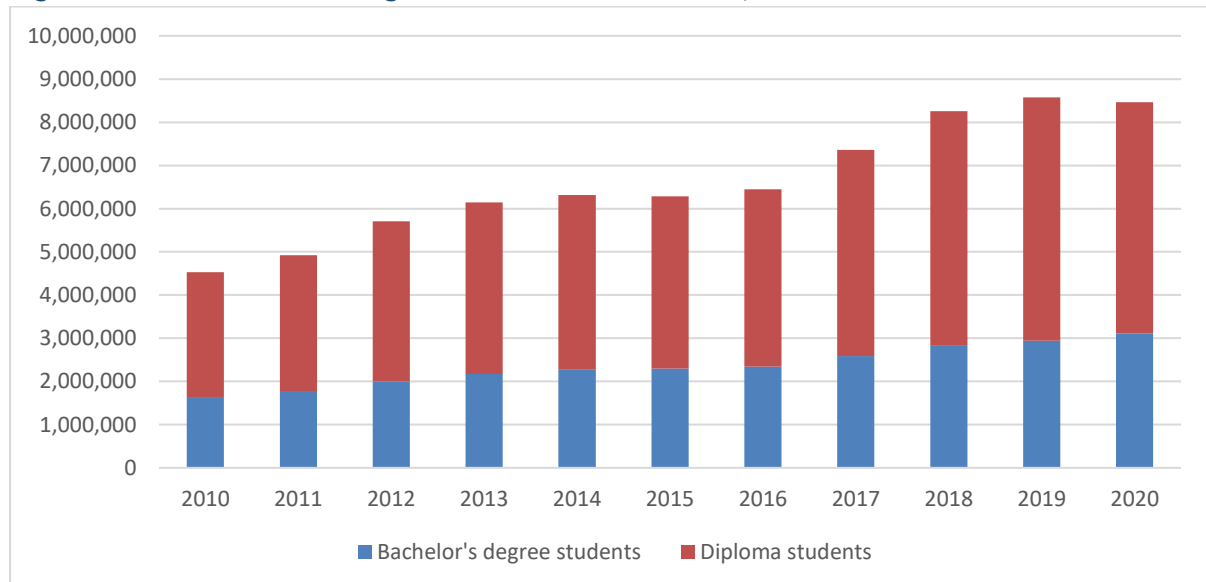
degree; however this proportion varied greatly from institution to institution – 80 per cent of students at Yunnan Open University were studying for a degree from that university, but at Beijing Open University and Guangdong Open University the figures were only 5 and 6 per cent respectively.³

In 2020 the remaining 39 provincial and city-level branches of the Open University of China also transitioned from Radio and Television Universities to Open Universities, but these branches were not given the same independent degree-awarding powers as the five pilot institutions and the Ministry of Education has not announced any plans to expand these powers.

Data from the Ministry of Education shows that a total of 3.11 million students were enrolled on bachelor's degree programmes delivered through online models in 2020 while a further 5.35 million students were enrolled on diploma programmes.⁴ This number has almost doubled over the last 10 years at both levels, while total distance learning HE student enrolments have increased by a factor of 16 compared to the 508,000 students enrolled at Radio and TV Universities in 1998.

However, recent data shows a decrease in students at the diploma level, with a particularly strong drop in new entrants. Students entering online programmes at this level fell from 2.16 million in 2018 to 1.71 million in 2020. This contrasts with (and may be partially caused by) an increase in the number of places available on traditional face-to-face diplomas over the same period. Growth in bachelor's degree entrants has also slowed, which again may be linked to an increase in in-person provision.

Figure 3.1: Chinese online higher education enrolments, 2010 - 2020



Source: Ministry of Education

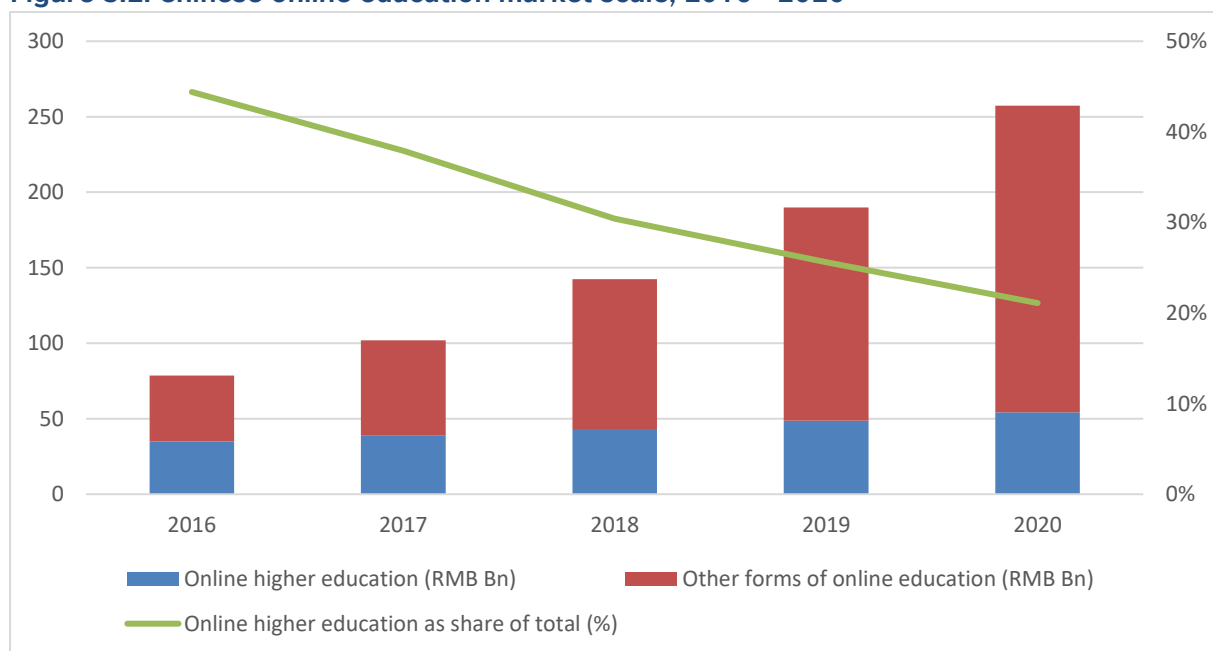
³ Zhang & Li, *Transformation From RTVUs to Open Universities in China: Current State and Challenges*; International Review of Research in Open and Distributed Learning, 2019

⁴ Ministry of Education, 2021. China's diploma programmes (专科) are typically three-year programmes when delivered through full-time courses, compared to a four-year traditional bachelor's degree programme. They can be regarded as roughly equivalent to Higher National Diploma / Diploma of Higher Education programmes in the UK.

Distance learning at the postgraduate level is much more limited in China. Although a number of Chinese universities offer MBA courses on a distance learning model, it is not possible to study an academic master's degree or a PhD through distance learning. This may change over the next few years, as the Open University of China's strategic plan calls for the university to apply for postgraduate degree awarding powers and interviews with staff at local universities suggest that this is a priority at other distance learning providers too.

In financial terms, a recent market research report by iResearch – a Chinese market research consultancy covering a wide range of market sectors – estimates that the total scale of China's online education market more than tripled from around RMB 79 Bn in 2016 to RMB 257 Bn four years later in 2020, equivalent to a compound annual growth rate of 34 per cent. However, this growth was mostly concentrated in the school-age and non-academic sectors, with online higher education programmes falling from almost half of the online education market to a little over a fifth.⁵ Combining this estimate with data on student numbers from the Ministry of Education suggests that average spending per student was around RMB 6,400 in 2020, up from around RMB 5,400 in 2016.

Figure 3.2: Chinese online education market scale, 2016 - 2020



Source: iResearch

Forecasts of market growth in the distance learning market were revised radically downwards in mid-2021 after the Ministry of Education announced unexpectedly strict regulations on private tutoring for school-age students. These regulations ban for-profit after-school training in academic subjects as well as preventing online training for these students from being delivered by non-citizens located outside of China. However, these regulations do not affect online higher education for adult students.

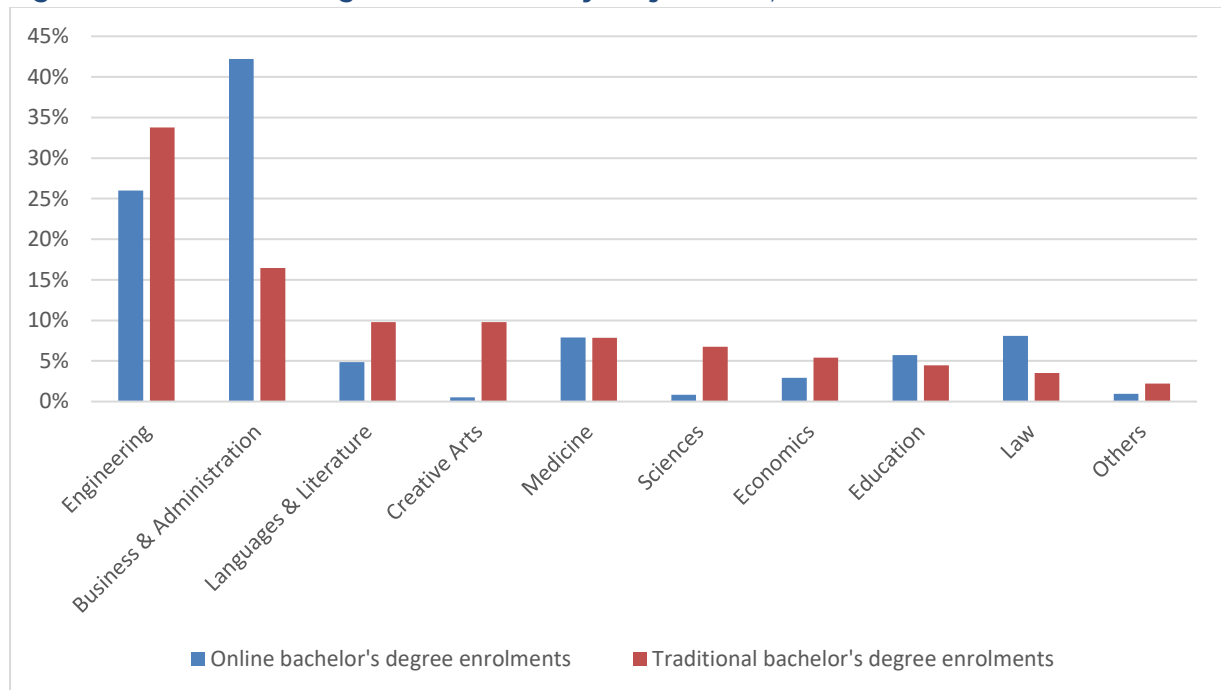
The Open University of China is by far the largest institution offering distance learning programmes in the country. Data from 2018 shows a total of 1.01 million students

⁵ iResearch, *China Online Education Industry Research Report 2020, 2021*

enrolled on the university's bachelor's degree programmes, making up a little over a third of total distance learning undergraduates that year. Meanwhile OUC's share of students at the diploma level was even higher accounting for slightly more than half of all students following distance learning programmes at this level.

At the bachelor's degree level, the largest proportion of distance learning students are studying programmes in subject areas classed as Business & Administration. Roughly 42 per cent of all students at this level are studying programmes in this broad field, far higher than the corresponding proportion of undergraduates on in-person programmes studying these programmes. Meanwhile the proportion of engineering students – a category which in China includes computing and IT – is notably lower than on traditional courses but still makes up the second-largest group of distance learning students. Other relatively popular subject areas for distance learning programmes include subjects related to Law, Medicine and Education.

Figure 3.3: Bachelor's degree enrolments by subject area, 2020



Source: Ministry of Education

Discussions with staff at Chinese universities offering distance learning programmes shows a similar pattern. The most popular subjects for self-funded students are business-related, such as accounting or business administration, or related to information technology which in China is classified under the broad field of engineering.

Some universities do offer online programmes in more traditional engineering-related fields – for example, an interviewee at a university specialising in electrical and electronic engineering commented that they enrol a lot of employees of state-owned power companies on courses in this area, funded by their employers. Another interviewee commented that a large number of their current diploma students are kindergarten teachers studying pre-school education, driven by a recent government policy requiring these teachers to upgrade their qualifications. Meanwhile a large

proportion of students enrolled on the “one student per village” scholarship scheme are studying rural administration.

Interviews also suggested that bachelor’s degree students tend to be students who already hold a diploma and enrol on a top-up course to upgrade this to a bachelor’s degree, rather than studying an entire degree programme from scratch. Online top-up programmes are particularly common at universities that also offer face-to-face courses.

One important recent Chinese government policy on distance learning programmes is the "Opinions of the Ministry of Education on Running an Open University", issued in 2016. These Opinions aimed to develop "an open university system with Chinese characteristics" by 2020, calling for institutions to develop both their physical infrastructure (including data centres as well as learning centres) and develop high-quality learning resources and curriculums that meet diversified learning needs.

The policy also called for increased cooperation, both with employers and with domestic and overseas universities and research institutes. Meanwhile it called on China’s open university system to establish a credit bank to recognise learning achievements and to work on mutual recognition of these credits with other universities and with industry. Distance learning was to be based on a principle of “broad entry and strict exit” – allowing students to enrol on courses without high qualification requirements, but strictly enforcing standards for graduation and strengthening learning monitoring and assessment.

More recently, in 2018 the MoE issued a “Notice on Carrying Out Annual Reports on the Development of Continuing Education in Higher Education Institutions”, implementing an annual report system for continuing education in universities, while in 2019 the “Notice on Promoting the High-Quality Development of Online Education in Modern Distance Education Pilot Universities to Serve the Entire Population" re-emphasised the importance of quality control and strict assessment of graduation requirements as well as noting that student enrolment should be based on clearly published standards approved by the relevant authorities and that misleading advertising and recruiting students through agents was not permitted.

In 2020 the Ministry of Education announced a “Comprehensive Reform Plan for the National Open University”, which sets a main goal of “adapting to the development trend of digital, intelligent, lifelong, and integrated education” and solving what it describes as problems with unclear positioning and low quality. Key tasks set out in this plan include:

- Clarifying the positioning of the National Open University and expanding its scope to cover both academic and non-academic education and lifelong learning, based on a transferrable credit system and in accordance with national skills priorities
- Exploring the provision of postgraduate education and applying for the right to award Master’s degrees
- Reforming management systems and staff evaluation
- Promoting the transformation of local branches from Radio and Television Universities to Open Universities, clarifying the management systems of these local branches and supporting their development while taking into account the needs of

the relevant provinces and regions

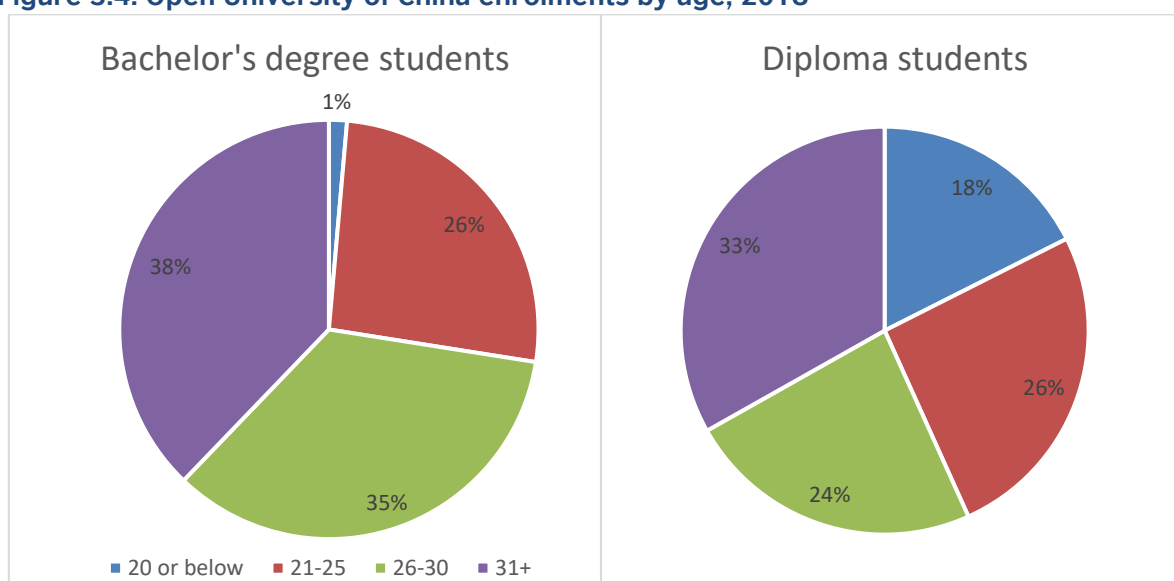
- Promoting the establishment of a new type of cooperation between the Open University of China and five pilot independent provincial-level Open Universities.
- Improving teaching quality, including strengthening practical training links, increasing the proportion of staff who also hold positions in industry, and improving systems for the political education of students.
- Increasing cooperation with industry and with other universities throughout China
- Accelerating the development of credit banks and mutual recognition of credits with other institutions
- Strengthening quality evaluation and quality monitoring, including third-party teaching quality evaluations, while continuing to follow the principle of “broad entry and strict exit” described above.

3.1.1 Profile of students enrolled on domestic distance learning programmes

In contrast to traditional bachelor’s degree programmes, a large proportion of China’s distance learning students at this level enter with previous HE qualifications. While direct data on enrolments is not available, the Open University of China’s 2021 recruitment materials list 48 different bachelor’s degree subjects available for entrants with diplomas compared to only 11 for applicants starting with high school qualifications. This style of top-up course is also more prominent in traditional universities’ distance learning recruitment materials than for their face-to-face courses.

Data from the Open University of China also shows that students studying on distance learning programmes tend to be older than the school leavers who enrol on in-person higher education programmes. The median age for both diploma and bachelor’s degree students was in the 26-30 range, with the largest group at both levels being students aged 31 or over.

Figure 3.4: Open University of China enrolments by age, 2018



Source: Open University of China

Interviewees at two different traditional universities offering online programmes agreed that their online students tend to be older than those they recruit for face-to-face programmes, typically between their mid 20s and mid 30s for both diploma and bachelor's degree students. An interviewee at one municipal-level open university gave similar answers.

These three interviewees all commented that the majority of distance learning students are currently employed, usually in white-collar occupations or service-sector jobs. The majority of students are generally self-funded and aim to increase their salary by earning a higher level of qualification; this increase could come either through earning a promotion or pay rise at their current company or by using the qualifications to find a higher-paying job.

One interviewee at another open university gave slightly different answers, saying that a large proportion of their students had recently graduated from secondary-level vocational schools, which was partly driven by a government policy encouraging graduates of these schools to continue their education via distance learning channels.⁶

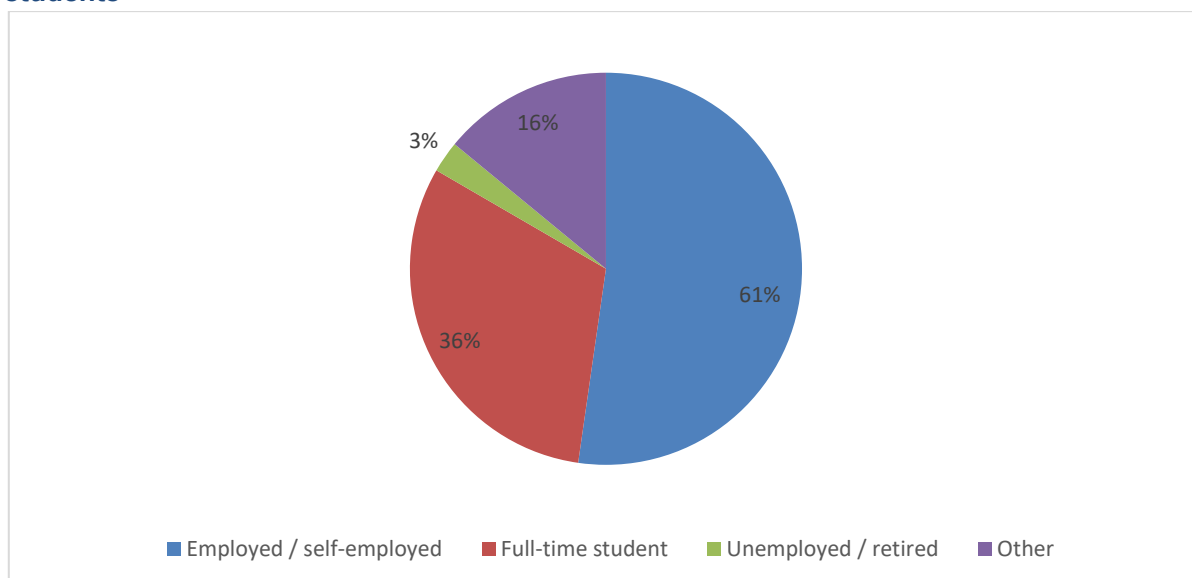
Aside from self-funded students, all interviewees also mentioned students on government scholarship schemes such as the "one student per village" programme which offers funding for students from rural areas to study distance learning courses.

A survey of students conducted by the OUC to support this research also shows that a large proportion of students are already employed and pursuing additional qualifications to improve their employability or earn a higher salary. Among the 464 respondents to the student survey who were enrolled on online programmes awarding academic qualifications (diplomas or degrees), less than a third described themselves as primarily students while a little over half said they were employed or self-employed. Relatively small proportions described themselves as unemployed or retired while a comparatively large proportion of respondents chose the "other" option.⁷

⁶ Upper secondary education in China is split between academic high schools, which prepare students for the Gaokao university entrance examination, and secondary vocational schools, which are typically seen as less prestigious and whose graduates mostly do not enter higher education.

⁷ The original survey separated the employed / self-employed category into several groups. Respondents that chose the "Other" option and wrote in more details have been re-categorised in the appropriate sections; almost all of this group named specific fields of employment which suggests that the remaining "other" respondents were also employed or self-employed.

Figure 3.5: Occupations of surveyed Open University of China academic distance learning students



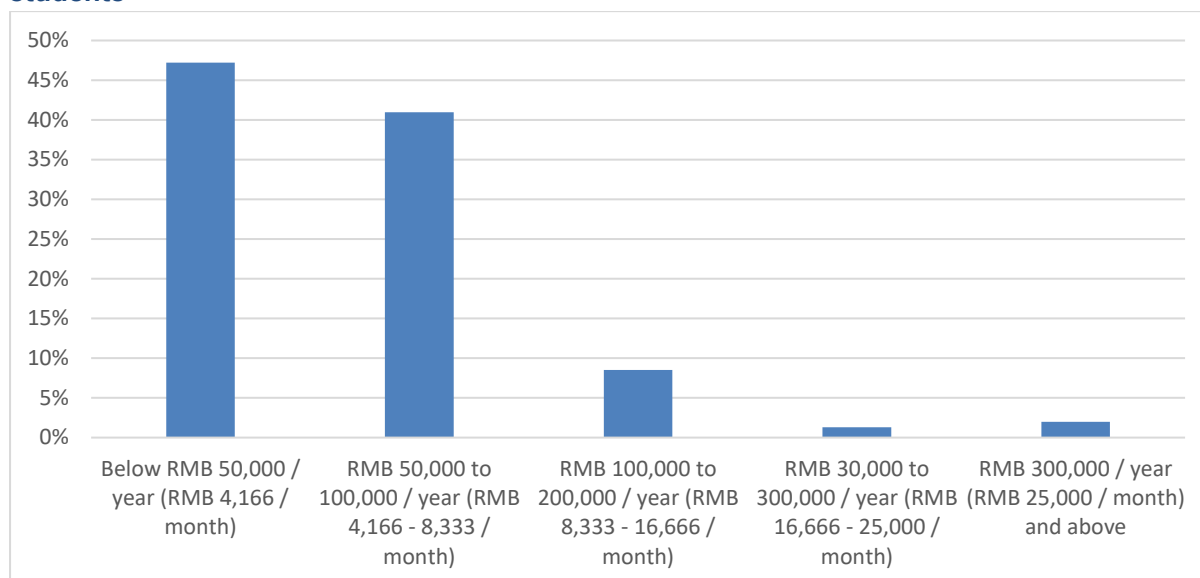
Base: OUC students enrolled on online academic programmes (464 respondents)

Among working students, the largest group said that they were employed in private Chinese companies, followed by government employees, self-employed people and workers at state-owned enterprises. Only around 4 per cent of students at the Open University of China said they were employed by foreign-invested enterprises.

OUC students studying non-academic courses were even more likely to be employed. Almost three quarters of this group said they were currently working while a further sixth categorised themselves as “other”.⁸ This is unsurprising as many of these courses are aimed at existing employees in specific industries.

Students at the Open University of China also reported relatively low incomes. Even excluding full-time students, almost half of students on academic distance learning programmes said that they earned less than RMB 50,000 (£5,700) per year, substantially below the average for both private and non-private employers according to data from the National Bureau of Statistics.

⁸ As noted above, respondents placing themselves in the “other” category are likely employed or self-employed.

Figure 3.6: Incomes of employed Open University of China academic distance learning students

Base: Employed / self-employed OUC students enrolled on online academic programmes (305 respondents)

3.2 Distance learning as part of traditional university programmes

Even before the Covid-19 pandemic, China's Ministry of Education had set out policies to integrate distance learning activities into traditional in-person degree programmes at universities of all kinds.

One prominent example of distance learning is represented by massive online open courses (MOOCs) offered by Chinese universities. The first domestic MOOC platform, XuetangX, was launched in 2013 by Tsinghua University, with large numbers of modules added to this and other platforms in the following years.

In 2015 the Ministry of Education published a set of Opinions on Strengthening the Construction, Application and Management of Higher Education Institutions' Online Open Courses, which were seen as supporting this form of education. The Opinions called for the country's universities to create a number of "high-quality online open courses", based on their own distinctive advantages and meeting different learning needs.⁹ It also called for the promotion and wider application of online open courses, with plans to strengthen the training of academic and technical staff in relevant areas and instructions for colleges and universities to promote credit recognition of online open courses, incorporate these courses into their teaching plans, and to set up methods for evaluating the effect of MOOCs on students' learning outcomes. Meanwhile the Opinions promised that the Ministry of Education would identify high-quality online courses and recognise these at the national level. Another policy announcement covering similar ground was the Ministry's 2016 Opinions on Promoting the Recognition and Conversion of Higher Education Credits which similarly encouraged mutual credit recognition.

⁹ In contrast to its usage in other parts of this report, the term "courses" in this context refers to modules that can form part of a larger academic programme rather than to full degree programmes.

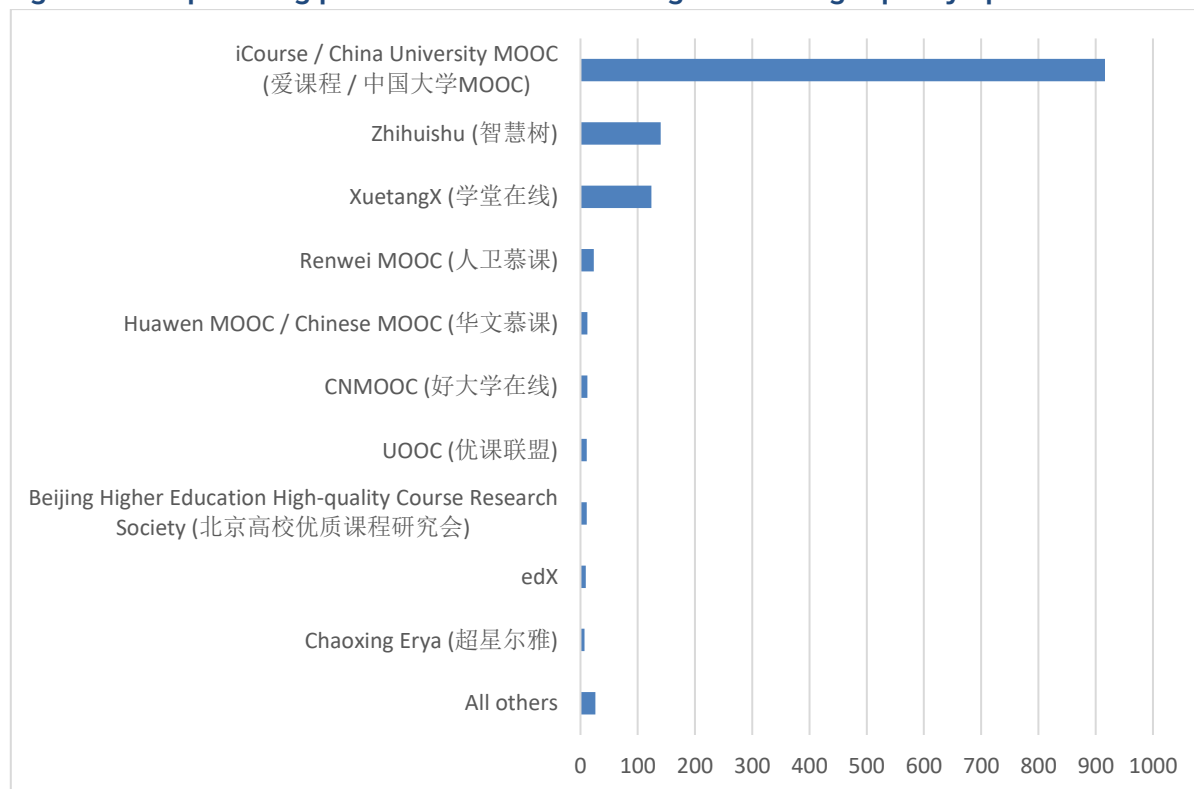
In 2017 the first batch of 490 national-level high-quality online courses was announced, based on initial analysis by provincial-level education departments and expert analysis. The approved modules came from a wide selection of 120 different Chinese HEIs, with the large majority being at the bachelor's degree level. Universities were encouraged to accept these courses and integrate them into their own programmes and credit recognition systems, while provincial-level education authorities were ordered to support the adoption and sharing of courses designated as high-quality at the national level in accordance with local conditions.

In 2018 a further 801 modules were designated as high-quality courses, with plans to approve around 900 additional courses in 2019 and reach a total of 3,000 by 2020. A Ministry of Education announcement in 2019 stated that a preliminary list of programmes for that year was available on the chinaooc.cn website but the British Council has been unable to find any announcement of the final list of designated courses for that year and the website is currently unavailable as of February 2022. In February 2020 Ministry announcements showed that the number of approved high-quality courses still only stood at 1,291, showing that final approvals for 2019 had not taken place by that point.¹⁰ In 2020 the Ministry announced a list of 99 approved courses at the higher vocational level but does not appear to have designated any new high-quality courses at the bachelor's degree level.

A large majority of these designated high-quality courses are hosted on iCourse (China University MOOC), a platform co-owned by tech company NetEase and China Higher Education Press. Overall this platform accounts for 955 of the 1,390 programmes, or 69 per cent of the total.

Two other platforms also have a relatively large number of designated courses, including XuetangX – a platform run by Tsinghua University but also hosting courses from many other institutions – has 144 designated courses, while Zhihuishu, also sometimes known in English as Wisdom Tree, has 136. Only 155 modules were hosted on any other platform, just 11 per cent of the total.

¹⁰ *Guidance on the organisation and management of online teaching and learning in regular higher education institutions*, Ministry of Education, 2020

Figure 3.7: Top hosting platforms for courses designated as high-quality open courses

Source: Ministry of Education / British Council analysis

In 2019 the Ministry of Education along with 10 other departments jointly issued a set of opinions titled *Guiding Opinions on Promoting the Healthy Development of Online Education*. Several sections of this announcement were related to distance learning at the higher education level, including encouragement for institutions to increase research into, and development of, online education resources, which should be shared through a national digital education resources platform, and encouragement to incorporate eligible online modules into their teaching programmes while ensuring that the quality of these modules should not be lower than in-person instruction at the same institution. Institutions such as higher vocational colleges, universities, research institutes and companies were encouraged to collaborate closely on collaborative education and research and to strengthen the application of new technologies in the field such as artificial intelligence.

Although the Ministry of Education encourages universities to accept MOOC courses for credit, recognition of modules from other institutions is not yet universal. A survey of 100 Chinese HEIs published in 2021 showed that 30 of these institutions did not accept MOOC courses for credit and a further 21 only gave credit for their own self-developed open courses.

This leaves 49 of the 100 surveyed institutions – slightly less than half – who accepted external modules for credit, including three which limited this acceptance to universities involved in a specific MOOC alliance. One such alliance is WEMOOC, the East-West University Course Sharing Alliance, whose website lists a total of 218 HEIs as members.

While the Ministry of Education does not set any specific limits on the proportion of a degree programme that can be delivered through distance learning, universities themselves tend to be relatively restrictive on the number of credits students can earn from external online modules. As an example, the University of International Business and Economics (UIBE) in Beijing allows students to earn credit for a total of three external modules across the course of an undergraduate degree programme, of which no more than two can be studied in any single semester. Each of these modules can carry up to two credits, meaning that the total number of credits earned through external courses is limited to six, compared to a total of 150 to 170 credits across a typical bachelor's degree programme.

The proportion of a degree that can be delivered through a university's own online modules is substantially higher. UIBE's regulations on distance learning modules, published in 2019 before the Covid-19 pandemic, allowed students to earn up to a third of the credits required for their degree through distance learning modes. However in practice the proportion of teaching delivered through this mode for students enrolled on traditional face-to-face programmes is usually much lower due to limited numbers of modules available online.

China, as with most other countries worldwide, imposed lockdowns in early 2020 in response to the global Covid-19 pandemic. The Ministry of Education announced the suspension of in-person teaching at all universities in the country in February 2020 and announced free access to more than 10,000 modules at the higher education level across 22 platforms, including 1,291 national quality online open courses. The Ministry instructed universities to make full use of these open courses, public course platforms and online materials and learning resources to carry out online teaching, while ensuring that the quality of online learning and offline classroom teaching is substantially equivalent.

By April 2020 the majority of provinces had announced plans for the resumption of in-person teaching, but continued Covid outbreaks meant that many universities continued to teach online for the remainder of the academic year. A Ministry of Education announcement in December 2020 stated that a total of 1.08 million academics had delivered more than 17 million modules online at the higher education level by that point of the pandemic, with an aggregate total of 3.5 billion learning resources accessed by students.¹¹

As of October 2021, all universities in China have resumed in-person teaching, but the country continues to impose short-term local lockdowns in response to new Covid-19 cases. Universities in affected areas shift their teaching online for a short period during these lockdowns.

The pandemic also continues to affect transnational education cooperation and international students. The Ministry of Education sets rules for the minimum amount of teaching that must be delivered by an overseas partner as part of a joint programme

¹¹ Ministry of Education, 2020. This figure counts each student and resource separately, so a student accessing 100 different learning resources – such as course notes or individual lectures – would count as 100 instances.

with a Chinese university, and many overseas universities rely on “fly-in faculty” to teach parts of the programme. As there are strict regulations on entering China from abroad, regulations have been temporarily relaxed to allow these parts to be delivered through distance learning. Similarly, China’s border restrictions mean that many overseas students at Chinese universities are still unable to re-enter the country and so are forced to attend classes online instead of in-person.

As described in Section 4, China has also relaxed its rules on the recognition of overseas qualifications earned through distance learning during the pandemic period, but the Ministry of Education has been clear that this policy only applies to students enrolled on traditional full-time face-to-face programmes that are unable to attend in-person classes due to pandemic precautions, and restrictions on programmes designed as distance learning qualifications are not affected.

4. OVERSEAS DISTANCE LEARNING PROVISION IN CHINA

4.1 Official recognition of overseas distance learning qualifications

While China and the UK signed an agreement for mutual recognition of degrees in 2003, the country does not recognise overseas qualifications delivered through distance learning models. The Chinese Service Center for Scholarly Exchange (CSCSE), a body under the Ministry of Education which certifies degrees earned overseas, names overseas degrees and diplomas earned through distance learning among the types of qualifications that it is not able to certify.

There is currently no clear official policy on the extent to which an in-person programme in the UK can deliver part of its programme through distance learning channels. In an interview conducted as part of the current research, a senior official commented that there was previously an unofficial policy that at least 50 per cent of the study period be spent in the country of the awarding HEI,¹² but this is no longer the only factor that is considered. Instead the judgement is now “quite complicated” and depends on “comprehensive considerations”, including time spent abroad as well as other factors such as admission requirements and study methods. The interviewee said that they expect reviews of these factors to become stricter over time.

The environment for recognition of overseas qualifications has been slightly relaxed as a result of the Covid-19 pandemic. In April 2020 the CSCSE announced that to support overseas universities' measures to mitigate the epidemic, measures such as online delivery of higher education courses and online thesis defences would not affect the recognition of overseas degrees.

The CSCSE later clarified this flexibility applies only to temporary measures applied during the pandemic period for students on in-person programmes, and specifically does not apply to programmes intended to be delivered entirely online. However, CSCSE has also clarified several times that this policy is still in force and affects new students as well as students who were already enrolled on in-person programmes when the pandemic started. They have also been flexible as regards students who are enrolled on UK programmes that have in principle re-opened for in-person study but who have been unable to travel to the UK because of travel difficulties or other reasons.

An interviewee from the authority commented that although these policies are currently very flexible, China does not accept overseas universities misusing this flexibility. They gave the example of a Malaysian institution which raised concerns when its recruitment of Chinese students increased from around 10 per year to around 300 students during the pandemic period. Further investigation found that this university was taking

¹² Previous discussions with CSCSE representatives had suggested that these limits were considered as a proportion of the total duration of the programme offered by the overseas HEI. In the case of students whose course was only partly taught at the overseas institution – for example students articulating overseas on a “2+2” partnership with two years in China followed by two years abroad – the minimum time abroad was based on a proportion of the two years the student would have been studying at the overseas HEI.

advantage of the pandemic policies to promote programmes designed as purely distance learning programmes, and Chinese authorities have suspended recognition of this university's qualifications. Some universities in Belarus are also under investigation for the same reason.

While overseas distance learning qualifications are not officially recognised by the Chinese government, this does not prevent private employers from taking these qualifications into account when recruiting employees. The official interviewee commented that aside from withholding recognition they do not do anything to prevent students from studying an unrecognised overseas distance learning programme, nor do they try to stop companies from hiring employees based on these qualifications.

Degree recognition and time spent abroad are also important when Chinese citizens apply for a hukou (household residence document), which gives advantages in areas such as purchasing apartments or sending their children to local schools. Some cities have policies which give returnees with an overseas degree favourable treatment when applying for a local hukou, but in most or all cases there are minimum requirements for time spent abroad. For non-citizens qualifications play a major role in China's points-based work visa system, and recent social media posts suggest that immigration authorities have recently become stricter about not taking distance learning degrees into account when it comes to issuing work permits.¹³

Aside from overseas study, transnational education is also a major mode of earning foreign HE qualifications in China. Data from HESA shows that more than 45,000 students in Mainland China were studying for UK HE qualifications through in-person programmes in the 2019/20 academic year, with perhaps a further 200,000 students studying for degrees awarded by institutions in other countries.¹⁴

As with programmes at domestic universities there are no set limits for the proportion of a transnational education degree that can be taught through online methods. However in the British Council's recent experience transnational education partnerships are unlikely to be approved if online delivery plays more than a minor supplementary role. As with online delivery of overseas programmes, regulations have been relaxed during the Covid-19 pandemic but Chinese authorities have been clear that this is a temporary policy which is only intended to cover the pandemic period.

According to the interviewee mentioned above, China has no plans to start recognising qualifications from entirely-online programmes in the near future. The interviewee commented that it was difficult to ensure the quality of this sort of programme and emphasised the need to develop quality assurance standards and supervision.

While education quality was the most important factor, the interviewee also discussed competition with Chinese institutions as another reason the country was reluctant to recognise overseas distance learning qualifications. Many well-known overseas

¹³ For example

https://www.reddit.com/r/China/comments/q4og9t/china_no_longer_accepts_online_degrees/

¹⁴ While exact data is not available on students on other countries' courses, UK programmes represent roughly a fifth of total approved TNE programmes in China.

universities offer these programmes which could have a “great impact” on enrolment at local distance learning providers like the Open University of China if they were to be fully recognised. They pointed out that China’s WTO commitments do not oblige the country to recognize overseas distance learning qualifications. A final negative factor that the interviewee discussed was the need to maintain “educational sovereignty”, as ideological education has recently been playing a more important role in China’s education policy.

Although China has no plans for full recognition of overseas distance learning, it is possible that policies may be relaxed in some minor ways. Over the pandemic period China has introduced flexible policies allowing students unable to travel overseas to study all or part of their programme online. The interviewee commented that this policy may be extended to other students in difficult circumstances in the future, such as those that need to return home because of illness or other urgent reasons. But they stressed that any changes would need to balance the needs of these students against other priorities, and that any changes would apply only to students enrolled on traditional overseas programmes rather than to distance learning programmes more broadly.

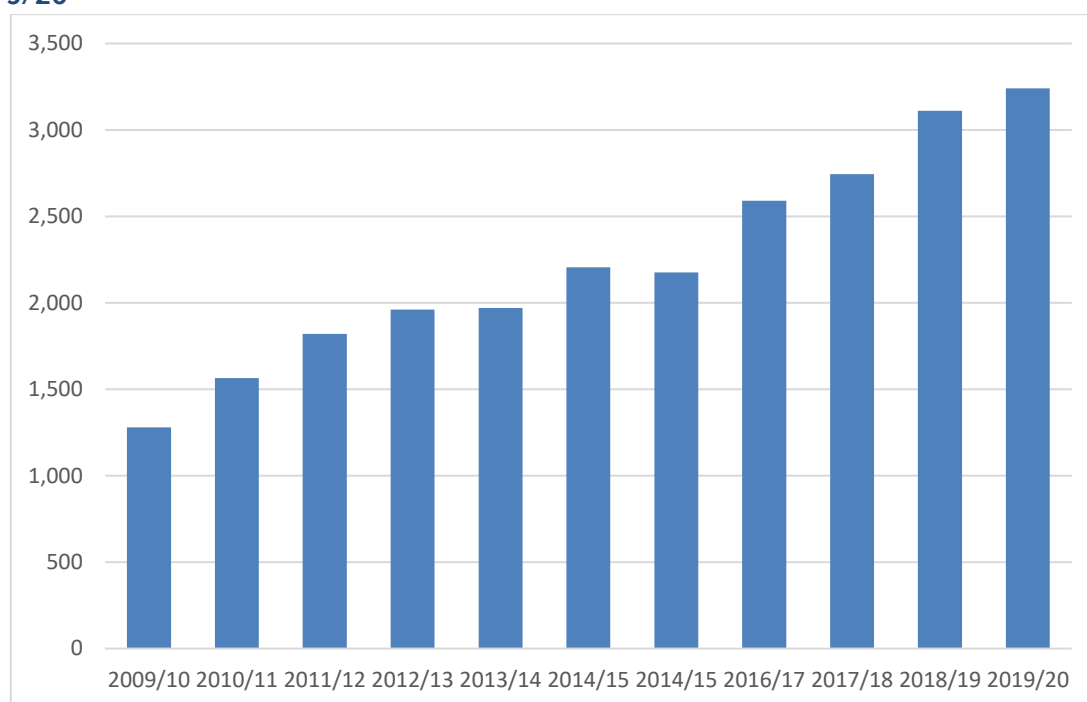
Over the longer term the interviewee commented that China wanted to encourage the internationalisation of its own distance learning system, especially as represented by the Open University of China, and that the government hoped to use this as a way to export Chinese education abroad. They commented that bilateral recognition agreements for distance learning qualifications could be drawn up in the future, although they stressed that this would need to involve cooperation between many different stakeholders in China as well as investigation into the quality assurance systems for overseas HE programmes.

The interviewee also talked about the importance of dialogue with overseas partners and said that they were already talking to the UK’s QAA in order to improve quality assurance for distance learning and address the challenges that both systems face.

4.2 Scale of overseas universities’ distance learning students in China

As noted in the previous section, while overseas distance learning qualifications are not formally recognised in China, some local employers do take these degrees into account. Statistics from the UK and Australia show that several thousand students are enrolled on distance learning programmes with universities from these countries, while many universities in other countries such as the US universities also allow students in the country to enrol on their online degree programmes.

As of the 2019/20 academic year around 3,240 students in mainland China were studying for UK higher education qualifications through distance learning models. This number has increased substantially over the last decade, with a compound annual growth rate of roughly 10 per cent since 2009/10.

Figure 4.1: Students in China enrolled on UK distance learning HE programmes, 2009/10 to 2019/20

Source: HESA. Data only includes students registered on flexible and distance learning programmes studying entirely outside the UK, and does not cover students on face-to-face degree programmes forced to study online by the pandemic.

The number of UK distance learning students in China is relatively low compared to the number of students enrolled on-campus programmes in the UK or studying through transnational education (TNE) models like joint programmes or institutes at domestic Chinese universities. Data from HESA shows that 148,530 mainland Chinese students were studying in the UK in-person in the 2019/20 academic year with a further 48,875 on TNE programmes,¹⁵ meaning that distance learning represents less than 2 per cent of the Chinese students studying for UK higher education qualifications.

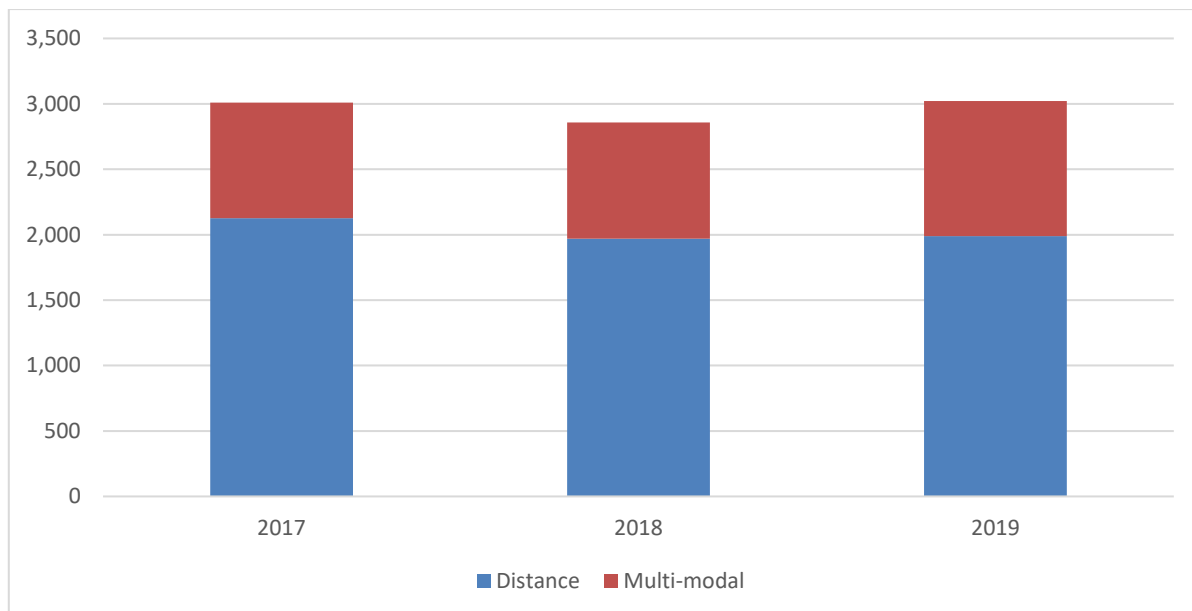
This means that China's share of distance learning students is much lower than the country's share of mobile international students. Overall China only accounted for around 3 per cent of the UK's international distance learning students compared to almost a quarter of on-campus international students.

61 HEIs reported having at least some distance learning activity in China, but most of these institutions had only a small handful of China-based students. Just four universities – the University of Manchester, the University of London, the University of Greenwich and the University of Sunderland – make up more than half of all UK universities' reported distance learning students in the country, while the top 10 institutions make up 69 per cent of the total. Among these four institutions, Manchester, Greenwich and Sunderland's distance learning students are overwhelmingly studying master's degree programmes while the University of London recruited a more balanced mixture of bachelor's and master's students.

¹⁵ Data for TNE here includes both partnerships and distance learning programmes

Data from Australia shows that almost 2,000 students resident in China were studying Australian HE programmes through distance learning models in 2019, while more than a thousand were described as “multi-modal”. In contrast to UK student numbers, the number of students studying Australian programmes has remained relatively constant over the last three years.

Figure 4.2: Students in China enrolled on Australian distance learning HE programmes, 2017 to 2019



Source: Australian Education International

4.3 Partnership and delivery models for UK distance learning qualifications

4.3.1 Fully online delivery with no local support

Chinese law does not allow overseas educational institutions to offer higher education programmes in China without a local partner.¹⁶ While wholly-owned foreign companies may offer vocational training courses, overseas HEIs can only teach their qualifications through joint programmes and institutes with a Chinese partner university.

However, these rules have been interpreted to only apply to teaching that is physically delivered in China. This means that if a programme has no in-person component, UK universities are not prevented from delivering it through entirely online channels (although as noted in previous sections any qualifications awarded would not be recognised by Chinese authorities).

In particular, one widely-reported recent regulation that affects online teaching does not apply to online HE programmes. While regulations issued on out-of-school training in mid 2021 prohibited online teaching by non-Chinese citizens located outside the country,

¹⁶ For example, higher education is included on China’s “negative list” which restricts the sectors that overseas entities can invest in in China; <http://www.gov.cn/zhengce/zhengceku/2021-12/28/5664886/files/5b1aecc9c9704b05b7a930eb6fd74e29.pdf>

these regulations only applied to school-age students taking classes in academic subjects, meaning that distance learning HE programmes are not affected.

The majority of UK institutions providing distance learning programmes to students in China do not tailor these courses specifically to Chinese students and do not provide any local in-country support to students in China enrolled on these programmes. Instead they enrol a small number of China-based students on programmes whose students are mainly in the UK or other countries. However, an interviewee from a UK university commented that recruitment to distance learning programmes through agents had been poor, perhaps because these agents focus mainly on the sort of students who would want to physically study abroad whereas the target market for distance learning is a quite different group as described in Section 4.4.

4.3.2 Support from a local entity of the university

Despite the restrictions on overseas delivery of higher education in China, it is still possible to provide some in-person teaching to students enrolled on their distance learning programmes. One example is the University of Manchester, whose China Centre supports students on the university's Global MBA programmes and several other distance learning programmes.

As overseas universities are not permitted to teach in-person degree programmes in China without a Chinese partner, in-person teaching cannot be a required part of the programme. Programmes following this format are also treated as an online programmes in terms of (lack of) official recognition of the degree by Chinese authorities as well as restrictions on marketing the programme as described in Section 4.5.

Institutions processing student information in China should be aware of new regulations on personal information protection that came into effect in November 2021, which is similar to the UK/EU General Data Protection Regulation (GDPR) in many ways but which is not exactly the same as UK laws. One notable aspect is that China's new Personal Information Protection Law requires specific consent from individuals for their personal information to be exported outside of China.

Case Study: University of Manchester Worldwide China Centre

The University of Manchester's China Centre, in Shanghai, was founded in 2008 and is one of the hubs of the University of Manchester Worldwide initiative. The most visible activity of the China Centre is supporting students on several of the university's blended learning programmes.

The most prominent of these is the university's Global MBA programme, while more recently the university has also added MSc degrees in Financial Management and International Fashion Marketing and an MA in Educational Leadership in Practice.

Manchester's Global MBA programme includes six residential workshops with UK faculty by UK-based academics. In normal times these academics fly to China for the three-day workshop, although Covid-related restrictions mean that they are currently taught by staff in the UK but students still attend sessions at the China Centre in person.

In order to comply with Chinese regulations these workshops are not credit-bearing and do not make up an essential part of the MBA programme, instead acting as an optional supplement and a value-added part of the programme. This contrasts with the same course delivered in other parts of the world such as through Manchester's centres in Dubai or Singapore, where the in-person workshops are a compulsory part of the programme.

Representatives of the University of Manchester see these in-person workshops as a key differentiator of their programme and a major reason for students to choose their course. Although the workshops are not compulsory, attendance is almost universal and students see them as very valuable as it allows them to meet teaching staff directly and network with fellow classmates. The programme competes with both purely online competitors, which tend to have lower tuition fees, and with Sino-foreign partnerships at leading local universities, but generally does not compete directly with local universities' own programmes.

Although Manchester has active partnerships with local employers, most students on their programmes are self-funded. Interviewees commented that this was a noticeable change from a decade ago, which they attributed to decreasing training budgets and companies being more reluctant to sponsor their students on MBA programmes.

Aside from supporting the in-person sessions, local staff at the China Centre also arrange induction events, act as the first point of contact for students with questions or technical difficulties, organise activities such as learning tips and student events to enhance the learning experience, work to support alumni, and market the programme by maintaining a local bilingual website and social media accounts, organising promotional events and maintaining the university's talent partnerships with local companies.

4.3.3 Non-academic support from local partners

Some local companies offer support for overseas distance learning providers. One example of a company providing this sort of support is CERNET Education, a subsidiary of state-owned company CERNET which operates academic computer networks for Chinese universities.

Interviewees from CERNET Education commented that they offer a range of services for overseas universities. These include recruitment and application services, based on an agency model, and promote the programmes to local students. Once students are enrolled the company's staff can provide support including localisation of course contents; language support such as subtitles for recorded lectures or live translation of livestreamed lectures; and logistical support such as reminding students of deadlines and assignment requirements. One of CERNET's UK university partners is the University of Law, with the company supporting the university's online master's programmes in Strategic Business Management and International Business Law.

The company also developed its own domestic learning platform to support higher education providers, although interviewees commented that overseas HEIs often preferred to use their own platforms, which was partly because of intellectual property protection as well as additional licensing fees that they would have to pay if offering learning resources through a third-party platform.

CERNET Education charges fees to universities based on a proportion of students' tuition fees, with the exact proportions negotiated on a case-by-case basis depending on what services the university partner needs.

4.3.4 Teaching support from local partners

At least one UK institution – the University of London (UoL) – offers a hybrid model for its distance learning programmes. Students register on a distance learning programme taught by the university's own staff and it is possible for a student to complete their degree entirely online without additional support. However, students can optionally choose to register with one of UoL's Registered Teaching Centres for additional in-person teaching support.

Local platform provider CERNET Education, discussed in the previous section, can also offer teaching support on a similar model. Interviewees at the company commented that this can optionally be included in the services the company provides, along with their other services described in the previous section of this report.

Case Study: The University of London's registered teaching centres

The University of London (UoL) uses a partnership model in China, which is similar to the one it uses across the world. Six local partners have been designated as UoL Recognised Teaching Centres, offering optional local, face-to-face teaching and other support for students enrolled on UoL's degree programmes.

UoL provides the Recognised Teaching Centres with all academic content and training support but does not direct their teaching. All assessments that form part of the degree course are set and marked by UoL itself, while the Recognised Teaching Centres' own assessments are purely formative.

This format is distinct from franchised or validated degrees as the student has two separate institutional relationships: one with the Recognised Teaching Centre and one with the UoL. Students may only register for teaching support after they are already admitted onto the UoL programme, but the UoL has no direct financial relationship with the Recognised Teaching Centre – students pay separate tuition fees to the two institutions.

All six of the UoL's Recognised Teaching Centres in China are state universities, which have the right to deliver both academic degrees and non-academic training. These universities deliver the UoL degree as a separate programme rather than combining it with their own degree course.

Globally around 50 per cent of the UoL's distance learning students also enrol with Recognised Teaching Centres. However, in China, these only represent a minority of UoL's distance learning students.

4.3.5 Degree validation

While China's Ministry of Education has been clear that overseas universities are not permitted to offer degrees through in-person programmes outside of an official TNE cooperation, their attitudes towards online education appear to be more flexible. Several overseas universities have partnerships with local organisations to run distance learning programmes that award a degree validated by the overseas institution.

This allows the local partner to use their understanding of the Chinese context to support students, while reducing the demands on the overseas institution's staff in terms of teaching and promotion – although quality assurance can still create a lot of work for the validating partner.

Case Study: The Open University and XuetangX

The Open University (OU) in the UK is a public university which has pioneered distance learning for over 50 years. It has alumni in over 150 countries, including China. Since 2020, the OU has been in partnership with Chinese MOOC provider XuetangX. Through a 'validation and licensing' partnership XuetangX licenses course content from the OU and delivers a Master of Business Administration (MBA) programme for OU validated award. As with the OU's own MBA, the XuetangX course is delivered through a supported blended model.

XuetangX is responsible for adapting and contextualising the licensed content for the Chinese market and delivering the course to local students. The local partner is also responsible for promotion and student recruitment. While the OU is not directly involved in teaching the course, it is responsible for ensuring that the award has parity of esteem within the University and with awards from all other UK Universities, and meets the requirements of the UK Framework for Higher Education Qualifications.

The local partner XuetangX is primarily a Chinese distance learning platform for MOOC courses. It is closely affiliated with Tsinghua University, one of China's most prestigious higher education institutions, but is a separate legal entity. Many of the academics teaching the course are also Tsinghua staff but have a separate employment relationship with XuetangX to deliver the OU validated programme.

XuetangX does not have degree awarding powers and the programme leads only to the validated UK degree. This award is not officially recognised by the Ministry of Education in China but is still acknowledged by many private and multinational employers. Most students are senior managers who recognise the value of an international award. The course is taught in English, but assessment is carried out in Mandarin. In other models, such as the partnerships between the OU and the Arab Open University, which operates across several Middle Eastern countries, both teaching and assessment are in English.

Quality assurance requirements were increased by the move to the Mandarin-medium assessment as it naturally means translation is required as part of the quality oversight. This has been supported by OU Mandarin speaking academic staff and bi-lingual academics from other UK Universities, including the External Examiner. However, the assessment in Mandarin makes the course more viable and marketable in China.

Collaborative partnerships such as this naturally take considerable time and investment to establish, as was the case here. However, the result is a strong partnership with successful recruitment to a high quality course which clearly meets a Chinese market demand. The longer term aim is to expand the partnership across more subject areas, focusing on the PG level.

4.3.6 Course licensing and support for Chinese distance learning providers

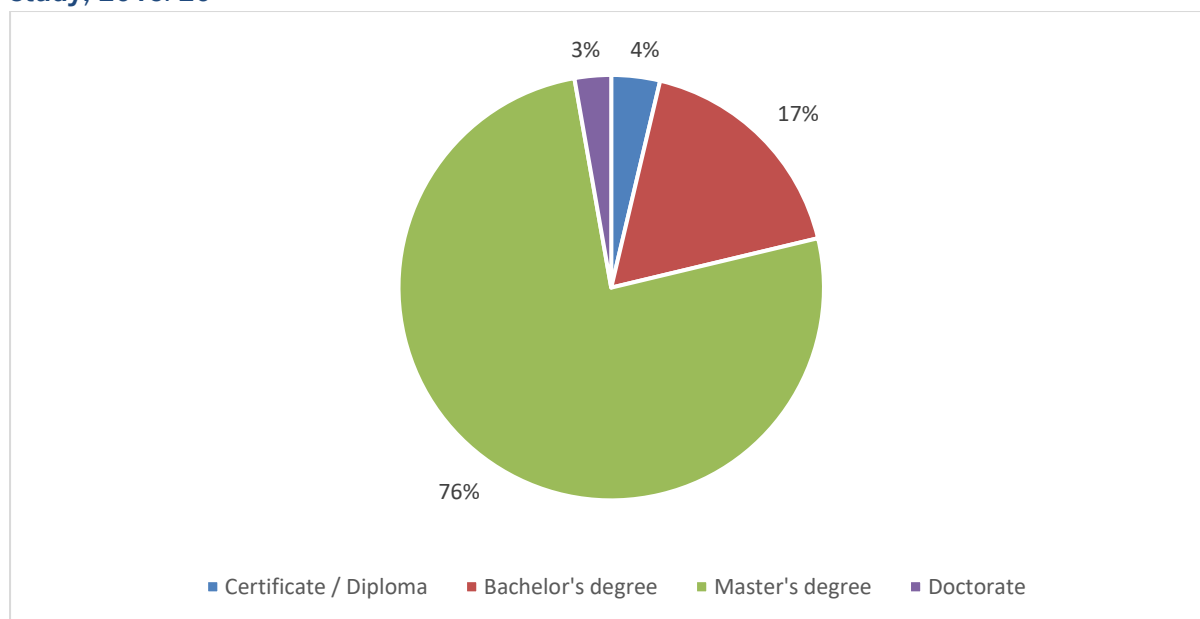
In addition to UK universities' own degrees, some HEIs license content to local universities for use in their own distance learning provision. This is typically at the module level, with the Chinese institution providing a licensed module (or an adapted version of the module) as part of their own degree programme.

The model for this sort of partnership is an IP licensing agreement, with payment usually based on a cost-per-student model. No UK qualification is awarded and the UK university has no direct involvement in course delivery.

4.4 Profile of students enrolled on overseas distance learning programmes

A large majority of students in China enrolled on UK distance learning programmes are studying for master's degrees. Overall more than three quarters of UK distance learning students in China are enrolled on programmes at this level.

Figure 4.3: Students in China enrolled on UK distance learning HE programmes by level of study, 2019/20



Source: HESA. Data only includes students registered on flexible and distance learning programmes studying entirely outside the UK and does not cover students on face-to-face degree programmes forced to study online by the pandemic.

Chinese students studying in-person programmes in the UK are also more likely to study at the master's degree level, with master's degree students making up 53 per cent of the total in 2019/20. However the imbalance is much more pronounced among distance learning students. The difference becomes even more prominent when considering that master's degrees are typically much shorter than bachelor's degree programmes.

Discussion with universities offering distance learning programmes to Chinese students shows that the typical student for a UK distance learning programme is a working professional at a private, often multinational, company, typically at the middle to senior management level. This contrasts with the very small share of students on domestic

distance learning programmes working at foreign-invested companies as described in Section 3.1.

China's degree recognition situation is probably a major reason for this. Government employees or workers in state-owned companies would be less likely to have their degree recognised by their employer. In contrast multinational companies tend to be more likely to accept overseas degrees even if these are not officially recognised in China. At the same time the relatively high cost of an overseas degree compared to a local qualification means that this is out of reach for many potential students who are not yet established in their career. As noted in Section 5, in-person degrees are also generally seen as more valuable than online qualifications in China, so a student from a family who could afford overseas education would likely study their bachelor's degree in-person either in China or abroad.

Another reason why master's degrees are more popular is the current situation for local provision. Despite major expansions over the last few years there is still a lot of unmet demand for master's degrees – in 2020 there were 3.4 times as many candidates for the country's postgraduate entry exam compared to the number of places for new entrants on master's degree programmes. Domestic distance learning providers such as the Open University of China also lack the power to award master's degrees, which may also drive some students towards overseas providers.

Although distance learning students are usually employed by major companies, most are studying on a self-funded basis. This trend is accelerating over time – one UK university interviewee commented that “in the past there was quite a lot of company sponsorship but in recent years it's been increasingly self-funded”, attributing this to changes in company budgets. However, the university still has partnerships with some major companies that lets their employees enrol on their programme at a discounted corporate rate even though most of the students taking advantage of this rate are self-funded.

Interviews with Chinese employers supported this finding. While most interviewees said that their companies worked with external institutions to provide online training for employees, this was almost always on short-term professional courses rather than higher education programmes. None said that they provided funding for overseas distance learning HE programmes, although one did say that they gave partial funding for MBA courses (20 per cent of fees) while another worked with a local vocational college for training at the diploma level.

One interviewee did comment that one of their providers of short online training courses was an overseas university, but emphasised that the courses this university offered were in multiple languages including Chinese. This was a critical point and they would not have accepted training courses that were only available in English. Another interviewee said that their company had an arrangement to give tuition reimbursement for mid-to-senior managers who completed courses on “a foreign distance learning website”, but said that no employees had signed up for training on that website because the courses were in English as well as being more expensive than local options.

Discussions with UK institutions providing distance learning degrees to Chinese students show that business-related subjects make up the largest part of their distance learning students – with the exception of the Open University, where most students are enrolled on the university’s open degree which allows them to choose modules more flexibly. MBA courses are particularly popular and a major focus for some UK universities’ distance learning provision in China. Interviews with a local platform supporting overseas distance learning providers confirmed that this preference for business subjects was common across students from all overseas countries, saying that the government recognition was the main reason – companies hiring employees with MBA degrees or master’s degrees in finance placed less importance on local government recognition and so saw overseas degrees as more valuable.

Despite this focus all interviewees mentioned that their institution wanted to expand the range of distance learning subjects for Chinese students – both to a broader range of business-related subjects, such as financial management or fashion marketing, or to subjects outside of this field such as computer science and psychology.

Business is also the top subject area for Chinese students studying face-to-face programmes at universities in the UK, but the preference for this subject among distance learning students is especially strong even compared to on-campus students.

It is also important to note that not all students studying UK distance learning programmes in China are Chinese. Many overseas distance learning students are UK citizens working abroad, while others are citizens of other overseas countries whose language skills make it difficult for them to study a local HE programme in Chinese or who aim to earn an international qualification. A representative of one UK university commented that their online master’s degree in education is particularly popular among British citizens living in China, perhaps because a large proportion of foreign employees in the country work as teachers and this type of qualification is valued by international schools in China.

4.5 Challenges for UK institutions providing distance learning programmes

4.5.1 Lack of recognition of overseas distance learning qualifications

Interviewees disagreed on the extent to which the lack of official recognition is a challenge for their distance learning activities in China. A representative from one UK university with a large number of distance learning students in the country commented that this was “a definite concern for students” and a major obstacle for recruitment, while an interviewee from a local company supporting overseas providers commented that the lack of recognition was “the most important factor” restricting provision of overseas distance learning degrees in China.

However, interviewees from other UK universities saw this lack of official recognition as a less important factor, commenting that most of their students were working for private companies who did not see Chinese government recognition as the main factor affecting the value of an overseas degree.

One reason for the difference in opinion may be the type of potential student that each interviewee was considering. There was general agreement that working professionals in private / multinational companies tended to make up the main market for overseas distance learning qualifications, and that this group was less worried about government acknowledgement of their qualifications than people working in the government or state-owned sector or people at an earlier stage in their career.

4.5.2 Restrictions on in-person teaching in China

Complying with Chinese laws on overseas teaching in China is also a challenge for UK institutions. Although entirely online programmes are interpreted as outside the scope of these laws, restrictions on overseas institutions delivering in-person teaching in China greatly restricts the type of blended learning programmes that can be offered.

While China's formal transnational education (TNE) partnership model allows in-person teaching in partnership with a local university, this is not a good fit for distance learning partnerships as the MoE has been reluctant to approve TNE partnerships where online teaching plays more than a minor supplementary role.

Complying with this law means that some universities' programmes have differences between delivery models in China and in other countries. For example, as noted in the previous section, the University of Manchester's Global MBA programme does not formally require students in China to attend the in-person workshops, whereas this is a compulsory part of the programme for students taught through other centres.

4.5.3 Restrictions on advertising distance learning qualifications

Marketing was also raised as a significant challenge when promoting UK distance learning qualifications in China. Chinese media such as newspapers, magazines or major websites refuse to run advertisements for non-approved HE programmes, and will closely examine documents before publishing an advert for even officially-approved partnerships.

This means that UK universities' promotion for their distance learning partnerships is mostly through owned media like social media accounts or their own websites. Some universities also run online advertisements for their programmes on overseas websites like Google, which many of their potential students access through VPN software. Other channels include corporate partnerships, in-person events, and promotion through alumni. Direct recruitment through agents was described as "not terribly successful", perhaps because these agents tend to target more traditional students rather than the kind of mid-career professionals who are more likely to enrol in an online degree programme.

In October 2021 five government bodies, including the Ministry of Education and the State Administration for Market Regulation, published an announcement titled "Notice on Strengthening Supervision of Advertisements for Continuing Education at the Higher

Education Level”. This announcement stated that there was a problem of “false and exaggerated advertising” in the field of adult HE programmes including online degree courses.

This announcement called for provincial authorities to crack down on misleading and illegal information, saying that information in areas such as admission requirements, minimum years of study and the certificate awarded for the programme must be true and accurate. It also stated that non-academic training – an area which is less strictly regulated in China – “must not be confused with universities that carry out academic education”. Even where a programme is delivered in cooperation with a local university, the announcement emphasised that advertisements published by a third party (which would include a UK partner) must have written authorisation from the university, and this authorisation must be “actively disclosed to the public”.

The announcement said that the crackdown will cover social media such as public WeChat accounts and websites as well as printed material and spam messages. It did not specifically mention degree programmes from overseas universities, but the crackdown shows that it is now more important than ever to avoid implying that a UK distance learning qualification would be recognised as a degree in China. Universities working with external partners such as agents or local training centres should pay particular attention to preventing their partners from stating or implying that the qualifications awarded through their programmes are recognised by Chinese authorities.

4.5.4 Internet restrictions in China

China’s so-called “Great Firewall” is a well-known barrier for internet users in the country. Many overseas websites are not available in the country, including popular services such as the Google search engine, other Google properties such as Google Docs or Gmail, Wikipedia, and BBC News. The process is not transparent – users are shown a web browser error message instead of an official notice that a site is censored – and there is no appeal process for overseas website operators who believe their service has been blocked by mistake.

In addition to sites that are directly blocked, some other sites are not available as they are hosted on blocked providers, or do not load properly because they rely on blocked sites for part of their functionality (for example, sites that use JavaScript libraries hosted on Google’s servers).

Most UK universities are already familiar with these difficulties through offering online classes to Chinese students through the Covid pandemic period, and have had to work on solutions to these problems.

One such solution is the Global Education Access Framework offered by JISC, the non-profit digital services organisation which also operates services such as the JANET network.¹⁷ JISC has worked with Chinese tech company Alibaba to set up this service,

¹⁷ <https://www.jisc.ac.uk/global-education-access-framework>

which allows students to access UK universities' resources and learning environments in a way that is legal and more reliable than unlicensed VPN software. As well as universities' own servers the framework can also allow students to access certain other blocked services such as Google Classroom and other G-Suite applications.

4.5.5 Employer and student attitudes towards distance learning

As described in Section 5, Chinese employers still generally see degrees earned through distance learning as less attractive than face-to-face programmes. While perceptions are improving over time, a distance learning qualification will often not be regarded as equivalent to an on-campus degree from the same institution.

Some interviewees also said that students often expected distance learning qualifications to be cheaper than in-person programmes, and not all students understand the value proposition of a high-priced course that does not involve in-person study. A representative of a UK university offering blended programmes that involve both in-person and online study commented that this course format was seen as more attractive than purely online competitors despite being at a disadvantage in terms of price.

5. EMPLOYER AND STUDENT PERCEPTIONS OF DISTANCE LEARNING IN CHINA

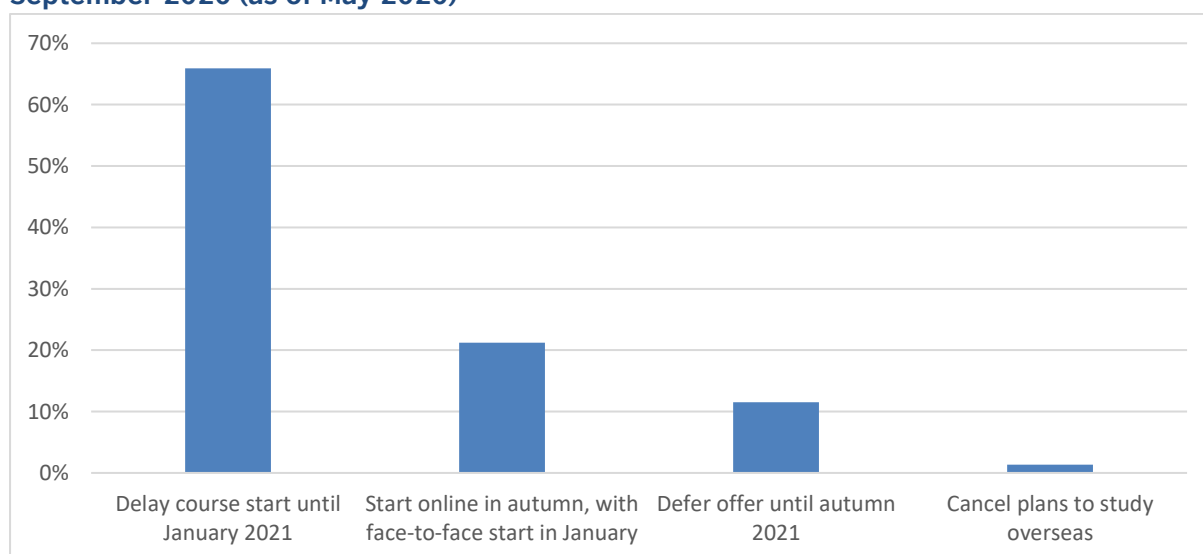
5.1 Student perceptions of overseas distance learning programmes

UK university representatives noted that students recognise their distance learning programmes as high quality, comparing favourably with domestic programmes. Students that enrol on these programmes value both international qualifications and the quality of education they will receive from a UK university, and the main competitors for these programmes tend to be other international universities or Sino-foreign partnerships rather than local HEIs.

However, interviewees also noted that in-person degrees are generally seen as more prestigious than online qualifications by both students and employees. A distance learning qualification from a particular university would generally be seen as less attractive compared to the same degree earned through in-person study. While studying online has advantages in terms of convenience, allowing students to study a UK degree part-time while still continuing to work in China, factors such as the lack of face-to-face contact and the loss of an on-campus study experience in the UK are seen as major disadvantages.

Research into attitudes to studying abroad during the Covid pandemic, conducted by the British Council in 2020, illustrate that for most students the negatives of online study outweigh the positives. Among students that held an offer to start a UK HE programme in the 2020/21 academic year, survey results showed that if they were unable to start their course in Autumn as planned a large majority of students would prefer to delay the start of their programme until January or the following September, or even to cancel their study plans entirely, rather than switch to online study for the first semester of the programme. Only a fifth of students saw an online start as the most preferable option, an even lower proportion than in most other East Asian countries.

Figure 5.1: Chinese students' preferred options if unable to start studying in-person in September 2020 (as of May 2020)



Base: UK offer-holders (6,227 respondents)

Similar attitudes were expressed in the British Council's discussions with prospective Chinese students early in the pandemic period, who almost universally expected a shift to online study as a negative impact of Covid and often commented that their decision to enrol on a UK degree would depend on the availability of in-person study. While this research covers students who originally intended to study an on-campus programme, it nevertheless reflects a more general opinion in China that online study is not comparable to face-to-face study – even in a situation where degree recognition is not an issue as Chinese authorities have announced that they will recognise courses delivered online due to pandemic countermeasures. However, more recent research suggests that some students who started their programmes online now say that they would prefer to complete their course in China rather than physically going to the UK because of continuing concerns over safety.

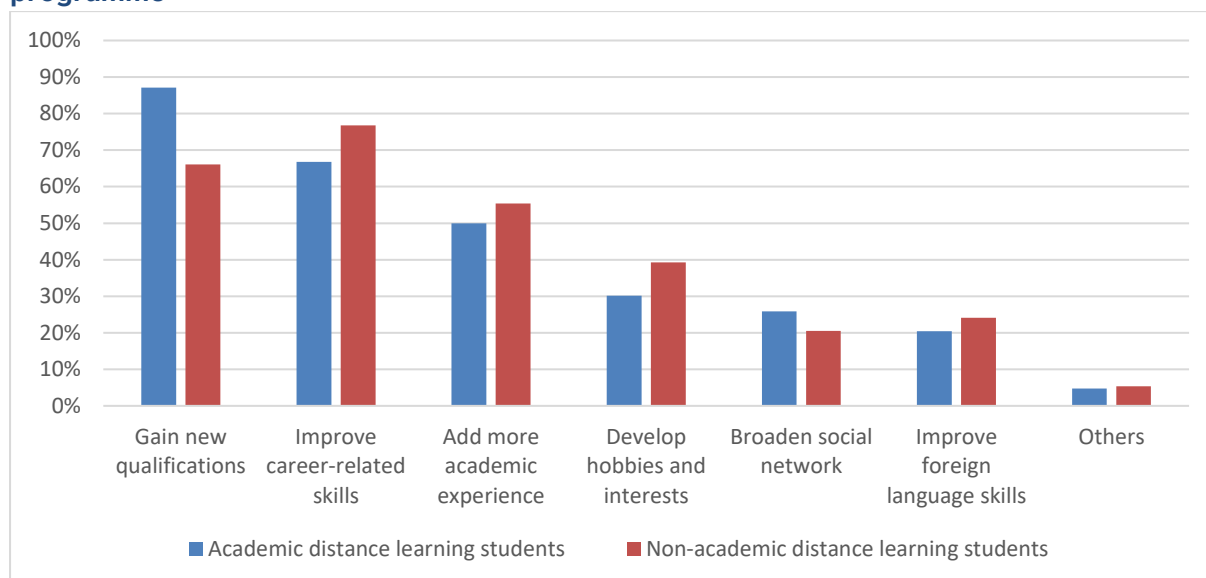
As noted in Section 4.4, students enrolling on UK distance learning programmes in China are mainly middle to senior managers in private / multinational companies. Aside from being more able to pay for a UK distance learning programme and less willing to move abroad for a long period, this group tend to be less concerned about degree recognition as their employers place value on overseas qualifications. This means that perceptions of these programmes are more positive in this group. Due to their senior positions there is also a substantial overlap in the perceptions of this group with employers' perceptions of distance learning programmes.

A survey of distance learning students at the Open University of China was also conducted as part of this research, covering 576 students enrolled on the university's online courses. 464 – or roughly 80 per cent – were enrolled on degree or diploma programmes while the remainder were studying courses that did not lead to academic qualifications. A further 419 students reported that they either had no online study experience or had only studied online temporarily due to the Covid-19 pandemic; these students have been excluded from the discussion below.¹⁸ When interpreting these survey results, readers should note that these reflect the opinions of students on domestic rather than international distance learning programmes.

Unsurprisingly the main motive for enrolling on a degree or diploma programme was to gain new qualifications, while this was also an important factor for many students on non-academic programmes. Two thirds of academic students and more than three quarters of non-academic students also said they aimed to improve skills related to their career, while around half of each group said they wanted more study experience. Other motivations were much less common – roughly a third said their field of study was related to their interests or hobbies, with a quarter saying they wanted to broaden their social network and roughly one in five wanting to improve their foreign language proficiency.

¹⁸ Many of these students were likely studying through OUC branches, while it is also possible that some had misinterpreted the survey to ask about previous online study experience rather than their current course.

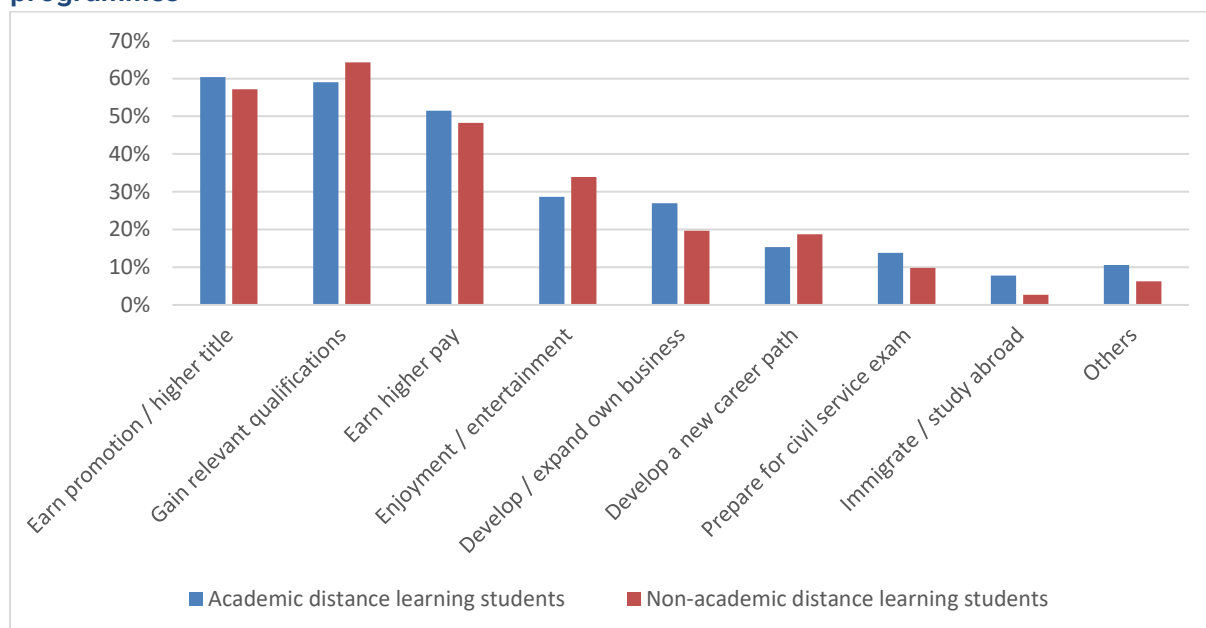
Figure 5.2: Open University of China students' reasons to study a distance learning programme



Base: OUC students enrolled on online academic or non-academic distance learning programmes (576 respondents)

Discussing more concrete objectives, the top reason for academic distance learning programmes – chosen by around 60 per cent of respondents – was to earn a promotion or higher professional title, while many students also aimed to gain relevant qualifications and earn higher pay. Other factors such as enjoyment or entertainment were much less popular. Around 8 per cent of academic distance learning students named immigration / study abroad among their reasons to take a distance learning course, although only one student named this as their sole objective.

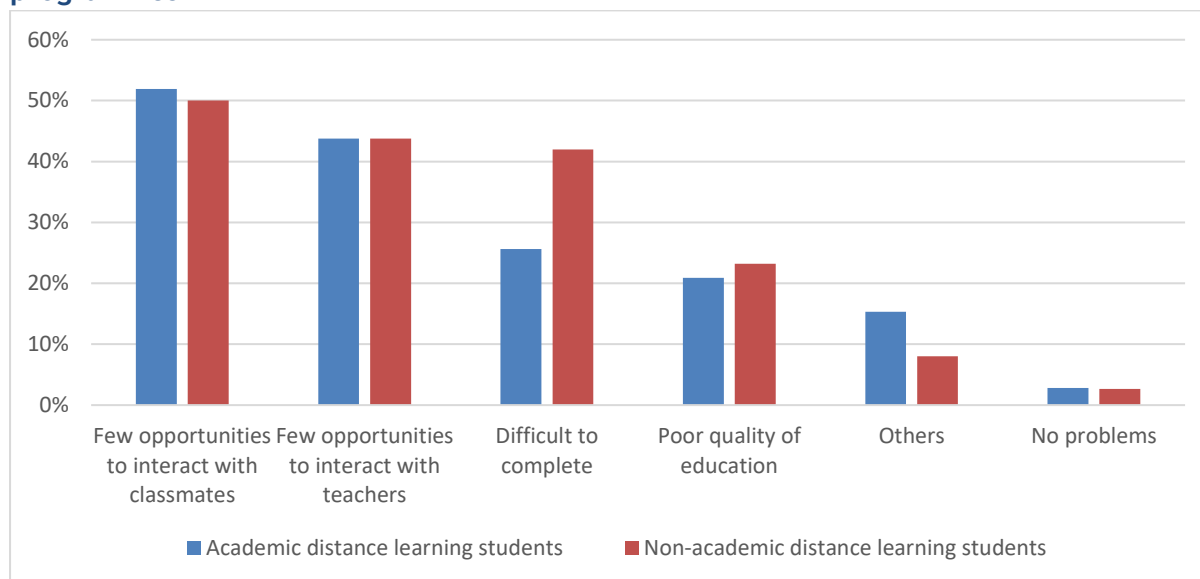
Figure 5.3: Open University of China students' desired outcomes from distance learning programmes



Base: OUC students enrolled on online academic or non-academic distance learning programmes (576 respondents)

When asked about problems with their course, students' main complaints on both academic and non-academic programmes were that there were few opportunities to interact with their classmates and with teaching staff. Comparatively smaller numbers of students saw their course as difficult to complete or the quality of their education as poor. Only 3 per cent of students chose no options or wrote in that there were no problems with their course, although it is possible that many of the respondents that chose the "other" option had this as their intended meaning.

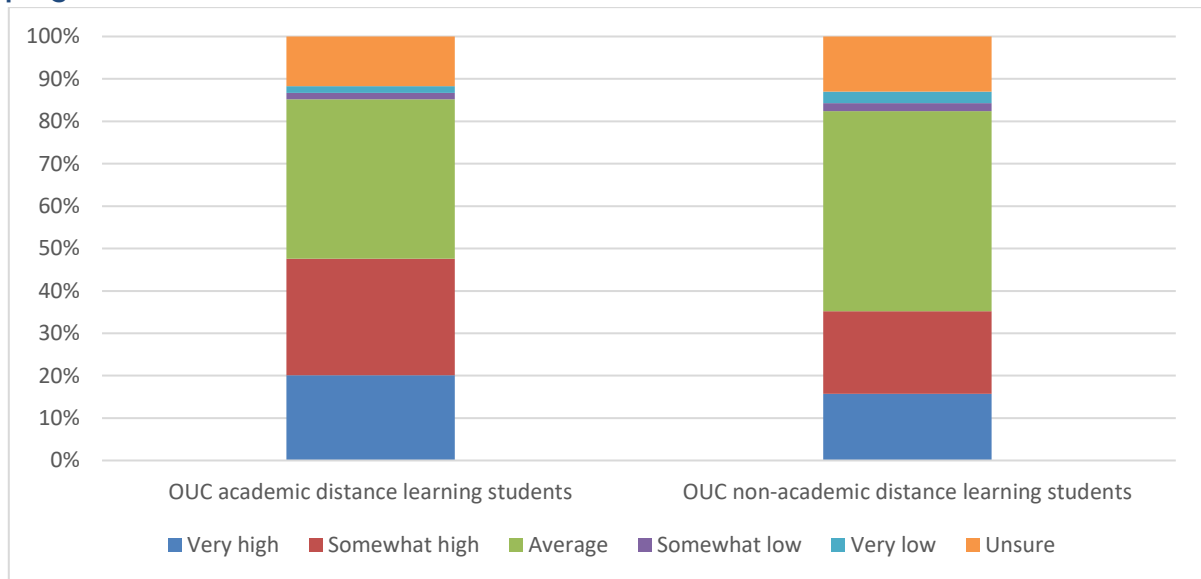
Figure 5.4: Open University of China students' perceived issues with distance learning programmes



Base: OUC students enrolled on online academic or non-academic distance learning programmes (576 respondents)

However, students were generally fairly positive about employers' recognition of distance learning courses. Among students studying academic programmes, almost half (46 per cent) said that they expected employers to have a "very high" or "high" degree of recognition of distance learning qualifications, while only around one in six said that they were not sure to what extent their qualification would be recognised or that they expected a low degree of recognition. Students on non-academic programmes were somewhat less confident with only a third saying that employers had a high or very high degree of recognition, but even among this group nearly 80 per cent still expected at least an average degree of recognition.

Figure 5.5: Open University of China students' perceptions of employer recognition of their programme

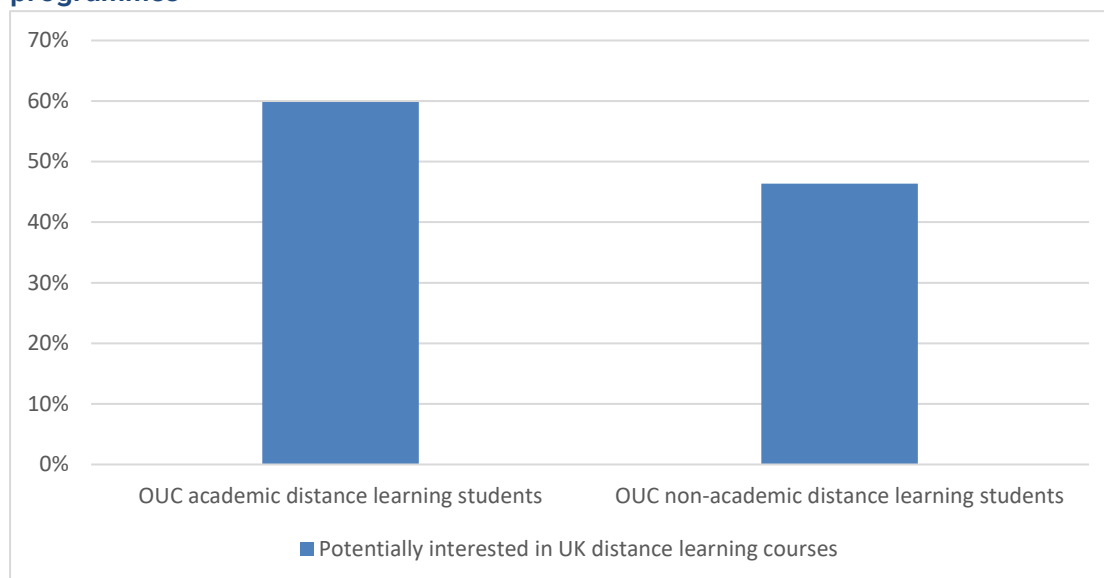


Base: OUC students enrolled on online academic or non-academic distance learning programmes (576 respondents)

Despite this relatively positive response, readers should bear in mind that these results are based on a survey of current distance learning students. This means that they might overestimate the real level of acceptance in society, as people who do not expect distance learning qualifications to be recognised are less likely to enrol on such a programme.

Respondents were also asked about their level of interest in UK distance learning programmes. Initial results were positive, with 60 per cent of those enrolled on academic programmes and almost half of non-academic students expressing potential interest, even after being prompted that these qualifications are not officially recognised by the Chinese government.

Figure 5.6: Open University of China students' interest in UK distance learning programmes



Base: OUC students enrolled on online academic or non-academic distance learning programmes (563 respondents)¹⁹

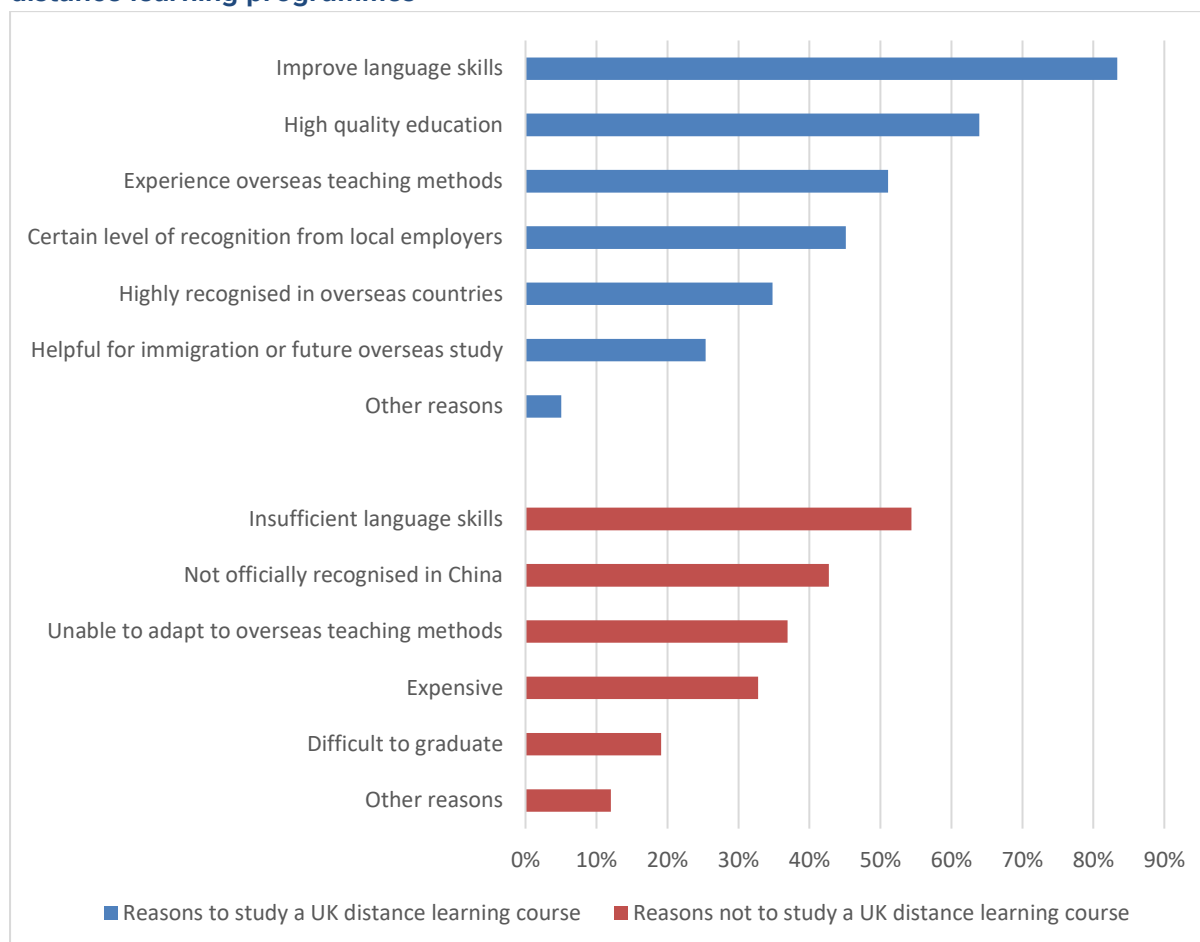
Bachelor's degree programmes were the most popular potential level of study by a large margin, perhaps because a large proportion of OUC students are currently studying at the diploma level. Overall students were most likely to express interest in studying Economics, Education and Management respectively, but most students did not restrict themselves to a single potential subject – almost two thirds named multiple possible fields of study, often covering a wide range of unrelated areas.

When OUC students who gave a positive response were asked about the potential advantages of studying a UK programme, the most popular reason was raising language proficiency while around two thirds named the quality of education from UK universities as an advantage. Slightly more than half named the UK education style as an advantage or said that UK degrees were highly recognised in China.

Meanwhile the most popular reason among people who said they were not interested in this sort of education was that they felt they did not have the necessary level of English proficiency. The lack of official recognition in China was mentioned by 43 per cent of these respondents while 37 per cent felt that they would not be able to adapt to overseas teaching methods. Only a third saw cost as a major issue.

¹⁹ This is lower than the base for previous questions as a several students skipped this question. Subsequent questions also had a small number of non-responses. All percentages are given as a share of students who responded to the relevant question.

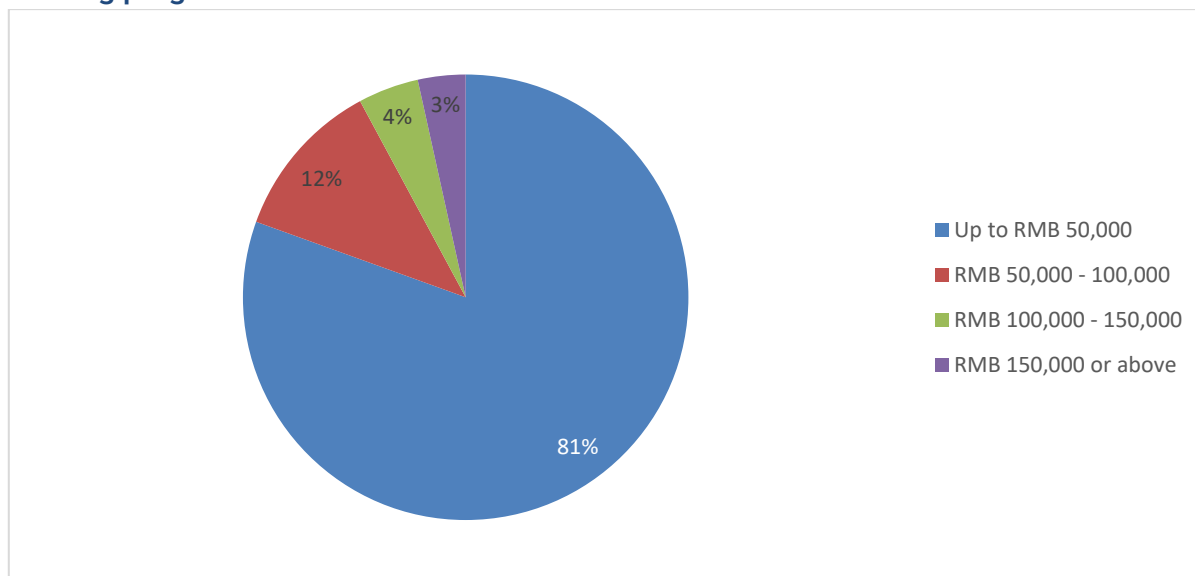
Figure 5.7: Open University of China students' perceived advantages and drawbacks of UK distance learning programmes



Base: OUC students describing themselves as potentially interested / not interested in UK distance learning programmes (560 respondents)

However, follow-up questions suggest that cost may be a larger factor than these responses suggest. Among OUC students who said they would be interested in studying a UK distance learning programme, a large majority said that they would pay no more than RMB 50,000 (£5,700) for such a course, while most of the rest were unwilling to pay more than RMB 100,000 (£11,300). Only 3 per cent of these students said they would pay RMB 15,000 (£17,000) or above – a figure which is still below the (UK) Open University's estimate of around £19,000 for an international student studying a bachelor's degree.

Figure 5.8: Open University of China students' maximum acceptable fees for a UK distance learning programme



Base: OUC students describing themselves as potentially interested in UK distance learning programmes (318 respondents)

5.2 Employer perceptions of overseas distance learning programmes

Although Chinese distance learning qualifications are legally equivalent to those earned through face-to-face study, Chinese employers generally have negative perceptions of these qualifications. The general perception among interviewed employers were that these qualifications were not equivalent to those earned through in-person programmes. All interviewees at Chinese universities offering distance learning degree programmes also confirmed that this was a common obstacle for their graduates.

This is particularly true among larger employees – including some major public-sector employers who have formal policies requiring their employees to have studied on a face-to-face programme. In contrast smaller companies tend to place less emphasis on formal qualifications and pay more attention to potential employees' individual skills, which makes them more likely to employ graduates who studied via distance learning.

Even at employers which treat distance learning and in-person qualifications equally, interviewed managers commented that in their experience employees with distance learning qualifications did not perform as well as those who had studied a traditional degree course. For several employers the distinction they drew was not online vs in-person but full-time vs part-time, with part-time in-person programmes also seen as having lower quality graduates than traditional full-time degrees.

Some attributed this to differences in the quality of education, saying that students at traditional universities study more intensely and have better guidance from teaching staff. Meanwhile one interviewee at a university offering both face-to-face and distance learning programmes blamed the difference on the "foundation of the employees". In-person students at the interviewee's institution need a high score in the Gaokao university entrance exam, but the requirements for enrolling on the university's distance

learning programme are much lower and the interviewee saw distance learning students as having lower ability even before the start of their course.

When it comes to overseas distance learning qualifications, most local employers have little experience of these programmes and opinions are mixed. One interviewee at a state-owned company said that “the quality [of overseas distance learning programmes] is not standardised and the courses aren’t recognized by the Ministry of Education”, which would be a major issue for potential employees with these qualifications. On the other hand an interviewee at a foreign-invested IT company had a more positive attitude about overseas distance learning qualifications, saying that overseas programmes are “more practical” than those from Chinese universities which they described as mainly exam-oriented.

This higher degree of recognition by international companies was described as a common trend by interviewees at UK universities, who commented that overseas distance learning qualifications are valued more highly by multinational employers. One interviewee commented that their qualifications are particularly highly appreciated by British companies in China, and can bring their graduates promotion opportunities or new jobs. This interviewee said that “as long as [the degree] is from a top university it’s valued, no matter whether online or in person”.

When discussing MoE recognition this was seen as important by most employers, with the majority using the Ministry of Education’s degree verification system to confirm new employees’ qualifications. Even interviewees at a company providing outsourced HR functions to overseas clients said that they would reject applicants with only overseas distance learning degrees, despite interviewees at that company commenting that an overseas degree was an advantage for many of the positions they hired for (either internally or on behalf of clients).

This need for verified degrees would filter out potential employees whose only HE qualifications were overseas distance learning degrees, but applicants with both an in-person bachelor’s degree and an online master’s qualification can still be passed through to the interview stage where their abilities are assessed by the people who will be working with the potential new employee directly. Employers noted that many of the benefits of a postgraduate course, such as skills, connections and personal growth, do not depend on official recognition.

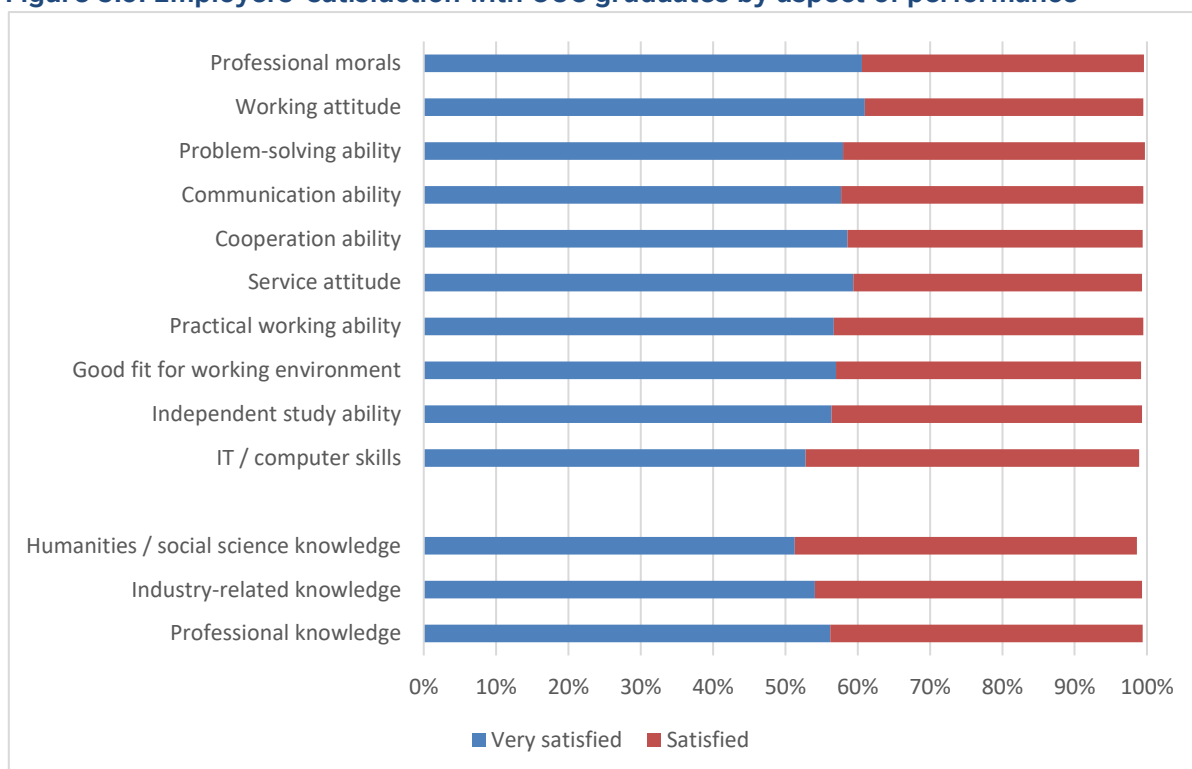
Beyond higher education, employers generally expressed more positive opinions of online professional qualifications – especially in the IT sector which values certificates from vendors such as Microsoft and Huawei. One interviewee commented that some companies saw these certificates are more valuable than degrees, and there was general agreement across all interviewees that companies were more willing to pay for employees to study short job-related courses rather than to provide funding for full online degree programmes.

As noted in Section 5.1, a survey of Open University of China students showed that these domestic distance learning students were moderately confident about the level to which their qualifications will be recognised by employers, with around half expecting a “very

high” or “high” degree of recognition while another third said that the level of recognition would be “average”.

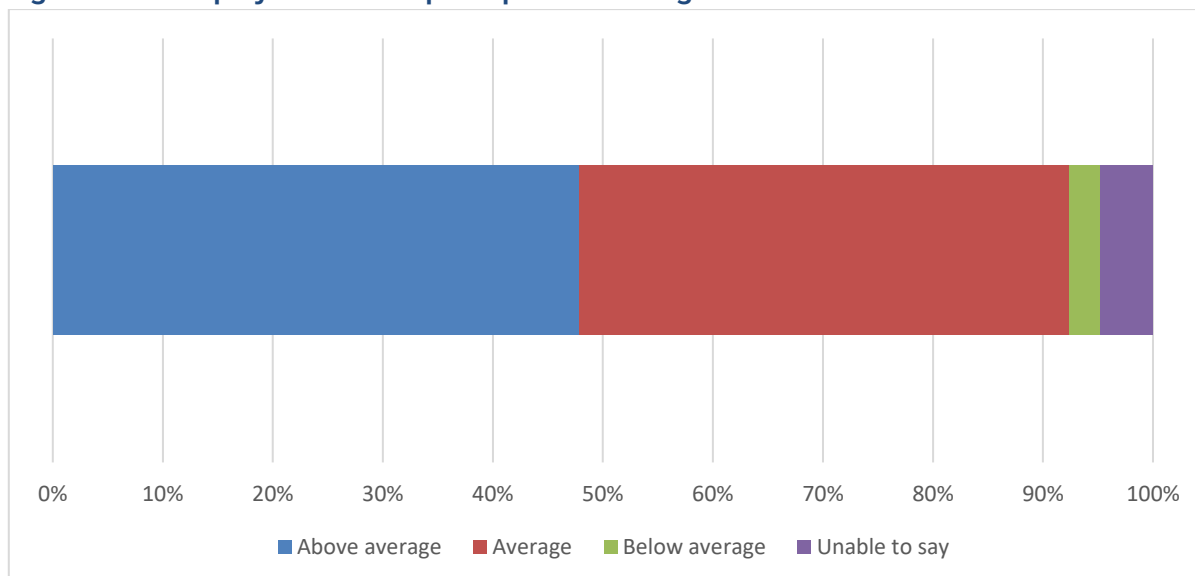
The Open University of China also monitors employers’ impressions of its graduates. The university’s 2019 graduate quality report showed that companies and organisations who hired OUC graduates, between 52 and 61 per cent described themselves as “very satisfied” with each of several different aspects of their graduates’ abilities with more than 98 per cent in each area saying they were at least “satisfied”.

Figure 5.9: Employers’ satisfaction with OUC graduates by aspect of performance



Source: Open University of China

Overall, 48 per cent of surveyed employers described OUC graduates as “above average”, while only 3 per cent said that they performed at a below-average level.

Figure 5.10: Employers' overall perception of OUC graduates

Source: Open University of China

Despite the positive results from this survey, it should be noted that the Open University of China only surveyed employers that recruited their graduates. This means that they probably give an overly positive assessment of attitudes towards distance learning, as companies with a less positive attitude are less likely to hire these graduates.

When discussing trends over time, interviewees at local employers commented that they expected the scale of distance learning to grow over time but they did not expect it to be competitive with in-person programmes in the near future. One interviewee commented that future developments in the distance learning sector “will depend on how well these courses are supervised and regulated”, while another said that the rigour of a distance learning programme did not compare to traditional degree programme and saw it as mainly a model for continuing education rather than as a mainstream alternative to in-person study.

A third interviewee talked about a more general trend towards increasing competition in terms of educational qualifications in China. They expected that this would lead to more people studying more master’s degrees and other postgraduate qualifications after leaving university and entering the workforce. This would lead to a rise in distance learning qualifications, which can be studied while still working, which would also benefit overseas universities as students would not need to move out of China to study.

Local university interviewees had positive attitudes towards trends in distance learning, with several citing the pandemic as having a positive effect. Although the immediate effect of Covid mainly affected in-person programmes which have now moved back on campus, one interviewee described this as a “large-scale experiment” which would help to boost the quality of distance education and lead to “profound changes” which will benefit future online teaching. Others also discussed reforms over this period such as computer-based examinations which helped to narrow the gap between distance learning and in-person programmes, which they expected to increase the quality of their programmes and have long-term positive effects on employer recognition as a result.

Interviewees at domestic universities also saw broader government policy as having a positive effect on employer recognition of distance learning. China's government is promoting distance learning for both HE courses and lifelong learning, as well as encouraging cooperation between industry and academia, although one interviewee commented that there are "still difficulties that need to be overcome". Technological improvements such as better availability of 5G networks and improved artificial intelligence technology were also described as likely to have a positive effect in the future.

6. CONCLUSIONS AND RECOMMENDATIONS

Distance learning in China has already reached a huge scale, with more than 8 million students studying degrees delivered through distance learning models at the bachelor's degree or diploma level. Many more study online modules as part of a programme designed as an in-person degree, and this is a rapidly developing area with the Ministry of Education looking to designate courses as high-quality and improve credit recognition systems to allow students more flexibility in their choice of modules. The Chinese government is also working to raise the quality of distance learning in the country, with a focus on improving quality assurance systems, teaching standards and relevance to employability and national development goals, as well as to improve systems for lifelong learning in the country.

Overseas degrees earned through distance learning are not yet officially recognised in China. This policy is unlikely to change quickly, both due to unresolved difficulties around quality assurance and also because it could have a negative impact on local distance learning providers or China's policy of ideological education.

While some policies on online study have been relaxed during the pandemic period the Ministry continues to emphasise that this is a temporary relaxation that only applies to students admitted to traditional full-time face-to-face programmes. Chinese authorities have taken a strict approach to universities that attempt to take advantage of these policies to recruit students to programmes designed around distance learning.

The lack of recognition doesn't prevent Chinese students from enrolling onto distance learning programmes directly with UK universities, but it does limit the attractiveness of these programmes for many Chinese students. Aside from government bodies and state-owned companies, many private employers also rely on the Ministry of Education's systems to verify the employees' qualifications. There is also a broader negative perception about distance learning in China, with most employers seeing qualifications earned online as less prestigious than face-to-face study with the same university.

Another important effect of the lack of official recognition is that it is difficult for UK universities to advertise their distance learning programmes in China. Local media and websites will generally not accept advertising for these programmes, and any promotion should avoid implying that the programme leads to a degree that is recognised by the Ministry of Education. This is especially important in the wake of recent crackdowns on "false and exaggerated advertising" in the field of adult HE programmes launched in late 2021.

From the perspective of UK universities the largest potential group of distance learning students in China is still mid to senior level managers who work in multinational companies. Multinationals tend to place more value on overseas distance learning qualifications than local companies, while people in relatively senior positions are more able to afford to study an overseas course. In general these students are self-funded – it is rare for a company to fully subsidise an overseas distance learning programme, although some employers do provide partial funding.

Demand is strongest at the master's degree level, as most potential students already hold a bachelor's degree from a university in China or from in-person overseas study. In general business-related programmes are the most common subjects for this group to study, with MBA courses being particularly popular.

Chinese laws on transnational education cooperation make it difficult for UK universities to provide in-person teaching for their own programmes in China without cooperating with a local partner. At the same time the Ministry of Education's current policies mean that it is unlikely for a formal transnational education joint programme to be approved if the UK partner's contribution is delivered mostly or entirely online. As with other aspects of online study, restrictions have been relaxed during the Covid pandemic period but this is a temporary change which will be discontinued after border controls return to normal.

Nevertheless, some UK institutions have been able to work with local partners or their own China-based centre to provide in-person support for distance learning programmes. In order to comply with Chinese laws this support is typically provided on an optional basis, supplementing a distance learning programme rather than making up a compulsory part of the programme. Local support adds value to students compared to studying entirely online but the concerns discussed above about the lack of official government recognition still apply and the potential student body is more limited than an in-person programme in the UK.

Beyond the direct provision of UK degree programmes there are also other ways for the UK HE sector to cooperate with China on distance learning. Chinese authorities are already working with their UK counterparts on understanding and developing quality assurance systems for distance learning, which will play an important role in any future official recognition of overseas distance learning degrees. Meanwhile the Open University of China, the leading think-tank for distance education in China, has a great deal of experience in designing and delivering distance learning programmes and is keen to work together with overseas partners on overcoming shared challenges and narrowing the gap between online and face-to-face provision.

Representatives of the OUC also mentioned their potential interest in developing joint provision with UK partners, including to pilot some innovative distance learning programmes with the UK. There is also room to explore non-degree online education provision including teacher training and providing modules through Chinese MOOC platforms. Finally, UK universities interested in the China's distance learning sector are advised to pay close attention to any developments in Chinese policy and to provide feedback on relevant policy suggestions. The British Council and the Department for International Trade (DIT) are working closely together with Chinese authorities, think-tanks, institutions to explore further opportunities in this area.