



Universities UK
International

SINGAPOREAN PRIVATE EDUCATION SECTOR: REGULATORY REFORM

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EXECUTIVE SUMMARY

In October 2016, the Singaporean Committee for Private Education set out a series of changes to the regulation of the private education sector. Further clarification about the changes were issued in February 2017.

These changes will impact Singaporean private education providers delivering UK programmes, and therefore UK universities working with those

providers. It will also impact any UK universities established as private providers in Singapore.

This information note sets out the detail of these changes and their perceived impact.

INTRODUCTION

In October 2016, the Singaporean Committee for Private Education (CPE) introduced a set of enhanced regulatory requirements for private education providers (PEIs). In February 2017, CPE released detailed guidelines about the requirements¹.

The detail and expected impact of these is set out below, but in brief these include:

- Participation in an employment outcomes survey comparable to the Destinations of Leavers from Higher Education (DLHE) survey².
- Securing previously discretionary four year EduTrust³ certification.
- Adhering to minimum academic entry standards.
- Demonstrating a certain level of financial sustainability.

The CPE is holding a series of workshops in Singapore to provide PEIs with an overview of the changes. Invitations have been sent directly to PEIs in Singapore. UK institutions seeking more information should contact the CPE directly⁴.

This regulation follows a decrease in the number of private student numbers. There is an expectation that this new regulation will hasten a shrinking of the private education market. This is expected to be concentrated upon *smaller players which may not have the financial resources or do not have links to reputable overseas universities*⁵. Consequently, the expectation is that UK providers will be less affected though competition is expected to increase amongst those PEIs that remain in the market.

POLICY DETAIL

The following table is taken from the Committee for Private Education’s press release⁶ which accompanied the announcement of the regulatory content.

Table 1: Details of the Requirements⁷

	New Requirements	Details
1	Mandatory participation in Committee of Private Education (CPE)’s graduate employment survey for Private Education Institutions (PEIs) offering External Degree Programmes (EDPs)	<ul style="list-style-type: none"> ▪ To enable prospective students to make informed education and career choices, PEIs that offer EDPs will be required to participate in an annual Graduate Employment Survey (GES). The survey will be centrally administered by CPE to ensure independence and neutrality. ▪ The survey results will be published on CPE’s website at the institution level.
2	EduTrust certification requirement for PEIs that offer EDPs and/or programmes that articulate into EDPs	<ul style="list-style-type: none"> ▪ Pursuing EDP programmes and/or programmes that articulate into EDPs typically involve significant investments by students. ▪ To enhance protection for students, all PEIs that offer such programmes will be required to first obtain an EduTrust (4-year) certification. ▪ This requirement takes immediate effect for new PEIs or existing PEIs that do not currently offer such programmes. ▪ PEIs who already offer these programmes but do not have EduTrust (4-year) certification must apply for certification by 1 June 2017 and attain EduTrust (4-year) certification by 1 June 2018.
3	Minimum academic entry requirements for all EDPs and/or programmes that articulate into EDPs	<ul style="list-style-type: none"> ▪ Admission to an EDP will require: <ul style="list-style-type: none"> — GCE A-Level, IB Diploma, or other equivalent pre-university certifications; or — Polytechnic diploma or equivalent; or — PEI qualification that provides direct articulation into an EDP ▪ Admission to a programme that articulates to an EDP will require: <ul style="list-style-type: none"> — GCE O-Level or equivalent; or — <i>Nitec, Higher Nitec or equivalent.</i> ▪ This will apply with immediate effect to all new EDPs and programmes that articulate into EDPs. ▪ Existing PEIs offering such programmes which do not meet the stipulated guidelines will be given until 1 June 2017 to revise the admission criteria for its programmes.

4	Minimum financial requirements for all PEIs	<ul style="list-style-type: none"> ▪ A minimum paid-up capital of \$100,000 will be required for new PEIs with immediate effect. ▪ Currently, PEIs must have at least a Band 3 credit rating to apply for EduTrust certification. ▪ The requirement for credit rating is extended so that: <ul style="list-style-type: none"> — PEIs that have a 1-year ERF registration period must have at least a Band 2 credit rating. — PEIs that have at least 4-year ERF registration period must have at least a Band 3 credit rating. ▪ All existing PEIs must meet the minimum credit rating requirement by 1 June 2017.
5	Enhancements to EduTrust standards	<ul style="list-style-type: none"> ▪ As EduTrust certification aims to recognise PEIs that are able to consistently maintain high standards in key areas of management and in the provision of education services; the pre-requisites will be tightened. ▪ Only PEIs that have at least a 4-year Enhanced Registration Framework (ERF) registration period will be able to apply for EduTrust certification with immediate effect. ▪ EduTrust standards will also be enhanced to place greater emphasis on academic processes and student education outcomes through new requirements and greater score weightage. ▪ Standards will be more outcome-focused to allow for greater flexibility and innovation in the design of PEIs' systems and processes. ▪ The Guidance Document version 3.0 (GD3) articulating these enhanced standards will be released in January 2017 and will come into effect on 1 June 2017.

POTENTIAL IMPACTS

1 Mandatory participation in Committee of Private Education (CPE)'s graduate employment survey for PEIs offering EDPs

SkillsFuture Singapore is increasing its focus upon employability outcomes and enabling prospective students to make informed choices. The survey is intended to perform a similar function to the UK Higher Education Statistics Agency's Destinations of Leavers from Higher Education (DLHE). Its findings will inform future priority setting, and are expected to complement existing CPE guidance such as *Guide for Choosing a Private School*⁸.

A pilot survey was conducted in 2015–2016 with nine PEIs. It had a response rate of 33%⁹ of students that graduated in 2014 (approximately 4,200 of a total of 12,600)¹⁰. By comparison the 2014–15 DLHE survey had an overall response rate of 79% from a target population of 528,545¹¹.

A media release highlighted the lower employment and salary outcomes for graduates of PEIs relative to those of the public institutions, Nanyang Technological University (NTU), National University of Singapore (NUS) and Singapore Management University (SMU). Consequently, there is a risk that despite differing intakes PEIs may continue to be compared unfavourably with public institutions.

2 EduTrust certification requirement for Private Education Institutions (PEIs) that offer External Degree Programmes (EDPs) and/or programmes that articulate into EDPs

The EduTrust certification was previously a voluntary scheme operated by CPE for PEIs seeking additional markers of quality, over and above the mandatory Enhanced Registration Framework. The certification is now required for all PEIs offering EDPs, and therefore might be perceived as adding regulatory burden, as well as associated costs.

Additionally, as described in item five below, the requirements for EduTrust certification have also been increased.

The current certification status of PEIs is available from the CPE website¹².

3 Minimum academic entry requirements for all EDPs and/or programmes that articulate into EDPs

Those PEIs already offering EDPs have until Thursday 1 June 2017 to revise the entry criteria for their programmes.

The enhanced requirements are for new school leavers only. PEIs will continue to have *the flexibility to admit mature students who do not meet the above minimum academic entry requirements but have prior learning or work experience in the relevant fields*¹³.

The new thresholds are unlikely to be higher than UK programme entrance requirements. Despite this and the flexibility for admittance thresholds for mature students, this new regulation might impact on PEIs' recruitment by influencing and potentially restricting the pool of applicants.

4 Minimum financial requirements for all PEIs

To protect students' investment, enhanced financial requirements are being introduced for PEIs offering EDPs. A 'Band 3' credit rating will be required for EduTrust certification, which will be required by all PEIs offering EDPs.

A 'Band 3' credit rating is defined as, *adequate financial capabilities to meet normal commitments. However, adverse changes in economic conditions could lead to doubtfulness in its ability to pay*.¹⁴

As with the other measures, this will come into effect immediately for new PEIs, with existing providers given until Thursday 1 June 2017 to comply.

5 Enhancements to EduTrust standards

Previously voluntary, EduTrust certification has become a *de facto* requirement for PEIs offering external degree programmes. The enhanced EduTrust Certification Scheme standards were released on Tuesday 21 February 2017¹⁵. Full details are available here: <https://www.cpe.gov.sg/for-peis/edutrust-certification-scheme/where-can-i-get-more-information>

The pre-2017 EduTrust criteria¹⁶ were:

1. management commitment and responsibilities;
2. corporate governance and administration;
3. external recruitment agents;
4. student protection and support services;
5. academic processes and assessment of students; and
6. quality assurance, monitoring, and results.

All six of these criteria remain and are now supplemented by a seventh set out below:

Achievement of Student and Graduate Outcomes – to assess student and graduate outcomes. This criterion, which forms 15 per cent of the total possible score of 1,000, will measure how PEIs track, review, and improve the performance and outcomes achieved by their students. For PEIs that offer EDPs, the outcomes from their Graduate Employment Surveys (GES) will be considered under this criterion. Hence, a PEI with a higher graduate employment rate will score higher for this criterion than a PEI with a lower employment rate. With the addition of this new criterion, the overall weightage for the set of criteria relating to academic processes and student outcomes, has been increased to a total of 40 per cent, reflecting the greater emphasis placed on these aspects.¹⁷

The table below sets out the changes in the relative weighting of the EduTrust criteria:

Table 2 – Enhancements to weightage of EduTrust criteria¹⁸

	EduTrust Criterion	Weightage (Out of 1,000 points)		
		Current	New	Change
1	Management commitment and responsibilities	50	50	No change
2	Corporate governance and administration	180	180	No change
3	External recruitment agents	120	80	Reduce by 40
4	Student protection and support services	210	200	Reduce by 10
5	Academic processes and student assessment	350	250	Increase by 50
6	Achievement of student and graduate outcomes (new)	-	150	
7	Quality assurance, monitoring and results	90	90	No change
	Total Score	1,000	1,000	

SUGGESTED ACTION

UK higher education institutions delivering degree programmes with PEIs in Singapore may wish to ensure that their partners are aware and have plans to comply with the enhanced regulatory requirements in time for deadline of Thursday 1 June 2017. CPE is hosting a series of workshops about the changes in Singapore in March 2017¹⁹. PEIs should have received an invitation to participate in these. UK higher education institutions which have concerns may wish to speak to their Singaporean partners about participation in these events.

Universities with questions about the detail and rationale for the enhanced measures are encouraged to contact the Committee for Private Education directly²⁰.

These measures appear indicative of the general direction of higher education policy²¹ in Singapore. We anticipate that Singapore will continue to be a key host destination for UK higher education transnational education (TNE), and that the policy changes are unlikely to significantly reduce the volume of existing or new partnership opportunities for UK universities. However, the environment may become more competitive with tighter scrutiny²².

While the growing onus on providers to demonstrate graduate outcomes appears primarily relevant to TNE providers, it extends to other forms of collaboration in higher education between the UK and Singapore. Recent policy documents, including the high-profile *Report of the Committee on the Future Economy* define the value of research collaboration in terms of employability and economic growth. It is likely that the emphasis upon higher education as a means to improve domestic economic inclusion and growth will continue at least in the medium term. Consequently, UK universities may wish to position their engagement with Singaporean partners in these terms where relevant.

ANNEX A

Key Singaporean regulatory organisations for private higher education

Council for Private Education (2009-2016)

The Council for Private Education was formally constituted as a statutory board under the Minister of Education on 1 December 2009 to formulate and oversee the implementation of initiatives to regulate and develop Singapore's private education sector²³. The Council was incorporated under the 2009 Private Education Act²⁴, which formed an amendment to the 1985 Education Act²⁵, which defines the overarching legal framework for education. The 2009 Act sets out both requirements for the composition, duties, staffing and management of the Council for Private Education as well as requirements for Private Education Institutions. In brief, the stated functions of the Council were registration, promotion, accreditation and certification, to publish information and to provide advice.

The Council established the mandatory Enhanced Registration Framework and the voluntary EduTrust certification scheme. The Council had a longstanding relationship²⁶ with the UK's Quality Assurance Agency (QAA), which included *collaboration on the UK top-up / articulation programme arrangements with Singapore's private education providers*²⁷. In October 2016 the Council for Private Education was renamed the Committee for Private Education and became part of SkillsFuture Singapore.

The SkillsFuture Council (2014-present)

The SkillsFuture Council was constituted in November 2014 to take forward the recommendations from the ASPIRE Committee alongside a focus on continuing education. The SkillsFuture Council exists to 'develop an integrated system of education, training and career progression for all Singaporeans.'²⁸

Committee for Private Education (2016-present)

The Committee for Private Education (CPE) was appointed by SkillsFuture Singapore (SSG) Board in October 2016 to carry out its functions and powers relating to private education under the Private Education Act. SkillsFuture Singapore was formally constituted through the *SkillsFuture Singapore Agency Act 2016*²⁹. Clause 71 of this Act notes the dissolution of the Council for Private Education, the transfer of its function to SkillsFuture Singapore and execution of that function through a subordinate committee: the Committee for Private Education. In practice (for the moment at least) the function and structure of the Committee for Private Education appears to be the same as that of the Council for Private Education with links to UK organisations such as the QAA extant.

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