



HOW UNREGULATED  
FOR-PROFIT PROVIDERS  
DEGRADE EDUCATION:  
THE CASE OF  
RAFFLES EDUCATION CORPORATION

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# Prologue

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## How the cookie crumbled

I joined Raffles Education Corporation in 2005 after a productive decade serving at Temasek Polytechnic in Singapore. The first year I worked as Senior Lecturer of Visual Communication at the Raffles Shanghai branch (Dong Hua University/ Raffles-LaSalle) before being promoted to Program Director for Multimedia Design at the Silom Road Campus in Bangkok.

Five years later, rumours surfaced that Raffles had not obtained a proper legal license to operate in Thailand, an accusation that proved to be true. In the local newspapers, Raffles was quoted as a rogue education provider offering international programs that it had no adequate permit to deliver. As the threat of foreclosure became imminent in 2010, Raffles committed to building a campus in Bangna to appease the government and to indicate that the company would play by the rules from now on.

In June 2015, another scandal hit Raffles. The entire network, via the Raffles College of Design and Commerce in Australia (RDCD), lost its accreditation granted by the Australian government for undergraduate programs for not delivering education of satisfactory standard. More than 1000 students across Asia ended up stranded, forced to either complete their studies at branches in other countries or to cut losses by discontinuing their education with Raffles. Closures of branches across Asia started to become more frequent. At the time, I was still completing my Masters in Applied Psychology with the University of Liverpool. After I graduated in December 2016, I left Raffles in February 2017 in mutually amicable agreement as I dissented with the company's business ethics and educational standards or lack thereof. This is the story of an unregulated and deeply dysfunctional education provider.

This document is written in gratitude to all of my students who put up with the inadequacies of the company during their studies (but still enjoyed marvellous learning experiences in our classes) and my ex-colleagues who have been through their share of professional frustrations. In order to gain a more objective perspective, policies and regulations at Temasek Polytechnic in Singapore are compared to corresponding frameworks at Raffles, setting the stage for directly comparing unregulated private education with regulated government education.

*Joana Stella Kompa, April 2017*

# Chapter 1

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## Who teaches the teachers?

“Were all instructors to realise that the quality of mental process, not the production of correct answers, is the measure of educative growth something hardly less than a revolution in teaching would be worked.”

John Dewey, *Democracy and Education*

A good starting point to assess the quality of an institution of Higher Learning is to probe the qualification of its teachers. How can schools, polytechnics, colleges or universities function without competent staff; not only competent in their field but also competent as educators and mentors of young people?

Temasek set up a dual strategy for teacher training. The first strategy was to offer a general two-year pedagogical certification program for academic staff conducted by SEDA, the Staff and Educational Development Association in the UK. At the end of the two-year program, staff obtained an international ‘Teacher in Higher Education’ accreditation. In essence, academic staff had to compile an evidence-based teaching portfolio ranging from applying pedagogical objectives in classroom settings to creating new programs that align with SEDA’s core values. These values entailed understanding how students learn, demonstrating concern for students’ development, commitment to scholarship, cooperation with colleagues, practising equal opportunities and ongoing reflection on professional practice.

The second pillar at Temasek was the further specialisation in active learning, student-centred pedagogy. In the case of Temasek, Problem-based Learning (PBL) was implemented across all faculties as a student-oriented pedagogy about 15 years ago. My task as Associate Consultant for PBL to Temasek Design School was the training of staff and students while managing the implementation of PBL for Temasek Design School.

At Raffles, by comparison, staff pedagogical training and development is non-existent. There are no qualification programs available of any kind to develop and improve even basic teaching skills. Typically, staff is recruited from the industry with a Bachelor or Master’s degree which is regarded as sufficient for employment. Raffles leaves the issue of teacher qualification unregulated, most likely since pedagogical training poses a significant cost factor. This neglect does not stay without consequences.

The deregulation of pedagogical standards encourages academic staff to replicate their personal teaching styles, leading to a predominantly instruction-based program delivery based on rote learning. Teachers tend to apply learning conditions under which they have learnt themselves. In such settings less capable staff, especially a large number of untrained part-time teachers fails across categories. Many teachers are incapable of basic classroom management. Some teach the wrong subjects or modules, tell students the answers to multiple-choice exam questions in advance, copy materials from the Internet or fill classroom time with nauseating PowerPoint presentations or YouTube videos. These counterproductive practices are amplified by Raffles conducting four-hour teaching blocks, tempting teachers to fill time with superfluous activities. There is no student that I know of who could pay attention for a continued four hours. Pedagogically absurd concepts such as the four-hour teaching blocks are however religiously enforced to accumulate, on paper, stipulated subject hours.

Once Raffles' untrained teachers enter the classroom they occupy their private kingdom. An evidence-based, peer-reviewed process of measuring the progress of students' learning is not implemented. Teachers are asked *pro forma* to provide formative feedback to students but then again, no staff has ever been trained on how to structure and conduct efficient formative feedback. How can students possibly improve when all they receive is feedback of a teacher's personal commentary? On a corporate scale, why would a franchise network consisting of 26 colleges with fluctuating staff turnover be interested investing in long-term pedagogical staff development?

Another example for teacher-centeredness is regularly conducted teacher course evaluations (so-called 'TEVALs') which are handed to students each term to assess the performance of their lecturers. Out of 20 questions to students, 12 relate directly and exclusively to lecturer evaluation. Only six questions relate to assessing the subject and not a single question refers to the different roles of students as learners.

In theory, as in practice, Raffles is a teacher-centred institution. It cares very little about students' development, be it on an individual or social level. Pedagogy is treated as an unnecessary cost factor while teachers blindly assume that their natural gift for teaching is sufficient to prepare students for the knowledge- and service society of the 21<sup>st</sup> century. The real problem is that it is irrelevant what a teacher teaches, but it is critical what a student has learnt. But how can teachers track students' ongoing progress in the absence of structured and mandatory review processes?

# Chapter 2

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## The Raffles Curriculum: Jack-Of-All-Trades, Master of None

'Franchised Arrangements: Where an offshore entity delivers a regulated course on behalf of a provider under license. (...) This model is likely to be higher risk as the provider does not contribute to the delivery of the course and has less control over the quality.'

Australian Government/ TEQSA Report on RCDC, October 2014

Besides a qualified staff, curricula are of the essence. The quality of offered programs is the very backbone of any institution of Higher Learning.

Curricula at Temasek were, as in most progressive government institutions, subject to critical review and improvement based on the feedback from students, academic staff, senior lecturers, program directors and PBL consultants. It is only by a comprehensive cooperative review that curricula can be successfully updated and improved. Changes affect particularly learning outcomes. New developments in technology and socio-economic contexts require a continuous updating of subject outcomes in order to remain valid and relevant. Secondly, curricula should not only offer solid foundation studies but beyond basics they should allow students to achieve mastery, achieving a professional standard in their field.

The origins of the Raffles Advanced Diploma curricula go back to the 1990s when Raffles started business operations in partnership with the Canadian LaSalle College of the Arts and Design. Some parts of the curricula were designed ad hoc by available academic staff and their peers. Since then, Raffles University System (RUS) is the sole guardian of the curricula as it centrally disseminates the programs to all of Raffles' branches as a franchise. Unlike Temasek, no feedback or data is gathered from students, staff or Program Directors to improve the 25-year-old curricula. Instead, a small expert group at RUS takes care of updating the programs. Such contained routine has multiple ramifications.

On a subject level, even the most prolific experts cannot be specialists at everything leaving the content of many subjects outdated and obsolete. For example, Raffles multimedia students still learn Adobe Flash although Flash stopped being used on the web for many years due to its massive vulnerabilities. New critical skills such as developing mobile applications have never entered the Raffles curriculum. More demanding skills such as advanced scripting and coding have never become part of multimedia programs, arguably because students with lesser aptitude would be overwhelmed. The culture of compiling 'softball subjects' affects

lecturers as well. For motivated lecturers, the teaching of Raffles' curricula can turn into a rather dull affair since they are not allowed to make sensible improvements that would change standardised learning outcomes, assessment, and assessment criteria. Instead, all that is required by lecturers is to deliver uniform packages, a practice that can be demotivating for staff whose professional qualifications supersede those of the curricula-guardians at RUS. No data and information are collected to find out how stipulated learning outcomes fare in the current context of industry and academia. The underlying blind assumption is that the recommendations of the RUS expert group are reliable, scalable and suffice as a benchmark.

Outdated content is not the only problem. The delivery of standard packages within the franchise system renders a lecturer's qualification largely irrelevant: A young and inexperienced lecturer with barely a Bachelor under her arm qualifies equally well to teach diploma subjects as compared to a senior and highly experienced professional on a graduate level. From the perspective of delivering standardised syllabi, high staff qualification is of secondary interest. The less specialised the syllabus, the easier employees can be substituted.

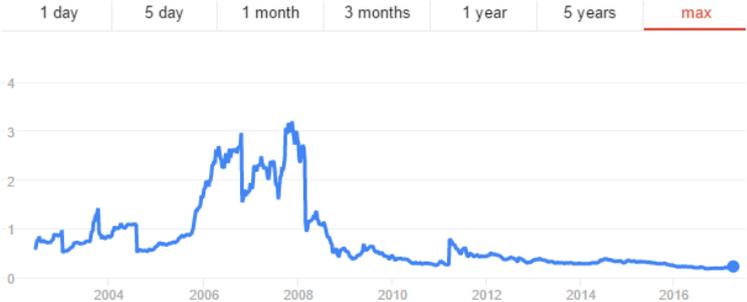
In order to understand the reasons behind the limited specialisation of study paths on program level one has to keep in mind that Raffles is a commercial entity. The profit formula of the company dictates that a maximum number of students are taught by a minimum number of lecturers resulting in a limited number of subjects on offer.

The multimedia curriculum at Raffles, for example, contains mixed sets for video production (3 subjects), animation (2 subjects), web-technologies (3 subjects) and interactive media (3 subjects) offering basic introductions to various aspects of multimedia, but not advancing into any area in depth. Let's assume a student intends to study filmmaking. At Raffles, this student would cover the subjects 'Storyboarding', 'Video and Audio Editing' as well as 'Experimental Video', which are three subjects in total. A student on diploma level at Temasek, by comparison, finishes 21 core subjects in video production (plus 9 electives). A student of '3D Interactive Media' at Temasek enjoys 23 specialised core subjects (plus 5 electives) while a student at Raffles covers in the same field a mere six subjects relating to 3D animation and interactive environments.

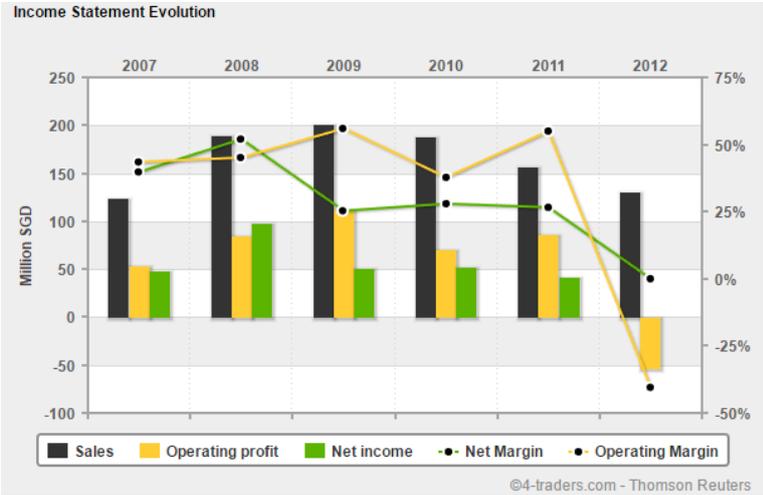
The lack of specialising subjects is easily explained. Although Raffles employs a wide network of campuses across Asia, student numbers for each campus are typically small, rendering the employment of large numbers of staff uneconomic. This is why highly specialised for-profit education providers such as, e.g., Full Sail University in the U.S. rely on a centralised campus with a large student population. Only with a larger pool of academic staff, it is possible to offer a wider array of specialised subjects. The paucity of subject specialisation at Raffles, particularly in the second year of studies, stands in stark contrast to its marketing promise of achieving career excellence.

Where in public institutions of Higher Learning well-staffed faculties create vivid communities of scholar-practitioners, lecturers at Raffles carve out an uninspiring solitary existence. Alone or with very few colleagues there is little incentive for them to create new exciting programs since syllabi are cast in stone. To this extent, the Raffles franchise model kills innovation in education.

### The tale of an unsustainable business model



**Company development:** After the crash of the global stock market in 2008, net profits declined correspondingly with a diminishing student population across the Raffles network. Most money was made during the short and rapid expansion based on the opening of new branches between 2006-2008.



**Detailed view:** Continuing losses after 2011

# Chapter 3

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## The Achilles Heel of Government Licensing

‘(21) In the event that TEQSA made a recommendation under section 9AA for RCDC’s registration to be renewed, the Secretary would need to have no reason to believe that RCDC (...) does not have the clearly demonstrated capacity to provide education of a satisfactory standard; or (...) is unlikely to be able to provide education of a satisfactory standard.’

‘(32) It is implicit in that observation that I reject the submission that the defaults identified by TEQSA were only record-keeping matters. In my opinion that understates the significance of many of them, particularly the ones concerned with the ability of the students to speak English at an adequate level.’

From Court Verdict Raffles College Pty Ltd v Tertiary Education Quality Standards Agency [2015] FCA 734 of 20<sup>th</sup> July 2015

### **Taking it Easy with Licensing and Working Around It**

The Achilles heel for all private education providers is official accreditation and licensing. In December 2016, Raffles obtained government approval to set up a Private Higher Education Institution, pending government conditions, after operating without a valid permit since 2003 when the company started as ‘Raffles Design Institute’ on Silom Road. Apparently, Raffles was only licensed as a tutorial centre. It had neither obtained a vocational nor a college license to legally operate in Thailand. Raffles Design Institute was licensed to provide one-year short courses while the official RUS Advanced Diploma program was set out as a two-year program. Raffles' solution to enrol students was simple: student visas for foreign students would be renewed annually. On paper, a student would e.g., study Graphic Design in the first year and Interior Design in the second etc., a convenient workaround to official regulations to run the full RUS diploma program.

### **Providing Misleading Information to the Press: Smokescreen Tactics**

In 2010, the Ministry of Education found out about Raffles flying under the radar of the law and threatened to close down operations. A deal was struck and Raffles committed to building a proper campus in Bangna on the outskirts of Bangkok as a prerequisite to qualifying as a Higher Education provider. Forbes magazine mentioned the pending shutdown in one of his articles but the CEO of Raffles, Mr Chew Hua Seng, demanded from Forbes magazine to

publish a correction. In his letter to Forbes on 2nd of August 2010, Mr. Chew Hua Seng claimed that *"Raffles Education Corp is working closely with Thailand's Higher Education Commission to comply with its requirement for RBK to acquire a university permit in addition to the vocational education license it had obtained in 2003 when it started operations in Bangkok."* However, the fact remains that Raffles had never obtained a vocational license. It was only in April 2016, six years later, that Raffles attempted to secure a proper vocational license by negotiating with the Ministry of Education - an idea Raffles later abandoned in favour of aiming at a Higher Education license. Needless to say, Raffles never acquired a university permit and was at no stage qualified to apply for one.

### **Smokescreen Tactics in Other Countries: The Example of Raffles Colombo**

In December 2016, the Thai Ministry of Education granted Raffles the license to set up a college, pending conforming requirements. Although it seems like good news that Raffles Bangkok appears finally on its way towards becoming a legitimate education provider, similar reports of starting operations under the radar of the law surfaced in other countries.

In October 2015, Raffles in Colombo, Sri Lanka was accused in *'The Sunday Leader'* of June 16, 2013, in the article *'Raffles Colombo Misleading Students'* of deceiving students by pretending that it had obtained government licensing for its diploma programs when in fact licensing had not substantialized yet. Raffles went ahead advertising its programs while government approval was still pending.

In their rebuttal to the article, Raffles made some misleading statements. It claimed that the company was *'granted in-principle approval'* from the government which is not identical to obtaining final approval. The original Sunday Leader article, written by Nirmala Kannangara, was attacked by Raffles accusing her of *'malicious intent (...) calculated to ridicule and injure the reputation of Raffles Education Corporation Ltd.'* Based on the aggressive response, one cannot evade the impression that the article may have hit a nerve.

The rebuttal further stated, *"The truth is Raffles is not banned in Thailand and in fact, we are in the process of being upgraded to university college status by the Thai authorities."* It is true that Raffles was never banned in Thailand, but one may add the light fact that it ran 13 years illegally without a valid permit. The fine print in the Raffles rebuttal used the term *'in the process'*, a standard smokescreen description employed by Raffles to buy time, evade factual scrutiny and formulate pre-emptive strikes: How dare you to accuse us when we are *in the process* of becoming legitimate? The term *'university college'* used in the rebuttal was misleading as the pending Thai license is de facto only a college license. Besides, in the UK, the title *'university college'* is protected by law and requires authorization by an act of parliament which is why Raffles should perhaps avoid the term altogether, in particular when cooperating with UK universities. The fact that Raffles started advertising Masters programs from Coventry University in May 2017 without a university license suggests that it blatantly continues to violate the law.

# Chapter 4

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## How the Raffles Franchise Model Affects Students

**‘Any student with a credit card and a wallet can enrol at Raffles’**

Former College Director

### **Loss of Accreditation affecting all Raffles Branches**

The Raffles franchise model affects students on a socio-economic, educational and psychological level. Since Raffles is a for-profit corporation, it reserves its right to open and close branches as the economic situation dictates, with little regard for students and parents.

In its short history, Raffles has closed branches in Chandigarh, Kolkata, Dhaka, Bangalore, Hanoi, Ho Chi Minh City and Manila, leaving students stranded or forcing them to relocate and continue their studies at other branches of Raffles. In June 2015, Raffles College of Design and Commerce (RCDC) in Australia lost its accreditation with TEQSA (Tertiary Education Quality Standards Agency), an independent statutory authority within the Australian Government, for not complying with requirements of the Higher Education Standards Framework. During legal proceedings, Raffles appealed to the Administrative Appeals Tribunal to have its name suppressed, a request that was denied by the court. In its verdict, the Federal Court in Australia attested RCDC that is *‘does not have the clearly demonstrated capacity to provide education of a satisfactory standard’*. The Honorary Judge Perram particularly criticised the lack of students’ English language proficiency. Subsequently, more than a 1000 students from campuses at Bangalore, Bangkok, Colombo, Guangzhou, Hong Kong, Kuala Lumpur, Mumbai, New Delhi, Shanghai, Singapore, and Ulanbataar were affected. Agreements were made to ‘teach out’ TEQSA’s undergraduate programs at selected campuses in Singapore, Kuala Lumpur and Colombo in order to provide an exit for stranded students who only had few subjects to complete.

For those students who were not able to take this exit, choosing Raffles translated into wasted time and financial resources for students and their parents. Most government agencies in SE-Asia lack legal frameworks for ensuring consumer protection to hold private education providers such as Raffles accountable for disastrous mismanagement. Due to the loss of accreditation, the student population in Bangkok diminished from approximately 350 to about 70 shortly after the college moved to its new campus in Bangna. Subsequently, classes shrank to only a few students per class. Since subject delivery works in four-hour blocks, in a worst-case scenario a single student would be taught by a lecturer for a full four

hours. Needless to say, that this is neither an enjoyable experience for the student nor a sensible pedagogical proposition. By replacing the lost accreditation of TEQSA by a new partnership with the University of Northumbria, Raffles hopes to restore its student population.

### **Educational Consequences**

The psychological and pedagogical consequences for students at Raffles are manifold and start with enrollment policies. As a former College Director at Raffles eloquently put it, “Everyone with a wallet and a credit card can enrol at Raffles”. To enrol, prospective students neither face aptitude tests nor qualification interviews or portfolio reviews. Due to limited numbers of new applicants, everybody qualifies. Language standards are likewise lax. On the Raffles Bangkok website (as per 23/4/2017) it was stated that an IELTS level of 5.0 is regarded as sufficient. Band 5 in IELTS officially signifies ‘modest’ language proficiency, meaning that the student can communicate in most situations but may struggle in an academic environment. An IELTS score of 5.0 is therefore in no way adequate when aiming for an undergraduate degree (standard is IELTS 6.0 or 6.5) with an affiliated partner university. Little seems learned from previous failures.

The unregulated intake of students also translates into unbalanced student distributions, resembling an inverted Bell curve. Highly qualified students share the same classroom with students of low aptitude, compromised cognitive abilities and low motivation making it difficult for teaching staff to cater to both groups. Motivated students tend to feel that they underperform in class while challenged students still struggle with regular assignments or skip classes. Failing by attendance numbers are unusually high. Since a common ground for over- and underperforming students is difficult to establish in absence of any pedagogical strategy, students’ overall learning remains suboptimal. Occasionally, I was lucky to coach a small group of talented and motivated students, which allowed establishing a more motivating and successful level of studies. Such instances, unfortunately, were the exemption of the rule.

Lastly, for many private students, commercial education is synonymous with the entitlement to a degree. As paying customers, students feel entitled to pass even when putting minimal effort into their studies. They feel entitled to receive extra services such as favourable treatment when it comes to non-attendance of classes, the extension of deadlines, turning a blind eye on plagiarism or better grades from their lecturers. Pleasing few paying customers (that maintain the business) puts academics and management in a compromising situation. The same is true for admissions: Turning down students with low aptitude translates directly into losing paying customers. If we value academic quality, the conflict of interest is obvious.

# Chapter 5

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## From Distinguished Academics to a Service-providing Precariat: The Degradation of Academics in Commercial Education

‘At RCDC there is little evidence of systems to support the academic committees. (...) AQUA (...) advises the College to increase its efforts to ensure the implementation and regular monitoring of quality assurance policies and their practical application at all levels of the College.’

Australian Government/ TEQSA Report on RCDC, October 2014

From the perspective of academic staff, Temasek and Raffles represent two entirely different worlds. Temasek invested heavily in staff professional development, encouraged motivated staff to take on extended responsibilities while rewarding efforts via salary increments and bonuses. For example, I was supported to speak at international conferences and was provided overseas training to develop educational competencies. As my employer, Temasek also paid into a retirement fund, the CPF (Central Provident Fund) contributing to my social security.

Regarding the importance of professional development, a former superior of mine at Temasek made perhaps the most important comment: *“As a lecturer and working in education for many years, you will lose your market value gradually. You are no more in competition with your peers in the industry. This is why it is our responsibility to upgrade your skill level to a point where you are on par, at least approximately, with industry should you ever decide to return. We owe you that much.”*

At Raffles, it is the absence of benefits and professional staff development that defines general working conditions. Since most staff is recruited from non-academic backgrounds, benefits such as academic research activities or participating at international conferences are not supported. Staff members that need to upgrade to a Masters or postgraduate level will have to do so at their own expense, creating hidden costs of employment for academics. Offering a poor two weeks of annual leave, Raffles clearly follows standards of the corporate but not the academic world. In the absence of accredited professional training, there is no official categorization system in place to distinguish junior from senior staff and subsequently no corresponding progressive salary structure.

Looking at staff benefits and rewards, the outlook is equally bleak. Raffles offers no performance bonuses or a year-end bonus. When I joined the company, I was assured that bonuses would be paid in lieu by staff stock options since Raffles is a publicly listed company on the Singapore Exchange. However, since Raffles stock steadily declined after the global financial crisis in 2008 to less than a tenth of its peak value, stock options have become redundant.

Unlike academic careers in the government sector, careers at Raffles are limited based on the following grounds:

1. The lack of professional development to build competencies and a decent portfolio
2. The lack of bonuses and incentives for good performance
3. The restriction of employment to fixed contracts that can be terminated at any time
4. The narrow task of delivering pre-packaged curricula without active participation in their design, which creates a rather passive working environment based on mere compliance
5. The absence of academic activities and scholarship such as support for research, publications or attending international conferences
6. The limitation to only two weeks of earned annual leave based on standards for commercial organisations but not academia

Lecturers are told that they need to compile their own teaching materials on an individual account. No workgroups or processes are in place to formally review and update those materials.

Subsequently, academics in the commercial sector degrade to a lowly qualified precariat. The trajectories of academic careers are tied closely to the commercial success of the company to which no long-term guarantees can be given. For this reason, distinguished academics from reputable colleges and universities will find little appeal in joining companies such as Raffles.

In the marketing speak of Raffles, the lack of pedagogical requirements for staff is advertised as *'Our educators are more than teachers. They are creative practitioners and experts in their own professions.'* (studyataffles.com, 2017). There is no such thing as 'more than' teachers. It rather appears that Raffles never bothered to take up the intellectual challenge to look at internationally established professional standards of teacher qualifications and applying them to their business.

# Chapter 6

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## The Learning Environment

'The independent expert report provided under paragraph b of this condition expressed concern about the functionality and adequacy of resourcing of the libraries in Hong Kong and Kuala Lumpur. While TEQSA considered further information provided by RCDC, TEQSA remained of the view that RCDC is at risk of not complying with the PCAS in respect of:

- PCAS 2.2, 2.3 and 2.4 relating to the adequacy of course resourcing and of access to library and information services, and to the adequacy of IT resources; and
- PCAS 1.9 in respect of the courses ensuring equivalent student learning outcomes regardless of a student's place or mode of study'

Australian Government/ Report on imposing conditions on the accreditation of two higher education courses offered by Raffles College Pty Ltd (t/a Raffles College of Design and Commerce ("RCDC")), 9 June 2016.

In more than a decade of service, beyond minimalist coverage, I have not yet seen any substantial equipment purchase required for students' studies. Although on paper Raffles does have a recommended equipment list, our multimedia students were never provided video editing suites, audio equipment, broadcast-level digital cameras or related software that would qualify as a sufficiently well-equipped learning environment. Due to the lack of equipment, students eventually had to bring their own cameras, had to improvise with inferior equipment such as Sony Handycams or record audio using their mobile phones instead of professional audio recorders. As a result, student work always lacked the polish as compared to productions from other institutions that use industry-grade equipment. Essentially, the new campus at Bangna has been an empty shell since its opening.

All that students could hope for was to produce passable, but improvised low-resolution pieces that have little in common with the sparkling diamonds promised in the Raffles marketing slogans. Nevertheless, why would a company invest in costly equipment when it is used in only a few subjects and for a limited number of students? Some of my alumni who felt pity for the poor choice of equipment available to our multimedia students offered their high-end professional equipment to come to the rescue. As a Program Director and their former lecturer, I felt both thankful and embarrassed. The dire lack of equipment and studios was no different when I worked at Raffles in Shanghai or when looking across departments. Until today, the product design department in Bangkok e.g., has no 3D-printers. The visual

design department still lacks basics such as professional font libraries, binding equipment, laser cutting machines or silkscreen printing facilities. For academic work, students do not have access to digital libraries (and no up-to-date analogue library either) while the few functioning classroom computers still ran on Windows XP, as per March 2017, unable to run the latest versions of required Adobe software. The commanding of high tuition fees stands in no relation to the deplorable state of the learning environment. It appears, contrary to its public image as a prestigious education provider, that the Raffles network might be simply running low on funds. Many issues relating to the learning environment go beyond facilities.

From 2006 to 2017, Raffles Bangkok employed a total of seven College Directors (the position of Academic Directors was abandoned for all colleges below 500 students in 2014), each with a different personal agenda on student support, such as promoting or abandoning English language programs, effectively prohibiting a consistent educational policy. Another example was that Raffles started business programs with Northumbria University and, after less than a year, is dropping these programs in favour of Coventry University as an alternate provider. Anybody looking for consistency, long-lasting partnerships and programs will be disappointed.

**Annual Report 2016 (excerpt below):**

Generic 'marketing speak' instead of facts and details on academic quality assurance

## Strengthen Academic Quality

RafflesEducation places a strong emphasis on curriculum development that is relevant to industry trends and needs. The ultimate goal of an education with Raffles is to groom skilled professionals through the transfer of industry-relevant knowledge and technical know-how to succeed in the globalised economy. Raffles University System ("RUS") is the corporate unit responsible for all academic matters.

RUS adheres strictly to a rigorous reporting and audit system to ensure quality standards and assurance, as well as operational compliance.

Through RUS, the Group grows its intellectual property portfolio and strengthens its accreditations and academic credibility.

## Are all private education providers bad apples?

Raffles is an extreme case of an unregulated for-profit education provider that has managed for many years to fly under the radar of government regulations and public scrutiny.

For-profit providers do not categorically provide an inferior education. Numerous private education providers open their institutions to regular independent quality audits, such as e.g. Stamford University in Bangkok, and have established a sensible academic culture.

In Germany, as another example, all private schools have to conduct standardised government exams and adhere to federal policies - the reason why many are government funded and charge little or no tuition. This is a very different approach as compared to entirely corporate providers. The objective in Germany is to offer parents different pedagogical approaches such as, e.g., Montessori, 'Club of Rome' or 'Jenaplan' schools that advocate global responsibility, social context immersion, social inclusion and democracy, goals that are not even on the radar of Raffles Education Corporation.

Many private providers charge tuition fees that still remain within an affordable range for middle-class income families. In stark contrast, the latest tuition fees for a Raffles-Northumbria undergraduate degree (two years' diploma with Raffles plus the final year with Northumbria) have increased to about two million Thai Baht (approx. 57,000 USD or 54,000 Euro). The justification of such high fees in a local context deserves a separate discussion. On their website, Raffles Bangkok recommends to potential students to contact local banks for loans. Raffles' corporate culture to live on borrowed credit seems to have been passed on to its customers and the institution obviously has no scruples to talk students into loans in excess of 50,000 USD. A tiny argument here is that Thai banks don't approve student loans.

Then there is the choice of programs. From a business perspective, campus size matters. An institution with a large staff and student numbers such as Full Sail University in the US (15,700 students as per 2016) can offer an infinitely more efficient learning environment and more differentiated curricula as compared to smaller colleges.

Quality is next. A relevant syllabus requires continuous updating and improvement - not by self-declared expert groups but by contributions from all participants of the learning process. Keywords are qualitative course feedback, dedicated academic quality workgroups, and a cooperative curriculum design. Ideally, curricula should include interdisciplinary studies and additional electives. Again, such setups require a reasonable staff size to achieve functional complexity. At Raffles Bangkok, a faculty typically never exceeded more than two staff members inclusive of the Program Director. Lastly, there has not been a single senior management member at Raffles who has ever worked on a doctoral or postdoctoral level at a reputable university, so how can one possibly expect an understanding of academic culture at a managerial level?

# Conclusion: How Private Education Providers Require Regulation

Let us not lose sight of the supervening issue as there is a huge difference in accountability. Government institutions have a national mandate to provide quality education to the public while private education providers such as Raffles can hide behind marketing campaigns, glossy brochures and high-flying promises to a privileged clientele. Unless for-profit education is regulated and subjected to external governmental auditing and binding obligations to consumer protection policies, such companies will continue to degrade the status of academia, hinder educational innovation and feed educational inequality. For-profits with high tuition fees inevitably promote a social system where financial status translates directly into degree entitlements to secure advanced life positions for the affluent. At the same time, governments in SE-Asia are taken to rigorous task to improve their public education systems and benchmark them against international standards as well. The burden of proof of quality is independent of the type of education provider.

Ultimately, Raffles has to be held accountable for its claims. This is when Raffles claims to provide quality education when in fact its franchise model compromises quality at the very core. It is when Raffles claims to support creativity and innovation but in fact, avoids investing in student-centred pedagogy, equipment and up-to-date curricula. It is when the Raffles group claims to operate at a university level but barely functions on a college level.

**In order to protect the interests of students, parents and academic staff, government- and consumer protection agencies need to press for policies in the following areas:**

- Private education providers require **regular quality audits** by state agencies on a national level and, as they offer international programs, a separate audit by independent auditors on a transnational level to allow for international benchmarking.
- In the case of potentially closing colleges unannounced or on short notice, for-profit providers with a history of financial mismanagement need to provide **security bonds** (or safety agreements) with local governments to protect parents' investment in their children.
- The academic staff deserves not only protection under local labour laws. Legally binding guidelines need to be set in place to ensure **adequate working conditions for academics**, such as relevant staff training, a salary structure based on competencies and holiday entitlements equivalent to academics in the public sector.

- ***Parents and students need to be provided with transparent, detailed mandatory information about the college***, such as staff qualifications (both professionally and pedagogically), facilities such as studios and up-to-date libraries, relevant external audits, faculty size, student numbers per faculty and typical class size, quality assurance policies, institutionalized student participation, alumni contacts and enrolment criteria.

In conclusion, postsecondary for-profit education cannot continue hiding under the smokescreen of unregulated education since it is publicly answerable to acceptable educational standards, quality assurance and accreditation on a national and international level. Private institutions of Higher Learning cannot disguise themselves as reputable education providers while serving as conduits for wealthy elites to obtain prestigious degrees with little or no effort. Instead, they are, just like their public counterparts, taken to task to contribute more rigorously and creatively to the knowledge and service economy of the 21 century. Since universities serve as the apex of academic systems anywhere, evidence-backed study competencies (such as language proficiency, research-, critical thinking and social skills) are mandatory for students aiming to enter universities from a wide diversity of postsecondary institutions. To this extent, assessment for testing student competencies on postsecondary trajectories requires a formal and auditable format.

Raffles presents an excellent case study to demonstrate the effects of unregulated commercialization in education. In this light, Altbach, Reisberg and de Wit (2017) note in their study 'RESPONDING TO MASSIFICATION - Differentiation in Postsecondary Education Worldwide' fittingly that, *"The burgeoning and often problematical private postsecondary sector needs to be categorized and regulations put into place to ensure that the private sector can serve the broader public interest."*