Correspondence or Discrepancy?

A Multi-Method Examination of Internationalisation

Agendas in Malaysian Private Higher Education

SHIN PYNG WONG

2018

LANCASTER UNIVERSITY

2018

Correspondence or Discrepancy?

A Multi-Method Examination of Internationalisation

Agendas in Malaysian Private Higher Education

SHIN PYNG WONG

2018

A Research Report Submitted to the Department of Educational Research,

Faculty of Arts and Social Sciences, Lancaster University,

in Partial Fulfillment of the Requirement for the Degree of

PhD in Educational Research – Higher Education

ABSTRACT

Internationalisation has become a central agenda in higher education sectors around the world. Malaysia, where this research is conducted, represents a growing world education hub, where there are more than 40 private universities which has led to a growing international student population. As non-government sponsored institutions, Malaysian private universities have a higher degree of autonomy in expanding their internationalisation agendas; they are able to establish more partnerships, recruit international talents, and grow international student markets without imposed limitations. Thus, the aim of this study is to examine the extent to which internationalisation legislation, policy and practice result in a relation of the correspondence or discrepancy in Malaysian private universities. It is also to explore the multiple factors that interact and influence the process of internationalising private tertiary institutions in Malaysia. The findings of this research can assist the stakeholders of private higher education to make informed decisions about how to effectively include an international dimension into the processes of policy making and practice.

To elucidate this relationship the study employs a mixed methods approach combining textual analyses and qualitative interviews. First, 6 legislative texts which relate directly to private higher education internationalisation were analysed, followed by the interviews with 20 Senior Management Leaders (SMLs) from 4 Malaysian private universities. It is through the triangulation of data that an in-depth understanding of the phenomenon of internationalisation in Malaysian private higher education emerges.

Theoretically, the thesis employs a synthesis of Pierre Bourdieu's theory of practice, and Engeström's activity theory. It is argued here that SMLs interactions with legislation, policy and practice, reveal the centrality of strong *habitus* at the organisational level of the university. This manifests in individualised and institutionally-specific internationalisation policies, which then must interact and align with government legislation. The textual findings indicate that legislation has granted the private university with a higher degree of autonomy

in developing its power hierarchy and habitus geared towards internationalisation. The increasing self-governance of the private higher education field has allowed negotiations between the SMLs and the governmental authority in aligning the university internationalisation policy and practice with legislation. This advocates Engeström's notion of knotworking in developing the SMLs' and the governmental authority's stable and institutionalised activity systems, and maintaining the power balance between both for implementing individualised internationalisation policies. The fierce local and international competitions between private universities have increased their motivations to individualise their internationalisation policies, for sustaining growth into the future.

The discrepancy between legislation, internationalisation policy and practice is due to the strict legislative control on specific internationalisation areas such as accreditation and student autonomy, which impedes knotworking between the activity systems of the SMLs and the governmental authority. It results in the SMLs' disempowerment, procrastination, negligence and eventually abandonment of realising an important internationalisation strategy. Both interacting activity systems have to address tension and disagreements, derived from their individual agenda of internationalisation, in order to establish the common internationalisation objective.

ACKNOWLEDGEMENTS

I thank God for being with me through the hardest times. His blessings and love provided me with courage and inspiration to complete this thesis.

To Dr. Kirsty Finn and Professor Dr. Paul Ashwin, the supervisors of my thesis, I truly appreciate your patience, guidance and encouragement during these years of supervision. This research report would not exist without them.

I would like to express my heartfelt thanks to the lecturers of the Department of Educational Research in Lancaster University during my study and research. They are Professor Dr. Malcom Tight, Professor Dr. Murray Saunders, Professor Dr. Paul Trowler, Dr. Jan McArthur, Dr. Ann-Marie Houghton, and Dr. Brett Bligh.

To my colleagues, students and friends who gave me invaluable assistance and support, I offer thanks beyond words.

I am deeply grateful to my parents and family members, for their unconditional love and encouragement. My gratitude also goes to my brothers, who offered moral support and empathy in a way no one else could.

CONTENTS

CHAPTER ONE

INTRODUCTION

Overview and Rationale

Over the past decade, internationalisation has become an important agenda in higher education institutions globally. International student mobility has shown more than a tripling growth from 1.3 million in 1990 to 5.0 million in 2014 (ICEF Monitor, 2015). The number of branch campuses of established institutions in overseas locations has also increased rapidly in the recent years. This innovation enables students to study in a different place to the home institution, but with an assurance of the academic system and standards attributed to it. The top branch campus *hosts* are United Arab Emirates hosting 42 branches of overseas institutions, China with 37 branches, and Malaysia with 14 branches. Meanwhile, the top branch campus origins are the United States with 104 overseas branches, the UK with 45 overseas branches, and Australia with 19 overseas branches (Savills World Research, 2016). The West-East dynamic is clear in these figures, and this relational flow has implications for the ways internationalisation is both conceived and practiced.

Notwithstanding this West-East flow, internationalisation continues to frame the missions of higher education institutions (HEIs) around the world, not only through the student and staff mobility and branch campuses, but the global intellectual exchange in the forms of management, teaching, learning, and research. It differentiates the graduates from their socially and culturally constructed knowledge, which includes international experience, intercultural competencies, and employment competitiveness. This research focuses on the situation in Malaysia, which represents

a growing world education hub, housing more than 40 private universities, and as outlined in this chapter, a growing international student population (Ministry of Finance Malaysia, 2017). The study has several aims. First, grounded in the disciplines of higher education internationalisation and educational administration, this study will provide empirical, holistic perspectives about the implementation of private university internationalisation strategies in relation to national legislation. Such internationalisation strategies could range from an overarching strategic plan, to the street-level operations. Examining this relationship will assist the stakeholders of private higher education to make informed decisions about how to effectively include an international dimension into the processes of policy making and practice.

Second, this study seeks to help revise the existing conceptual frameworks of higher education internationalisation to include a critical, integrated approach. This is to address the current gaps between the internationalisation legislation, policy and practice. Potential gaps could be the communication issues between internationalisation policy makers and practitioners, and the conflicts between legislation, internationalisation policy and practice. The roles and actions of Senior Management Leaders (SMLs) would also be part of the new structure of the higher education internationalisation conceptual framework. It is because their practice is likely to set the directions for the future internationalisation of PHEIs. .

Third, the study will contribute to a growing body of literature, by exploring possible influences on the process of private university internationalisation. The research seeks to shed light on the complex interaction between the SMLs and the multiple rationales embedded within internationalisation agendas. Often the rationales of internationalisation focus on cultural exchange, knowledge acquisition, curriculum content enhancement, and programme commercialisation. Changes in the

internationalisation rationales over a certain period of time and the impact of such changes in various private higher education contexts are also likely to be shown in this research.

I have been interested in the topic of private higher education internationalisation for many years, since the start of my career as a lecturer. The fluctuating internationalisation policy and practice, which happened in many PHEIs that I worked for, has made me contemplate the causes and implications of such constant changes. This motivates me to investigate how the private university key stakeholders interact with legislation, internationalisation policy and practice, and how the correspondence or discrepancy occurs. During my doctoral studies, the textual analysis was conducted to explore the interrelatedness between quality assurance policy texts in different international contexts, while the interviews were carried out on private university mentoring policy among the academicians, who were meso- and street-level practitioners. These past research experiences later contributed to my thesis, which discusses the internationalisation agendas through the analyses of textual and interview findings, and explores how the correspondence or discrepancy occurs between legislation, internationalisation policy and practice.

First it is important to say a few things about the context of this study: Malaysia. Malaysian private universities are non-government sponsored institutions that have a higher degree of autonomy in expanding their internationalisation agenda, by establishing more international partnerships, recruiting international talents, and growing international student markets. On the contrary, the public universities are funded by taxes, thus their internationalisation strategies are controlled by the government authority and legislation. In April 2017, 66% of private universities are found in the central west coast of Malaysia, which comprises the national capital Kuala

Lumpur, and its neighbouring state Selangor (Department of Higher Education Malaysia, 2017). The proximity of these private higher education institutions (PHEIs) indicates that stiff competition is likely to happen between institutions, and that internationalisation would become the institutional strategy to differentiate them from other competitors.

Within the vast territories of Kuala Lumpur and Selangor, national legislation is significant for the ways in which private universities are able to develop and implement internationalisation policy; however, the relationship between legislation and the policy making and implementation processes around internationalisation are under-researched issues. Thus, the aim of this thesis is to bring these issues together through a mixed methods study, to understand the multiple factors that interact and influence the process of internationalising private tertiary institutions in Malaysia. As stated, this study examines the ways in which legislation, policy and practice interrelate in private higher education internationalisation, from the perspective of the university SMLs. Among the SMLs are the senior policy makers and practitioners who interact with legislation, their university internationalisation policy and practice. Their perspectives can shed light on the interplay between the documentary and social realities of internationalisation derived legislation, and policy and practice, respectively. Two qualitative methods are used sequentially to address the research aims outlined above: qualitative interviews with SMLs followed by a textual analysis of legislative documents. The mixed methods approach intends to triangulate data, which provides an in-depth understanding of the phenomenon in question through multiple sources of evidence.

Internationalisation in Higher Education: Strategies and Stakeholders

This thesis recognises there are ways to interpret internationalisation. However, The table below shows prominent definitions of internationalisation in higher education in the literature. Different actors have defined the concept of internationalisation, and these definitions have helped me to provide a stronger definition of internationalisation, which is a collective process of implementing strategies that build an internationalised campus, through the interplay between university stakeholders, policy and legislation.

Author	Internationalisation Definition
Knight (2003, p. 2)	Internationalisation in higher education is "the process of integrating an international, intercultural or global dimension into the purpose, functions or delivery of post-secondary education."
Knight (2004)	Internationalisation occurs at the level of institutions, countries, and sectors.
Stier (2004)	Engaging in internationalisation includes three dominant ideologies: Idealism, instrumentalism and educationalism. First, idealism emphasises that internationalisation can contribute to the creation of a democratic and socially just world. Second, instrumentalism is based on the sustainable development in global markets. Third, educationalism focuses

	on the individual's learning process in reflecting critically on cultural differences and similarities.
Brandenburg and de Wit (2011)	The term "internationalisation" is associated with globalisation and the commercialisation of higher education.
Engwall (2016)	The four modes of internationalisation are import of ideas, outsourcing, insourcing, and Foreign Direct Investments (FDI).
Teichler (2004, p. 7)	Internationalisation tends to address an increase of border-crossing activities amidst a more or less persistence of national systems of higher education. Internationalisation is often discussed in relation to physical mobility, academic cooperation and academic knowledge transfer as well as international education.

The internationalisation of private universities takes place in the forms of legislation, policy and practice (Tham, 2013). It can range from a long-term local academic programme which awards a foreign partner university qualification, to a shorter term, traditional study-abroad programme to gain cross-cultural learning experiences and certain academic knowledge (Albatch & Knight, 2007). University internationalisation

strategies usually involve a number of stakeholders; policy makers; administrative staff and academic faculty members; and, of course, students. Internationalisation strategies are not merely a set of documented ideas, but consist of the power dynamics through the interaction between actors, spaces, and knowledge (Viczko & Tascón, 2016). The actors, who are the SMLs and university stakeholders are responsible to materialise internationalisation policy to achieve specific outcomes. They are powerful in their own territory: SMLs construct policy and monitor practice, meso- and street-level practitioners carry out practice, whereas students participate in internationalisation activities such as student exchange programmes and intercultural clubs. With so many stakeholders, vested interests and experiences of internationalisation as a broad set of policy directives, initiatives and practices, there is the potential for considerable disharmony in the ways policy and practice around internationalisation policy is imagined and enacted. Moreover, national legislation pertaining to university internationalisation policies potentially further complicates any efforts to regulate practice within and across the board of private institutions.

It is proposed in this thesis that these differences and complexities necessarily lead to either the correspondence or discrepancy within and between legislation, policy and practice of higher education internationalisation. The extent to which there is a correspondence or discrepancy, depends largely on the kinds of rationales and barriers, both internally and externally. They are perceived and experienced by key stakeholders and/or expressed with the legislative literature and institutional documentation. According to Knight (2004), economic, academic, social, cultural, and political rationales are among the two types of rationales, which are either the existing rationales at the national and institutional levels, or emergent rationales at the individual level. These rationales are loosely related, perceived as separate

motivations of internationalisation. However, a number of studies critique Knight's approach for the abstract and problematic relations between rationales (Berry & Taylor, 2014; Vincent-Lancrin, 2009). These scholars argue that the categorisation of rationales based on levels has undermined the role of human agency in higher education internationalisation. The SMLs, who are policy makers and practitioners, can be either the recipients or initiators of internationalisation rationales. For instance, while the political rationale motivates the university to seek international partnerships within a specific region, the SMLs create the economic rationale to collaborate with the universities in other regions that excel at marketable and high quality curriculum design.

Motivations for Internationalisation in Malaysia

A review of the literature around internationalisation reveals that there are various motivations for strong internationalisation policies within private universities. These can be revenue generation, social responsibility, student learning outcomes, curriculum enhancement, and research development (Albatch & Knight, 2007; Othman & Othman, 2014). Most private universities in Malaysia receive little or no government subsidies which sponsor their operations and expenses. According to Jin (2014), private universities struggle to compete with public universities in faculty recruitment, and infrastructure. Internationalisation, thus, becomes a branding strategy in helping private universities to maintain their competitive advantage in the local and global higher education markets. Monetary motivation is perceived to drive internationalisation of Malaysian private universities. In 2014, Malaysian private college and university education contributed the highest gross output of RM7.5 billion,

which is equivalent to 1.8 billion USD (Department of Statistics Malaysia, 2016). As most profits derive from the student recruitment, private universities have to meet their student-clients' demands in terms of their offers and provision. The following graph shows that the enrolment of the international students at Malaysian PHEIs has increased rapidly than public universities from 2006 to 2015. According to the Malaysian Higher Education Minister, there was a 12% increase in the enrolment of international students at Malaysian higher education Institutions in 2016 - out of the total of 151,979 international students in Malaysia, 80.3% are enrolled in HEIs (New Straits Times, 2017). Further, the 200,000 target set for the international student enrolment by 2020 in Malaysia would likely be achieved.

Figure 1. Enrolment of international students at Malaysian higher education institutions (2006 – 2015) (Luo, 2017)
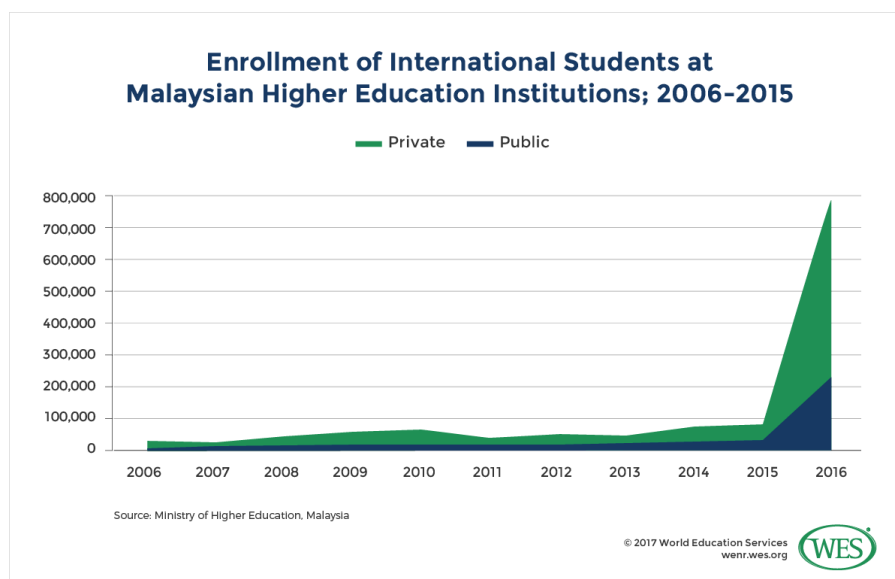
These international students were cited to be attracted by the quality of education, cost, quality of life and cultural comfort. This concurs with the findings from Baharun et al. (2011) that international students are inclined to choose Malaysian private universities based on quality education and facilities. Internationalisation initiatives of the PHEIs, therefore, are likely to be geared to maintain their global image as an

internationally recognised higher education institution in teaching, learning and research.

It is crucial to acknowledge that private university internationalisation encompasses not only international but local students. Providing all undergraduate students with an international experience is part of private university internationalisation (Edwards, 2007). Students participate in internationalisation in the areas of academic programmes, research, extracurricular activities and student support services. For instance, the student exchange programme provides all students with the opportunity to gain international exposure. Students travel to their partner university, which is usually located overseas, to attend a short-term academic programme. Meanwhile, students can choose to enrol in an academic programme abroad for a long duration. Student mobility therefore is a focus of internationalisation, as it shows individual movements between different locations to seek for higher education opportunities.

In many private universities, internationalisation extends to departments, administrative staff and faculty members. Thus, it becomes a collective effort in which university employees and students participate in internationalisation policy making and practice. According to Berry and Taylor (2014), internationalisation is perceived as a strategy for projecting existing successes of the university and also enhancing the university's profile. Their findings showed that the development of academic quality was not emphasised in university internationalisation. This draws us back again to the issue of academic quality assurance in internationalisation policy and practice. Despite a large population of participants, academic quality is decreasing in various internationalisation practices, such as the university franchise and academic programme licensing business that involve partner institutions and students (Mok,

2007; Othman & Othman, 2014). The degree to which legislation controls the quality of internationalisation policy and practice is little known to the stakeholders. The perceptions of private university practitioners who are directly or indirectly involved in internationalisation are also neglected. Hence, endeavours are needed to inspect international initiatives and safeguard quality in the private higher education.

Before 1996, there were no private universities in Malaysia because running private higher education business was illegal. Thus, only public universities provided exclusive higher education services to the students in Malaysia. In 1996, legislation set a milestone for the private higher education. The implementation of the Private Higher Educational Institutions Act 1996 has permitted the establishment of private universities in Malaysia. Wan (2007) stated that in 2007 the amount of private universities exceeded public universities, as there were 30 private universities or university colleges compared to 20 public universities. The increasing number of private universities in 2007 was in line with the National Higher Education Strategic Plan which was introduced in the same year. One of its major initiatives was intensifying internationalisation, which impacted five critical areas that were governance, leadership, academia, teaching and learning, and also research and development.

Until 31 May 2011, 25 private universities, 22 private college universities and 5 foreign university branch campuses registered with the Private Higher Educational Institution Management Sector (PHEIMS), which was attached to the Ministry of Higher Education Malaysia (Department of Higher Education, 2011). Currently, 75 private universities have their programmes or qualifications (i.e. certificate, diploma, advanced diploma, or degree) registered with the Malaysian Qualifications Register (MQR), in order to conform to the Malaysian Qualifications Framework (Malaysian

Qualifications Agency, 2017). Gaining such internal recognition is essential as it strengthens the brand of the private university as a successful, trustworthy local and international higher education brand. Internationalisation activities usually follow in the form of expansion, such as offering international curricula, designing homegrown programmes based on international curricula, exposing programmes to international quality assurance, and recruiting international students (MAPCU, 2014).

Malaysian private higher education institutions are not sponsored with any financial funds from the government. Most need to generate their own profits through undergraduate programmes. Few operate on education trust funds while creating revenue by conferring their own degrees. Hence, Malaysian private universities, which represent a product of privatisation and commoditisation, have a high level of autonomy to include an international dimension in their policy and practice (Lee, 2004). For instance, private universities use the social responsibility platforms to penetrate the overseas student markets. The international marketing agents approach the secondary school leavers who are potential undergraduates through the strategy of community involvement. The SMLs have been invited to give marketing seminars to secondary school students and their parents in different countries, and the international student talents have been offered with scholarships or tuition fee discounts (Othman & Othman, 2014). The marketing strategy to recruit international students makes up their distinctive internationalisation policy, which not only preserves their legitimacy of an internationally recognised institution, but adapts to the changing higher education demands.

National Legislation

Higher education internationalisation policies are best understood against the backdrop of national legislation, which is perceived to significantly influence the monitoring, development, and implementation of Malaysian private university internationalisation strategies. This legislation is comprised of a number of Acts including:

- Act 155 Immigration Act 1959/63,
- Act 125 Companies Act 1965,
- Act 30 Universities and University Colleges Act 1971,
- Act 555 Private Higher Educational Institutions Act 1996,
- Act 679 Malaysian Qualifications Act 2007, and
- Act A1352 Private Higher Educational Institutions (Amendment) Act 2009.

These Acts underlie many aspects of Malaysian international and transnational education, such as governance, human resources, scholarly research, franchising, and quality assurance. Similar influences also occur globally. In the UK, since 1997 the Quality Assurance Agency has started to audit UK universities' overseas franchises to reduce the risk of trading off quality against higher profits (Healey, 2013). Meanwhile, the expansion of Korean private universities has been advocated through the government education reform policies, and a set of laws (Chae and Hong, 2009). In Malaysia, legislation also regulates the accreditation of private universities internationalised academic programmes, and the establishment and management of home-grown and foreign branch institutions.

Research Problem

Many studies have discussed the relationship between internationalisation and one particular rationale or strategy for internationalisation (Kuwamura, 2009; Whitsed & Volet, 2011; Wiers-Jenssen, 2008). De Wit (2002) and Meiras (2004) were among the very few studies which examined the motivations and barriers underlying the university's responses toward internationalisation. Their findings reveal that economic, political, sociocultural and academic rationales have had a predominant role in higher education internationalisation. This indicates that internationalisation strategies not only aim to generate revenue, but sustain the university's local and global recognition.

However, internationalisation is a far more complex process, involving the key university stakeholders, legislation, motivations and barriers. The role of human agency is often neglected in the processes of internationalisation policy making and practice. For example, the SMLs are the key stakeholders of internationalisation that interact with the governmental authority, meso- and street-level practitioners, yet how their decisions are formed and put into practice remain unclear. Various rationales could influence the ways in which SMLs respond to legislation, internationalisation policy and practice. For instance, both economic and academic rationales are likely to influence the recruitment of international teaching and administrative staff, in order to attract more students, internationalise the university teaching staff profile to attract more students, and enhance academic colleagues' and students' learning and research experience.

There have been insufficient research findings for the motivations and barriers that control the SMLs' internationalisation actions, and why they make such decisions in internationalisation policy and practice. It is suggested by Tadaki & Tremewan (2013)

that a people-centred approach including the senior policy makers and practitioners can increase the understanding of internationalisation policy and practice. Hence, this study aims to explore the interrelatedness of the key stakeholders' actions and rationales in private higher education internationalisation. Synergy and/or changes would occur during the interaction between the internationalisation actors and rationales. The SMLs work with existing rationales by adapting their internationalisation policy and practice; the changes in rationales could also result in modifications of the SMLs' internationalisation policy and practice.

Research Questions

Contesting the above research, internationalisation policy and practice do acknowledge a variety of rationales (de Wit, 2002; Knight, 2004). National legislation seems to influence internationalisation policy and practice, while the PHEIs' greater autonomy impacts the ways in which their key stakeholders interact with legislation. The correspondence or discrepancy is likely to exist between legislation and implementation, largely influenced by additional factors. This research examines the interwoven relationship between legislation, internationalisation policy and practice, and hence to supplement the existing models and approaches with an empirical framework of private higher education internationalisation. The following research questions are addressed in this study:

(1) How might private universities differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives?

(2) In what ways does legislation interact with institutional policy and practice in private higher education internationalisation?

(3) What do the different perceptions and interactions mean for the future internationalisation of private institutions?

Structure of the Thesis

This thesis has seven chapters. Having provided an overview and aims of this study, describing the research problem and questions, the thesis proceeds as follows:

- Chapter 2 Literature Review on Higher Education Internationalisation. It explains the private university perspectives about legislation, internationalisation policy and practice, and the interaction between internationalisation actors and legislation,

- Chapter 3 Theoretical Framework. This chapter describes the ways in which I have navigated different theoretical positions to develop an approach which draws out individual agency, whilst recognising context and constraint. Key concepts are derived from Bourdieu's (1984) theory of practice, and Engeström's (2001) activity theory to examine their influence on the phenomenon of internationalisation, and to provide an explanation for how and why the theories are relevant to legislation, internationalisation policy and practice of private universities,

- Chapter 4 Methodology. Here I discuss the research approach and the methods that reflect the philosophical principles underlying this approach, the research sample, and the data analysis methods,

- Chapter 5 Textual Findings and Discussion. Here I provide perspectives on private university internationalisation through the legislative textual resources,

- Chapter 6 Interview Findings and Discussion. This chapter examines the PHEIs and SMLs' interactions with legislation, internationalisation policy and practice, and the motivations and barriers in such interactions, and

- Chapter 7 Conclusions. This final chapter introduces the summary and synthesis of the themes derived from the interviews and textual analysis.

CHAPTER TWO

HIGHER EDUCATION INTERNATIONALISATION – A LITERATURE REVIEW

Introduction

This chapter introduces the literature on internationalisation of PHEIs in the context of globalisation. The inextricable intertwinement of internationalisation and globalisation in private higher education is discussed based on a review of past studies, with the aim of exploring how policy around internationalisation has been theorised in relation to practice and legislation. As this study is carried out in the context of Malaysian private universities, the literature on the Malaysian private universities and Malaysian legislation is examined to provide an insight on how the two converge or diverge during the process of internationalisation. This review aims to identify the gaps in the literature, consisting of limited rationales influencing private university internationalisation, a lack of data on the changes of internationalisation rationales over time in private higher education, scarce findings on the role of SMLs who are the key university stakeholders in internationalisation, and insufficient qualitative research into the dynamics of internationalisation policy, practice and legislation. The links between the gaps in the literature and the research questions of this study are also explained.

To explain the private university perspectives about legislation, internationalisation policy and practice, and the interaction between internationalisation actors and legislation, the chapter is organised into six sections as follows:

(1) internationalisation of higher education: private institutions in a global system,

(2) internationalisation policy and practice in private higher education,

(3) neoliberalism in private university internationalisation,

(4) private university internationalisation strategies,

(5) Malaysian legislation and internationalisation, and

(6) implementation gaps in private university internationalisation practice.

Internationalisation of Higher Education: Private Institutions in a Global System

Internationalisation is a strategy which forms a truly international community, and prepares the community members to live and work in a globalised environment. In the higher education context, internationalisation is perceived as a set of pro-active institutional measures to facilitate the processes of internationalising the academic community and enhance the students' global competitiveness. However, according to Britez and Peters (2010), the strategic plans of many universities have included internationalisation as a synonym for "study abroad" and "international student recruitment", without aligning it with the purposes of international education. When the university programme becomes the commodity, internationalisation is contextualised as a means of revenue generation. Thus, there is a potential for such an approach to neglect the educational aims of internationalisation.

The complexity of internationalisation lies in its processes, which interact with various rationales. They comprise academic, economic, geographical, historical, and political rationales. These rationales could influence the directions of a university's internationalisation, in terms of policy making and implementation. Through a case study of internationalisation in a university, de Jong and Teekens (2003) argue that the academic rationale has a strong dominance over the campus's internationalisation

19

in order to increase the standards of global teaching and learning. On the contrary, Dolby's (2010) case study reveals that multiple rationales, which are academic, economic and geopolitical, heavily influence the university's internationalisation processes. Nevertheless, concerns arise over the lack of a formal institutional policy on internationalisation. There is no appropriate route map of internationalisation in which the stakeholders struggle to make sense of the phenomenon, strategies and actions. The need for a standardised monitoring system of the constant changes in higher education internationalisation, therefore, has been the focus of past research (Humfrey, 2011). Historical and contemporary trend evaluation are among the methods of analysing university internationalisation. The researchers examine the changes in internationalisation over a certain duration, and make comparisons between the past and current trends of internationalisation. It is believed that from such evaluation, the university management can gain an overview of internationalisation, identify the relevant rationales, and set future directions in order to achieve better results (Lo & Tang, 2017).

In this study, competing rationales are likely to affect the key stakeholders' actions toward their private university internationalisation policy and practice. These rationales often conflict with each other, in which one or a few dominate others (De Wit, 2002; Meiras, 2004). The unfulfilled rationales create tensions in university internationalisation, and when left unattended for a long time, it obstructs the route map of internationalisation. As discussed by Tadaki & Tremewan (2013), the actors, who have been participating in internationalisation over years, would find themselves entangled in a cycle of policy and practice that intends to accomplish a number of rationales, including generating profits, complying with legislative commands, meeting the client-student's expectations, and establishing international partnerships.

Meanwhile, the SMLs who are new to university internationalisation seem to be hopeful and determined in achieving particular rationales. Yet their lack of historical and current trend evaluation on the competing rationales in university policy making and implementation could result in a similar cycle, which plagues their many predecessors. The literature review reveals that there has been a lack of data on the interaction of SMLs and multiple rationales because most past research explore how other university actors such as middle managers and street-level practitioners interact with rationales to accomplish university internationalisation agendas. The perceptions of SMLs, who are the university key internationalisation holders, policy makers and practitioners, are often silenced in the literature. It leads to the research question of this study, probing how private universities might differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives. In order to address this gap that has been identified in the review, my research examines the SMLs' evaluation of various rationales in university internationalisation, and the role of rationales in their own internationalisation policy and practice.

Contrasting views have been shown toward the internationalisation and globalisation of higher education. On one hand, researchers argue that internationalisation is regarded as a key institutional strategy of private universities, and as a product of globalisation (Hou et al., 2014; Ilieva et al., 2014; Sanderson, 2011; Trahar & Hyland, 2011). It is driven by the economic, academic, political, social and cultural rationales, which are linked to globalisation. On the other hand, a number of scholars advocate the globalisation of higher education as it gains increasing recognition, which is an effect of growing border crossing activities of blurred national systems of higher education (Dickson, 2009; Dzvimbo & Moloi 2013; Teichler, 2004). HEIs undergo enormous policy changes, in order to cater for the demands of

globalisation such as knowledge economy, staff and student mobility, and university community diversity. Globalisation is acknowledged as the prime guide of the private university policies.

Globalisation is perceived to supersede internationalisation in higher education policy and practice. However, I argue that globalisation impacts private higher education internationalisation in many ways, yet remains distinguishable as a concept. This means despite certain overlapping features, globalisation is seen as the inspiration, "behind the curtain" of the private university internationalisation. Globalisation is a phenomenon beyond the institution control, which subsumes into political, economic, social and cultural dynamics across borders (Knight, 2015). It bridges HEIs with the international arena, and provides HEIs with both opportunities and risks. For instance, the economic rationale drives the private university to generate more revenue by expanding its international student markets. Simultaneously, the university is bound by the political rationale that constrains the recruitment of international students through the implementation of new immigration law. The diametrically opposed sentiments toward globalisation – embracement and rejection – change the higher education internationalisation trends, which include profits, knowledge, partnerships, and talents. On the other hand, it causes anxiety in people that it deprives the country of privileges, votes, identity, and culture. As globalisation changes internationalisation (Arshad-Ayaz, 2008), this study aims to examine the challenges from and the rationales underneath both phenomena, which are likely to shape the perceptions of SMLs toward internationalisation policy and practice, and the language of legislative texts that are related to internationalisation. It is the internationalisation strategies that guide the private universities to sustain the global competition from other HEIs. Private universities need to keep pace with global higher

education needs by offering internationalised curricula, establishing international partnerships with other universities, engaging in international research collaboration, developing international experience for the existing students, and recruiting international students and employees.

Higher education internationalisation is described in four modes, which are import of ideas, outsourcing, insourcing, and foreign direct investments (Engwall, 2016). Among these modes, the import of ideas to the home institution, through human mobility and course literature, is found to be the most significant mode of internationalisation in universities. Incoming, outgoing and home students participate in knowledge exchange and transfer as they study abroad, or interact with international students in the home institution. As higher education internationalisation is discursive, there has also been a lacuna between the role of the university employees and student mobility. Little attention has been given to the cultural knowledge exchange, and hence the intercultural dialogue approach in student mobility (Castro et al., 2016). Similar cultural challenges occur in mobility of the university academic employees. Walker (2015) states that newly appointed international academic staff face obstacles resulting from their enculturation in a different system of education in which they are currently working. It is therefore suggested that intercultural education can add value to internationalisation strategies pertaining to human mobility.

The mobility of local academic staff has direct contribution to the course literature. According to Engwall (2016), local faculty members who travel to partner institutions abroad for work bring in international perspectives while writing up text books, and teaching their students with such literature. However, I argue that course literature is not limited to text books, as it can include specific course materials such as international research publications, case studies and insider news of particular

phenomena. The international experience of academic staff helps them tremendously not only in composing course literature, but in selecting appropriate course literature for their classes. Besides writing up course literature, its delivery is also debatable. The absence of intercultural interaction and the application of team work pedagogy raises the concern among a number of academics and students (Trahar & Hyland, 2011). Developing the participants' intercultural competencies should be a major characteristic of course literature, in order to address university internationalised teaching and learning motives.

The modes of internationalisation frame this study as they discuss the directions of private higher education internationalisation, which are outbound and inbound. PHEIs are not only the recipient, but the giver of internationalisation. In terms of student mobility, the international students enrol in the university academic programmes while the local students travel abroad to the university partner institutions to join student exchange programmes. Private universities "import" international students to obtain revenue and talents, and to position themselves as an internationalised institution. Meanwhile, "exporting" students promotes knowledge exchange, and strengthens international partnerships between universities. Despite being the major internationalisation agenda in private higher education, intercultural education is often undermined, and identified as the gap in the literature. Clifford & Montgomery (2017) stress that internationalisation of curriculum practices should include indigenous knowledge, and that internationalised curriculum needs to be transformative and holistic to develop global citizens. This raises the research question exploring the ways in which legislation interact with institutional policy and practice in private higher education internationalisation. In my study, intercultural education, which is one of the internationalisation modes, is examined in the areas of course

literature, research collaboration, staff orientation, and student co-curricular activities. Hence, the SMLs' perceptions from the interviews and the textual findings based on legislation will shed light on the intercultural interaction and other internationalisation modes in private higher education.

Internationalisation Policy and Practice in Private Higher Education

Policy refers to a course of action or procedure to conform to the decision. It is "a set of ideas or a plan of what to do in particular situations that has been agreed to officially by a group of people, an organisation, or a government" (Cambridge Dictionary, 2017). In the context of higher education internationalisation, policy has wider definitions in terms of its focus. For instance, there are different policies for the university degree accreditation, external and internal audits, or student recruitment – each informs the stakeholders of the guidelines about managing a particular area of the university. Internationalisation policy delivers key information about the goals underpinning university internationalisation strategies and what practitioners should do to achieve those goals. An example is shown in Poole's (2016) description of how the macro-level internationalisation policies in Japanese universities impedes the implementation of the micro-level internationalisation practices. The SMLs' idealistic mission towards university internationalisation results in a huge resistance, which drive the meso- and street-level practitioners towards "deinternationalisation". This indicates that internationalisation policies seem to be translated into different interpretations and actions at various stages of implementation.

As stated in past research (Agnew, 2012; Dolby, 2010), many universities lack a formal, overarching institutional policy of internationalisation. Thus, a university likely

has policies for managing various academic and administrative departments, and integrates internationalisation in each of the policies. Instead of an independently functional policy, internationalisation becomes the "add-on value" to the existing university policies. Such a phenomenon is commonly identified in the university management teams that primarily regard internationalisation as "a movement of recruiting international students", rather than recognising it as part of knowledge acquisition and cross-cultural experience. According to Poole (2016), despite being aware of the university's internationalisation mission, the strong institutional identity of upholding an ideology of bureaucratic rules impedes the operations of internationalisation among the administrators. Subsequently internationalisation "policy" within the other policies is evaded, and the objectives of internationalisation are abandoned.

Internationalisation policy is not merely a set of documented ideas, but has to include its multi-dimensional interaction with the policy spaces, actors and knowledge. Viczko & Tascón (2016) examine the dynamics of power through the interplay between spaces, knowledge and actors. The actors, who are the university stakeholders and practitioners, are responsible to materialise internationalisation policy to achieve certain agendas. They are powerful in their own territory: SMLs construct policy and monitor practice, whereas students participate in internationalisation activities such as student exchange programmes and intercultural clubs. As internationalisation policy is conceptualised as a social and political space (Shore & Wright, 1997), external variables could result in the power shift across territories. For example, students hold protests on a specific international political issue. It defies the Malaysian legislation which forbids any student participation in political activities inside and outside the country. The governmental and university authorities, therefore, attend to the student

protests and mediate the situation. Consequently, the power of the authority and students collides across their territories. This shows that when a crucial internationalisation matter arises, power would be inclined to manage the situation within the policy space. In order to achieve the balance of power in internationalisation, actors need to apply knowledge, interact with external variables, and form alliances.

Private universities are not operated by the government, relying on the student tuition fees, corporate funds, non-profit foundations, and alumni donations. As internationalisation becomes an essential element of higher education sustainability, private universities have to join the race to increase their competitiveness among other HEIs. In either the formal or informal institutional plan of internationalisation, numerous areas of internationalisation are given attention for further development, which comprise internationalised curriculum and programmes, global head-hunting of higher education management, teaching and research talents, international student recruitment, and transnational education. Healey (2017) delineates a UK university's effort of changing direction and developing a new internationalisation approach which focuses on an international learning experience for all students. Given an overarching goal that moves into policies, the university strengthens its position in internationalisation.

Despite publicising their participation in internationalisation, the role of many private universities can be rather limited to certain areas of internationalisation. This happens to the private universities which uphold international student recruitment or other internationalisation areas that are able to generate revenue (Tham, 2013). The commodification of education seems to overshadow the cause of education. However, this phenomenon receives little attention from the past literature, which explores the extent of internationalisation implementation instead (Yang, 2004; Yonezewa &

Shimmi, 2015). The ways in which the private university internationalisation is driven by profit-making motives require further evidence. It remains a debate that a private university can undergo changes from an "internationalised" campus in disguise, to a truly internationalised HEI that creates the global experience for its stakeholders.

Private university internationalisation practice is a habitual or customary performance, carried out by the practitioners at the macro, meso and micro levels in areas of internationalisation. It starts with the university SMLs who liaise with the government internationalisation policy makers to develop the institutional internationalisation policy, or integrate internationalisation in various university policies. At the macro level, the SMLs usually conduct inspections of internationalisation through a top-down approach. Their internationalisation practice focuses on university development planning and strategic management, international university benchmarking, marketisation, and gaining international recognition as world class universities (Cho & Palmer, 2013; Pfotenhauer et al., 2013). The interaction between practitioners and recipients therefore is bound by the objectives of internationalisation practice. For example, a senior management leader gives potential student parents marketing talks abroad, in order to persuade them to enrol the child in the university programme.

The institutional internationalisation policy, at the macro level, also emphasises transnational partnerships between universities which are often influenced by various social, cultural, political, geographic and historical contextual factors. Montgomery (2016) explains the diverse and complex transnational partnerships in Chinese universities, in forming elite alliances and situating their internationalisation policy in the contexts. Xiamen University (XMU), for instance, set a precedent for Chinese higher education in establishing an international branch campus in the south-west of

28

Kuala Lumpur, Malaysia. It offers the undifferentiated academic programmes that are aligned with its main campus in Xiamen, China. Ranging from goals to curriculum, university internationalisation policy is perceived as a benchmarking system, which safeguards the communication of internationalisation agenda, and the quality of internationalisation practice.

Meso-level internationalisation practice involves the middle management leaders, also known as the intermediate management members of a hierarchical higher education institution. They are subordinate to the senior management and responsible for at least two lower levels of junior employees. Among the university middle management leaders are the heads and middle managers of academic and administrative departments. They have to coordinate internationalisation practice from both the senior management and junior staff. In other words, they act as the bridge between the macro- and micro-level internationalisation practices.

At the micro level, private university internationalisation practice usually intensifies the groundwork and specific stakeholders. The practitioners comprise administrative and academic staff who have direct interaction with the university stakeholders, who are existing students, their parents, and potential customers. The purpose of the interaction is to develop the global teaching and learning experience inside and outside the classroom (de Jong & Teekens 2003). Simultaneously, the micro-level practitioners contribute to the volume of international contacts through research collaboration, academic programme partnerships, and student exchange programmes with oversea universities. Smeby and Trondal (2005) find that regional policy initiatives and global trends lead to the increasing internationalisation activities in universities. Micro-level internationalisation practice should complement the policies

at the meso and macro levels, and respond to the external variables of internationalisation.

Neoliberalism in Private University Internationalisation

Private universities are often related to the commercialisation of higher education as they compete in the free market locally and internationally to recruit more students to enrol in academic programmes. Revenue becomes the goal of the private university commercialisation, thus internationalisation is the means of earning more profits. On the contrary, neoliberalism is not about generating revenue through university internationalisation, but focuses on the goal of freedom in making economic and academic choices, institutional autonomy, deregulation, and compliance with evaluation (Olssen & Peters, 2005). Being influenced by neoliberalism, governments tend to minimise rules and regulations to increase institutional autonomy. It leads to more efficient, smaller universities that adopt output-oriented systems (Chang, 2015). PHEIs are able to exercise an extent of self-governance in internationalisation, such as selecting international partners, employing international talents, and increasing admission quota for international elite students. Neoliberalism has reduced the constraints of regulations in internationalisation, providing it with liberty for growth.

Deregulation is a critical element in the neoliberal perspective of internationalisation. This means the influence of legislation, including the governmental rules and regulations, decreases in private university internationalisation policy and practice. However, deregulation remains disputable in private higher education in many countries. It contributes to freedom in making choices, yet incurs unlawful policy and practice. For example, the sub-Saharan African

higher education is dominated by neoliberal discourse, and is made committed to globally-recognised higher education practice. Deregulation eventually removes the specialities of higher education from each African nation, "regulating" them into a single entity that participates in internationalisation, in ways like the rest of the world (Dzvimbo & Moloi, 2013). In the context of European higher education, Enders (2004) argues that deregulation challenges the power of nation states fundamentally, as states have very limited control over policies which regulate higher education "systems". The compliance with legislation is not the primary concern for a many private universities, as their institutional autonomy sets own internationalisation directions, policy and practice.

The popular notion of deregulation in the literature, however, does not account for the sustainability of private higher education internationalisation policy and practice. In a number of countries, private universities are being regulated by the local government through legislation although they are allowed to practice an extent of institutional autonomy. For instance, the Japanese government regulates internationalisation of its higher education by controlling university research budgets, sending citizens for study abroad programmes, and recruiting more international students (Yonezewa & Shimmi 2015). It indicates that regulation can impact private university's neoliberal-influenced internationalisation policy and practice. This review reveals regulation as identified as the gap in the literature, thus my study addresses this gap by exploring how legislation interacts with institutional policy and practice in private higher education internationalisation. It is again linked to the research question which delves into how legislation interacts with institutional policy and practice in private higher education internationalisation. The tension between regulation and

deregulation will be examined through the analysis of legislative texts, and the perceptions of SMLs in my research.

Internationalisation, under the neoliberal influence, includes various evaluation mechanisms that monitor autonomous policy and practice. Private universities have to undergo quality assurance protocols in the internationalisation areas, such as academic programmes, student recruitment, human resources, finance, and administration. Institutional and financial audits are carried out to ensure the PHEIs meet the local and international standards of higher education. According to Olssen and Peters (2005), neoliberalism results in a shift from bureaucratic-professional types of accountability to consumer-managerial models of higher education. Thus, evaluation mechanisms which involve the techniques of auditing, accounting and management would be a new mode of regulations for higher education internationalisation policy and practice. In Malaysia, for example, the government-linked Malaysian Qualifications Agency (MQA) is the higher education quality assurance body, which conducts institutional audits and academic programme accreditation. It evaluates the internationalised academic curricula, and institutional policy and practice. Hence, private universities have to maintain high standards in their senior management, faculty administration, academic programmes, and financial control.

Malaysian Legislation and Internationalisation

Malaysian legislation regulates common policy and practice of private higher education. Internationalisation is embedded in higher education policy and practice stated in the Acts. An example is shown in the Universities and University Colleges

Act 1971 in which the regulations of internationalisation are only implicitly described in particular legislative clauses: every university must keep and maintain an office situated within Malaysia, in order to carry all forms of communications locally and internationally. This enables the local authority to monitor and regulate the PHEIs' policy and practice, which include internationalisation strategies and implementation. In addition, these legislative clauses address Malaysian private universities which are branch campuses relating to their main campus overseas. They are the product of internationalisation that is marketed to Malaysia, thus have to comply with the local law to sustain their operations in the country.

The regulations of internationalisation are found in the Malaysian Acts related to private higher education. They are the Private Higher Educational Institutions (PHEIs) Act 1996, the Companies Act 1965, the Malaysian Qualifications Act (MQA) 2007, the Universities and University Colleges Act 1971, and the Immigration Act 1959. The Acts are categorised into Malaysian private higher education and Malaysian higher educational institutions. The PHEIs Act and the Companies Act cater for Malaysian private higher education, since their legislative clauses impact policy and practice of PHEIs. The PHEIs Act, also known as the Act 555, was established in 1996 to focus on the establishment, registration, management and supervision of, and the control of the quality of education provided by PHEIs. According to Abdul Aziz & Abdullah (2014), since its establishment in 1996, the Act has contributed immensely to internationalisation to Malaysian private higher education by hosting eight international branch campuses that are attached to their main campus abroad, and increasing the number of PHEIs and international students. The internationalisation areas are identified in the parts of legislation, which are the establishment of a private university, conduct of courses of study, discipline and conduct of students, permits to

teach, and inspections of PHEIs. As such, the private university internationalisation key stakeholders, including senior management members, administrative departments, faculties and members, and students are the supervisees of the authority. Meanwhile, the Companies Act was first delivered in 1965 prior to any Malaysian PHEIs establishment. It applies to private universities because they are registered as private corporations in the higher education industry. It emphasises the inspection on the university senior management that parallels the company organisation structure. Internal and external audits are conducted on the university departments to supervise the budget controls, operations, management, and policy making.

Another category of the Acts consists of the MQA Act, the Universities and University Colleges Act, and the Immigration Act which regulate not only the Malaysian PHEIs, but the government-sponsored public HEIs. The MQA Act is an act to establish the Malaysian Qualifications Agency as the national body to implement the Malaysian Qualifications Framework, to accredit higher educational programmes and qualifications, to supervise and regulate the quality and standard of higher education providers, to establish and maintain the Malaysian Qualifications Register. It authorises the MQA to inspect all the private university academic programmes, either internationalised or home-grown. Besides, the Act empowers the MQA to carry out institutional audits on the university senior management, internationalisation policy and practice. The Universities and University Colleges Act, provides an overview of regulations for Malaysian HEIs on the establishment, maintenance and administration of universities and university colleges. The acknowledgement of internationalisation of private higher education is limited in the Act that only a few legislative clauses stress the establishment of the university campus at a local address. This indicates that

efficient communications with the local authority is prerequisite to internationalisation activities, and that keeping records of all communications is mandatory to safeguard the quality of university internationalisation practice. Lastly, the Immigration Act that was established in 1959 provides important regulations for the Malaysian HEIs' recruitment of international students and employees. Private universities, in particular, place the international student and staff recruitment as their main internationalisation agenda to strengthen the international position and generate revenue. It is therefore crucial for private universities to comply with the Act to facilitate their international students and employees' entry to and residence in the country.

This review of Malaysian legislation is important for my study because it explains the ways in which these Acts regulate internationalisation policy and practice, through the inclusion of clauses about internationalisation. The upcoming textual analysis will explore the ontological status of the legislative texts, either as the "documentary reality" that merely exists in the texts (Atkinson & Coffey, 2011), or as the underlying social realities of internationalisation (Bryman, 2012). The results will shed light on whether the documentary reality corresponds with or contradicts the social realities of internationalisation. In addition, the legislation's emphasis on the communications between the governmental authority and SMLS helps identify the internationalisation areas in which the interactions between legislation and actors occur frequently. Thus, the upcoming interviews of the SMLs who participate in such areas can provide more insights into their interaction with legislation in constructing and implementing internationalisation policy in their institutions.

Implementation Gaps in Private University Internationalisation Practice

Saunders and Sin's (2014) metaphor of a policy implementation staircase positions the meso-level practitioners, also known as middle managers in enactment of university policy (Figure 2). Middle managers are described as "caught in the middle" as they need to corroborate the SMLs' internationalisation policy, while supervising the micro-level practitioners' internationalisation practice. Mediating internationalisation practice of different university practitioner groups can entail tension and conflicts (Agnew, 2012; Dolby, 2010). This happens particularly when the meso-level practitioners face resistance from the micro-level practitioners against the macro-level internationalisation policies. They express the lack of power in resolving the conflicts between the systemic positions on the implementation staircase, which include policy makers, SMLs, lecturers and students. When the middle managers' voices are neglected, the implementation staircase of internationalisation is disconnected.

Figure 2. Middle managers on the implementation staircase (Saunders & Sin, 2014, p. 139)
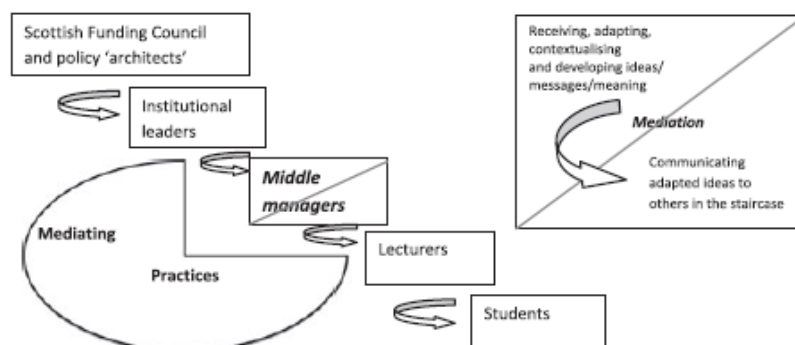
Junior teaching and administrative employees are among the micro-level internationalisation employees, who are usually at the end of the "food chain". They

are not involved in policy making, but receive instructions of implementing policy from the meso-level practitioners. Their responses form a crucial part of the internationalisation groundwork, as they maintain direct contact with students. They are responsible to manage their role in student mobility, especially to carry out intercultural education for incoming, outgoing and "home" students (Castro et al., 2016; Sanderson, 2011). The implementation gaps occur when the academic staff upholds student mobility an economic rationale – increasing student numbers for economic agenda. International quality assurance is ignored in the curriculum and programmes.

Meanwhile, the junior administrative staff is entangled by street-level bureaucracy that they could respond to internationalisation policy in three ways: modification of client demand, modification of job conception, and modification of client conception (Hudson, 1993). For instance, they experience psychological withdrawal in which they are not concerned about the discrepancy between their expected and real job performances. Lipsky (1980) questions the street-level bureaucrats' accountability to the organisation when they exercise a high degree of discretion. In the HEI context, this means without appropriate supervision, they would not be able to carry out internationalisation practice effectively, which is in line with policy. As discussed by Poole (2016), as the junior administrators find their ways of doing things are in opposition to the university internationalisation policy, a struggle of work identity occurs that they strive to position themselves, and redefine their job scope within the university internationalisation ecosystem.

Implementation gaps are inescapable, even at the macro level. Internationalisation policy is abandoned when it fails to translate from ideology into practice of the meso- and micro level employees. In the policy implementation

staircase (Saunders & Sin, 2014), policy makers and SMLs hold the top systemic positions, thus should deliver internationalisation policy to the lower systemic positions such as middle managers, lecturers, junior administrators and students. Nevertheless, the top-down approach of implementing internationalisation policy faces obstacles such as the continuing lack of local capacity, structural inequalities in partnerships, and deficient examination of major internationalisation models (Singh, 2010). Among discussions on various policy implementation obstacles, there have been scarce findings on communication barriers as a major hindrance between internationalisation policy and practice. Insufficient bottom-up interactions also seem to isolate the university SMLs from their subordinates and junior employees, causing further divide in the implementation staircase.

The role of human agency, including SMLs, the governmental authority, meso- and street-level practitioners, and students is identified as the gap in the literature, as they are undermined in the past research. In order to address this gap in the literature, my research argues that communication barriers between practitioners and flawed internationalisation policy could result in the discrepancy between policy and practice. This contributes to the research question that explores what the different perceptions and interactions mean for the future internationalisation of private institutions. The divergent SMLs' views, from the interview data, would provide an insight into their communication with the governmental authority, policy makers and junior practitioners, and how such interactions affect the future internationalisation of private universities.

Conclusion

This review of past literature on private higher education internationalisation is important for this study, because it discusses the gaps in the literature, relating to the relevance of globalisation, neoliberalism, internationalisation strategies and Malaysian legislation, and implementation barriers to the process of internationalisation in PHEIs. The review identifies a number of gaps in the literature, revealing that current research does not thoroughly examine the different levels at which internationalisation takes place. Related to this, more research is required to understand which actors that the processes of internationalisation involves, and the role of human agency within this. Thus, these are the questions driving this research. Moreover, this study focuses on the motivations and barriers that private university stakeholders face during their interaction with legislation, internationalisation policy and practice because these issues are not well addressed in the literature. Only by understanding the outcome of individual agency and organisational structures can we make sense of current and future university internationalisation.

From this discussion, there is clearly a need to examine how the individual agency of the SMLs operate within the activity systems of these PHEIs. In the following chapter, I lay out a discussion of Bourdieu and Engeström's theoretical frameworks that answer the research questions. This chapter, nevertheless, identifies why we need the research questions. The research questions aim to address specific gaps in the literature: the first research question explores the motivations and barriers during the private university stakeholders' interaction with legislation, internationalisation policy and practice, and the role of human agency is crucial in linking internationalisation policy, practice and rules; the second research question examines

the impact of regulations on private university's neoliberal-influenced internationalisation policy and practice, and the contradictions and tension occur during the interplay of a university leader's internationalisation practices with specific habitus; the third research question probes into how internationalisation happens at different levels and involves actors at these levels, and the impact of individual agency and organisational structures on the current and future university internationalisation.

In the later chapters, this review will serve as a reference in conducting the interviews and textual analysis. It guides the design of interview questions, and the selection of SMLs and legislative texts. In the analysis of interviews, this literature review also helps to synthesise the meaningful relationship between the interview codes, in order to formulate themes that explain the correspondence or discrepancy between legislation, internationalisation policy and practice. The themes derived from the interview and textual findings. As for the textual analysis, the review will help locate the codes in the Acts, and link them to specific themes. In the last chapter of conclusions, the synthesis of the themes from the interview and textual analyses will be developed, with reference to this review of past research.

CHAPTER THREE

THEORETICAL PERSPECTIVE

Introduction

This chapter outlines the ways in which I have, over the course of this study, navigated different theoretical approaches in educational research to develop the best framework for making sense of the relationship between rules and regulations of legislative structures, and the ways in which internationalisation policy shapes different private higher education institutions in Malaysia. What I have found in this journey is that there is no one theoretical perspective that fully explains my research problem, and the following discussion is a reflection on how I have come to draw together Bourdieu's (1984) theory of practice and Engeström's (2001) activity theory. The chapter explains the reasons for, and crucially the limitations of synthesising these two quite different theoretical approaches; however, I will make it clear how the theories are brought to bear on different data sets.

I have drawn on the two theories because they describe and make sense of the relationship between the legislation, policy and practice, and they appeal to me to answer the research questions of this study. Bourdieu's (1984) theory of practice and Engeström's (2001) activity theory explain the role of human agency, which is found to be given insufficient attention in present research of higher education internationalisation. Bourdieu's conceptual trio – field, habitus and capital (social, cultural and economic) – provides an insight into how actors within the field of higher education draw on their resources to demonstrate certain dispositions and accrue distinctions in relation to others. Therefore, I drew from Bourdieu's theory of practice

to explain the distinction between the practices and ways of being within four private universities, and how this relates to the actors' own perspectives in relation to the implementation of internationalisation policy. This helped me answer the first research question of this study, which was "How might private universities differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives?"

Bourdieu's theoretical approach, however, has its limitations. King (2000) argues that Bourdieu's theory of practice once reached an impasse of objectivism and subjectivism, as his concept of habitus according to which society consists of objective structures and determined—and isolated—individuals is incompatible with his notion of virtuosic interactions between actors. When navigating Bourdieu's theory of practice, I found that it leaned to objectivism, by emphasising habitus, field and capital, and how the distinctions between habitus and capital within the field control the interaction between actors. The role of human agency is explained objectively in relation to the private higher education organisational structures at three levels: individual, group and organisation. Bourdieu's theoretical approach does not offer enough understanding of the subjective, changing dynamics of actors who collaborate or struggle to accomplish internationalisation objectives.

At this juncture, I was drawn to Engeström's (2001) third generation of the activity theory, which delves into how the activity systems respond to rules and regulations. The activity systems are seemingly stable through the interconnectedness of the division of labour, rules, mediating artifacts, subject, object and communication. Engeström suggests that human agency which includes various actors should work toward a common internationalisation objective. His concepts of activity systems help me to answer the second research question, which is "In what ways does legislation

interact with institutional policy and practice in private higher education internationalisation?" Engeström's activity theory assists me in identifying what is going on in the different activity systems. It also helps me to discuss the contradictions and shared objectives that are likely to happen during the interaction between the activity systems of internationalisation agents, which are the governmental authority, and senior policy makers and practitioners, respectively.

Nevertheless, Engeström's activity theory has its limitations. It does not explain explicitly the gaps between legislation, policy and practice at different levels of implementation. It fails to offer an understanding of why legislation cannot connect with the ground-level internationalisation practice, and how the actors address these gaps. As I identified in my literature review, the role of human agency has been undermined in private higher education internationalisation. Legislation remains a written, unread text without human agency. Therefore, the role of human agency, particularly the internationalisation actors, is central in my research, and that motivates me to embark on the analysis of the SMLs' interview data and the legislative texts to provide an insight into how various actors communicate and implement legislation. My research contributes to the existing knowledge, by theorising how the legislative framework – the rules and regulations – is effectively implemented, how it informs the daily practices of the practitioners at different institutions, and the internationalisation actors can be brought together, or "glued' to enact legislation.

As identified in the literature review, the gaps reveal that despite having the policy and rules in internationalisation, we have people at different levels and internationalisation occurs at these many levels. My research addresses the problem of how internationalisation policy, its rules and actors come together. It is by taking from both Bourdieu's theory of practice and Engeström's activity theory, that I am able

to better understand the layering of policy implementation, recognising that each brings new knowledge to the table, albeit with limitations. My contribution of knowledge lies in the way I reveal the workings of the activity systems, and different habitus and capitals that individuals within those systems carry. This novel theoretical approach enables me to unpack the very complex relationship between the legislative framework and the real-life internationalisation practice.

Navigating Different Theoretical Frameworks

A Theory of Practice

Bourdieu's (1984) theory of practice provides useful tools for making sense of this research, because it focuses on the field of education, and, more specifically, how different actors within a field (i.e. PHEIs) exist in relation to one another, and to the implicitly defined rules of the field. Moreover, Bourdieu's conceptual trio – field, habitus and capital (social, cultural and economic) – offers a framework for understanding how actors within a field or subfield draw on their resources to embody certain dispositions and accrue distinctions in relation to others. Because international student and academic staff mobility, labour market and intercultural education are central in this study, Bourdieu's theoretical framework is closely aligned to the research; for example, the movement of private university students and academic employees from their home country to an international geographical location, and their identity as an international student or staff in a university are perceived to be part of the process of accumulating symbolically valuable social distinctions (Hoffman 2009; Sin, 2009). Only students and employees who possess sufficient capital are able to study or work abroad,

distinguishing themselves from others who lack those same economic, social and cultural resources, such as students from lower social classes. Thus, we can understand the processes of internationalisation as a mode of distinction both at a personal and institutional level.

Bourdieu's theory of practice examines aspects of power struggle and inequality (Naidoo, 2004; Shim, 2012). In the notion of supply and demand the elite universities, which recruit students with most economic and intellectual capital, would contribute to the high-skilled labour market. The gap between social classes widens and social inequality intensifies, when these university graduates earn higher salaries than those who did not have the opportunity to study in the elite universities.

The field of private higher education has a hierarchical structure in which the agents (that is, staff, students, SMLs and universities themselves) engage in various forms of power relations – dominant or subordinate. The practices of distinction vary in the field in the strength of the private university capacity to reduce interference from other fields (Marginson, 2006). The institutions, which can recruit most students and academic talents, and demonstrate sufficient capital, place themselves at the top rank of private universities. Bourdieu (1993) states that time, space and culture can cause the differences in the relative autonomy of fields. Decades before internationalisation became important feature of the global higher education system, the field was mostly controlled by the government in terms of university policy and practice. Currently, the field is characterised by a high degree of autonomy, producing responses to internationalisation independently with minimal constraints from economic and political fields (Naidoo, 2004). The autonomy of the private higher education field is relatively higher, as it does not depend on public funding. While generating own income, it would face additional interference, particularly from the economic field.

Capital plays a pivotal role in the field of private higher education. Naidoo (2004, p. 458) describes capital as "specific cultural or social (rather than economic) assets that are invested with value in the field which, when possessed, enables membership to the field." Bourdieu (1998) identifies two forms of capital: academic capital that is the institutionalised form of cultural capital based on properties, and intellectual capital that is related to the scientific or intellectual authority. These cultural and intellectual capital are required particularly in the teaching and learning aspects of private university internationalisation, such as intercultural education, internationalised curriculum and research collaboration. Nevertheless, when private universities participate in internationalisation, their economic, academic or human resources capital could determine the conduct of internationalisation. According to Bolden et al. (2008), the field refers to a network of social positions structured through power relations as regulated through the access to resources (personal, political and economic). This means the private universities which own most capital would be able to gain a more powerful position in internationalisation. For example, with adequate capital, elite universities can invest in a large-scale international head-hunting campaign to recruit more academic talents with attractive salaries, scholarships and grants. These brightest student, research and teaching talents help building the university's international reputation, and contributing to its capital.

Individual agency and organisational structures shape private higher education internationalisation at three levels: individual, group and organisation. Each of these levels has its own habitus, defined as "a system of durable [. . .] principles which generate and organise practices and representations that can be objectively adapted to their outcomes without presupposing a conscious aiming at ends", which controls likely action at a specific time (Bolden et al., 2008; Bourdieu, 1990, p. 53). Therefore,

in the context of internationalisation, the actors from any of the three levels are bound to the rules and changes in social and physical structures of the private university. As a major actor, SMLs' practice arguably would influence the university internationalisation strategies. Their leadership practice, in other words, can be either productive or disruptive to the university internationalisation.

Lingard and Christie (2003) advocate productive leadership habitus in the context of schools, containing the elements of reflexivity, the disposition to fuse 'the moral will with the grasping of evidence', and the disposition to deal with the wholeness of the school and the educational system as fields. Their notion corresponds with Bourdieu's concept of productive leadership habitus, which addresses the way the private university leaders internalise social structures, perceive the world and operate in ways that are compatible with their institutions. However, Eacott (2013) refutes Bourdieu, by suggesting that the disruptive nature of leadership is a durable disposition, rather than is limited to exceptions. Thus, leadership habitus would continuously fall out of alignment with the private education field in which it operates. This also opposes Lingard and Christie's notion of productive and lasting leadership habitus, which excludes temporality and embraces Bourdieu's theory of practice. According to Eacott's proposition, leadership habitus could become disruptive, as a result of the contradictions and tension during the interplay of a university leader's practices with particular habitus, working across a number of fields with different power structures, hierarchies of influence, and logics of practice. The discrepancy, therefore, is likely to happen when the SMLs face obstacles in implementing internationalisation practices within their institutions and across the fields of private higher education and legislation.

Class distinction, power and inequality are intricately bound in the context of private higher education internationalisation. Social classes are positively related to power insofar as many educationally successful students tend to come from affluent and powerful families, which invest in high value education to maintain their leadership and social status (Marginson, 2006). Upper and middle-class families that have sufficient capital are able to participate actively in internationalisation, by sending their children to study abroad for several years, or pay for short-term international education opportunities such as student exchange, summer vacation, and cultural exchange programmes. According to Kupfer (2011), in the field of higher education, inequality exists in the university international ranking practice: wealthy students who are attending the elite universities with higher international rankings go on to receive additional advantages, while students who cannot afford the expensive tuition fees of the elite universities would be deprived of social opportunities. It is also argued that the gap between the universities of high and low ranks intensifies the logic of a winner-take-all market, further neglecting the values of social and educational equality.

The Third Generation of the Activity Theory

I found myself drawn to the theoretical framework of the third generation of the activity theory (Engeström, 2001) because it offers possibilities to explore the contradictions and shared objectives that are likely to happen during the interaction between the activity systems of internationalisation agents. These are the governmental authority, and senior policy makers and practitioners, respectively. These outcomes are helpful in addressing the research questions of this study, pertaining to whether the

discrepancy or correspondence occurs between legislation, internationalisation policy and practice in PHEIs, depending upon the kinds of habitus of the PHEIs and SMLs.

The SMLs and the governmental authority resemble two activity systems that have different objectives and values. When these activity systems collide, contradictions which are "historically accumulating structural tensions within and between activity systems" (Engeström, 2001, p. 137) tend to emerge. As illustrated in Figure 2, the Objects$_1$ serve as the separate moving targets, which the activity systems of the SMLs and the governmental authority aim to achieve independently within a specific duration. For example, the SMLs' objectives are to implement their university internationalisation policy and practice based on the economic rationale – to attract more local students with the internationalised academic programmes, and increase the number of international students in their universities. In contrast, the governmental authority's moving targets are to enforce the closed-door policy in accordance with the Immigration Act, by reducing the approval rates of international student visas, and international staff work permits. In many ways, and to relate back to Bourdieu, activity systems reflect different rule spaces, where the logic of the game, and the stakes for playing, are structured differently in each case.

Figure 3. Two interacting activity systems as minimal model for the third generation of the activity theory (Engeström, 2001, p. 136)
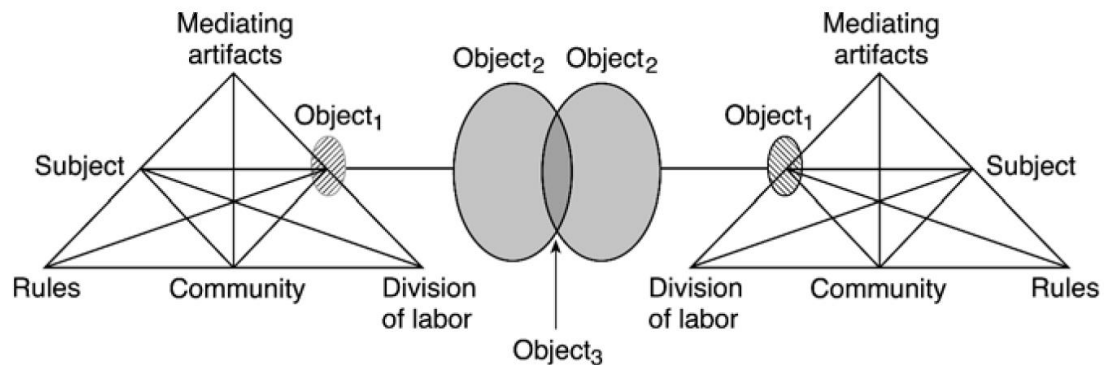
The collision between the $Objects_1$ of the SMLs' and the governmental authority's activity systems contributes to a certain extent of synergy between the two interacting activity systems. The $Objects_1$ result in the delivery of the new individual objectives $Objects_2$, which overlap and contradict each other simultaneously. During the formation of $Objects_2$, the activity systems of the SMLs' and the governmental authority generate expansive swarming engagement and multi-directional pulsation, consisting of improvisation and persistence. Such two-way communication and knowledge exchange not only help these activity systems generate common objectives, but also strengthen the SMLs' law compliance.

Eventually, a mutually agreed objective $Object_3$, such as a number of collaborative strategies and a long-term communication network, is established in both the SMLs' and the governmental authority's intellectual systems and actions. Through this process, it is thought that the participants will find a common internationalisation objective, and then work together to achieve it through policy and practice. The SMLs, for instance, revise their university internationalisation policy and practice, from profit-driven to equitable quality education. This makes private higher education potentially available for any students, regardless of their capital. The governmental law enforcers

also improvise their communications with the SMLs, and adopt more people-oriented policy. The Object$_3$ acknowledges the mediating role of senior policy makers and practitioners, and the academic and economical contributions of the international staff and student mobility.

The mycorrhizae-like activity systems are appropriate representations of the dynamics of the private higher education internationalisation agents, such as the SMLs and the governmental authority. Engeström (2007) asserts that a symbiotic relationship exists between plants/mushrooms and their roots, metaphorically known as the mycorrhizae-like formation. The fungal roots, known as the specialised roots, are underneath the mycorrhizae-like formation, which the plants grow, and which the mushrooms inhabit. In this study, the mycorrhizae-like formation can be regarded as the organisational structures of the activity systems, including internationalisation objectives, subjects, mediating artifacts, rules, division of workload, governmental authority members, university senior policy makers and practitioners. Meanwhile, the fungal roots describe knotworking, which is collaboration and coordination within and between the organisational structures of the activity systems.

The mycorrhizae formation relies heavily on the stable and institutionalised SMLs' and governmental authority's activity systems. They are bound by national legislation and institutional regulations that are related to internationalisation. In order to work toward the similar target, the SMLs' and governmental authority's activity systems engage in the two-way communication and knowledge exchange, that is, the embedded "fungal roots". However, the SML-governmental authority interaction is a double-edged sword for private higher education internationalisation. When the SMLs and governmental authority communicate effectively, it provides stability to university internationalisation policy and practice. Otherwise, the "rotten fungal roots" – the

analogy of dysfunctional SML-governmental authority communication – would impede internationalisation. This is rather similar to Bourdieu's notion of 'lack of fit' between habitus and field, so there are fruitful overlaps between the two approaches, particularly in terms of understanding whether and how the discrepancy between legislation, policy and practice, may occur. Knotworking mycorrhizae forms when both interacting activity systems of the SMLs and the governmental authority attempt to resolve their conflicts, derived from their individual objectives of internationalisation through constructive dialogues. Stable, mycorrhizae-like activity systems will achieve their individual university internationalisation objectives and the mutually-agreed objective, and determine the future directions of internationalisation.

Conclusion: Synthesising the Theories

In this chapter I have described how, and why I have drawn on Bourdieu and Engeström's theoretical perspectives based on synergy and tension that exist between the hierarchical levels and activity systems. According to Bourdieu's proposition of distinction, in the context of internationalisation, the PHEIs and key stakeholders are driven or disempowered by distinctive internationalisation strategies, and the amount and types of assets. These motivations and barriers are explained slightly differently in Engeström's activity systems – the activity systems of the SMLs and the governmental authority encounter motivations and barriers, which consist of rules, individual rationales, and mutual internationalisation objectives. My overall analytical position is that a combination of motivations and barriers from Bourdieu and Engeström's theories would shed light on the ways in which the current and future

internationalisation of private higher education can maintain or improve, subsequently framing the research methods and data analysis of this study.

Furthermore, I have brought the theories together in this study in order to address the gap in the literature, which is the role of human agency, including SMLs, the governmental authority, meso- and street-level practitioners, and students is undermined in the literature. There has also been a lack of evidence on the motivations and barriers that the private university stakeholders face during their interaction with legislation, internationalisation policy and practice. These gaps, thus, are addressed in the different data sets of my research, and are described through the theoretical frameworks of Bourdieu and Engeström.

While writing this chapter, I faced limitations of synthesising the theoretical frameworks. Bourdieu's theory of practice and Engeström's third generation of the activity theory make slightly different assumptions about the social world. First, Bourdieu's theory of practice explains distinction through the relations between PHEIs, key stakeholders, habitus, and capital in the field of higher education. In its social world, the PHEIs and key stakeholders are driven or disempowered by distinctive internationalisation strategies, and the amount and types of assets. These motivations and barriers further shed light on ways in which the current and future internationalisation of private higher education can maintain or improve. Bourdieu's notion of power and inequality, moreover, demonstrates the dynamics of internationalisation agents at the institutional, group, and personal levels. It addresses the existing gaps in the literature, with an emphasis on individual agency and organisational structures, that would either be productive or disruptive to the current and future university internationalisation.

Meanwhile, Engeström's third generation of the activity theory assumes that common objectives and discrepancy possibly occur in the social world, particularly between the activity systems of internationalisation agents, which are the governmental authority, and senior policy makers and practitioners. Knotworking and mycorrhizae-like activity systems are metaphors of functional SMLs-governmental authority interaction, which is crucial in internationalisation. The dynamics of key stakeholders and external influences is central in understanding the correspondence or discrepancy that is likely to occur between legislation, policy and practice, in the context of private higher education internationalisation.

These two theories are related to the use of constructivism in methodology, both based on transactional and subjectivist epistemology. Bourdieu's theory of practice is said to once reach the impasse of objectivism and subjectivism, by discussing how capital, habitus and distinction shape multiple realities of internationalisation, emphasising the impact of external elements on the internationalisation processes and goals. Engeström's third generation of the activity theory, however, focuses on subjective social interaction between the actors and external elements. The notion of social-constructed realities is explained through constructivism, in which the key stakeholders participate in the meaning-making internationalisation activities, and co-create findings around the phenomenon of internationalisation. Truth comes into existence in and out of the people's engagement with different realities (Crotty, 1998). Thus, the participants actively bring in different values and beliefs, in order to negotiate with various social, political and cultural contexts of internationalisation.

Navigating the theoretical frameworks provides an insight into how and why Bourdieu's and Engeström's theories are relevant to the relations between the actors

and socially-constructed realities of internationalisation. During the SMLs' interaction with legislation, policy and practice, they encounter motivations and barriers, internally and externally. In my research, interviews will be carried out with private university SMLs in order to obtain their perceptions toward institutional internationalisation strategies and the practices these might instigate, while the textual analysis will be conducted to explore the "documentary reality" of national legislation, and its relations to the socially-constructed realities of internationalisation, bridging legislation and real-life policies and practices.

CHAPTER FOUR

METHODOLOGY

Introduction

This study adopts a mixed methods design, which brings together two qualitative methods: interview and textual analyses within the interpretive paradigm. In order to discuss the research methods, sample, and data analysis methods, this chapter is organised into three sections as follows:

(1) epistemological position,

(2) methods, and

(3) data analysis

Mixed methods research often involves the use of quantitative and qualitative methods (Creswell, 2011). However mixing different qualitative methods is possible, being guided by research questions and objectives of the study (Hennink et al., 2011). It reflects an attempt to triangulate data, which provides an in-depth understanding of the phenomenon in question through multiple sources of evidence. This means various perspectives can be generated from the mixed-methods approach. Triangulation, therefore, is not a tool of validation, but a strategy that adds rigour, breadth, complexity and richness to any inquiry that relates to the research questions (Flick, 2014). It explores a single phenomenon from different angles to yield complementary findings, and to provide a holistic overview of the phenomenon.

In my research, two qualitative methods are used sequentially, which the textual analysis is conducted followed by qualitative interviews. The textual findings, which

are derived from the Acts, represent the "documentary reality" of private higher education internationalisation. Meanwhile, the interview data express the "social reality" of the internationalisation phenomenon, as the university SMLs discuss their interaction of the internationalisation legislation, policy and meso- and street-level practitioners. The participants' perceptions, however, are complex, and objective reality can never be captured through qualitative research (Denzin & Lincoln, 2005; Fontana & Frey, 2005). The social and documentary realities can either coincide or diverge. Interviews hence are utilised to complement the textual analysis of national legislative texts to explore the real-life issues of private university internationalisation policy and practice. It also gains an understanding of how the participants establish their views toward legislation, internationalisation policy and practice. As my research questions probe whether legislation, internationalisation policy and practice concur or collide, the multi-method findings can shed light on the rationales and reasons which underlie the correspondence or discrepancy.

During my doctoral studies, I carried out the textual analysis to explore the interrelatedness between quality assurance policy texts in different international contexts, and interviews on private university mentoring policy among the academicians, who were meso- and street-level practitioners. In the institution that I have been working for, I am also involved in internationalisation policy making and monitoring internationalisation practice in a specific academic department. The research experience of the topic has helped me understand why and how the correspondence or discrepancy occurs in legislation, policy and practice relating to internationalisation. My interest and involvement in internationalisation of private higher education over years have contributed to this research into how the private university key stakeholders interact with legislation, internationalisation policy and

practice, and exploring the internationalisation agendas through the textual and interview findings.

Forms of Data Generated and Analysed

Data	Method	Sample/Text	Analysis
Textual	Textual analysis	Six legislative texts	The textual analysis of this study aimed to elicit the discourse evidence from six selected Malaysian Acts, in order to interpret the 'internal' which included the semantic and grammatical relations, and 'external' relations of the legislative texts containing the themes to explain the interaction between the legislative texts and Malaysian private university internationalisation actors.
Interview	Qualitative interviews	20 private university SMLs	This research used a thematic analysis in order to analyse the qualitative data from the interviews. Three themes were developed to provide an

			insight into the dynamics of SMLs, legislation, internationalisation policy and practice.

Epistemological Position

Post-Structuralism

Meanwhile, the post-structuralist approach is applied in the textual analysis of legislative texts. It not only emphasises the interaction between the reader and the text, but explores how the meaning-making works through the legislative texts. According to McKee (2003), in the post-structuralist approach, people from different cultures experience reality differently. All sense-making strategies have their own advantages and limitations, thus there is no single "truth" that describes reality, or "accurate" way of making sense of reality. From the post-structuralist perspective, legislative texts are not measured as to how accurately they describe truth about private university internationalisation. However, the textual analysis of legislative texts allows us to recognise how similar or different the sense-making practices of different SMLs, who are most likely the readers, can be. This means despite reading the same legislative texts, the SMLs make sense of the reality of internationalisation through their own lens. The SMLs' interpretation of legislative texts can vary, mainly depending on their private university cultures and individual experience of internationalisation.

In the textual analysis of legislative texts, semantic and grammatical relations between sentences is described to provide information about the governmental authority's sense making practices of internationalisation. According to Richardson and St. Pierre (2005), post-structuralism connects language, subjectivity, social organisation and power. Through language, social organisation and power are defined and contested. The use of specific syntactical and lexical aspects in legislative texts expresses how the governmental authority makes meaning of internationalisation, and persuades the readers to perceive the reality of internationalisation in the similar way that they do. This indicates that the writers of legislative texts favour a realist mode of thinking about sense making. In fact, a legislative text itself imposes a single "truth" of internationalisation on the readers – these are the only right internationalisation practices, while others are wrong. The realists, therefore, perceive the readers' cultures and experiences as irrelevant to make sense of internationalisation. On the contrary, post-structuralism maintains the notion of diversity in sense making. While legislative texts advocates their sense-making practices, the SMLs can obey, or respond to the texts differently. The readers' social and cultural experiences are seen to empower their interpretation of legislative texts, and practices of internationalisation.

In the post-structuralist approach, language constructs one's subjectivity in ways which are historically and locally specific (Richardson and St. Pierre, 2005). The meaning of legislative texts is constructed based on the readers' perception of reality about internationalisation. For instance, a private university encourages the long term employment of international academic staff, thus would willingly comply with the Immigration Act in apply for its staff entry visas and work permits. In contrast, when the university intends to hire more local employees instead of international staff, it would perceive immigration legislation as a barrier of international staff recruitment,

and utilise it to impede the renewal of employment contracts and work permits. Denzin and Lincoln (2005, p. 27) state that language is an unstable system of referents, thus it is impossible ever to capture completely the meaning of an action, text, or intention. The language use of legislative texts is a site of exploration and struggle, which creates social reality differently for the university internationalisation participants. This suggests that legislative texts serve as a catalyst to make the SMLs constantly construct their sense of self – their subjectivity. The usage of specific sentences and words in legislative texts not only generates expected internationalisation outcomes from the SMLs, but result in unanticipated contradictions between legislation and real-life practices.

Constructivism

Constructivism has informed the theoretical perspective, methodology and methods of my research. Its epistemology is transactional and subjectivist, which emphasises co-created findings from the community of participants. Guba and Lincoln (2005) believe that the meaning-making activities are crucial to constructivists as they shape the action or inaction of individuals around the phenomenon. Similarly, university policy makers and practitioners bestow the processes and goals of internationalising their institution with specific meanings and values. They have to interact with various internationalisation agents constantly in order to reach their goals, which could be a partnership with a foreign university, a joint research project between local and international researchers, or the recruitment of international expertise and students. Crotty (1998) states that there is no objective truth for people to discover, and truth comes into existence in and out of the people's engagement with different realities.

The participants actively bring in different values and beliefs, in order to negotiate with various social, political and cultural contexts of internationalisation. Community negotiations may formulate agreements about truth and valid knowledge (Guba & Lincoln, 2005). The participants constantly co-create meanings when they interact with other community members in different time and space.

In line with my epistemological position, the interview analysis of my study takes the constructivist theoretical perspective. It assumes that multiple realities exist, and that reality is socially constructed. Berger and Luckmann (1967) contend that social interactions are crucial in obtaining and sustaining knowledge of everyday reality. Learning therefore occurs when people interact with each other and artefacts. In private higher education, policy makers and practitioners work together in a team to achieve internationalisation goals. The acquisition and exchange of knowledge resources is likely to take place during the interaction between agents and between the agent and the artefact. The artefacts could include books, policy documents, and legislative texts. Simultaneously, numerous external factors can influence the interaction, and eventually hinder learning in the internationalisation agents. They range from the psychological issues, contexts, communication barriers, and cultural conflicts. Thus, a collection of the participants' perceptions and experiences would elicit insights on interpreting and using artefacts, which include legislation, policy, and practice on private higher education internationalisation.

According to Lee (2012), the term "constructivism" is often used interchangeably with "constructionism", yet there is a difference between social constructionism and radical constructivism. The latter refers to the active state of the individual mind exclusively in the meaning-making activities. The term "constructivism" would be used throughout my study to emphasise the constructivist paradigm. It

62

assumes a relativist ontology (there are multiple realities), a subjectivist epistemology (the knower and respondent co-create understandings), and a naturalistic (in the natural world) set of methodological procedures (Guba & Lincoln, 2005). Constructivism that I advocate in this study leans toward the strong form of social constructionism. It focuses on collective generation of meaning, in which truth derives from the relationship between community members (Schwandt, 1989). In my research, the private university SMLs engage in meaning-making internationalisation activities as a community. Once the activities complete, the members of the SMLs' community would be able to discover truth about internationalisation, and reach any agreements about the valid knowledge of internationalisation.

The constructivist approach resonates with the post-structuralist approach because both focus on the existence of socially constructed realities by interpreting and utilising artefacts. In my research, interviews provide various SMLs' perceptions on how they create reality of internationalisation through social interactions and artefacts. Meanwhile, textual findings shed light on how truth of internationalisation differs from the governmental authority that writes legislation, to the SMLs that produce and supervise their university internationalisation policy practice. For example, the SMLs communicate with various internationalisation agents such as the governmental authority, other SMLs, street-level practitioners, students, and parents. Simultaneously, they make use of the artefacts, which are legislative texts, policy documents, books, notices and memorandums, in order to carry out internationalisation practices that correspond with their institutional goals. The proposition of multiple truths and realities binds constructivism with post-structuralism, as the SMLs perceive truth of internationalisation subjectively, utilise the artefacts diversely, and carry out practices differently. In both approaches, the SMLs' social and

63

cultural knowledge and experiences are said to contribute to the subjectivity and diversity in their internationalisation perceptions, policy making, and interactions with agents and artefacts.

The Researcher's Position and Positionality

My professional and educational background are closely related to English language, communication skills, and research methods. I have been teaching these modules in higher education institutions for more than eight years. As an insider and staff member, I experienced abrupt internationalisation policy changes, seeing first-hand the struggle for legislative compliance, and disempowerment in internationalisation practice. Through these experiences, I began to recognise the ways that language and social interaction have the potential to provide insight into the ways underlying internationalisation legislation, policy and practice interact to shape outcomes and cultures within and between institutions. My inclination towards understanding the role of the language mechanics and perception dynamics motivated me to adopt the textual analysis and qualitative interviews as the research methods of this study. The textual analysis would unpack the social practices underneath the discourse use of the legislative texts, whereas the qualitative interviews would obtain the SMLs' perceptions toward institutional internationalisation policy and practice. I am aware that I carry certain biases with me into the research and I have been mindful of these in characterising the institutions in the study, and the participants whom I interviewed. I employed a reflexive approach to research; knowing that whilst it is not possible to eliminate bias fully, I am conscious of the ways my prior experiences and preconceptions might enter into the research process, particularly in the interpretation

stage. This is in line with qualitative approaches to methodology and objectivity (Berger, 2013), which states how the researcher's characteristics and experiences could influence reflexivity.

Methods

Textual Analysis

The textual analysis was carried out in this study to examine the discourse structure of Malaysian national legislative texts. According to Fairclough (2003), textual analysis approaches are oriented at either the linguistic elements of texts or the social practices in texts. The textual analysis of this research, nevertheless, focuses on the social practices underneath the discourse use of the legislative texts. The reason is that a text analysis does not require a detailed linguistic analysis because excessive attention on the latter can neglect the dialogue between the text discourse and action (Saarinen, 2008).

The selection of legislative texts was based on the inclusion of clauses relating to private higher education internationalisation. I started off with five Education Acts but rejected two Acts, which were the Education Act 1996 and the Education Act 1961 because they did not relate to internationalisation of private higher education. After reading the remaining three Acts, I decided to include three other Acts, which was the amendment Act of one of selected Acts, and two non-education Acts relating to internationalisation of private higher education that were the Immigration Act and the Companies Act. Internationalisation was not explicitly delineated in the parts of the six Acts. Rather, it was embedded within the paragraphs. The significance of these Acts

was summarised as follows:

(1) Act 155 Immigration Act 1959/63: This Act regulates the recruitment of international students and staff, which is part of private university internationalisation.

(2) Act 125 Companies Act 1965: This Act comprises internationalisation practices which are the international student and staff recruitment, financial management, and programme accreditation. Malaysian private universities are registered as private corporations that carry out the business of higher education. Therefore, their operations have to comply with the Companies Act.

(3) Act 30 Universities and University Colleges Act 1971: This Act includes a limited amount of clauses related to higher education internationalisation, particularly in stating that a local address is mandatory for the university operations.

(4) Act 555 Private Higher Educational Institutions Act 1996: This Act contains nine parts which are related to the private university internationalisation. They are the establishment of private higher educational institutions (PHEIs), the establishment of a PHEI with the status of a university, university college and branch campus, the registration of PHEIs, management of PHEIs, the conduct of courses of study at PHEIs, the discipline and conduct of students, the permits to teach, the inspection of PHEIs, and the offences and penalties.

(5) Act 679 Malaysian Qualifications Act 2007: This Act describes the functions of the Malaysian Qualifications Agency (MQA) in higher education programme accreditation. Designed and offered in private universities, internationalised programmes which are either conducted locally and/or overseas have to undergo accreditation of the MQA.

(6) A1352 Private Higher Educational Institutions (Amendment) Act 2009: This Act amends the Private Higher Educational Institutions Act 1996, through semantic

relations that can affect the course of internationalisation in private universities. These legislative texts were downloaded from the official website of The Attorney General's Chambers (AGC), which was attached to the Malaysian prime minister's department (http://www.agv.gov.my). The retrieval of the legislative texts did not incur any ethical issues, as they were public documents produced by the government and were available for public consumption (Henn, et al., 2009). The legislative texts were used for the textual analysis of this study, and the data were presented solely for academic research purposes.

Before conducting the textual analysis, I assessed the quality of these legislative texts using Scott's (1990) criteria: authenticity, credibility, representativeness and meaning. As the legislative texts are government documents, the evidence is genuine and of unquestionable origin. The texts are also credible, free from errors. In terms of representativeness, the legislative texts have been regarded as official references, yet the extent to which internationalisation policy makers and practitioners relate to and interact with the texts remains uncertain. Knowing the legislative texts does not guarantee the readers' compliance. Similarly, the legislative texts may present clear and comprehensible evidence about internationalisation but readers can interpret the texts differently due to their internationalisation knowledge and experience.

Two opposing views occur on the status of the legislative documents. On one hand, the legislative texts are perceived as representations of the reality of internationalisation policy and practice (Bryman, 2012). Documents should be examined as what they are to learn the underlying social realities. On the other hand, the legislative documents present a distinctive ontological status, known as a "documentary reality" (Atkinson & Coffey, 2011). This suggests that the documents

are unlikely to translate into private university internationalisation policy and practice, and that the social reality contradicts with the "documentary reality". As such, researchers should analyse the documents in terms of the purposes and the context in which they were constructed, and their readership. In this study, the textual analysis of legislative texts was carried out in order to complement the interview findings, from the angle of the linguistically-constructed "documentary reality". While the interviewees SMLs' perceptions indicate the socially constructed realities of internationalisation, the interviews and textual analysis are interrelated to explore whether real-life policy and practice match or conflict with legislation. Therefore, both methods are linked in a complementary relationship, addressing the research questions of this study from different angles.

The Analysis of Textual Findings

The textual analysis of this study aimed to elicit the discourse evidence from six selected Malaysian Acts, in order to interpret the 'internal' and 'external' relations of the legislative texts. It constituted the representativeness and credibility of the legislative texts, and the meaning of the words. The analysis of the 'internal relations' of the legislative texts contained semantic relations and grammatical relations between sentences and clauses. The semantic relations, found in the Acts, were purposive relations, conditional relations, temporal relations, additive relations, and elaborative relations. Meanwhile, paratactic relations, hypotactic relations, and embedding relations were the grammatical relations, which were identified in legislation. As for the 'external relations' of the Acts, themes were derived in order to explain the interaction between the legislative texts and Malaysian private university internationalisation

actors. According to Fairclough (2003), the textual findings illuminated the internal and external relations of the texts. In this study, the 'internal' and 'external' relations of the legislative texts were interconnected, as the textual findings were used to substantiate the themes.

Similar to the interview data analysis, I carried out the preliminary coding to locate the codes which potentially addressed the second and third research questions: (1) in what ways does legislation interact with institutional policy and practice in private higher education internationalisation? and (2) what do the different perceptions and interactions mean for the future internationalisation of private institutions?. When the textual analysis began, I read each legislative text thoroughly, divided the text into segments of information, and then marked the segments of information with codes. Lean coding was conducted to prevent me from overcoding the legislative text – the maximum 10 codes were identify for a 10-page text. A smaller amount of codes helped me to form a precise number of themes. In addition, I removed the overlapping codes to ensure that the remaining codes were significant to create themes.

After the preliminary coding of all the legislative texts, the long list of codes was narrowed down according to the areas of private higher education internationalisation in which legislation interacted with internationalisation policy and practice. The final list comprised 11 codes that were internationalised academic programmes, international partnerships, university internationalisation strategies, student autonomy, staff and student mobility, social class, governmental authorities and legislation, power imbalance, university governance, communication, and university practitioner's engagement in internationalisation. I clustered these codes into four themes: (1) legislation as a governmental authority soliloquy, (2) legislation as a representation of student autonomy, (3) legislation as a manisfestation of the power hierarchy, and (4)

legislation as a text without the meso- and street-level participation. These themes explored the social interactions and power relations between legislation and private higher education actors, in the light of internationalisation policy and practice. The first theme consisted of five codes, which were internationalised academic programmes, international partnerships, university internationalisation strategies, governmental authorities and legislation, and staff and student mobility. Furthermore, two codes, that were student autonomy and social class, were categorised into the second theme. The other two codes – power imbalance and university governance – were related to the third theme. The remaining two codes, which were communication, and university practitioner's engagement in internationalisation, were classified into the fourth theme.

In line with the analysis of the 'internal' and 'external' relations of texts, Denscombe's (2010) perspectives on the validity of documentary data were employed. The textual findings, which were derived from the Acts, represented the "documentary reality" of private higher education internationalisation. Through the themes, the social reality of internationalisation, or the contexts in which the Acts were constructed were examined. As such, the logical relations between the codes were synthesised, in order to ensure that the themes were not stand-alone, but interrelated. For example, the codes of the first theme were related to the codes of the fourth theme – the governmental authority maintained communication with the university SMLs, without recognising the feedback of the meso- and street-level practitioners in the internationalisation areas, such as academic programmes, international partnerships, and the international staff and student recruitment. Besides, the codes of the second and third themes were connected, as the power hierarchy of a PHEI was founded on distinction that underlined leadership habitus, and the ownership of capital. The SMLs and students, who possessed strong habitus and capital, seemed to take a more

autonomous and dominant role in the internationalisation activities. A synthesis on the codes of different themes shed light on the complex entanglements between documentary and social realities of private higher education internationalisation.

The themes derived from the textual findings were analysed with Engeström's (2001) third generation of activity theory, and Bourdieu's (1984) theory of practice. The first theme, which was legislation as a governmental authority soliloquy, corresponded with Engeström's activity systems that the activity systems of the internationalisation actors are regulated by rules, which are largely from legislation. It discussed the overpowering role of legislation in knotworking between the activity systems of the governmental authority and university SMLs, which could result in either law compliance or violation. Meanwhile, the second theme – legislation as a representation of student autonomy – was closely related to Bourdieu's notion of social distinction because student autonomy in internationalisation was likely to be determined by their amount of the capital. Malaysian students' scarce capital also restricts their freedom of giving political speech or stating their political stance, not only locally but internationally.

The third theme that was legislation as a manisfestation of the power hierarchy explored distinction in sustaining the power hierarchy of the private higher education field, through Bourdieu's conception on the relative autonomy of a field. The textual findings indicated the jurisdiction of the SMLs in constructing internationalisation policies, and supervising the policy implementation at the meso- and micro levels. Private universities were granted a large extent of self-governance, which included establishing its own power institutional hierarchy. Lastly, the fourth theme examined legislation as a text without the meso- and street-level participation, based on the lack of acknowledgement for the middle managers, junior administrators and lecturers who

conducted most communications groundwork. Through Engeström's proposition of knotworking in effective communication between interacting activity systems, this theme delineated how communication obstacles between the SMLs and meso-level and street-level practitioners would impede the collaboration with the governmental authority in their university internationalisation policy making and implementation.

The themes derived from the textual analysis would be synthesised with the themes derived from the interviews, in order to discuss the interrelatedness of legislation, policy and practice in private higher education internationalisation, and whether such the implications of such interactions on the future internationalisation of PHEIs.

Qualitative Interviews with SMLs

This study employed interviews with 20 private university SMLs in order to elicit their perceptions toward institutional internationalisation strategies and the practices these might engender. The interviews were particularly concerned with the SMLs' approach to national legislation and institutional policies, thus the interview was selected as a method because of "its capacity to access self-reflexivity among interview subjects, leading to the telling of stories that allow interviewers to understand and theorise the social world" (Miller and Glassner, 2011, p. 137). The aim of the interviews was then to generate candid opinions and engaged personal narratives from the SMLs on how they responded to legislation, internationalisation policy and practice. Their experiences of interacting with legislative texts and other internationalisation participants could be acquired from the interviews. The SMLs' interview accounts provided the "insider's perspectives about the internationalisation phenomenon in

private universities. Indeed, Miller and Glassner (2011) maintain that an in-depth analysis of interview accounts gives two intertwined sets of results, which are evidence of the nature of the phenomenon under investigation, as well as the understanding into the cultural frames that participants use to make sense of the experiences.

An emphasis of relatively open questions constitutes semi-structured interviewing (Wengraf, 2001). The interview guide developed for the present study included a set of prepared open questions that contained the basic topics and themes for the participants to answer. The two topics comprised the role of legislation in private university internationalisation, and internationalisation policy and practice in private universities. The first topic explored various themes related to legislation, which were the management of teaching permits, international student discipline and conduct, courses of study, student recruitment advertisements, the management of departments, and the departmental and university inspections. Meanwhile, the themes related to the second topic ranged from the management of academic programmes, research and scholarly collaboration, cross-border relations, extra-curricular activities, governance, human resources, and services for internationalisation (Appendix A). The semi-structured interview sessions ranging from 40 minutes to 1 hour 15 minutes were carried out for each participant. The SMLs (n = 20) agreed upon an appointed time to attend the interview session in their university offices, or other venues that the participants suggested and the interviewer agreed with. The research context was important because it provided the participants and the interviewer with control to speak in an environment in which they felt safe and comfortable. A trusting relationship has to be established between the participants and the interviewer (Fontana & Grey, 2005), and a mutually agreed research context is essential in gaining trust. The participants proposed an interview venue within their comfort zone, while the

interviewer was willing to accommodate the participants' choice of the research context to reduce their participants' anxiety.

During the interview, the SMLs were asked questions which probed their perceptions toward private university internationalisation policy and practice, with reference to national legislation. The interview questions were divided between two major topics and a number of themes, which were explained earlier. The interview questions aimed to answer the research questions which examined: (1) how the private universities might differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives, (2) the ways in which legislation interacts with institutional policy and practice in private higher education internationalisation, and (3) what the different perceptions and interactions mean for the future internationalisation of private institutions. The participants discussed their past and present involvement in their university policy making and practice. They also addressed their own university internationalisation strategies, in the light of their social and cultural experiences with various internationalisation agents and artefacts. Each interview was audio-recorded and later transcribed.

The interview guide for semi-structured interviewing, nevertheless, generates differentiation between the different groups of actors. Scott and Garner (2013) state that the interview questions can yield agreements and disagreements among the participants, and the various ways in which they formulate replies. Since the interview questions were not tailored to the job scope of the participants, they responded differently toward similar interview questions. The interviewees were asked the same set of questions, despite their job scope. In occasions when they gave minimal input, the researcher asked them some supporting questions to elicit more responses. Some participants at times were unable to answer the interview questions which were not

related to their job scope, therefore the researcher would skip the questions spontaneously, and ask them other questions from the interview guide that were linked to their job scope.

These are some examples of differentiation between different groups of actors during the interviews. The SMLs who were professors or senior academicians discussed passionately the areas of internationalisation in which they actively participated, such as academic programmes, research and scholarly collaboration and extracurricular activities. Their views, however, were limited to university policy and practice in cross-border relations, governance, and services for internationalisation, which were not part of their job scope. In contrast, the SMLs that held senior administrative positions, such as the Vice Chancellor, deputy Vice Chancellor, provost, senior executive director, and senior managers managed to provide their perspectives on cross-border relations, governance, and the services for internationalisation, as they coordinated efforts from various academic and administrative departments to launch international marketing campaigns. They were also able to shed light on establishing international partnerships through academic and research collaboration, by initiating the memorandum of understanding (MOU), or the memorandum of agreement (MOA).

Engaging in a casual conversation with the participants at the beginning of the interview can help the interviewer identify the areas of internationalisation in which the participants are activity involved. It tends to humanise the interviewer and diminish his or her power and control of the interview process (Foley & Valenzuela, 2005). Such small talk not only breaks the ice between the participant and interviewer, but most importantly elicit input about the participant's job scope and role in university internationalisation (Driessen & Jansen, 2013; Qu & Dumay, 2011). Thus, I could use

this information to select the interview questions that generated most responses from the participants because they were able to relate to the questions. Besides relying on the interview guide, the structure of the interview can be highly flexible, manoeuvring from semi-structured to unstructured. I was ready to ask any questions to follow up with a new insight or perspective, which was not included in a pre-prepared interview guide. I also modified the follow-up questions for the individual interviewees during the interviews to collect their spontaneous responses in the natural environment.

During the interviews, I recognised two categories of private university SMLs that are academic administrators and non-academic administrators. Both have distinctive influences in particular areas of internationalisation. For example, a faculty dean is heavily involved in crafting and monitoring the internationalisation policies within departments to ensure they align with the university internationalisation strategic plan. An international office manager, on the other hand, has to travel overseas often to recruit international students, publicise the university programmes internationally, and analyse the business prospects of the international student market. Because of these pre-set categories, specific interview questions were allocated to the academic administrators and non-academic administrators, respectively. Hence, they would be able to explain the areas of internationalisation in which they participate actively.

Typology of the Four Universities

University	Typology	Characteristics
A	The transnational university	It is located in a rural area, away from the city centre. It is medium-sized, and its

		disciplinary focus is engineering, science and arts.
B	The internationalised university	It is a medium-sized university, located in the city centre. Its disciplinary focus includes business, science and arts.
C	The localised university	It is a semi-urban university, and is medium-sized. Its disciplinary focus is rooted in engineering, business and information technology.
D	The comprehensive university	It is situated in the city, and is a large university. Its disciplinary focus consists of engineering, science, business and arts.

In the interview findings, University A will be referred to as the transnational university, University B as the internationalised university, University C as the localised university, and University D as the comprehensive university. Each university is characterised as it is, based on geography, size and disciplinary focus. This is simplifying the complexity of each university. I recognise that this is a simplistic way of categorising, but it is for the purpose of the thesis and will be explained more fully in the conclusion where findings are drawn together.

Sampling Frame

Purposive sampling was applied in which 20 SMLs from 4 private university departments were invited to participate in the interviews. According to Robinson

(2014), the purposive sampling strategy is to ensure that specific categories of cases within a sample universe are represented in the final sample of a project. The inclusion and exclusion criteria are determined based on the researcher's theoretical understanding of the topic being studied (Figure 4).

Figure 4. Sample universe, inclusion and exclusion criteria, and sample (Robinson, 2014)
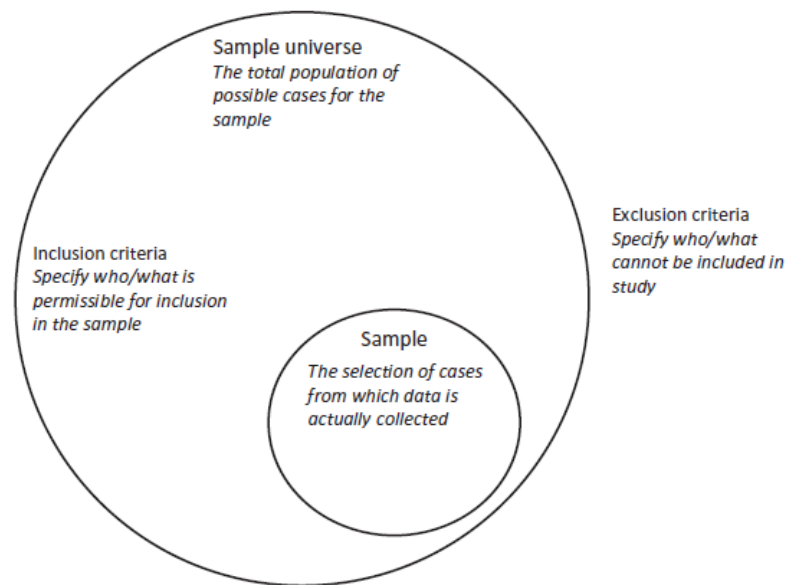
The SMLs were chosen because they have been participating in institutional internationalisation policy making, and monitoring the practice of these strategies for more than fifteen years. Diversity is also a key criterion when choosing the sample of this research (King & Horrocks, 2011). The participants were recruited as they represented a variety of positions pertaining to private higher education internationalisation, such as the vice chancellor, the deputy vice chancellor, the senior executive director, the provost, faculty deans, associate deans, senior managers, and professors. It shed light on the meaningful differences in the internationalisation experience. While ensuring there was a variety in recruiting participants, practical constraints were taken into account. King and Horrocks (2011) suggest that the

researcher should focus on one or two important aspects that define the target group, and then seek diversity in other aspects. As such, I referred to Knight's (2004, p. 16) conceptual framework that delineates eleven aspects of internationalisation:

If the institution has taken an integrative and sustainable approach to internationalisation, then a broad range of policy and procedure statements would be implicated ranging from quality assurance, planning, finances, staffing, faculty development, admission, research, curriculum, student support, contract and project work.

I then selected quality assurance and student support as two key areas of internationalisation to recruit the first 10 participants. It was because they mainly addressed internationalisation policy and practice of many SMLs. For example, the faculty deans had to ensure that the programmes were aligned with international academic standards, and the needs of international students. Similarly, the senior manager from the international student recruitment office was responsible for regulating the quality of international marketing campaigns and attending to the international students' welfares. This enabled the SMLs to account for the governmental authority's inspection and the university internal audit. The significance of quality assurance and student support in linking legislation, internationalisation policy and practice has addressed my research questions on whether the correspondence or discrepancy occurs between legislation, policy and practice in private university internationalisation. The research questions of this study explored (1) the differences and similarities in the private universities' relationship between legislation, internationalisation policy and practice through their SMLs' perspectives, (2) how legislation interacts with institutional policy and practice in private higher education internationalisation, and (3) the impact of different perceptions and

interactions on the future internationalisation of private institutions. Legislation emphasised the need of quality assurance in private higher education internationalisation, whereas services related to students who are major stakeholders of internationalisation would shed light on whether gaps exist between legislation, policy and practice.

The other 10 participants were selected based on their active involvement in other areas of internationalisation. These areas included international research collaboration, international partnerships, transnational education programmes, student exchange programmes, and cultural exchange programmes. They were the colleagues of the first 10 participants, and were recommended by the latter to take part in interviews. The snowballing technique was used as the researcher requested the first 10 participants to identify others to become interviewees (Creswell, 2011). Despite being known as an alternative to convenience sampling, the researcher adapted the snowballing technique by accessing the community of SMLs through the first 10 participants, and then screened the list of recommendations to select the other 10 participants on the basis of their significant role in particular internationalisation areas, as stated earlier. Hence, the other 10 participants were not chosen because of their availability to be interviewed, but their contribution to other internationalisation areas that were different from the first 10 participants'.

Sample Size

The question on how many participants I should interview before achieving saturation had been constantly pondered during the interviews. Hennink et al. (2011) describe that saturation is the point at which information that the researcher collects from the

interviewees repeats itself. After interviewing 15 participants, this issue intensified as the information from the participants began to repeat itself. A number of internationalisation strategies and obstacles of internationalisation had already been identified before achieving the initial sample size of 30 participants (which was the desired number at the outset). For example, the interviewees who had the academic teaching background emphasised the same strategy of internationalising the curricula that it should be developed locally, but moderated internationally with their partner university. Meanwhile, senior administrative staff spoke about the needs and challenges of coordinating with various university departments to implement the internationalisation initiatives.

Information saturation was also observed in the interviews with the participants from the same university. They repeatedly spoke of the internationalisation policies in the areas that they worked together such as quality assurance and student services. For instance, the interviewees who managed the internal and external audits of the university provided similar views on facing challenges to bridge the gap between legislation and practice. Henn et al. (2009) argue that the number of participants is affected by the level of research resources which the researcher can obtain, and the level of precision required in the results. Nevertheless, the selection of institutions and participants is justifiable because the four private universities, where the participants work, represent different international partnerships that are the franchise, validation, and academic collaboration. Instead of the specific information and the increase in the sample size, the diversity of the perceptions should guide the number of participants. Malterud et al. (2015) also suggest that the sample size should be guided by information power, which indicates the more information the sample holds that is relevant for the actual study, the lower number of participants is needed. Despite

receiving consent from more interviewees from these four universities, I decided to finish the interviews at 20 participants, which was the pinnacle of saturation.

Gaining Access: Obstacles and Gatekeepers

I started the recruitment off on my own to enter the community of SMLs in Malaysian private universities for the first time. Such an encounter was crucial for building networks that could be a forum for recruitment. This was among the strategies of access suggested by Nudzor (2013), which was developing good ethical procedures and reputation within the elite network, including assuring interviewees of their anonymity and the confidentiality of data. The private universities and the list of their senior management team members in Selangor and Kuala Lumpur were first identified. Then, I emailed the interview invitation together with the consent form and participant information sheet to the SMLs. Having done the same steps for almost a month, the response was much slower than I had hoped. Out of more than 100 email invitations, only three participants agreed to do the interview.

The high rate of rejection indicates that gaining access to the senior management team of Malaysian private universities is indeed challenging for several reasons. First, the private university prioritises commercialisation in higher education, thus it avoids any potential risks to its business and image such as participating in a study that explores the gaps in their internationalisation policy and practice. Second, a number of private universities adopt a "closed door" policy that shuts any outsider-researchers out, or demands them to go through stringent ethical procedures for gaining access. Third, many SMLs simply do not have time to do the interviews as they are busily engaged in meetings, oversea trips and administrative tasks.

After realising these difficulties of recruiting the SMLs, I revised the recruitment strategies by building rapport with the gatekeepers who mediate the access to the private universities (Hennink et al., 2011). This was in line with Nudzor's (2013) notion that the researcher should modify the research method, particularly the sampling technique, to suit a changing context. Current work acquaintances and former colleagues of private universities were approached to seek their referral to SMLs who would become my potential interviewees. They were provided with a range of information to assist them to recruit interviewees (King & Horrocks, 2010). This consists of the participant information sheet and consent form (Appendices B & C). The former stated the overview of my research project, purpose of the study, data collection methods, anticipated outcomes and the time commitments required from the interviewees. Meanwhile, the latter asserted participants' anonymity and their rights to withdraw from the study. These gatekeepers introduced me to their friends who held the SML positions in various private universities. They either allowed me to use their name as the reference in my email invitation, or volunteered to write the referral email on my behalf. This was a positive move in terms of gaining access; I received numerous responses from SMLs who agreed to participate in my research. In fact, a few who ignored my first invitation, later gave their consent to do the interview after receiving the referral email, thus highlighting the significance of gatekeepers and 'hot leads' in gaining access to research participants.

These interviewees, as insiders, also helped me to recruit additional volunteers. They identified and introduced their colleagues who met the sampling criteria of the research, so that I could approach them to submit the participant information sheet and to request the consent. According to King and Horrocks (2011), the insider assistance through the snowballing technique is beneficial. It not only saves the

researcher's time and budget to approach the universities which are located at a long distance, but encourages the SMLs to participate in the study based on the recommendation of their acquainted, trusted colleague that acts as the insider. However, the insider recruitment strategy has risks. Dependence on personal networks within the university can cause an ethical danger that insiders may impose pressure on colleagues to participate, which would deprive them of genuine, free informed consent. It also reduces the possibility of selecting the individuals who are the representative of the senior management leader population (Creswell, 2011). In order to balance the advantages and risks, before the interviews I analysed the insiders' recommended recruits based on the sampling criteria, and instead of communicating through the insiders, I requested to speak directly with potential participants to gauge their willingness to take part in the study. They were briefed thoroughly about the study from the purpose to the outcomes. They were aware that they had the right to give the consent despite the referral, and that they would not face any consequences if they did not want to participate.

Bryman (2012, p. 151) states that gaining access is "a constant process of negotiation and renegotiation of what is and is not permissible". At times, the insider provided special requests for helping me gain access into a university. For instance, I was asked to write a thank-you email to the insider from the transnational university as an evidence of doing the interview with him or her. The email was then forwarded to a senior management leader from the comprehensive university as a "referral letter", together with the insider's pitch of persuading the colleague to participate as well. The insider mentioned that it was extremely difficult to gain access into the B University which implemented a "closed-door" policy for outsider researchers, thus the personal connection technique might work.

Layers of access vary from job positions and scopes. The reason is that insiders differ in the degree of willingness to accommodate the researcher's investigative needs (Clegg & Stevenson, 2013). Through the interview, the participants reflect on their internationalisation practice and experiences to a certain extent, and such reflexivity drives them to help the researcher recruit colleagues who are potentially as reflective as them. SMLs who are non-academicians tend to introduce me to their colleagues who are also mostly administrators and managers. However, many SMLs who have been academicians since their early days have more than one layer of access. They are inclined to refer me to both academicians and non-academicians whom they perceive as appropriate interviewees for my research. They would also give more research-related opinions on which SMLs' perception can contribute to particular areas of internationalisation, and why their perception matters. Besides, people whom insiders work with can affect the layers of access. SMLs who hold top positions such as vice chancellors, deputy vice chancellors, provosts and senior executive directors would refer me to their colleagues or acquaintances who hold similar top positions. Meanwhile, other SMLs such as deans, associate deans and academic directors would introduce me to the senior managers or lecturers whom they work closely with.

Ethics, Power and the Challenges of Researching 'In' and 'Up'

Before collecting data, I requested the permission from my university where I studied to conduct the research in private universities. This was done through official ethical procedures with my university ethics committee, which is an institutional review board. It applies guidelines according to four ethical principles: non-maleficence,

beneficence, autonomy and justice. I began the ethical procedure by becoming familiar with the ethics review process, identifying the ethics committee members, and downloading the ethics forms from the university website. The forms were then thoroughly read to determine the information the ethics committee required about my research.

Several concerns were established and addressed in the ethics forms. First, my participants would not likely experience any physical, psychological, emotional, legal, social or economic risks in the study because the interviews would be conducted in the location of their choice, either at universities or public areas (Creswell, 2011). If they experienced any distress following the participation, they were encouraged to inform the researcher and contact the resources provided in the participant information sheet. The second ethical consideration was benefice. I thought about who would benefit from the study and whether the target population gained any benefit directly or indirectly (Hennick et al., 2011). This was then clearly described as the possible benefits of taking part in the participant information sheet. Before the interviews, potential participants would be aware that the findings could enrich their experience as a higher education internationalisation policy maker and a practitioner, and also assist them to reflect on and facilitate the internationalisation processes in their university. Third, my target population was not a sensitive population of high risk. They were mature, healthy working adults aged between 30 to 60 years old who remained autonomous on whether to do or withdraw from the interviews. Finally, the ethical principle of justice was responded with the statement that I would not exploit or deceive the sample to carry out the research. As such, I would present myself as a researcher who is a former practitioner of university internationalisation, but now merely a researcher who is an outsider exploring the phenomenon of internationalisation. The

participants also would be assured that their identity as well as the university's remained confidential throughout the study.

While completing the ethics forms, I developed an informed consent form for the interviewees to sign before they take part in the research. It delineated the participants' rights, which consisted of their voluntary participation in the study, their right to know the purpose of the study, and their right to withdraw from the study. After that, the consent form was submitted together with the ethics forms, participant information sheet and research proposal to the ethics committee. Evaluation was conducted on my research project, and feedback was given for making amendment to the documents submitted. Changes were made to the forms based on the reviewer's comments. After four months of revision, I obtained the permission from my university ethics committee to start gathering data.

During the participant recruitment, the researcher adhered to the ethics guidelines strictly by informing the participants of the research purpose and terms of participation, addressing their concerns pertaining to the study, and acquiring their written consent prior to the interviews. There were no issues of vulnerability in relation to the potential participants. The participants came from different academic and personal backgrounds, reflecting the demographic variation within the desired university SMLs' population. The identity of the participants stayed anonymous and confidential throughout the study in all forms of publication, which included the interview transcripts and the thesis.

Dialogues are exercises of power, thus recognising power dynamics in the interviews is crucial (Kvale, 2006). One of the private universities that I approached was my former workplace where I had worked for several years. Thus, I interviewed ex-colleagues who used to be my superior and peers, and managed various power

relationships. Despite having left the university, my interviewees still perceived me as an insider and a colleague, by entrusting me with certain confidential information about the university internationalisation policy and management issues. To maintain the objectivity and ethicality of interviews, I informed the participants before the interviews that I am now a student- researcher who is an outsider of the university internationalisation policy and practice.

An imbalanced power relationship may occur between the researcher and participants, and this became clear during the course of the project. In my previous role as a lecturer, and my current role as a postgraduate student and researcher, I am the "managed" while my participants are mostly the "managers". These different positions within academic institutions undoubtedly shaped the research encounter. For example, when discussing interview topics related to the private university management protocols in which I am inexperienced, I often felt powerless in keeping up the pace of the conversation, and posing questions that lead to more responses from the participants. Such power differences should be recognised and reflected on, thus disclosure and authenticity between the researcher and participants need to be encouraged (Karnieli-Miller et al., 2009; Mertens & Ginsberg, 2009). To address this issue, I had to learn the perspectives of the managed and the manager, and effective questioning techniques. This was done through a pilot study with 5 private university academicians and administrators prior to the actual interviews. An interview guide was crafted in advance to be used in the pilot study. It contained topics and questions pertaining to the private higher education internationalisation. After the pilot study, the interview guide was revised based on the feedback of the interviewer and participants. I then used the improved interview guide and pilot interview experience to carry out the actual interviews.

The Analysis of Interview Data

As previously discussed, as a way of organising the interview process and the data generated, I separated participants into two groups: academic and non-academic. The job roles of the SMLs were important analytical categories because they described their identity, professional background, and internationalisation areas in which they participated. Tierney and Dilley (2002) state that the interviewees, who are even in the same category, utilise varied frameworks of knowledge and language to make sense of, and to account for their world and experience. Every individual participant perceives the reality of internationalisation differently, which is constructed by his or her social and cultural knowledge and experience from the current university, or the PHEIs where he or she worked. Besides, despite their involvement in similar areas of internationalisation, the academic and non-academic administrators' interpretations of reality could vary. According to Creswell (2011), the analysis of qualitative data is inductive in form, moving from the interview transcriptions to the general codes and themes. In order to develop a deeper understanding about various SMLs' views on internationalisation policy and practice, I read the interview data several times, and conducted an analysis each time. In each analysis, the transcripts were coded for themes to be discussed further.

This research used a thematic analysis in order to analyse the qualitative data from the interviews. Bryman (2012, p. 717) illustrates that "it is a rather diffuse approach with few generally agreed principles for defining core themes in data". It is crucial to look at the patterns of themes across the participants' accounts, identifying how the interviewees differ as well as what they have in common. King and Horrocks (2011) define themes in the thematic analysis as distinctive and recurrent features of

interviewees' accounts, highlighting specific experiences and perceptions, which the researcher sees as relevant to the research questions. To be able to develop themes from the interview data, the researcher needed to go through all steps: transcription, reading, organisation and coding.

First, I transcribed all the 20 audio-recorded interviews into text data. The process of transcription was labour intensive. I spent two months on transcribing 10 interviews by listening to the audio files of interviews, and converting the verbal accounts to the Microsoft Word documents. During transcription, any identifiers were removed or replaced with pseudonyms to preserve the participant's anonymity, and to maintain ethical principles (Hennink et al., 2011). The identifiers consisted of any names of people and universities, locations, places or specific information that may reveal the identity of participants or universities. The other 10 interviews were sent to a professional transcription company which I have employed for my other qualitative studies over years. It specialised in transcription services to the legal firms, universities, students, and businesses. I specifically reminded the transcription company of the research ethics protocol by keeping the identity of the participants and universities confidential and anonymous. A list of pseudonyms that I created for the first 10 interviews was also delivered to the transcription company, to ensure the consistency in the usage of pseudonyms. After transcription, I read all the 20 transcripts thoroughly, and listened to the recordings simultaneously to proofread the transcripts and reduce any typo errors.

The preliminary exploratory analysis and coding were performed to identify themes in the participants' responses. This was to address the research questions: (1) how might private universities differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives?, (2) in what

ways does legislation interact with institutional policy and practice in private higher education internationalisation?, and (3) what do the different perceptions and interactions mean for the future internationalisation of private institutions?. During an early stage of the data analysis, each of the interview transcripts was read closely to identify the codes that responded to the research questions of this study. While reading through the pages of the transcript, I divided the text into segments of information, and labelled the segments of information with codes. In simpler terms, codes are labels used to describe a segment of text (Creswell, 2011). Codes represent a core level of meaning, which is derived from a number of text segments (Galletta, 2013). Instead of overcoding the interview data, I adopted the idea of lean coding, in which I assigned only a few codes the first time I analysed a transcript. For instance, 5 to 10 codes were identified for a 10-page transcript. This later helped me to reduce the codes to a small number of themes.

An inventory of codes was established using the NVivo software. The interview quotations that were related to the codes were organised into labelled folders. While editing the inventory, I also set aside the overlapping codes to ensure that the remaining codes were relevant to create broad themes. After coding all the transcripts, I narrowed the long list of codes based on the areas of private higher education internationalisation, and the interrelatedness of legislation, policy and practice in the private higher education internationalisation. The final list consisted of 15 codes that were the SMLs' stances toward legislation related to internationalisation, internationalised academic programmes, university internationalisation strategies, internationalisation route map, university governance, international research collaboration, international partnerships, staff and student intercultural activities, staff and student mobility, social class, governmental authorities and legislation,

communication, power imbalance, student autonomy, and university practitioner's engagement in internationalisation.

As the analysis progressed, the final 15 codes were clustered, and the meaningful relationship between the codes was synthesised. This helped me to create three broader themes, or categories that gave new insights to my interview data interpretation: (1) developing individualised internationalisation policies within a university, (2) the collision between legislation, internationalisation policy and practice, and (3) implementation gaps between internationalisation policy and actors. The first theme contained six codes, which were internationalised academic programmes, university internationalisation strategies, internationalisation route map, international research collaboration, international partnerships, and staff and student intercultural activities. Meanwhile, another five codes were categorised into the second theme, which were SMLs' stances toward legislation related to internationalisation, student autonomy, staff and student mobility, social class, and governmental authorities and legislation. The third theme comprised four codes: university governance, communication, power imbalance, and university practitioner's engagement in internationalisation.

Inspections were carried out repeatedly to ensure that the themes can be evidenced with the transcripts. The interviewees' quotes were classified according to the above-mentioned codes, which were linked to a specific theme. Galletta (2013) explains that the codes' viability in responding to the research questions should be assessed constantly. Hence, I returned to more coding, by locating logical relations between codes. For example, several codes of the first theme were interrelated with certain codes of the third theme, as the power imbalance and the gaps of university governance were found in internationalisation areas such as internationalised

academic programmes, international research collaboration, international partnerships, and staff and student intercultural activities. Furthermore, the codes of the second theme were connected to the codes of the first theme, as the university individualised internationalisation policy was often aligned with legislation via the communications between the SMLs and government authorities. Synthesising the logical connections between these codes and themes provided a holistic perspective on the internationalisation phenomenon – the sustainability of private university internationalisation depends on the interaction between legislation, policy and practice. The SMLs were recognised lawfully as the key personnel to interact with the governmental authority, therefore their responses toward legislation had implications for the university internationalisation policy and practice.

After coding, I started to interpret the interview data with reference to Bourdieu's (1984) theory of practice, and Engeström's (2001) third generation of activity theory. The first theme, which was developing individualised internationalisation policies within a university, tied in with Bourdieu's habitus and capital, and Engeström's activity systems. Habitus adapted to the internationalisation outcomes, and formed individualised internationalisation policies in the PHEI. Distinction was also identified in the interview data that the possession of capital was closely linked to the establishment of the university's global image, and its recruitment of international talents. Meanwhile, Engeström's (2007) notion of rules was found to be crucial in developing the SMLs' stable and institutionalised activity systems in order to carry out individualised internationalisation policies. The SMLs were obliged to follow institutional regulations and legislation, so that their practice was on par with the university internationalisation strategies.

The second interview theme was related to Engeström's conception of knotworking, which was known metaphorically as the "fungal roots" embedded in the university's and the government authority's activity systems to form a healthy, strong mycorrhizae formation. It explored how legislation was entangled with internationalisation policy and policy in the light of two-way communication and knowledge exchange about legislation between the activity systems of the SMLs and the government authority. The interview findings indicated that compliance and adaptation to legislation were pivotal in generating mutual objectives for two interacting activity systems. Lastly, the third theme focused on the implementation gaps between internationalisation policy and actors. It was related to Engeström's proposition that the conflict between the internationalisation objectives of policy makers and practitioners could cause tensions between the two activity systems. Structural inequalities and communication barriers also resulted in contradictions between the SMLs and the university internationalisation policies. Further, Bourdieu's leadership habitus was applied to explain the consequences of the implementation gaps on internationalisation policy and practice. The disruptive nature of habitus seemed to correspond with the interview findings that individual SMLs, groups or universities were unable to control likely action of internationalisation at a specific time.

Synthesising Textual and Interview Findings

A synthesis of the themes from the textual and interview findings was conducted to explore the relationship between legislation and the SMLs' perceptions on private higher education internationalisation policy and practice. Such triangulated data can reveal completeness, convergence, inconsistency and complementary results

(Creswell, 2011; Johnson et al., 2007). During the synthesis, I treated equally the textual findings and participants' perceptions, whether centred on the discrepancy or correspondence between legislation, policy and practice, as valuable insights that contributed to my research. While recognising the discrepancy between legislation, internationalisation policy and practice, I kept an open mind toward the outliers that refuted such hypotheses of the internationalisation phenomenon. This means that the synthesis of the interview and legislative data could show that no implementation gaps were identified in specific areas of internationalisation, and that the stakeholders were well-positioned in their university future internationalisation strategic plan.

The synthesis of themes from the textual and interview analyses would be evidenced by the interviewees' accounts, and the 'internal relations' of legislative texts that included the semantic relations and grammatical relations between sentences and clauses. The textual findings, which were elicited from the Acts, represented the "documentary reality" of private higher education internationalisation. I also used the contexts in which the Acts were constructed and implemented as a supporting evidence to explain any correspondence or discrepancy between legislation, internationalisation policy and practice. While the interviewees SMLs' perceptions indicated the socially constructed realities of internationalisation, the contexts also explained the social reality of the private higher education internationalisation. The textual and interview findings were interrelated to explore whether real-life policy and practice comply with or contradict legislation. Hence, both themes were connected in a complementary relationship, responding to the research questions of this study from different lenses. Conclusions would be finally made as to whether the results from both the textual analyses and interviews supported or contradicted each other.

CHAPTER FIVE

TEXTUAL FINDINGS AND DISCUSSION

Introduction

The textual analysis of this study intends to provide perspectives on private university internationalisation through the legislative textual resources. The findings discuss the 'internal' relations of the Malaysian Acts, and connect it with the 'external' relations of these Acts, focusing on the interaction between internationalisation actors and legislation. The analysis of the 'internal relations' of the Acts includes semantic relations and grammatical relations between sentences and clauses. The semantic relations, found in the Acts, are purposive relations, conditional relations, temporal relations, additive relations, and elaborative relations. Meanwhile, the grammatical relations which are identified in legislation comprise paratactic relations, hypotactic relations, and embedding relations. As for the 'external relations' of the Acts, themes are derived in order to illuminate the power relations between the legislative texts and Malaysian private university internationalisation agents. The chapter is organised into four themes as follows: (1) legislation as a governmental authority soliloquy, (2) legislation as a representation of student autonomy, (3) legislation as a manisfestation of the power hierarchy, and (4) legislation as a text without the meso- and street-level participation. The contexts, in which the Acts were constructed and implemented, are also examined with the themes. Different themes, which are found in different Acts, form a coherent whole of understanding the internationalisation agendas.

Theme 1: Legislation as a Governmental Authority Soliloquy

The Private Higher Educational Institutions Act 1996 emphasises the overarching role of the governmental authority in implementing the law related to private university internationalisation. Obtaining the prior approval from the ministry members, who are the minister and registrar general, is reiterated from establishing a private university to conducting academic courses. Private universities are financially independent by earning own income instead of relying on government funds. However, to a certain extent their governance is controlled by the government authority through legislation. The institutional autonomy of the Malaysian PHEI internationalisation has reduced in the last decade, which is due to the increasing legislative controls in private universities. This contrasts with neoliberalism that accentuates fewer regulations, and more freedom for private universities (Olssen & Peters, 2005). Without the green light of the governmental authority, none of internationalisation strategies such as internationalised academic programmes, international marketing tours and international student enrolment can be substantiated into real practices.

Legislation is the governmental authority soliloquy to regulate private university internationalisation activities. The dominating presence of the governmental authority allows no open discussion for any queries about the internationalisation procedures in the legislation. When the university stakeholders are in dispute with internationalisation matters, they are required to refer to the governmental authority that is stated in legislation. To stress government authoritativeness in higher education internationalisation, specific semantic and grammatical relations between legislative clauses are used in the Act. The use of conditional (if-clauses), temporal (time order words such as when, after, before, etc.) and elaborative relations (exemplification and

rewording) illustrates the procedure of setting up a locally incorporated private university with specific details. Conditional, temporal and elaborative relations justify the authoritativeness of the Act, which tend to give commands rather than to provide reasons. The absence of causal relations through the text also indicates that the readers ought to accept the procedure without understanding its rationales.

In the Private Higher Educational Institutions Act 1996, conditional relations, which are semantic relations, describe the requirements of implementing internationalisation strategies.

Applicant to incorporate company locally

12. (1) Upon approval being granted, CONDITIONAL <u>if</u> the successful applicant is not a locally incorporated company, the applicant shall, within one year from being notified of the approval, incorporate a company locally ELABORATION —

    (a) having issued and paid-up capital of an amount, as may be determined by the Minister;

    (b) subject to such terms and conditions with respect to equity participation and composition of the board of directors, as may be determined by the Minister; and

    (c) with the sole object of establishing and managing private higher educational institutions stated in the memorandum and articles of association

  (2) The prior approval of the Registrar General on the proposed memorandum and articles of association of the company shall be obtained TEMPORAL <u>before</u> an application is made for the incorporation of the company.

  (3) CONDITIONAL <u>If</u> the applicant fails to incorporate locally a company within the time specified in subsection (1), the approval granted for the establishment of a private higher educational institution shall be deemed to have been withdrawn unless an extension of time is granted by the Registrar General.

  (4) Notwithstanding paragraph (1)*(b)*, if the applicant is a natural person, he shall at all times ELABORATION —

    (a) have a controlling interest in the company; and

(b) hold such percentage of the voting shares in the company as may be

determined by the Minister.

For example, clauses are connected through the conjunction "if" to illustrate the conditions of incorporating a private university branch campus, which reflects the main campus in another country, as a company locally. Further, through the usage of the conjunction "before" temporal relations deliver the urgency of obtaining the governmental authority, the Registrar General's prior approval preceding the application of incorporating a private university as a company. Meanwhile, clauses are in an elaborative relationship to communicate the demands of the Minister on the successful applicant that receives the approval of establishing a private university locally. As discussed in the textual findings, the lack of causal relations shows that legislation is an instrument of the governmental authority to control private university internationalisation policy and practice, by dismissing reasons which underlie the legislative clauses. Barriers to internationalisation, therefore, could occur when there has been insufficient interaction between legislation and university policy and practice, which are part of the activity systems of the governmental authority and university SMLs, respectively. In Engeström's (2001) activity theory, the activity systems require the two-way communication and knowledge exchange to function efficiently. Communicating legislation to the university SMLs not only helps generate common objectives that the SMLs and the governmental authority work for, but also strengthens the SMLs' compliance.

Teaching permits are vital for international teachers that work in Malaysian private universities. Given the assistance of the human resource department, a number of private universities require the non-Malaysian newly joined academic staff to apply for the teaching permit via the Ministry of Higher Education online platform.

The Private Higher Educational Institutions Act 1996 states the power of the governmental authority, the Registrar General in asking for the teaching permit applicant's additional information or documents by written notice. Specific grammatical relations are found to delineate the requirements of the governmental authority in issuing the teaching permit. Through parataxis, clauses are grammatically 'equal' (Fairclough, 2003). It suggests that pieces of important legal information are connected to convey correspondence. An example is shown in the section of the permits to teach:

> **Issuance of permit to teach**
>
> **51.** (3) At any time after receiving the application for a permit to teach PARATAXIS <u>and</u> before it is determined, the Registrar General may by written notice require the applicant to provide additional information, particulars or documents, which may differ as between different subjects to be taught by the applicants.

The paratactic relations between clauses show that the Registrar General's request for the teaching permit applicant's additional information is perpetual – any time after the application and before the permit issuance. International academic staff mobility is an important channel for importing ideas to the home institution, which is known as the most significant mode of internationalisation (Engwal, 2016). Thus, the power of the governmental authority is seen to be timeless in issuance of the teaching permit that is necessary in the employment of international teaching staff. It validates the knowledge transmission from international academic talents to the Malaysian private university students.

Through the Act, the governmental authority extends its jurisdiction to determine the quality of academic programmes, educational facilities and university

management. This is shown in the use of the subordinating conjunction "unless" to form hypotactic relations between clauses:

Authority to determine adequacy of educational facilities and quality assurance of course of study

39. (1) The minister shall not grant his approval under section 38 HYPOTAXIS <u>unless</u> he is satisfied —

> *(a)* with the suitability of arrangements relating to the educational facilities; and

> *(b)* with the quality assurance of the courses of study or training programmes,

based upon the recommendation of an authority established under a written law for such a purpose.

The conjunction connects clauses to explain the requirements from the Minister and the Registrar General that private universities must adhere to. In order to continue the university operations, the approval of the governmental authority has to be obtained on the quality assurance of the academic courses, educational facilities and senior management in which internationalisation strategies are carried out. For instance, the undifferentiated academic courses and teachers of the branch campus that resemble the ones of the main campus overseas require the government authority's approval prior to any marketing activities. Similarly, the arrangement of educational facilities for the local and international students and staff are to be approved by the government authority. The appointment of SMLs who are internationalisation policy makers is also subject to the approval of the Minister. Hypotactic relations was used with the relative pronoun "which" to provide specific information about the phrase for necessary elaboration, as shown in the following extract of the Act:

Person not eligible to take part in the management of private higher educational institution

36. No person who has been – *(a)* a member of the board of directors of a company establishing;

(b) a chief executive of; or

(c) directly concerned with the management or business of,

a private higher educational institution HYPOTAXIS <u>which</u> has been closed down under Part XI shall act in such similar capacity with respect to another private higher educational institution, without the approval of the Minister.

Such hypotactic relations have the similar function of the defining clauses, which is to provide essential information about someone or something in order to understand what or who is being referred to (Cambridge Dictionary, 2017). The essential information makes the sentence more emphatic, by informing the private university stakeholders clearly of what must or must not be done in accordance to the Act. Through legislation, the governmental authority imposes rules, which "nurture" the mycorrhizae formation (Engeström, 2007), on private university internationalisation. The rules cultivate knotworking underlying the formation that is also the fungal roots metaphorically, leading to stable and institutionalised activity systems of the governmental authority and SMLs.

The role of the governmental authority is seen to be prominent in the Immigration Act which concerns international students and staff in private universities. Among the governmental authority are the immigration officer and the Director General that hold power to deport international students and employees, or deny entry to them who do not have valid entry permits. In the Immigration Act, the deportation can take place immediately with the immigration officer's directives. The deportees cannot disobey the immigration officer's deport instructions, but have to comply with it. As shown in the following extract of the Act, power differences are shown through the use of paratactic relations between the clauses:

Control of entry into Malaysia

6. (1) No person other than a citizen shall enter Malaysia unless ELABORATION —

(a) he is in possession of a valid Entry Permit lawfully issued to him under section 10;

(b) his name is endorsed upon a valid Entry Permit in accordance with section 12, ADDITIVE <u>and</u> he is in the company of the holder of the Permit;

(c) he is in possession of a valid Pass lawfully issued to him to enter Malaysia; or

(d) he is exempted from this section by an order made under section 55.

The elaborative and additive relations reinforce the requirement of having a valid entry permit with the legitimate owner to enter Malaysia. International students and employees ought to comply with these clauses to acquire the entry permit through their universities. Linked with the coordinating conjunction "and", the superiority of the governmental authority and the conformity of deportees are grammatically equal. This indicates that legislation empowers the governmental authority, and silences the powerless deportees who include international students and staff. The immigration officer receives full legislative support to strengthen the jurisdiction over deportation, while the non-citizens follow the immigration authority's order passively.

In the Immigration Act, the governmental authorities are given different powerful immigration positions about deportation. The Director General holds power to release deportees from immigration deportation, whereas the immigration officer detains people for deport. The following extract states that the immigration officer has the power to authorise an immigration deport on any person.

Power to send person to deport for further examination

27. (1) HYPOTAXIS <u>Where</u> an immigration officer is in doubt as to the right of any person to enter Malaysia, it shall be lawful for the officer to direct the person to an immigration deport PARATAXIS <u>and</u>, in such case, the person shall proceed forthwith to the deport PARATAXIS <u>and</u> shall remain there HYPOTAXIS <u>until</u> permitted to leave by the officer:

Provided that—

    (i) (*Deleted by Act A719*);

    (ii) the Director General may, in his discretion, and pending the completion of inquiries regarding the said person, release the person from the immigration deport on such terms and conditions HYPOTAXIS <u>as</u> the Director General may deem fit, PARATAXIS <u>and</u> for that purpose the Director General may issue to the person a Pass in the prescribed form.

(2) Any person HYPOTAXIS <u>who</u> refuses or neglects to comply with directions given by an immigration officer under subsection (1), or HYPOTAXIS <u>who</u> leaves an immigration deport in contravention of that subsection, shall be guilty of an offence against this Act.

The coordinating conjunction "and" is repeatedly used to express the paratactic relations between the clauses. It gives an equal emphasis on the immigration officer's lawful deport instructions, and the deported individual's compliance. This indicates that both the law enforcer and foreigner must abide by the deportation rules without queries. When doubts arise, the university new international students and staff are subject to deportation. They could be forbidden to enter the country despite the possession of the admission letter, employment contract, or entry permit.

The division of labour in managing deportation is exemplified through the hypotactic relations between clauses. The use of subordinating conjunctions, such as ""where", "until", "as", and "who"" forms the hypotactic relations to explain that the conditions of deportation determine the jurisdiction of the governmental authorities. For instance, the Director General can authorise the release of the detainee according to terms and conditions that he or she may deem fit. Meanwhile, the person is detained when the immigration officer doubts his or her right to enter the country. The dominant role of the governmental authority in enforcing the immigration act indicates that

distinction penetrates the labour and student markets of private universities. Naidoo (2004) argues for the inequality in private higher education internationalisation and labour market, in the light of Bourdieu's theory of practice. The international student and staff mobility, which is a crucial internationalisation area, is controlled by the powerful governmental enforcers. The student and staff entry to Malaysia not only must be supported by valid permits or visas, but can be denied based on the immigration authorities' doubts.

The conditions of detaining and releasing deportees, however, remain unclear despite the use of hypotactic relations that merely stresses the power of the governmental authorities. The immigration officer's doubts can lead to deportation. Similarly, the terms and conditions of releasing detainees are decided by the Director General instead of clearly written legislation. It perplexes the private university recruitment teams of international students and staff. They find it challenging to adapt to the ambiguous, governmental authority-controlled conditions of deportation. As deportation conditions fluctuate, new international students who have obtained the university enrolment letter and the entry permit are rejected to enter the country at the immigration. Thus, they are unable to start their first-semester study on time as other local peers. The Immigration Act seems to disempower university international students and employees, making them vulnerable to last-minute immigration policy changes. As the SMLs are responsible in the international student and staff recruitment, their compliance with or violation of legislation would affect the university internationalisation strategies. This means their leadership habitus, which is a system of durable principles, could be productive and lasting in line with the legislative changes (Bourdieu, 1990). Otherwise, it could be in the state of constant disruptions,

exposing the implementation gaps between legislation and SMLs' practice (Eacott, 2013).

Theme 2: Legislation as a Representation of Student Autonomy

Students are the major client of private universities as they pay the university tuition fees themselves through the family fund, scholarship or government study loan. Over the recent decades, the higher education commercialisation has made the university degree programmes to be the commodities for sale. This increases the level of student autonomy, enabling them to select the academic programme and pay their chosen "product". In the following extract of the Private Higher Educational Institutions (Amendment) Act 2009, a new definition of "student" not only includes the context of internationalisation, but expands the meaning of student autonomy.

> *(h)* by substituting for the definition of "student" the following definition:
>
> > ' "student" means a registered student, other than a student at an institution allied to the private higher educational institution, who is following a course of study, instruction, training or research of any description at the preparatory, under-graduate, post-graduate or post-doctoral level on a full time or part-time basis in, by or from the private higher educational institution and includes a distance-learning, off-campus, exchange and non-graduating student;'

Private university students who are from wealthy families can select the academic programme which provides them with the opportunity of studying abroad for a short or long term. As shown in the extract, they can be a ""distance-learning, off campus, exchange and non-graduating student". This relates to Bourdieu's theory of practice that affluent and powerful families tend to invest in high value education to maintain

106

their social status and leadership (Marginson, 2006). When their social class upgrades, the autonomy of participating in internationalisation also escalates. These students could choose to enrol in elite universities overseas, and take part in international intercultural programmes.

However, according to the Amendment Act, private university student autonomy is limited to specific internationalisation areas such as selecting desirable academic programmes, studying abroad, and joining student exchange programmes. Individual students and student organisations are not allowed to have any affiliation with any political party, illegal bodies and organisations that the Registrar General deems unsuitable in and outside the country and the university. These details are delineated through the use of hypotactic relations in the amendment act, as shown in the following extract of the Act:

> (1C) No student of the private higher educational institution and no organization, body or
> group of students of the private higher educational institution HYPOTAXIS <u>which</u> is
> established by, under or in accordance with the constitution, shall express or do
> anything HYPOTAXIS <u>which</u> may reasonably be construed as expressing support for
> or sympathy with or opposition to —
> *(a)* any political party, whether in or outside Malaysia;
> *(b)* any unlawful organization, body or group of persons, whether in or outside
> Malaysia; or
> *(c)* any organization, body or group of persons specified by the Registrar General
> under subparagraphs (1)*(a)*(iii) and *(b)*(iii) to be unsuitable to the interests and well-
> being of the students or the private higher educational institution.

The relative pronoun "which" extends the legislative clauses to strengthen the compliance of students with law. Any political involvement, for example, is forbidden for individual students and student bodies. Their opinions toward any political party

are silenced, and their freedom of speech is suppressed. This undermines the intercultural dialogue approach in student mobility, which has received little scholarly attention (Castro et al., 2016). Being able to exchange political opinions, in particular, is part of cultural knowledge exchange while "importing" and "exporting" students. It enables both the local and international students to be the inventors and givers of internationalisation, rather than the mere recipients. Student mobility is not restricted to physical internationalisation activities, such as enrolling in long term academic study abroad, taking part in short term student exchange programmes, and joining intercultural events. It also involves the students' intellectual contribution through the freedom of speech to discuss any political, social and cultural issues that develop their thinking and reflecting skills.

Theme 3: Legislation as a Manifestation of the Power Hierarchy

The SMLs of private universities are associated with the power hierarchy which resembles the company organisation structure. They are managers of various departments, supervising academic and administrative operations, such as registry, examination, academic research, finance, branding, marketing, facilities, human resources, and international student affairs. The top-down approach, therefore, is applied in the power hierarchy of a private university where the SMLs design internationalisation policy, and inspect practice (Cho & Palmer, 2013). Their power can be extended across departments, or confined to a specific department. Similarly, internationalisation could be the main or minor part of the university departmental practice. For instance, the Vice President oversees the internationalisation policy and practice in many departments. Meanwhile, the senior manager of the international

office coordinates oversea marketing campaigns with other relevant departments, and also looks after the welfares of all international students.

The Companies Act 1965 promotes collaboration between SMLs to maintain the power balance in the hierarchy. In order to monitor the power hierarchy, inspections that are a common corporate quality assurance practice is conducted on all the departments. Since the Malaysian PHEIs are registered as private corporations, inspections are applicable to the senior management of private universities for ensuring the standards of policy and practice. In the following extract of the Act, the clauses are connected through purpose and additive relations to emphasise the aim of an inspection and the power of an inspector.

Power to conduct inspection

7B. (1) PURPOSE <u>For the purpose o</u>f ascertaining whether a corporation or any officer of a corporation is complying with this Act, the Registrar may have access to any place or building ADDITIVE <u>and</u> may inspect ADDITIVE <u>and</u> make copies of or take extracts from any book, minute book, register or document required by or under this Act to be kept by the corporation.

The clauses start with the purpose relations through the use of the marker "for the purpose of", in order to justify the action of the university inspection officer. Given the purpose, the inspection appears to be more acceptable to the readers. Furthermore, the second and third clauses are in an additive relationship to provide supporting details of an inspection. They state what the Registrar is authorised to do during the inspection. In these clauses, additive relations are paired with purpose relations so that the latter is fully supported by additional yet necessary information of the inspection. As such, the coordinating conjunction "and" is used twice to join a number of lengthy clauses to form a sentence about the power of the inspection officer.

The Registrar is the legally assigned inspector to review the company compliance with the Act. Hence, the inspector has the power to access to any places and documents related to the university policy and practice. The objectives, which are to evaluate and enhance the quality of internationalisation policy and practice, underlie the interaction between SMLs (Pfotenhauer et al., 2013). As a form of peer evaluation, they often switch roles as inspectors or recipients. The inspection procedure is carried out on the university departments that implement internationalisation policy and practice. The marketing department, for example, is inspected for its international advertising practice and expenses. The internationalisation activities of academic faculties, such as the recruitment of international students and lecturers, and outreach programmes are also audited to ensure the compliance with the Act.

The repetitive use of paratactic and hypotactic relations between legislative clauses heavily emphasises the requirements of appointing company auditors, as shown in the following extract of the Act:

Company auditors

9. (1) A person shall not knowingly consent to be appointed, PARATAXIS <u>and</u> shall not knowingly act, as auditor for any company PARATAXIS <u>and</u> shall not prepare, for or on behalf of a company, any report required by this Act to be prepared by an approved company auditor—

    (a) HYPOTAXIS <u>if</u> he is not an approved company auditor;

    (b) HYPOTAXIS <u>if</u> he is indebted to the company or to a corporation HYPOTAXIS HYPOTAXIS <u>that</u> is deemed to be related to that company by virtue of section 6 in an amount exceeding two thousand five hundred ringgit;

    (c) HYPOTAXIS <u>if</u> he is—

      (i) an officer of the company;

      (ii) a partner, employer or employee of an officer of the company;

      (iii) a partner or employee of an employee of an officer of the company; or

      (iv) a shareholder or his spouse is a shareholder of a corporation HYPOTAXIS whose employee is an officer of the company; or

(d) HYPOTAXIS <u>if</u> he is responsible for or HYPOTAXIS <u>if</u> he is the partner,

employer or employee of a person responsible for the keeping of the register

of members or the register of holders of debentures of the company.

The conjunction "if" provides the meaning of "on the condition that", whereas "that" defines the subordinating clause "he is indebted to the company or to a corporation". These conjunctions intensify the requirements of appointing company auditors by attaching a number of dependent clauses (if-clauses and the relative clause "that" to the independent clause 9. (1). Hence, the independent clause 9. (1), which states the don'ts of appointing company auditors, is able to stand firmly with the supporting details of dependent clauses. Through the use of these paratactic and hypotactic relations, private universities are provided with details of outsourcing the audit responsibilities to external, approved company auditors. Current university employees are forbidden to be the company auditors. As private universities generate own revenue, strong financial management is crucial to sustain its power hierarchy. This exhibits the neoliberal influence in internationalisation, shifting from bureaucratic-professional types of accountability to consumer-managerial models of higher education (Olseen & Peters, 2005). The techniques of auditing, accounting and management have become the new mode of regulations for private universities. The SMLs' ability to exercise financial control in internationalisation activities of their own department needs to be assessed by external company auditors. It produces unbiased and independent audit reports that appraise the university's financial controls and statements, thus empowers the SMLs to implement internationalisation policy and practice effectively.

Theme 4: Legislation as a Text without the Meso- and Street-Level Participation

The Universities and University Colleges Act 1971 stresses that private universities must maintain strong local presence prior to undertaking any international ventures. It is applicable to both private universities which are locally established or attached to the main oversea campus. In the following extract of the Act, conditional and hypotactic relations between clauses are used to describe the relevance to keep the university office as an address for service in Malaysia:

> **University to keep office as an address for service in Malaysia**
>
> **9.** (1) Every University shall keep and maintain an office situated within Malaysia, which shall be its address for service for all writs, plaints, notices, pleadings, orders, summonses, warrants or other proceedings and written communications of all kinds.
>
> (2) All writs, plaints, notices, pleadings, orders, summonses, warrants or other proceedings or other written communications shall, CONDITIONAL if left at the office kept and maintained under subsection (1), be deemed duly served upon or delivered to a University or such officer or authority to whom they may have been addressed, in all proceedings before any Court in Malaysia.

In order to explain the purpose of maintaining the local office, the clauses are semantically related through the use of conditional "if". Conditional relations recall the service of the office, which is mentioned in the preceding subsection. It also asserts that there is no exemption from delivering all written communications to the university or its local recipients.

The university authority that is usually the SMLs are fully accountable for all kinds of internal and external communications. As such, they have to ensure their university local office keep all written communications. In the context of internationalisation, the university authority is likely to take part in the communications

with the university international and local partners, which emphasise strategic planning instead of hands-on practice. Internationalisation policy is delivered from the SMLs who hold the top systemic positions to the meso- and street-level practitioners that are in the lower systemic positions (Saunders & Sin, 2014). The middle managers, junior administrators and lecturers carry out most communications groundwork – building relationships, organising dialogues, and engaging in interactions, and doing follow-up sessions with the university stakeholders through multiple channels.

Nevertheless, the role of meso- and street-level practitioners in managing internal and external communications is unacknowledged in the Act. Among them are middle managers, junior academic and administrative employees who interact with the university stakeholders directly and frequently. In fact, they serve as a bridge between students, parents, and the university middle and senior management leaders. Their participation is found in various university internationalisation areas that include teaching, research, marketing, branding, and student welfare services. The Act however is authority-centred, focusing on the university SMLs' communications with the governmental authority. Such a top-down approach of implementing internationalisation policy can result in the continuing lack of local capacity, and structural inequalities in partnerships (Singh, 2010). The meso- and street-level practitioners are perceived as subordinates to the university authority, hence they are placed at the bottom of the communication chain, working for the managers and clients without the legislative recognition.

The lack of emphasis on bottom-up interactions in legislation also causes the further divide in the implementation staircase, detaching the university SMLs from the meso- and street-level practitioners. Engeström (2007) states that functional policy and practice rely on knotworking, which is the two-way communication and knowledge

exchange between the institutionalised activity systems. The communication barriers between the SMLs and meso-level and street-level practitioners would hinder the collaboration and coordination within and between the private university organisational structures, and impede internationalisation policy making and practice. Legislation is, in fact, the means through which the SMLs and meso- and street-level practitioners interact, and align their policy and practice with present and future university internationalisation directions. The significance of the meso- and street-level practitioners in communications with the SMLs and the governmental authority, which is much neglected, should be given an equal recognition as the authority in legislation.

The Malaysian Qualifications Agency Act 2007 focuses on the role of the Malaysian Qualifications Agency (MQA) as the designer of the university programme accreditation framework, and the inspector of academic quality. The responsibilities of the Agency are delineated through the extensive use of purpose relations, as shown in the following extract of the Act:

> **6.** (2) Without prejudice to the generality of subsection (1), the Agency shall have the following functions:
>
>> *(a)* PURPOSE <u>to</u> implement and update the Framework;
>>
>> *(b)* PURPOSE <u>to</u> accredit programmes, qualifications and higher education providers;
>>
>> *(c)* PURPOSE <u>to</u> conduct institutional audit and review of programmes, qualifications and higher education providers;
>>
>> *(d)* PURPOSE <u>to</u> establish and maintain a register to register programmes, qualifications and higher education providers;
>>
>> *(e)* PURPOSE <u>to</u> conduct courses, training programmes and PURPOSE <u>to</u> provide consultancy and advisory services relating to quality assurance;
>>
>> *(f)* PURPOSE <u>to</u> establish and maintain liaison and cooperation with quality assurance and accreditation bodies in higher education within and outside Malaysia;

(g) PURPOSE <u>to</u> act as a qualifications reference centre on accredited

    programmes, qualifications and higher education providers;

(h) PURPOSE <u>to</u> advise the Minister on any matter relating to quality assurance in

    higher education; and

(i) PURPOSE <u>to</u> do all things reasonably necessary for the performance of its

    functions under this Act.

According to Fairclough (2003), legitimation is foregrounded through the use of explicit markers of purpose. They are necessary to reinforce all of the MQA's legitimate functions. It enables the university stakeholders to obtain a holistic perception about the contribution of the MQA to higher education. The purpose relations "2(f)" particularly delineate the function of the MQA in university internationalisation, which represents the national quality assurance and accreditation agency locally and internationally. The specific marker of purpose "to" has strengthened the MQA's internationalisation movement in maintaining ongoing communication with international quality assurance and accreditation bodies. As quality is crucial in internationalisation, the collaboration between the MQA and private universities is vital for the academic and institutional quality assurance. The latter has to participate in the accreditation procedure actively. It is to ensure their internationalised programmes receive the accreditation status from the MQA, so that the graduates can obtain local job opportunities in both the public and private sectors.

The Act, however, does not empower the university meso- and street-level practitioners. They initiate the design of the academic programmes, and the administration of the quality assurance protocol. Their feedback on the fieldwork is often unheard, and is only requested during the formal inspection of the MQA. This results in their struggle of work identity (Poole, 2016), when their ways of designing

and conducting the academic programmes conflict with legislation. As such, they endeavour to position themselves: some manage to redefine their job scope within the university internationalisation ecosystem, while some are trapped in street-level bureaucracy, being unable to adapt their academic practice to legislation.

The reliance on the MQA to carry out multiple leading roles as a qualifications reference centre, a programme reviewer, and an institution auditor can be problematic. The MQA acts as the sole accreditation authority that governs academic quality assurance in private universities. Described in paratactic relations, the Act grants the MQA power to create the Malaysian Qualifications Framework (MQF), and allows it to work with any person including the university practitioners to amend the MQF. Despite indicating the MQA's receptivity for collaboration, how it engages the university practitioners in amending the MQF remains unknown in legislation. Given a lack of emphatic semantic and grammatical relations, the role of the private university meso- and street-level practitioners in amending the MQF remains passive in the Act, as shown in the following extract:

The Framework

35. (2) Subject to subsection (4), the Agency may for the purposes of subsection (1) from time to time amend the Framework and may collaborate, cooperate and coordinate with any person, including government agencies, higher education providers, students, academic staff, quality assurance and accreditation bodies, examination or certification bodies and employers, PARATAXIS <u>and</u> in the case of professional programmes, professional qualifications and higher education providers, the Framework shall be amended in accordance to the criteria and standards set by the relevant professional bodies.

The private university meso- and street-level practitioners are expected to be dependent on the MQA's collaboration initiatives, and to be compliant during the collaboration with the MQA. When they are psychologically withdrawn from legislation,

the discrepancy is likely to happen between their expected and real job performances (Hudson, 1993). Besides, they would tend to modify the client demand and conception, by perpetuating delay, withholding information, and stigmatising the process of service delivery. Legislation needs to address the implications of street-level bureaucracy in implementing and amending the MQF, in order to match the university practitioners' policy and practice with international academic standards.

Conclusion

This chapter has presented the textual findings from six selected Acts, in order to explain the power relations between legislation and Malaysian private higher education internationalisation stakeholders. Heavily based on the textual findings, different themes are found in different Acts, which form a coherent whole of understanding the internationalisation agendas. The first, third and fourth themes illustrate the dominating role of authorities, which are the governmental authority, PHEIs and SMLs in private university internationalisation. Meanwhile, the second theme illuminates the manoeuvers of student autonomy in power relations that are controlled by capital and legislation. All the Acts are not contradictory, but interrelated through different themes describing power relations of private higher education internationalisation.

Through the analysis of the 'internal' and 'external' relations of the legislative texts, the governmental authority, PHEIs, students, SMLs and meso- and street-level practitioners seem to struggle to position themselves in the power relations of the private higher education internationalisation. In line with Engeström's (2001)'s activity theory, the activity systems of the internationalisation actors are regulated by rules,

which are largely from legislation. The interaction between the activity systems and legislation, therefore, indicates the extent with which legislation is complied, and the implications of such legislative outcomes on private university internationalisation. Furthermore, knotworking underneath the activity systems of the governmental authority and the university SMLs provides an insight into how the conformity or transgression occurs.

Secondly, student autonomy that is represented in legislation is associated with Bourdieu's (1984) conception of social distinction. The textual findings suggest that private university students who are from wealthy families can choose the academic programme which provides them with the opportunity of studying abroad for a short or long term. This means powerful families which possess a large amount of capital have higher autonomy to participate in internationalisation, such as investing in high value international education, and obtaining a seat in any elite universities for their children. On the contrary, there would be scarce opportunities to study abroad or take part in other internationalisation activities for students who have insufficient capital. Legislation, in addition, controls private university student autonomy by banning any internationalisation activities affiliated with political parties. It indicates again a strong sense of distinction between the students' ownership of academic and political capital, restricting their social position to be a student who studies, rather than an advocate of a political stance.

Third, this chapter has revealed the resemblance between the power hierarchy of the private university and corporate organisational structures. Through the top-down approach, the university SMLs seem to be powerful in managing their own departmental internationalisation activities, while coordinating with other departments on internationalisation projects. It maintains that distinction is crucial in sustaining the

power hierarchy of the private higher education field – the SMLs construct internationalisation policies, and supervise the policy implementation at the meso- and micro levels. As the relative autonomy of a field differs due to time, space and culture (Bourdieu, 1993), legislation used to control university policy and practice prior to internationalisation. The findings suggest that legislation has granted the PHEI with a higher degree of autonomy in establishing its power hierarchy and habitus geared towards internationalisation. The increasing self-governance in the private higher education internationalisation has enabled the SMLs to respond to legislation through negotiations with the governmental authority.

The fourth theme elucidates the absence of the private university meso- and street-level participants in legislation. They consist of the middle managers, junior administrators and lecturers who conducted most communications groundwork. However, legislation is authority-centred, which emphasises the university SMLs' communications with the governmental authority. The SMLs who liaise with the governmental authority deliver internationalisation policy to the meso- and street-level practitioners that are in the lower systemic positions (Saunders & Sin, 2014). The latter roles have been neglected in legislation, being regarded as the subordinates to the SMLs. The scarce emphasis on bottom-up interactions in legislation results in the further divide in the implementation staircase, restraining communication between the governmental authority, SMLs, and meso- and street-level practitioners. Engeström (2007) explains that functional policy and practice rely on knotworking, which is the two-way communication and knowledge exchange between the institutionalised activity systems. The communication obstacles between the SMLs and meso-level and street-level practitioners would impede the collaboration with the governmental authority in internationalisation policy making and practice.

Each theme has a stance which is derived from the legislative emphasis on private university internationalisation policy and practice. All four themes address the second and third research questions, by exploring the ways in which legislation interact with institutional policy and practice in private higher education internationalisation, and the implications of such interactions on the future internationalisation of private institutions. Legislation interacts with the PHEI internationalisation policy and practice in various forms – a governmental authority soliloquy, a representation of student autonomy, a manifestation of the power hierarchy, and a text without the meso- and street-level participation. These different interactions shed light on the future directions of internationalisation policy and practice in the field of private higher education.

CHAPTER SIX

INTERVIEW FINDINGS AND DISCUSSION

Introduction

This chapter introduces the interview findings and themes of twenty SMLs from four Malaysian private universities which are the transnational university, the internationalised university, the localised university and the comprehensive university. The SMLs are the senior policy makers and practitioners who participate in their university internationalisation. The interviewees provided perspectives about the relationship between legislation, policy and practice in internationalisation of private higher education. Their perceptions also shed light on the future internationalisation of private higher educational institutions (PHEIs). The interview findings and themes derived from these encounters address the research questions of this study:

(1) How might private universities differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives?

(2) In what ways does legislation interact with institutional policy and practice in private higher education internationalisation?

(3) What do the different perceptions and interactions mean for the future internationalisation of private institutions?

In order to explain the PHEIs and SMLs' interactions with legislation, internationalisation policy and practice, and the motivations and barriers in such interactions, the chapter is organised into three themes as follows:

(1) developing individualised internationalisation policies within a university,

(2) the collision between legislation, internationalisation policy and practice, and

(3) implementation gaps between internationalisation policy and actors.

These themes emerged from the synthesis of the codes in the transcripts of the 20 participants. During the interview data analysis, the codes were first clustered, and the overlapping codes were then set aside. The final list of codes led to the inquiries into the meaningful relationship between codes. It created the themes, which were evidenced with the interview findings. The first theme was dominant as it responded to the first and third research questions, by discussing how private universities, through the SMLs' perceptions, differ in their interactions with legislation, internationalisation policy and practice. In relation to the second and third research questions, the dominance of the second theme was described through how policy and practice contradict laws in private higher education internationalisation. The third theme, on the contrary, was less dominant because it addressed the third research question by exploring the discrepancy between policy and actors, and such implications for the future internationalisation of private universities. The themes form a coherent whole by illustrating different angles of the interaction between SMLs, legislation, policy, and practice in internationalisation. The relations between the themes, therefore, shed light on how the SMLs coordinate or battle with the internationalisation agendas in the context of private higher education.

Theme 1: Developing Individualised Internationalisation Policies within a University

The first theme addressed the first and third research questions, offering ways to conceptualise how and in what ways private universities differ in their responses toward policies and laws, and what such differences might mean for the future of PHEIs in Malaysia. The interviews revealed the development of seemingly individualised internationalisation policies within a given university. This was due, largely, to the disparate rationales underpinning strategies for and policies guiding internationalisation within the different universities. Intensifying competition in private higher education industry has driven universities to present their unique selling proposition through individualised internationalisation policies, in order to differentiate it from other PHEIs, and increase profits. The private university's individualised internationalisation policies also aimed to establish its "brand" as an internationalised campus for sustainability. It needed to sustain its growth into the future, in many aspects such as finance, reputation, and quality. As a non-government-sponsored institution, a private university was more likely to tailor its internationalisation strategies and policies to the rationales that benefit it most, so that it could survive and advance in the local and international competitions of PHEIs. The SMLs, who were the insiders of their university internationalisation, gave perspectives on how the university internationalisation policies were adapted and individualised.

The interview findings revealed that all four of the Malaysian private universities in the study had individualised internationalisation policies, and implemented them in various university academic and administrative departments. The transnational university is an international branch campus, which is located in Malaysia and attached

to its main campus in the UK. The internationalised university and the comprehensive university are home-grown private universities that are based in Malaysia, and are significantly driven by economic and academic rationales to participate in internationalisation. Meanwhile, The localised university is a private university which is wholly owned by a government-linked company, and is well-known for its academic programmes of a particular industry. International policy of these four universities was specific, defined by the internationalisation strategies of individual universities. This indicates a strong sense of habitus which exists at the organisational level of the university. Bourdieu (1990) defines habitus as a system of durable principles which can be objectively adapted to their outcomes. Its interaction with cultural capital and field generates the logic of practice. Relating to Engeström's (2001) third generation of activity theory, the rules of an activity system connect the community members to objectives, in certain ways, develops its logic of practice. Habitus and activity systems operate on different grounds, yet their aspirations for logic are parallel.

Habitus contains the university's internationalisation principles in various areas, including short-term study abroad programmes, international student recruitment, specialisations, and home-grown academic programmes. It adapts to the internationalisation outcomes, and controls the university's internationalisation policy design and actions. The university's individualised internationalisation policy eventually forms, that is likely the result of habitus at the organisational level.

Obtaining international experience was the main purpose of the short-term study abroad programme in English University which is located in the UK, according to the interviewee R1 who was the Vice Chancellor of the internationalised university. It has been the partner institution of the internationalised university for several years.

We have been discussing with English University about having some students having a semester in English University, taking a semester out of the internationalised university and going to English University. When they come back, they would rejoin the programme. And that's very good because they get the experience being in the country for, say six months and we've been working on that. We are going to do that. What we have to do is make sure they take credits overseas and they can bring back the credits to the programme here. (R1, the internationalised university)

During the study abroad programme, the participants have the opportunity to study in a different cultural environment, and enrich their worldview through the interaction with new classmates and lecturers. It provides them with the intercultural interaction experience, which is often absent in local course literature (Trahar & Hyland, 2011). The inclusion of such short-term study abroad programmes as an individualised internationalisation initiative shows that the university emphasises the development of intercultural competencies in students. This also forms an important part of the academic rationale driving university internationalisation. In addition, through credit transfer, the internationalised university attempted to incorporate the study abroad course literature into its existing long-term academic programme. It yielded measurable outcomes from the six-month study abroad programme, increasing the educational values of the programme.

However, the short-term study abroad programme raises the issue of inequality because it merely caters for the educational needs of the elites. International student mobility aims at obtaining socially and culturally constructed knowledge, other than the formal knowledge, and reproducing the employment advantage (Findlay et al., 2012). The elites' perception that they achieve "distinction" through the overseas educational opportunities unfolds a form of cultural capital, different from Bourdieu's (1998)

traditional academic capital – the institutionalised form of cultural capital based on properties. These study abroad programmes, despite the brief duration, are expensive as students need to pay their own tuition fees, flights, accommodation rental fees, and living allowances. According to the interviewee R14, who was the associate faculty dean in the internationalised university, the expenses of the study abroad programme are equivalent to half of the entire 3-year local programme tuition fees. It was suspended due to the high costs. Only a handful of students whose families could afford the fees enrolled in the programme, while many expressed their interest yet were unable to pay the fees.

> The study abroad programme can take place but we have not started, partly due to the cost issue. If students were to go to English University, without any pre-arrangement, they are paying double or triple. It means a year's fees as what they pay here in the internationalised university is the fees that they will pay in English University for only a semester. (R14, the internationalised university)

This phenomenon indicates class distinction that only students with adequate capital gain more opportunities to participate in higher education internationalisation. They receive financial support to take part in university internationalisation from their wealthy families, which tend to invest in high value international education to maintain their leading societal role and status (Marginson, 2006). In the possession of economic capital they are regarded as economic elites, or the dominant fraction of the ruling class (Bourdieu, 1979). On the contrary, students who come from lower social classes hold less power to decide the extent of their internationalisation involvement. Thus, their participation would be limited to mainly the internationalisation activities based in their home institutions, instead of travelling abroad. It was perceived in the

transnational university's policy on gaining the international experience on a local premise.

> For us, it's about internationalisation and branding. They are not directly related, but a bit connected. Branding in a sense is we want our brand to be more global. The transnational university has always been global. Even within our campus, we have students from 80 countries. So if you are on our campus, it is like the United Nations. (R2, the transnational university)

The transnational university focused on international student recruitment as its individualised internationalisation strategy. The interviewee R2, who was the faculty dean, perceived internationalisation and branding as closely related, by associating the increasing number of international students with a more enhanced global image. Being branded as a global university seemed to be the goal of the transnational university's internationalisation policy. Again, there is a sense of habitus, a way of positioning within the field of PHEIs in Malaysia, by drawing on past values and dispositions to orient the institution toward the present – *the transnational university has always been global*. Thus, an orientation towards the global institution becomes embedded in and mediated through the organisation (Reay et al., 2001). It is important to note that the interviewee used the term "global", instead of "globalisation". This suggests that internationalisation was clearly distinguishable from globalisation, and remained predominant in the transnational university's global branding strategic plan. The view coincides with past studies that internationalisation is a product of globalisation, and a key institutional strategy of private universities (Hou et al., 2014; Dzvimbo & Moloi 2013; Sanderson, 2011). The concept of diversity in the global village

was therefore applied to position the transnational university as an internationalised campus.

Private universities have to ensure their sustainability through various individualised internationalisation strategies. For instance, the transnational university established its brand as a global HEI to increase its competitiveness against other HEIs. Recruiting students from up to 80 countries became the unique image of the transnational university, creating a differentiated presence in both local and international higher education markets. This helped attract and retain its student-clients. Unlike other private universities which relied heavily on international student recruitment or other internationalisation areas for generating income (Tham, 2013), the transnational university recruited international students mainly for branding purposes, by identifying them as university ambassadors, not commodities. As a branch campus which reflected its British main campus values, the transnational university aimed to maintain its international position, through its multinational, intercultural education. This is supported by Healey's (2017) discussion on a UK university's effort of developing an internationalisation approach that emphasises an international learning experience for all students. Thus, such an overarching internationalisation goal that moves into policy helps sustain the transnational university's global image.

In contrast, the recruitment of international students was not prominent in the localised university's internationalisation strategies. The emphasis was to offer specialist engineering programmes which are mostly power-based and energy-based. These programmes are currently a niche in the higher education market.

The localised university was not aggressive enough in terms of trying to get international students. There were international students […].The localised university was set up more for

power. So, most of their programmes were power-based and energy-based. (R20, the localised university)

The interviewee R20, who was a professor coordinating and teaching academic programmes, asserted that providing more academic programmes with the power specialisations was the reason why the localised university was founded. The way the localised university distanced itself from other private universities that had been recruiting international students aggressively suggests that it intended to create a distinction between internationalisation for quality and quantity. Hence, the localised university's individualised internationalisation strategy is to develop and promote its power-based academic programmes locally and internationally, rather than merely increasing the number of international students.

Funded by a power-based government-linked corporation, the localised university has sufficient economic capital to establish its international position, as a reputable institution in the field of private higher education power-based programmes and research. This is in line with Naidoo (2004) that states the possession of capital enables membership to the field. In spite of recruiting international students, the localised university's focus of internationalisation was shifted to research collaboration. According to the interviewee, R3 who was a professor leading major international research projects, the localised university supported research collaboration strongly with the oversea universities, and organised international conferences.

We have quite a number [of international joint research activities], particularly in the field of electrical engineering and energy. I think the latest collaboration we have which just started last week is with University F2 in the States, with Professor L. […]. Every year. The college does it.

> It can be an engineering conference. The centre of renewable energy does an international conference on energy once in every two years. The business school would have a conference on business. The IT school would have a conference on IT. (R3, the localised university)

Through international joint research projects, the localised university gained various capital that were particularly academic and intellectual. The outcomes of research collaboration comprised publications and commercial products, which were based on academic properties and related to the scientific or intellectual authority (Bourdieu, 1998). These capital contributed to the localised university's position in the field of private university internationalisation.

Developing in-house academic programmes was the comprehensive university's individualised internationalisation strategy.

> They [partner universities] are still our supporters. We started with the twinning programme until 2013, and then we have got our independence and started to run our programmes. But we still actually have connection with them. Okay, we don't run their programmes but we have our own programmes. We still have been working with them in terms of visitor professors. (R13, the comprehensive university)

The interviewee R13's use of the words "got the independence" expresses self-governance and academic freedom in conducting programmes, which are benchmarked against other programmes internationally. R13 was the senior lecturer coordinating and teaching academic programmes of a particular specialisation. The comprehensive university's emphasis on self-governance in internationalisation was initiated after the Malaysian PHEIs Act was established in 1996, allowing private universities to obtain the ministry approval to conduct a course of study on their own. As the number of Malaysian private universities increased, the existing universities

like the comprehensive university had to diversify and sustain their efforts in internationalisation, rather than relying solely on international partnerships (Abdul Aziz & Abdullah, 2014; Clifford & Montgomery, 2017). During the development of internationalisation, the position of the comprehensive university shifted from a beneficiary to an originator, taking charge of the curriculum design and management. It controlled the extent of international academic collaboration, without the contractual restraints of partner universities. Thus, the relationship was maintained between the comprehensive university and its partner universities, in various internationalisation areas such as visiting scholars and research activities.

Having adhered to their own internationalisation policies, a number of the university SMLs seemed to be aware of the internationalisation movement in other private universities including the transnational university, the internationalised university, the localised university and the comprehensive university. When speaking of this, they were inclined to distinguish their university internationalisation policy and practice from the others, and indicate that theirs was exceptional. Such tenacity derived from the university's access to a large of amount of capital in the field of private higher education. The capital could be academic, intellectual, personal, politic, or economic (Bolden et al., 2008; Bourdieu, 1998). The ownership of these capital not only enables the institutions to enter but attain a powerful position in the field of private higher education. The private universities, in fact, were capable of individualising their internationalisation policies because they had sufficient capital, and were determined to increase current capital for their university growth.

In addition, these SMLs strongly promoted their institutional identity as a private university which sustained internationalisation initiatives, and also communicated the sense of belonging to their university as to being a member of the university

internationalisation committee. Lingard & Christie (2003) suggest that the contribution of productive and lasting leadership habitus to a field is durable. This means the senior management talents are a major capital which helps the university develop its global image in the private higher education field. It is explicitly described by the interviewee R10, who was a faculty dean at the transnational university, that the SMLs who effectively construct and implement policy play a significant role in sustaining the individualised internationalisation strategies for a long duration.

> It's because of our caution about quality dimension. We don't do validation. We don't do franchising. We're not like some places, like the English University franchise… validating the internationalised university. It's a different course structure. We don't do validation. That's why I said from here it's like basically we don't have any programmes that we teach offshore. It's our staff who do the delivery (R10, the transnational university).

The interviewee R3, who was the professor at the localised university, shared the perspective of the reciprocal relations between the SMLs' performance and internationalisation sustainability. The implementation of the university's individualised internationalisation strategies would endure, based on the SMLs' actions of maintaining the standards of such policy and practice.

> Some universities do very well. They have got a special education arm, or an international office. The job is purely to look for students. Let say every student you bring in, you get two thousand ringgit. Without naming the universities, there are people who do that. There are universities which run purely on international students only. Our university is not like that. We don't depend on international students. We need them to get the right mix, but 80% to 85% of our students are local students on the whole. I think we value the standard quite high here. Business can be seen in two ways – business to survive and business to really make money. And when you do that, you tend to compromise on quality. (R3, the localised university).

Most SMLs emphasised internationalisation practice, and perceived themselves as practitioners rather than policy makers. They participated in international marketing and outreach activities, and managed international higher education projects. The SMLs who were also faculty members described their active research collaboration with higher education institutions and colleagues worldwide. In accordance with Engeström's (2001) third generation of activity theory, these university practitioners formed their own activity system with particular objectives and values of internationalisation – a habitus of sorts – which frame orientations towards internationalisation. Simultaneously, they strove to collaborate with internationalisation policy makers based on mutual objectives. Quality assurance, for instance, is a goal of internationalisation policy and practice that create the win-win power relations between the SMLs.

The senior management members' willingness to communicate with the university internationalisation policy makers seemed to arise out of a sense of duty. This was shown in the repeated use of the word "responsible" in the interviewee R9's speech. R9 was a senior manager of the international office at the internationalised university.

> Our marketing strategy is not the same for all countries, so it needs careful studying, and a lot of fact finding. And as you are going at the expense of company's funds, you have to make sure it is well worth it. This is because at the end of the day, I'm responsible for the trip… you spend about 30k, what is your ROI.... I'm responsible for that. My job is to guide my team of people and we carefully study, and it's very important for you to interact with all our competitors. When we travel together, we are friends. (R9, the internationalised university).

Feeling obliged to the university drove the interviewees to respond to internationalisation policy, by making initiatives of reaching out to potential international students and parents, and engaging in research collaboration overseas. In their internationalisation practice, the SMLs communicated with their peers effectively on common objectives and rules. According to R9, research on various markets of international students was carried out before any oversea trips to ensure that their marketing activities were received positively by local authorities and customers. It also prevented the misuse of the university internationalisation funding, and the unnecessary expenses. This indicates that the economic rationale drove internationalisation policy and practice of the internationalised university. In the senior academician R13's point of view, the academic rationale seemed to motivate international research collaboration at the comprehensive university, which was the home-grown private university similar to the internationalised university. Institutional policy offered grants to the SMLs of academic departments to work with international research teams in different regions of the world.

> Currently we have collaboration with a university from Japan. So, they actually agreed to support our staff and students, especially young staff. Some of our staff visited this university and they have already started some research work with them. Even we have grants with them. We also have research collaboration with University E in the UK. (R13, the comprehensive university).

This coincides with Engeström's (2007) notion of rules in establishing stable and institutionalised activity systems. Legislation and institutional regulations bind SMLs to play their role as an actor in specific internationalisation areas. When a stable work

system forms, policy meets practice to accomplish the university individualised internationalisation strategies.

Theme 2: The Collision between Legislation, Internationalisation Policy and Practice

The second and third research questions particularly tie in with this theme as legislation is entangled with internationalisation policy and practice in various ways. The connection between legislation, policy and practice provides an insight into the third research question, which is the future internationalisation of private universities. The interview participants concurred with the implementation of legislation in managing private higher education internationalisation. Legislation is represented by the rules in each activity system, which becomes impactful in building shared objectives between the activity systems (Engeström, 2001). It signifies compliance and stability that are much needed in collaboration between the PHEI and the governmental authority. According to the interviewee, R3 who was a senior academician and administrator in the localised university, the university aligned its internationalisation strategies with the aims of the governmental authorities that included the Malaysian Ministry of Higher Education and the Minister of Higher Education. Among the initiatives were to reduce expenses, increase the number of postgraduate students who engage in internationalisation collaboration, and raise its international ranking.

> We are governed by the rules stated by the MQA and EAC. Of course what the higher education
> minister says as well. We are bound by certain structure. Basically he says don't spend a lot of
> money. The education minister has got his own KPI. He has a PhD. That's why he started the
> MyBrain scholarship to enhance the number of PhD and Masters students. We must have this

number of international collaboration. It's also part of the ministry wish list. The minister basically tells everybody "I want one or two of you to be the top hundred in the world". As the minister, he gives that direction. Now the vice chancellors of all public universities have to do something to bring them up. Even private universities like us need to join the race. Work is now ongoing, to at least reach the top two hundred at the Asian level within the next few years. We are aiming to do that. (R3, the localised university)

Stable and institutionalised SMLs' and governmental authority activity systems are based on their two-way communication about legislation, also known as knotworking. Knotworking between these activity systems is the embedded "fungal roots" to form a healthy, strong mycorrhizae formation that interrelates legislation, internationalisation policy and practice. This is seen in the localised university's commitment to its collaboration with the governmental authorities, by complying with legislation and government policy.

Besides, the Malaysian governmental authority imposed more stringent legislative procedures related to the private higher education quality control, in order to prevent frauds, such as unaccredited institutions, fake partnership programmes, and the misuse of international student and employee permits. This was a result of the increased number of private universities in Malaysia, which has even exceeded the number of public, government-sponsored universities (*Malaysian Qualifications Agency*, 2017; Wan, 2007). Private universities that are foreign university branch campuses were not exempted from the law implementation. Their undifferentiated postgraduate degree programmes, which were in line with the academic standards of its main overseas campus, had to go through the local, legislation-bound accreditation procedures. The process of accreditation was slow, involving numerous negotiations between the university and the Malaysian government. The laborious accreditation

task is described by the interviewee R8 from the transnational university, who was the senior academician working both for the Malaysian branch campus and the British main campus.

> We had to go back to the ministry to ask for the PhD programme to be renewed. They said yes, and it's got to be a PhD in a subject. In our case, it refers to PhD in education, PhD in chemistry, PhD in economics, etc. We don't have them, so it took months and months of negotiations to enable the transnational university fit both the requirements of the government here and the expectations of the main campus in the UK. During that period, all the recruitment of PhD students was suspended. So I had almost 9 months of students who couldn't register. (R8, the transnational university)

The transnational university needed to meet the local accreditation requirements for its PhD programmes that was part of its internationalisation policy and practice. For months, it had been working closely with the MQA, a government-linked higher education quality assurance agency. The recruitment of the PhD students, including the international students, was suspended during the interaction between two activity systems, the transnational university and MQA. Simultaneously, the transnational university was bound to its own habitus at the organisational level (Bourdieu, 1990), as mentioned by the interviewee R8 "it took months and months of negotiations to enable the transnational university fit both the requirements of the government here and the expectations of the main campus in the UK." This indicates that habitus shapes how a private university reacts to legislation, compliably or resistibly. Transnational partnerships are complex and diverse, often situated in political and legislative contexts (Montgomery, 2016). In the case of the transnational university, it sought to balance the legislative requirements and institutional expectations, so that it was able

to restore the reputation of the PhD programme – recognised both internationally and locally.

Nevertheless, the interview findings revealed that it was challenging to ensure that internationalisation policy and practice to be coordinated with legislation. Hence, the SMLs not only had to be familiar with legislative changes, but address any interferences that could disrupt law compliance in their university internationalisation policy and practice.

> We try to do everything in the legal framework that we are subject to. I am not an expert in every single law that applies, but certainly I think in terms of the overall framework we comply with the immigration regulations and student visas. We work very hard to monitor the progress of the student attendance because attendance is critical. And we have to report to the immigration authorities students who are not present for a certain number of sessions. So I think we follow the guidelines and requirements pretty closely. We have the international office that manages the international students. They are very conscious of the legal requirements, so as far as we are aware, we are pretty much compliant. I am not an expert in every single piece of legislation. My junior colleagues are. They manage international students, and international student recruitment. They know how to process student visas correctly. (R1, the internationalised university)

The interviewee R10, who was a faculty dean from the transnational university, discussed how the international competition between two private universities arose from a new legislation. In accordance to the Private Higher Educational Institutions Act 1996, the transnational university that was a British university branch campus refrained from becoming the partner of the transnational university that was a local private university, but chose to operate independently by purchasing the land and building its own Malaysian campus.

When the 1996 Higher Education Act was enforced, the internationalised university actually looked for foreign universities. Actually, the internationalised university approached the transnational university, but our then Vice Chancellor said no to the internationalised university because the internationalised university wanted the campus to be in the internationalised university, high rise buildings. He said, "No, this is not what the transnational university is about. The transnational university is about a full facility university." We found this piece of land. No one did any donations. We purchased this piece of land. (R10, the transnational university)

Having acknowledged the legislative changes, the internationalisation strategies of the transnational university and the internationalised university diverged: the former emphasised self-governance in managing its policy and practice as a foreign university branch campus, whereas the latter was keen on international partnerships to develop a global image, rather than remaining a local PHEI. In the SML R10's point of view, the activity systems of the transnational university and the internationalised university collided, due to different internationalisation objectives and habitus (Bourdieu, 1990; Engeström, 2007). However, knotworking between both universities was mycorrhizae-like, as they adapted and conformed to new legislation through constructive dialogues of a potential partnership. This explains that interrelationships of legislation and subjectivity in which the private universities interpret legislation based on their leadership and institutional principles, and gear it to achieve their own internationalisation goals.

The interaction between legislation, internationalisation policy makers and practitioners occurs effectively through the embedded "fungal roots" in mycorrhizae-like activity systems. These fungal roots are an analogy of ongoing communication, mediating artifacts, division of labour, and mutually agreed objectives (Engeström,

2007). When the roots decay, the activity systems become dysfunctional, which obstructs internationalisation in private universities. During the interviews, the SMLs from the internationalised university and the comprehensive university were pessimistic toward current and future internationalisation in their universities. As stated earlier, the comprehensive university and the internationalised university are home-grown Malaysian private universities, significantly driven by the economic and academic rationales. The interviewee R6 was a centre director at the internationalised university, who was responsible for the international student recruitment of the centre's academic programmes. The interviewee R6 spoke about the experience of dealing with the discrepancy between immigration legislation, international student recruitment policy and practice.

> I don't think the problem is the discipline and conduct of international students. For recruitment, they keep changing the rules. This makes it very difficult. The most immediate one is the EMGS, which makes it quicker. It doesn't. It makes it more expensive, so the government puts up the price by tenfold. Instead of students paying RM200, they pay RM2000. The government puts it through the government agency for reasons that could be understood by everybody who understands how accounting works in Malaysia. And the EMGS doesn't speed up the process at all. In fact, we have four students who started yesterday, and that's three weeks late. They were held up because of the immigration procedures. (R6, the internationalised university)

Education Malaysia Global Services (EMGS) is a company limited by guarantee, incorporated under the laws of Malaysia and wholly owned by the Ministry of Higher Education (*Education Malaysia Global Services*, 2017), which is in charge of managing and processing international student study visas in public and private HEIs. The interviewee's articulation "For recruitment, they keep changing the rules. This makes it very difficult" revealed immense frustrations due to the constant changes in

immigration legislation, for halting the centre's international student recruitment plans and operations. These legislative changes included the EMGS's high cost of student study visa application, and the sluggish international student study visa application process.

The similar disempowerment of SMLs was expressed in the account of the interviewee R7, who was an associate dean at the comprehensive university. When attempting to align the academic policy and practice with legislation related to the MQA, the interviewee R7 struggled to link the "documentary reality" of legislation to the social reality of current internationalisation policy and practice. This corresponds with Atkinson & Coffey (2011) that the legislative documents present a distinctive ontological status, known as a "documentary reality", which can either coincide or contradict with the social reality.

> When it comes to the MQA auditing, it's all about quantification, as in points. Everything is measurable. When auditors come in, they have to follow a format. First, they look at the university mission and vision, and then they look at your programme learning outcomes. They look at the course learning outcomes. From the course learning outcomes, they align it with the Bloom's taxonomy. Then, they use the Bloom's taxonomy to look into your assessment. To me, it's superficial, tangible, observable and measurable quantified data that you can collect. I have yet to encounter an auditor who would look at the teaching materials and even our teaching content as in topics that we have put in each course, and ask the question "How did you come to this topic? What is the content that you use? How did you choose your content?" Isn't teaching a more delicate work that is entitled to better attention? When we talk about ethics, it's about values. Definitely the world would be a better place when we have people who say "I am doing it not because the MQA asks me to do this. It's because it's the right thing to do." We don't seem to have that kind of empowerment yet. (R7, the comprehensive university)

At the individual level, both the comprehensive university and the internationalised university SMLs' leadership habitus are bound to the legislative changes, and are often left powerless during their interaction with the governmental authority. As expressed by the interviewee R7 "We don't seem to have that kind of empowerment yet", dissatisfaction and involuntariness were among the undercurrents beneath the relations between leadership habitus and legislation. They were likely to provoke the disruptive nature of leadership habitus (Eacott, 2003), as opposed to Bourdieu's (1990) productive habitus. The discrepancy would occur in the private higher education field when the SMLs encountered massive challenges and were unwilling to implement law in their internationalisation policy making and practice.

A few participants argued against the hasty amendments to legislation which affected their university internationalisation. They defended existing policy and practice, indicating that the discrepancy was intentional. It needed to take place to protect the student welfares and the university's internationalisation initiatives. This corresponds with Bourdieu's (1990) conception of habitus, stating that rules and changes in social and physical structures of a private university control the actors of three levels: individual, group and organisation. The SMLs found it even more challenging to adapt to abrupt legislative changes in the field of private higher education internationalisation. For instance, the interviewee R12, who was the head of school from the transnational university, conveyed the university's dilemma over law compliance and student interests.

> International universities are basically victims of this… they can't do anything. They just have
> to wait and bide their time. You know, like the immigration approving student visas, taking so
> long. Some of our students cannot come in time for semester, so the university has to set up

another pathway for them. Even they come late, you know, we give them other ways of catching

up. (R12, the transnational university)

As the SMLs represented the private university at the group and organisation levels, they had to ensure that internationalisation policy and practice yielded most benefits for the university stakeholders, who provided their university with the sustainable income. When legislative amendments arose, they received the first wave of impact on their internationalisation policy making and practice. Consequently, they were caught in a tug of war, attempting to balance the university's internationalisation motives and the legislative commands.

Despite being a home-grown Malaysian private university, the SMLs from the internationalised university shared the sentiments of disempowerment with the SMLs at the transnational university, which was a foreign university branch campus. According to the interviewee R11 who was the senior executive director of the internationalised university and also the private university representative on the MQA council, the activity system of the PHEI often conflicted with the activity system of the legislative authority. The government officer, for example, interrogated the internationalised university's SMLs with the questions about the proximity and shared facilities between the college and the university.

One of the things I don't like about this is that they can be very rigid. So, you can have an officer who comes; tick, tick, tick, tick, you know. For example, one of them was like, "Ahh, the law says the institutions cannot be together. They must be separated." So, I said, "You don't want my college and my university together; I put a fence between the two of them, okay?" "No! Your building is still connected". I said, "Yes, I'm also connected to a mall". "No, you're not." I said, "Yes, there's a link bridge. See, concrete one", or whatever you know, "It's connected". Everything is connected here". So, they get stuck with me; they don't know what to do, "No, no,

143

no. Then, I get another rule to tell you, you know, you're too close to each other by distance".

So, it's like that… go on and on and on. This is where you go very crazy. They don't see the

big picture as in the synergy between the college and the university. Right, like, which you feel

right now, you know. And the shared resources; why is my library so big? There's the college

and the university. My E students are coming over here as well. My internationalised university

students are going to E. It's seamless. (R11, the internationalised university)

The collision between the university's and the legislative authority's activity systems

should produce a mutually agreed internationalisation objective, which forms

collaborative strategies and long-term knotworking mycorrhizae (Engeström, 2001).

Until the common objective becomes established, both interacting activity systems

have to address tension and disagreements, derived from their individual agenda of

internationalisation. Rather than impromptu and fluctuating demands, stable,

institutionalised activity systems would achieve the current goals, and decide the

future directions of private university internationalisation.

Theme 3: Implementation Gaps between Internationalisation Policy and Actors

This theme responds to the third research question by exploring why the practitioners

did not comply with internationalisation policy, and how such implementation gaps

shed light on the future internationalisation of private universities. These conflicts were

revealed through the perceptions from the SMLs who were the practitioners and

insiders for their university internationalisation. In the interviews, a number of SMLs

claimed that internationalisation policy did not necessarily inform practice. This

happened to various internationalisation policies, which targeted the university

stakeholders or a specific government audience. They consisted of internationalised

academic programmes, international marketing campaigns, international student and employee recruitment, international research collaboration, and student-exchange programmes. When the implementation gaps occurred, private higher education internationalisation suffered the consequences at the three levels: individual, group and organisation. Habitus became disruptive that the individual practitioners, groups or institutions were incapable of controlling likely action of internationalisation at a specific time (Bolden et al., 2008; Bourdieu, 1990).

While coordinating policy and practice, the SMLs struggled to identify clear directions of university internationalisation, and maintain open communication with their university's international partners. The difficulties are due to the structural inequalities and communication barriers in international partnerships, which eventually result in the implementation gaps (Singh, 2010). For instance, the interviewee R19, who was the director of the university international partnership, used the word "miscommunication" to describe his or her dilemma in implementing university internationalisation policy, in which a sudden U-turn occurred when the practitioners from their international validation partner, English University denied its participation in the validation procedures completely.

> Internationalisation works if you have people in the parent or the country of origin who fully understand what they're getting into. The English University's big mistake in the beginning was moving ahead strategically at the upper level without bringing the operational staff on board. So, when documentations started arriving from the internationalised university to be validated, they're saying, "What's this? We've never seen this before. We can't do this. There's been no consultation". The internationalised university has gone through and put this all through the MQA [Malaysian Qualifications Agency], and then dropped the desk, and they're expected to validate it. So, there's a lot of miscommunication there. (R19, the internationalised university).

Class distinction existed between the university practitioners, who worked together to develop international partnership. This is in line with the interrelatedness of capital and power in the field of private higher education internationalisation (Bourdieu, 1998). The internationalisation policy makers of English University, who owned more academic and intellectual capital, seemed to overpower its own and the internationalised university's practitioners in the procedures of validating the latter internationalised academic programmes. The partnership between the internationalised university and English University was likely to be superficially built on internationalisation policy and strategies by a small circle of policy makers, as the interviewee R19 uttered, "at the upper level without bringing the operational staff on board". The lack of communication between practitioners and policy makers, therefore, resulted the implementation gaps between policy and actors.

Private university practitioners also struggled to fulfil the expectations of internal and external governance bodies toward their internationalisation activities. These included the accreditation of undifferentiated degree programmes, recruitment and conduct of international students, curriculum development, and credit transfer scheme. For example, the transnational university needed to work simultaneously with the MQA and its main campus in the UK, in order to obtain the academic programme accreditation. The interviewee R2, who was a faculty dean, carried out the role of a middle manager that adhered his or her internationalisation practice to the leaders of three university and government governance bodies. The use of the phrase "all three of them are bosses" indicated that this particular SML strove to coordinate and balance the power relations between different internationalisation stakeholders.

> There are a few things here. Number one, we are a branch, like the 7-11. We follow, comply with or live with that we have a UK mothership. So whatever they tell us to do, we do it. Number

146

two, we have our local bodies which my predecessors and I have totally different attitudes. Number three, of course our university has our own policies and protocols that we have to follow. Just to name these three, there is no way I can coordinate all three. No way. All three of them are my bosses. I have to listen to the management in the UK. I have to make sure that the provost is happy with me. At the moment, I would not say that it is effective. If it is effective, we would not get into trouble. For example, previously we failed almost every accreditation of the engineering degrees. Typically you will get five years of accreditation, and you will have a peaceful life for five years. We got one year, which literally says "you are screwed". Now my attitude has changed, and they gave us three years. It is better. But still it is not the most ideal case. (R2, the transnational university)

The interviewee's claim "There is no way I can coordinate all three [bosses]" suggested it was beyond his or her capability to ensure that internationalisation policy met practice, in which university policy makers of the UK main campus and Malaysian branch campus worked hand in hand with the local governmental agency. According to Engeström (2001), contradictions occur when structural tensions accumulate within an activity system, and different objectives of the activity systems do not show a certain extent of shared features. In the case of the transnational university, the actors, who were the university practitioners, failed to resolve the tensions, and form a common internationalisation objective between activity systems. The conflicting goals of multiple activity systems from the branch campus practitioners, the main campus policy makers, and the government authority eventually resulted in the implementation gaps between policy and practice.

The interview accounts from the SMLs of the comprehensive university and the internationalised university indicated that certain discrepancy between policy and practice were purposive. Engeström (2001) states that the conflict between the internationalisation objectives of policy makers and practitioners can result in

147

contradictions and tensions between the two activity systems. As home-grown, commercialised private universities, the comprehensive university and the internationalised university prioritised the economic rationale whenever academic disputes arose. Despite acknowledging university internationalisation policy that was driven by the economic rationale, the interviewees chose to implement it according to their capital and principles. For example, the interviewee R7, who was the associate faculty dean at the comprehensive university, explained the academic ethical crisis as a consequence of bureaucracy, from the power struggle between SMLs. Different layers of senior management caused the procrastination, negligence and eventually abandonment of making an important academic decision.

> Many foreign universities have a university ethics committee which is explicitly known. I am in the position of making the proposal to set up an ethics committee, and in fact I have done it. But it's fallen on deaf ears. I sat in the university research committee. So when I proposed it to the person who was supposed to propose this to the higher level… you know it's very bureaucratic… and that's it. When I revisited it and said "Where is it? Who is in it?" he said "I am sure we do." I don't know why such attitudes exist at such a level. We are not talking about the middle management level. We are talking about above the middle management. I am not comfortable with that. So what I can do at the micro level is that whichever work comes through my hand, I put it through a very stringent reading to make sure that the ethical concerns are addressed. It's very tedious because I also have my workload. (R7, the comprehensive university)

The findings revealed that when the individual actor's habitus and habitus operating at an organisational level diverged, implementation gaps happened. These habitus resembled two activity systems that interact with their own cultural capital and field. Conflicts, therefore, occurred when the habitus (or the activity systems) have different

cultural capital and values. The interviewee R7 advocated the establishment of an ethics committee as a pivotal university internationalisation strategy, which was on par with "many foreign universities". Since the voices went unheard, the SML implemented ethics procedures at the micro level, such as editing university journals and assessing students' research reports, in order to align the research work with international ethical standards. Eacott (2013) suggests that the nature of leadership is disruptive to and incompatible with the field. This refutes Bourdieu's notion of stable, lasting leadership habitus. Strong, durable individual leadership habitus, in relation to research ethics, set the SML apart from the comprehensive university's internationalisation directions.

Correspondingly, the SML from the internationalised university, R6 who was the centre director at the internationalised university, refused to reduce the marketing campaigns in specific international student markets, despite the recent revision of the internationalised university's international student recruitment policy based on changes in legislation and rationales. For instance, it placed more investments in the Japanese student market that is affected by the social and political rationales, due to the terrorist incident in the Malaysia's neighbouring country.

> The difficulty lies, as I have said to you, in terms of the international recruitment rules keep getting changed. Secondly, we are vulnerable to outside factors. And a large scale of student outings nationally and internationally is affected. You have one incident recently with a nearby university involving their students involved in the Jakarta bombings that cut out Japanese students by 90 per cent. It's part of our strategic vision incorporated into the annual business plan which I am going to proceed shortly. It's articulated and very much depends on the development. So we are strengthening and developing the model with Japanese universities. At the same time, I am often invited to do presentations, some direct and some soft marketing like two weekends ago in Indonesia for four days, working with teachers and students. I do that twice a year because we get lots of Indonesian students. We have had some visiting, auditing

Vietnamese students just for two weeks, just to see how things are. It's kind of like a reaching out thing. (R6, the internationalised university)

The interviewee R6's marketing efforts seemed to be strongly driven by individual leadership habitus (Bourdieu, 1990), and the economic rationale of recruiting more international students. Hence, initiatives were made in order to resolve the tensions between university policy and individual agency. While helping the university to recover from the dwindling Japanese student market, the individual SML insisted on reaching out to the Indonesian student market which suffered the political uncertainties. This suggested that the practitioner meditated on and carried on certain implementation gaps between policy and practice, in order to achieve the individual and institutional objectives of internationalisation.

Synthesising the Themes

This chapter has presented the findings from the interviews with SMLs in four Malaysian PHEIs to demonstrate how different institutions with the same field position themselves differently vis a vis internationalisation policy. This shows how internationalisation becomes a means through which universities try to develop a sense of distinction within a field of PHEIs, all competing in different ways. Habitus seems to exist at the organisational level of the university (Bourdieu, 1990), containing distinctive principles in various internationalisation areas. Habitus adapts to the outcomes, thus regulates and individualises the PHEI's internationalisation policy and practice. In addition, the sense of distinction is also related to the institutional identity as a private university that sustains internationalisation strategies and changes for a significant duration. The university's global image is built on its ownership of academic,

intellectual, personal, economic or political capital. Meanwhile, Engeström's (2007) notion of rules is found to be significant in developing the SMLs' stable and institutionalised activity systems for implementing individualised internationalisation policies. The SMLs' sense of obligation motivates them to carry out their role as an internationalisation actor in particular internationalisation areas.

Secondly, legislation is inextricably intertwined with internationalisation policy and policy. The rules represent stability that is required in collaboration between the PHEI and the governmental authority. The interview findings indicate that the universities not only need to comply with existing legislation, but adapt their internationalisation policy and practice to legislative changes. Hence, two-way communication and knowledge exchange about legislation between the university's and the government authority's activity systems, which are also known as knotworking, are crucial in determining the outcomes of internationalisation (Engeström, 2001). Knotworking between these activity systems is the embedded "fungal roots" to form a healthy, strong mycorrhizae formation that interrelates legislation, internationalisation policy and practice.

Third – this chapter has revealed the divergent perceptions of SMLs on the implementation gaps between internationalisation policy and practice. The findings suggest that such a discrepancy happens when habitus becomes disruptive at the three levels: individual, group and organisation (Bolden et al., 2008; Bourdieu, 1990). The individual university practitioners, groups or institutions were disempowered to control likely action of internationalisation at a specific time. Class distinction occurs between the universities who are involved in international partnership. The university which has more capital seems to have a leading role in partnership, exhibiting a strong sense of internationalisation, defined in and through the organisation's habitus.

151

Similarly, individual SMLs attempt to resolve the tensions between policy and practice, based on their personal capital. The implementation gaps, in fact, are carried out deliberately by the practitioners at the micro level. They have been acknowledged as the initiatives to address university internationalisation policy shortcomings, through a bottom-up approach.

The themes form a coherent whole by illustrating different angles of the interaction between SMLs, legislation, policy, and practice in private university internationalisation. Each theme has a stance which is derived from the perceptions of private university SMLs who are internationalisation policy makers and practitioners. Addressing the first research question, the first theme explores individualised internationalisation policies within a university, through the lens of SMLs. The second research question is explained in the second theme, which is how legislation interacts organically with institutional policy and practice in private higher education internationalisation. Similar to the second theme, the third theme also answers the second research question, by discussing power, disempowerment and institutional identity issues that emerge from the interaction between internationalisation policy and actors. Finally, all the three themes respond to the third research question by explaining the implications of different perceptions and interactions for the future internationalisation of private universities. This is revealed in the interview accounts, which express the participants' conjectures and the university future directions of internationalisation. Therefore, the relations between the themes are vividly described through the interplay between SML-practitioners and internationalisation agendas, in the forms of collaboration and struggle.

Conclusion

This chapter has presented the interview findings from 20 SMLs of four private universities, exploring their perceptions on the relationship between legislation, policy and practice in internationalisation of private higher education. It contributes to the whole thesis, by addressing the problem of how internationalisation policy, its rules and actors come together. The findings suggest that when habitus becomes disruptive at the individual, group and organisation levels, the discrepancy occurs. The chapter also discusses the motivations and barriers that the private university stakeholders face during their interaction with legislation, internationalisation policy and practice. During the SMLs' interaction with legislation, policy and practice, they encounter motivations and barriers, internally and externally. The findings reveal that the SMLs' sense of obligation motivates them to carry out their role as an internationalisation actor in specific internationalisation areas, whereas communication barriers could result in the discrepancy between internationalisation policy, practice and legislation.

The themes derived from the interview findings are important as they respond to the research questions of this study. First, how private universities, through the SMLs' perceptions, differ in their interactions with legislation, internationalisation policy and practice were discussed. It offers insights into human agency which is a gap in the literature of private higher education internationalisation. Habitus seems to exist at the organisational level of the university, involving the actors and distinctive principles in various internationalisation areas. While adapting to the internationalisation outcomes, habitus regulates and individualises the PHEI's internationalisation policy and practice. Second, the themes discuss how policy and practice contradict laws in private higher education internationalisation. How legislation interacts organically with

institutional policy and practice in private higher education internationalisation is also examined. Lastly, the themes form a coherent whole by explaining the discrepancy between policy and actors, and such implications for the future internationalisation of private universities. The dynamics of actors and external influences, power, disempowerment and institutional identity issues are crucial in understanding the discrepancy that potentially happens between legislation, internationalisation policy and practice.

CHAPTER SEVEN

CONCLUSIONS

Introduction

This chapter introduces the summary and synthesis of the themes derived from the textual analysis and interviews. It seeks to revisit and clearly address the three research questions of the study, which are:

(1) how might private universities differ in the relationship between legislation, internationalisation policy and practice through their SMLs' perspectives?

(2) in what ways does legislation interact with institutional policy and practice in private higher education internationalisation? and

(3) what do the different perceptions and interactions mean for the future internationalisation of private institutions?.

The first research question was answered in the first theme from the interviews, which is developing individualised internationalisation policies within a university. Meanwhile, the second research question was answered in all the four themes emerged from the textual analysis: (1) legislation as a governmental authority soliloquy, (2) legislation as a representation of student autonomy, (3) legislation as a manisfestation of the power hierarchy, and (4) legislation as a text without the meso- and street-level participation. It was also addressed in the second and third themes from the interviews, which are the collision between legislation, internationalisation policy and practice, and implementation gaps between internationalisation policy and actors. It. Lastly, all the themes from the textual analysis, and the themes from the interviews responded to the third research question.

In order to delineate the relations between the themes, the effectiveness and limitations of the methodological approach, this chapter is organised into three sections as follows:

(1) summary of main findings,

(2) the implications of the different perceptions and interactions for the future internationalisation of private institutions, and

(3) the effectiveness and limitations of the methodological approach

Summary of Main Findings

Differences in the Relationship between Legislation, Internationalisation Policy and Practice

The first research question was addressed in the first theme derived from the interview findings. The individualised internationalisation policies of all four private universities, which are the transnational university, the internationalised university, the comprehensive university, and the localised university result in their differences toward legislation, policy and practice. International policy of these universities is specific, defined by the internationalisation strategies of individual universities. This suggests a strong sense of habitus which exists at the organisational level of the university. In relation to Bourdieu's (1990) theory of practice, the university's individualised internationalisation policy is likely the result of habitus. Habitus contains the university's principles in various internationalisation areas, such as home-grown academic programmes, international student recruitment, and short-term study abroad

programmes. Thus, it controls the university's internationalisation policy and practice, and adapts them to the outcomes.

The internationalised university is a home-grown private university that is based in Malaysia. For years, it has been having a durable international partnership with English University located in the UK. The interview findings revealed that its internationalisation policies focus on obtaining international experience through the six-month study abroad programme in English University. This individualised policy ties in with the academic rationale, enabling the student participants to gain intercultural interaction experience, which has been neglected in local course literature (Trahar & Hyland, 2011). It also aims to align the home-grown academic programmes with international standards through credit transfer from the study abroad programme. However, many students who are interested cannot afford the fees of the study abroad programmes. This raises the issue of class distinction that the overseas education opportunities caters for the needs of economic elites, who intend to obtain not only traditional academic capital for elevating their social class (Bourdieu, 1998), but cultural capital for reproducing the employment advantage (Findlay et al., 2012). Affluent and powerful families are likely to invest in high value education to maintain their leadership and social status (Marginson, 2006). In contrast, students who come from lower social classes are disempowered in the extent of their internationalisation participation, which is restrained to mainly the internationalisation activities based locally in the internationalised university.

Meanwhile, the transnational university that is a branch campus attached to its main campus in the UK, emphasised its brand as a global university in its internationalisation policies. The strategies include recruiting more international students, and providing the existing students with the international experience on its

local premise. The transnational university's recruitment of international students is not driven by the economic rationale for increasing profits; it identifies the international students as the university ambassadors, instead of commodities. The transnational university's internationalisation policies aim to sustain its global image, through intercultural education for students of various nationalities. For instance, the transnational university is differentiated from other PHEIs in both local and international higher education markets, by having students from diverse cultural backgrounds, up to 80 countries. A sense of habitus toward the global institution is embedded in and mediated through in the transnational university's internationalisation policy (Bourdieu, 1990; Montgomery, 2016; Reay et al., 2001). This aligns the branch campus with the main campus's internationalisation values and strategies, and offers undifferentiated education – the students of both the Malaysian branch and British main campuses would obtain the similar international education experience.

On the contrary, the localised university's individualised internationalisation policies are to develop and promote its power-based academic programmes and research collaboration locally and internationally, rather than delivering intercultural education or increasing the number of international students. Strongly motivated by the academic rationale, it asserts high academic quality, creating a distinction between the localised university and other PHEIs driven by the economic rationale. Moreover, its internationalisation policies have relied on the political rationale, as it is a private university wholly owned by a government-linked company. The localised university's leadership habitus, which consists of individual agency and organisational structures (Bolden et al., 2008; Bourdieu, 1990), is bound to the principles of its power-based corporate sponsor. This explains why its policies are centred on the power-based

specialisations in the internationalisation areas, such as the academic programmes, research and student and staff talents recruitment. The possession of sufficient economic capital enables the localised university to establish its international reputation in the field of private higher education power-based programmes and research (Naidoo, 2004).

The comprehensive university's individualised internationalisation policies stress the development of in-house academic programmes through self-governance and academic freedom. It exhibits strong habitus in managing internationalisation activities (Bourdieu, 1990). For example, it reduces distinction in international partnerships, by controlling the extent of academic and research collaboration. The equal relationship between the comprehensive university and overseas partner institutions empowers the former to design its own curriculum in line with international standards, house visiting scholars, and encourage international joint-research projects. The comprehensive university's conduct of internationalisation is likely determined by its economic, academic or personal capital. Bolden et al. (2008) explain that the ownership of resources (personal, political and economic) helps an organisation to access a network of social positions structured through power relations. This suggests that the PHEIs which have most capital would gain a more powerful position in the areas of internationalisation.

My research addresses the existing gap by examining the SMLs' evaluation of various rationales in university internationalisation, and the role of rationales in their own internationalisation policy and practice. In the literature, there has been insufficient data on the interaction of SMLs and multiple rationales. Most past research explore how other university actors such as middle managers and street-level practitioners interact with rationales to accomplish university internationalisation

agendas (De Wit, 2002; Meiras, 2004; Tadaki & Tremewan, 2013). The perceptions of SMLs, who are the university key internationalisation holders, policy makers and practitioners, are often silenced in the literature. The interview findings revealed that the SMLs and multiple rationales underlie the private university's individualised internationalisation policies and strategies. These insights are important because they are in line with the role of human agency in higher education internationalisation that the SMLs can be either the initiators or the recipients of internationalisation rationales (Berry & Taylor, 2014; Vincent-Lancrin, 2009). It also complements Knight's (2004) categorisation of rationales based on the national and institutional levels, which undermines the internationalisation actors. These insights can encourage the future research and practice to emphasise on the role of SMLs, which receives little attention in private higher education internationalisation.

The SMLs are the insiders of their university individualised internationalisation policy making and implementation. In this study, Engeström's (2007) notion of rules is found to be significant in developing the SMLs' stable and institutionalised activity systems for implementing individualised internationalisation policies. The SMLs' sense of obligation motivates them to carry out their role as an internationalisation actor in particular internationalisation areas. While interacting with the rationales to adapt and individualise internationalisation policies, they foster and mediate communication between the other actors that are the legislative authority, meso- and street-level practitioners.

The Ways in which Legislation Interact with Institutional Policy and Practice in Private Higher Education Internationalisation

This research question was addressed in the second and third themes from the interviews, and all the four themes from the textual analysis. The interviewees SMLs concur with the implementation of legislation in managing private higher education internationalisation. According to Engeström (2001), legislation is represented by the rules in each activity system, suggesting compliance and stability that are required in collaboration between the activity systems of the PHEI and the governmental authority. Knotworking between these activity systems, known as the embedded "fungal roots", is crucial to develop a healthy, strong mycorrhizae formation that interrelates legislation, internationalisation policy and practice. These fungal roots are an analogy of ongoing communication, mediating artifacts, division of labour, and mutually agreed objectives (Engeström, 2007). Knotworking has been found in the two-way communication about legislation between the stable and institutionalised SMLs' and governmental authority activity systems.

Similar knotworking practice is also advocated through the third theme of the textual analysis, that is, legislation as a manifestation of the power hierarchy. In the Companies Act 1965, the SMLs of private universities are associated with the power hierarchy which resembles the company organisation structure. Cho & Palmer (2013) argue that the SMLs mostly apply the top-down approach in the power hierarchy of a PHEI, where they construct internationalisation policy, and inspect practice (Cho & Palmer, 2013). Maintaining power balance in the university's organisational structure is needed for building shared objectives between the activity systems of the SMLs and the governmental authority. Thus, the SMLs have to comply with legislation, which

states that inspections – a common corporate quality assurance practice – are to be carried out on all the university departments. Distinction seems to be pivotal in sustaining the power hierarchy of the private higher education field – the SMLs communicate with the governmental authority pertaining to legislation, design internationalisation policies, and monitor the practice at the meso- and micro levels. Prior to internationalisation, legislation used to control university policy and practice strictly (Bourdieu, 1993). The textual findings indicate that legislation has granted the PHEI with a higher degree of autonomy in developing its power hierarchy and habitus for internationalisation. The increasing self-governance of the private higher education field has allowed negotiations between the SMLs and the governmental authority in aligning the university internationalisation policy and practice with legislation.

Both the textual and interview findings suggest that the stringent legislative procedures regulate private higher education quality assurance protocols, and student autonomy. This corresponds with the first and second themes from the textual analysis, which are legislation is the governmental authority soliloquy, and the representation of student autonomy to regulate private university internationalisation activities. The dominating presence of the governmental authority in legislation forbids any open discussion for any queries about the internationalisation procedures in the legislation. When the dispute about the internationalisation issues arises, the SMLs are required to refer to the governmental authority which is stated in legislation. The undifferentiated academic programmes of the private universities that are foreign university branch campuses, for example, have to undergo the local, legislation-bound accreditation procedures. Nevertheless, the interviewees claimed that the process of accreditation is laborious and slow, as it involves negotiations between the university and the Malaysian governmental authority. This indicates that habitus relates to how

a private university reacts to legislation, either compliably or resistibly (Bourdieu, 1990). The PHEIs seem to strive to balance the institutional expectations and legislative requirements in their internationalisation strategies, in order to gain local and international recognition. Furthermore, Legislation controls private university student autonomy by prohibiting any internationalisation activities affiliated with political parties. It indicates again a strong sense of distinction between the students' possession of academic and political capital, by confining their social position to be a student who studies, rather than a proponent of political perspectives.

The SMLs, according to the interview findings, find coordinating their internationalisation policy and practice with legislation an arduous task. While adapting to impromptu legislative changes, they need to resolve the interferences that could disrupt law compliance in their policy and practice. Such a dilemma is shown in the collision between the activity systems of the SMLs from the transnational university and the internationalised university, which is largely due to their different internationalisation objectives and habitus (Bourdieu, 1990; Engeström, 2007). These actors attempt to establish a partnership between a foreign university branch campus and a Malaysian home-grown private university, by adapting their own internationalisation policies to new legislation. The mycorrhizae-like knotworking between both institutions illuminates the PHEIs' subjectivity in interpreting legislation based on their leadership and institutional principles, and negotiating with other activity systems to achieve specific internationalisation objectives.

The governmental authority and SMLs often have conflicting cultural perspectives toward internationalisation agendas. A lack of intercultural interaction, which is one of the internationalisation modes, is evident in the collaboration between the SMLs and governmental authority particularly in the accreditation of course

literature. The SMLs' disempowerment was expressed in the interview accounts, when aligning the academic policy and practice with legislation related to accreditation. However, at the individual level, the SMLs' leadership habitus is subject to abrupt legislative changes (Bourdieu, 1990), and they are often left powerless during their interaction with the governmental authority. There seems to be a gap between the "documentary reality" of legislation and the social reality of current internationalisation policy and practice. It reciprocates with Atkinson & Coffey (2011) that the distinctive ontological status of legislative documents, known as a "documentary reality", can either coincide or contradict with the social reality. These insights are important because they illustrate how the contradictory cultural perspectives of actors can impact internationalisation policy and practice. Among the implications of these insights for the future research is that intercultural education can add value to internationalisation strategies pertaining to human mobility. Hence, private universities have to keep pace with global higher education needs, by offering internationalised curricula, establishing international partnerships with other universities, engaging in international research collaboration, developing international experience for the existing students, and recruiting international students and employees.

The similar predicament of inadequate intercultural interaction was described through the third theme from the interviews, and the fourth theme of the textual analysis, which are implementation gaps between internationalisation policy and actors, and legislation as a text without the meso- and street-level participation. The SMLs, who are both policy makers and practitioners, stress that certain discrepancy between legislation, policy and practice is purposive, for protecting the university's internationalisation initiatives. Little attention has been given to the cultural challenges that occur in academic staff mobility (Castro et al., 2016), especially when they

struggle with the worldview represented through legislation, which conflicts with their own. Despite the fact that university internationalisation policy has to comply with legislation, the interviewees carry out their practice based on their capital, values, and individual habitus. Adding to the Walker's (2015) data that only newly appointed international academic staff undergo cultural challenges, the findings of this study revealed that even the experienced SMLs face obstacles resulting from their enculturation in a different system of education in which they are currently working. This addresses the existing gap in the literature that undermines intercultural interaction as a major internationalisation agenda in private higher education.

The typology of the four institutions has enabled the ways in which legislation, policy and practice are worked out as far as internationalisation is concerned. The transnational university and the internationalised university emphasise their internationalisation approach through close collaboration with a particular university abroad, which is unique in their own way: the transnational university is the branch campus of an overseas university, while the internationalised university is the partner institution of an overseas university. Their strong branding strategies have been part of university policy and practice, but at times, contradicted with legislation and internationalisation directions of the governmental authority. Thus, these two universities constantly work towards reducing the tension between legislation, policy and practice in terms of internationalisation. The localised university and the comprehensive university, on the other hand, incline towards meeting the legislative requirements about internationalisation through policy and practice. Their internationalisation agendas, however, differ slightly as the localised university stress the higher local student ratio, whereas the comprehensive university promotes localised curriculum and higher local employment rates.

These recurring insights are significant as the lack of intercultural interaction seems to have a stronger impact on internationalisation. It provides the implications for future research and practice that intercultural interaction needs to be integrated into internationalisation agendas, and that the dynamics of intercultural interaction should be managed to reduce the tension between internationalisation actors and policy. The typology of the four universities reveals the nuances of the ways their internationalisation policy and practice come together, in order to achieve internationalisation agendas. These institutions recognise the importance of intercultural interaction in addressing the tension between legislation, policy and practice, and hence cater for the interests of the local stakeholders that are the governmental authority, SMLs, practitioners, and students.

The Implications of the Different Perceptions and Interactions for the Future Internationalisation of Private Institutions

The fierce local and international competitions between PHEIs have increased their motivations to individualise their internationalisation policies, for sustaining growth into the future, in many aspects such as finance, reputation, and quality. Private universities are non-government-sponsored institutions, therefore they are more likely to adapt their internationalisation strategies and policies to the rationales that benefit them most. Globalisation seems to impact the university internationalisation policies in many ways. It is a phenomenon beyond the institution control, which subsumes into political, economic, social and cultural dynamics across borders (Arshad-Ayaz, 2008; Knight, 2015). Among the outcomes of globalisation are individualised internationalisation policies, in which the universities keep pace with global higher

education needs. For instance, the PHEIs offer internationalised curricula, develops international experience for existing students, establishes international partnerships, and recruits international staff and students.

Based on the SMLs' perceptions from the interviews and the legislative textual findings, this study addresses the existing gap in the literature, which gives little recognition to intercultural interaction, as a major internationalisation agenda and an outcome of globalisation in private higher education. The absence of intercultural interaction and the application of team work pedagogy raise the concern among a number of academics and students (Clifford & Montgomery, 2017; Trahar & Hyland, 2011). These insights provide the implications for future research and practice, which are developing the participants' intercultural competencies should be a major characteristic of course literature, in order to address university internationalised teaching and learning motives.

Different layers of senior management result in the procrastination, negligence and eventually abandonment of realising an important internationalisation strategy. While coordinating legislation, policy and practice, the SMLs struggle to identify clear directions of university internationalisation, maintain open communication with other actors, and fulfil the expectations of internal and external governance bodies toward their internationalisation activities. Engeström (2001) asserts that contradictions occur when structural tensions accumulate within an activity system, and different objectives of the activity systems do not show a certain extent of shared features. Habitus became disruptive that the individual practitioners, groups or institutions were incapable of controlling likely action of internationalisation at a specific time (Bolden et tal., 2008; Bourdieu, 1990). The textual findings also revealed that the SMLs who liaise with the governmental authority deliver internationalisation policy to the meso- and

street-level practitioners that are in the lower systemic positions (Saunders & Sin, 2014). The latter roles have been unacknowledged in legislation, being regarded as the subordinates to the SMLs. Hence, the lack of emphasis on bottom-up interactions in legislation results in further divide in the implementation staircase, restraining communication between the governmental authority, SMLs, and meso- and street-level practitioners.

My study, therefore, addresses the gap in the literature relating to the neoliberalisation of higher education by exploring how legislation interacts with institutional policy and practice in private higher education internationalisation. The tension between regulation and deregulation was examined through the analysis of legislative texts, and the perceptions of SMLs. The discrepancy occurs in the private higher education field when the SMLs encounter huge challenges and are unwilling to implement legislation in their internationalisation policy making and practice. When the implementation gaps happen, private higher education internationalisation suffers the consequences at the three levels: individual, group and organisation. Habitus becomes disruptive that the individual practitioners, groups or institutions are incapable of controlling likely action of internationalisation at a specific time (Bolden et al., 2008; Bourdieu, 1990). The collision between the university's and the legislative authority's activity systems should produce a mutually agreed internationalisation objective, which forms collaborative strategies and long-term knotworking mycorrhizae (Engeström, 2001). The popular notion of deregulation in the literature, however, does not account for the sustainability of private higher education internationalisation policy and practice. This insight is important as it indicates that regulation that is implemented based on institutionalised activity systems can impact private university's neoliberal-influenced internationalisation policy and practice. It also contributes to the

implications for future research and practice, which are until the common objective becomes established, both interacting activity systems have to address tension and disagreements, derived from their individual agenda of internationalisation. Rather than impromptu and fluctuating demands, stable, institutionalised activity systems would achieve the current goals, and decide the future directions of private university internationalisation.

The Effectiveness and Limitations of the Methodological Approach

The use of a multi-method approach in this study facilitates the thickness and richness of data, and strengthen the interpretation of findings. It demonstrates an attempt to triangulate data, which provides an in-depth understanding of the phenomenon in question through multiple sources of evidence. Various perspectives, therefore, can be generated from the multi-method approach. The triangulated data can reveal completeness, convergence, inconsistency and complementary results (Creswell, 2011; Johnson et al., 2007). It contributes to the synthesis of the themes from the interview and textual findings, in order to explore the relationship between legislation and the SMLs' perceptions on private higher education internationalisation policy and practice. During the synthesis, the participants' perceptions and textual findings, whether centred on the discrepancy or correspondence between legislation, policy and practice, were evaluated equally. While acknowledging the discrepancy between legislation, internationalisation policy and practice, I observed the outliers that leaned toward the correspondence.

In this study, two qualitative methods were used sequentially, which qualitative interviews were conducted followed by the textual analysis. The participants'

perceptions, however, are complex, and objective reality can never be captured through interviews (Denzin & Lincoln, 2005; Fontana & Frey, 2005). The textual analysis hence was utilised to provide a context for the interviews, and to explore the collision or divergence of legislation, internationalisation policy and practice. It also helped gain an in-depth understanding of how the participants established their views toward internationalisation agendas.

Several limitations, however, are identified in this research. The participants were selected from four private universities that are located in the central west coast of Malaysia. According to the Department of Higher Education Malaysia (2017), in April 2017 66% of private universities are found in the central west coast of Malaysia, which consists of the national capital Kuala Lumpur, and its neighbouring state Selangor. The proximity of these PHEIs is an inclusion criterion, which specifies what is permissible in the sample. The reason is that stiff competition is likely to happen between institutions, and that internationalisation would become the institutional strategy to differentiate them from other competitors. The phenomenon of internationalisation in the remaining 34% of private universities, which are in the other states of Malaysia, is under-researched. The findings of this study therefore were not collected at the national scale, but were generalised to develop an understanding of the internationalisation phenomenon in the context of Malaysian private higher education.

In this study, the coding and analysis of the interview and textual data involved only one coder, who was the researcher. The researcher went through most of the steps, including transcription, reading, organisation, coding, and developing and synthesising themes. The first 10 interview accounts were transcribed by the researcher, while the other 10 were sent to a professional transcription company which

the researcher has employed for other qualitative studies over years. Two different coders including the researcher should be involved in the coding and analysis processes to negate any bias that any one coder might bring to scoring, and also increase the credibility of the results.

Conclusion

This chapter has presented the summary of main findings and the synthesis of themes from the textual analysis and interviews. It is important for this study by addressing the gaps in the literature, which have been identified in the review. First, the main findings of interviews examine the SMLs and multiple rationales, which underlie the private university's individualised internationalisation policies and strategies. These insights address the gap in the literature, discussing the role of human agency in higher education internationalisation that the SMLs can be either the initiators or the recipients of internationalisation rationales.

Second, the synthesis of the themes from the textual analysis and interviews reveals that knotworking between the activity systems of internationalisation, known as the embedded "fungal roots", is crucial to develop a healthy, strong mycorrhizae formation that interrelates legislation, internationalisation policy and practice. These fungal roots are an analogy of ongoing communication, mediating artifacts, division of labour, and mutually agreed objectives. Furthermore, the increasing self-governance of the private higher education field has allowed negotiations between the SMLs and the governmental authority in aligning the university internationalisation policy and practice with legislation. Legislation has granted the PHEI with a higher degree of autonomy in developing its power hierarchy and habitus for internationalisation.

Third, the main findings of the textual analysis and interviews address the gap in the literature, which is the lack of organisational recognition to intercultural interaction, as a major internationalisation agenda and an outcome of globalisation in private higher education. These insights provide the implications for future research and practice, which are developing the participants' intercultural competencies should be a major characteristic of course literature, in order to achieve university internationalised teaching and learning motives. Besides, the findings suggest that regulation that is implemented based on institutionalised activity systems can impact private university's neoliberal-influenced internationalisation policy and practice. It contributes to my research, pertaining to the implications for future research and practice – until the common objective becomes established, both interacting activity systems need to address tension and disagreements, derived from their individual agenda of internationalisation.

Lastly, this chapter discusses the effectiveness and limitations of the methodological approach. The use of a multi-method approach in this study facilitates the thickness and richness of data, strengthens the interpretation of findings, and demonstrates an attempt to triangulate data through multiple sources of evidence. The chapter also explains the limitations of the methodological approach. The findings of this study were not collected at the national scale, but were generalised to develop an understanding of the internationalisation phenomenon in the context of Malaysian private higher education. The phenomenon of internationalisation in the remaining 34% of private universities, which are in the other states of Malaysia, is under-researched. In addition, the coding and analysis of the interview and textual data involved only one coder, who was the researcher. Two different coders should be

involved in the coding and analysis processes to negate any bias that any one coder

might bring to scoring, and also increase the credibility of the results.

References

Abdul Aziz, M. I., & Abdullah, D. (2014). Finding the next 'wave' in internationalisation of higher education: Focus on Malaysia. *Asia Pacific Education Review, 15*, 493-502.

Agnew, M. (2012). A false dichotomy of serving either the local or the global community and its impact on internationalisation of the university. *Journal of Higher Education Policy and Management, 34*(5), 473-489.

Altbach, P. G., & Knight, J. (2007). The internationalization of higher education: Motivations and realities. *Journal of Studies in International Education*, *11*(3/4), 290-305.

Arshad-Ayaz, A. (2008). From producing citizens to producing managers: Education in a globalized world. In K. H. Rodney., Yeakey, C.C., & Boakari, F. M (Eds.), *Power, voice and the public good: Schooling and education in global societies (Advances in education in diverse communities: Research, policy and praxis, volume 6).* (pp. 479-506). Bingley: Emerald Group Publishing Limited.

Atkinson, P., & Coffey, A. (2011). Analysing documentary realities. In D. Silverman (Ed.), *Qualitative research: Issues of theory, method and practice.* (3rd ed.) (pp. 56-75). London: Sage.

Baharun, E., Awang. Z., & Padlee, S. F. (2011). International students choice criteria for selection of higher learning in Malaysian private universities. *African Journal of Business Management, 5*(12), 4704-4714.

Berger, P. L., & Luckmann, T. (1967). *The sociology construction of reality: A treatise in the sociology of knowledge.* Harmondsworth: Penguin.

Berger, R. (2015). Now I see it, now I don't: Researcher's position and reflexivity in qualitative research. *Qualitative Research*, *15*(2), 219–234.

Berry, C., & Taylor, J. (2014). Internationalisation in higher education in Latin America: Policies and practice in Colombia and Mexico. *Higher Education, 67*, 585-601.

Bolden, R., Petrov, G., & Gosling, J. (2008). Tensions in higher education leadership: Towards a multi-level model of leadership practice. *Higher Education Quarterly, 62*(4), 358-376.

Bourdieu, P. (1984). *Distinction: A social critique of the judgement of taste*. Cambridge: Harvard University Press.

Bourdieu, P. (1990). *The logic of practice*. Stanford, CA: Stanford University Press.

Bourdieu, P. (1993). *The field of cultural production*. Cambridge: Polity Press.

Bourdieu, P. (1998). *Practical reason: On the theory of action*. Stanford, CA: Stanford University Press.

Brandenburg, U., & de Wit, H. (2011). The end of internationalization. *International Higher Education*, 62, 15–17.

Britez, R., & Peters, M. A. (2010). Internationalisation and the cosmopolitical university. *Policy Futures in Education, 8*(2), 201-216.

Bryman, A. (2012). *Social research methods* (4th ed.). New York: Oxford University Press.

Cambridge dictionary. (2017). Retrieved from http://dictionary.cambridge.org/dictionary/english/policy

Castro, P., Woodin, J., Lundgren, U., & Byram, M. (2016). Student mobility and internationalisation in higher education: Perspectives from practitioners. *Language and Intercultural Communication, 16*(3), 418-436.

Chae, J. E., & Hong, H. K. (2009). The expansion of higher education led by private universities in Korea. *Asia Pacific Journal of Education, 29*(3), 341-355.

Chang, D. F. (2015). Implementing internationalization policy in higher education explained by regulatory control in neoliberal times. *Asia Pacific Education Review, 16*(4), 603-612.

Cho, Y. H., & Palmer, J. D. (2013). Stakeholders' views of South Korea's higher education internationalization policy. *Higher Education, 65*, 291-308.

Clifford, V., & Montgomery, C. (2017). Designing an internationalised curriculum for higher education: Embracing the local and global citizen. *Higher Education Research & Development, 36*(6), 1138-1151.

Creswell, J. W. (2011). *Educational research: Planning, conducting, and evaluating quantitative and qualitative research* (4th ed.). Upper Saddle River, New Jersey: Pearson.

Crotty, M. (1998). *The foundations of social research: Meaning and perspective in the research process.* London: Sage.

de Jong, H., & Teekens, H. (2003). The case of the University of Twente: Internationalisation as education policy. *Journal of Studies in International Education, 7*(1), 41-51.

de Wit, H. (2002). *Internationalization of higher education in the United States of America and Europe: A historical, comparative, and conceptual analysis.* Westport, CT: Greenwood.

Denscombe, M. (2010). *The good research guide: For small-scale social research projects* (4th ed.). Berkshire, UK: McGraw-Hill/Open University Press.

Denzin, M., & Lincoln, Y. S. (2005). Introduction: The discipline and practice of qualitative research. In M. Denzin., & Y. S. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed.) (pp. 1-32). Thousand Oaks, CA: Sage.

Department of Higher Education. (2011). *Getting started: Establishing and operating private higher education institution (PHEI) business in Malaysia*. Retrieved from http://docplayer.net/9944127-Guidebook-phei-management-sector-getting-started-establishing-and-operating-private-higher-education-institution-phei-business-in-malaysia.html

Department of Higher Education. (2017). *Statistics of private universities Malaysia*. Retrieved from https://drive.google.com/file/d/0B6PiZu5MIeTaT0ppVHJXN1NrUmc/view

Department of Statistics. (2016). *Press release: Services statistics education (private sector) 2015*. Retrieved from https://www.dosm.gov.my/v1/index.php?r=column/pdfPrev&id=VTd6aUtNUH RGL1JJeXVQSkZUNHJrdz09

Dickson, T. (2009). Knowledge transfer and the globalisation of higher education. *Journal of Knowledge-based Innovation in China, 1*(3), 174-184.

Dzvimbo, K. P., & Moloi, K. C. (2013). Globalisation and the internationalisation of higher education in sub-Saharan Africa. *South African Journal of Education, 33*(3), 1-16.

Dolby, N. (2010). Internationalizing higher education: The development of practice and policy in South Africa. *Teachers College Record, 112*(7), 1758-1791.

Driessen, H., & Jansen, W. (2013). The hard work of small talk in ethnographic fieldwork. *Journal of Anthropological Research*, *69*(2), 249-263.

Eacott, S. (2013). Towards a theory of school leadership practice: A Bourdieusian perspective. *Journal of Educational Administration and History, 45*(2), 174-188.

Edwards, J. (2007). Challenges and opportunities for internationalization of higher education in the coming decade: Planned and opportunistic initiatives in American institutions. *Journal of Studies in International Education, 11(3/4)*, 373-381.

Education Malaysia Global Services. (2017). *About us.* Retrieved from https://educationmalaysia.gov.my/about-us.html

Enders, J. (2004). Higher education, internationalisation, and the nation-state: Recent developments and challenges to governance theory. *Higher Education, 47*, 361-382.

Engeström, Y. (2001). Expansive learning at work: Toward an activity theoretical reconceptualization. *Journal of Education and Work*, *14*(1), 133-156.

Engeström, Y. (2007). From communities of practice to mycorrhizae. In J. Hughes, N. Jewson & L. Unwin (Eds.), *Communities of practice: Critical perspectives* (pp. 41-54). London: Routledge.

Engwall, L. (2016). The internationalisation of higher education. *European Review, 24*(2), 221–231.

Fairclough, N. (2003). *Analysing discourse: Textual analysis for social research*. New York: Routledge.

Findlay, A. M., King, R., Smith, F. M., Geddes, A., & Skeldon, R. (2012). World class? An investigation of globalisation, difference and international student mobility. *Transactions of the Institute of British Geographers, 37*(1), 118-131.

Flick, U. (2014). *An introduction to qualitative research* (5th ed.). London: Sage.

Foley, D., & Valenzuela. (2005). Critical ethnography: The politics of collaboration. In M. Denzin., & Y. S. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed.) (pp. 217-234). Thousand Oaks, CA: Sage.

Fontana, A., & Frey, J. H. (2005). The interview: From neutral stance to political involvement. In M. Denzin., & Y. S. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed.) (pp. 695-727). Thousand Oaks, CA: Sage.

Galletta, A. (2013). Ongoing and iterative data analysis. In A. Galletta (Ed.), *Mastering the semi-structured interview and beyond* (pp. 119-145). http://www.jstor.org.ezproxy.lancs.ac.uk/stable/j.ctt9qgh5x

Guba, E. G., & Lincoln, Y. S. (2005). Paradigmatic controversies, contradictions, and emerging confluences. In M. Denzin., & Y. S. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed.) (pp. 191-215). Thousand Oaks, CA: Sage.

Healey, N. (2013). Why do English universities really franchise degrees to overseas providers?. *Higher Education Quarterly, 67*(2), 180-200.

Healey, N. M. (2017). Beyond 'export education': Aspiring to put students at the heart of a university's internationalisation strategy. *Perspectives: Policy and Practice in Higher Education, 21*(4), 119-128.

Henn, M., Weinstein, M., & Foard, N. (2009). *A critical introduction to social research* (2nd ed.). Wiltshire, UK: Sage.

Hennink, M., Hutter, I., & Bailey, A. (2011). *Qualitative research methods.* Cornwall, UK: Sage.

Hoffman, D. M. (2009). Changing academic mobility patterns and international migration: What will academic mobility mean in the 21st century? *Journal of Studies in International Education, 13*(3), 347-364.

Hou, J., Montgomery, C., & Mcdowell, L. (2014). Exploring the diverse motivations of transnational higher education in China: Complexities and contradictions. *Journal of Education for Teaching, 40*(3), 300-318.

Hudson, B. (1993). Michael Lipsky and street level bureaucracy: A neglected perspective. In M. Hill (Ed.), *The policy practice: A reader* (1st ed.) (pp. 386-398). London: Harvester Wheatsheaf.

Humfrey, C. (2011). The long and winding road: A review of the policy, practice and development of the internationalisation of higher education in the UK. *Teachers and Teaching, 17*(6), 649-661.

Jin, H. (2014, October 24). China's private universities. *Science*. Retrieved from http://science.sciencemag.org/content/346/6208/401.full

Johnson, R. B., Onwuegbuzie, A. J., & Turner, L. A. (2007). Toward a definition of mixed methods research. *Journal of Mixed Methods Research*, *1*(2), 112-133.

Karnieli-Miller, O., Strier, R., & Pessach, L. (2009). Power relations in qualitative research. *Qualitative Health Research*, *19*(2), 279-289.

Knight, J. (2003) Updating the definition of internationalization. *International Higher Education*, *33*(Fall), 2-3.

Knight, J. (2004). Internationalization remodeled: Definition, approaches, and rationales. *Journal of Studies in International Education, 8*(1), 5-31.

Knight, J. (2015). *Updating the definition of internationalisation*. Retrieved from https://ejournals.bc.edu/ojs/index.php/ihe/article/viewFile/7391/6588

King, A. (2000). Thinking with Bourdieu against Bourdieu: A 'practical' critique of the habitus. *Sociological Theory, 18*(3), 417-433.

King, N., & Horrocks, C. (2011). *Interviews in qualitative research*. Cornwall, UK: Sage.

Kupfer, A. (2011). Towards a theoretical framework for the comparative understanding of globalisation, higher education, the labour market and inequality. *Journal of Education and Work, 24*(1-2), 185-208.

Kuwamura, A. (2009). The challenges of increasing capacity and diversity in Japanese higher education through proactive recruitment strategies. *Journal of Studies in International Education, 13*(2), 189-202.

Kvale, S. (2006). Dominance through interviews and dialogues. *Qualitative Inquiry, 12*(3), 480-500.

ICEF Monitor. (2015). *The state of international student mobility in 2015*. Retrieved from http://monitor.icef.com/2015/11/the-state-of-international-student-mobility-in-2015/

Lee, M. N. N. (2004). Global trends, national policies and institutional responses: Restructuring higher education in Malaysia. *Educational Research for Policy and Practice*, *3*(1), 31-46.

Lee, C. G. (2012). Reconsidering constructivism in qualitative research. *Educational Philosophy and Theory, 44*(4), 403-412.

Lipsky, M. (1980). *Street-level bureaucracy: Dilemmas of the individual in public services*. New York: Russell Sage Foundation.

Lo, W. Y. W., & Tang, H. H. H. (2017) Dancing with global trends: Higher education policy and university governance in Hong Kong, 1997–2012. *Journal of Educational Administration and History, 49*(1), 53-71.

Lingard, B., & Christie, P. (2003). Leading theory: Bourdieu and the field of educational leadership. An introduction and overview of this special issue. *International Journal of Leadership in Education, 6*(4), 317-333.

Luo, N. (2017). *Japan, Malaysia, Taiwan, and South Korea: Remap regional student flows*. Retrieved from https://wenr.wes.org/2017/08/global-mobility-japan-malaysia-taiwan-and-south-korea-seek-to-shift-student-mobility-by-2025

Malaysian Qualifications Agency. (2009). *The Malaysian Qualifications Agency rating system for higher education institutions in Malaysia*. Retrieved from http://www.mqa.gov.my/SETARA09/index.cfm

Malaysian Qualifications Agency. (2017). *Private universities*. Retrieved from

    http://www2.mqa.gov.my/mqr/

Malaysian Association of Private Colleges and Universities MAPCU. (2014). About

    MAPCU: Internationalisation. Retrieved from

    http://www.mapcu.com.my/aboutMapcu_internationalisation.html

Malterud, K., Siersma, V. D., & Guassora, A. D. (2015). Sample size in qualitative

    interview studies: Guided by information power. *Qualitative Health Research*,

    26(13), 1753-1760.

Marginson, S. (2006). Dynamics of national and global competition in higher

    education. *Higher Education, 52*(1), 1-39.

McKee, A. (2003). *Textual analysis: A beginner's guide*. London: Sage.

Meiras, S. (2004). International education in Australian universities: Understandings,

    dimensions and problems. *Journal of Higher Education Policy and*

    Management, *26*, 371-380.

Mertens, D., & Ginsberg, P. E. (2009). *The handbook of social research ethics*.

    Thousand Oaks, CA: Sage.

Miller, J., & Glassner, B. (2011). The 'inside' and the 'outside': Finding realities in interviews. In D. Silverman (Ed.), *Qualitative research: Issues of theory, method and practice* (3rd ed., pp. 131-148). Cornwall, UK: Sage.

Ministry of Finance Malaysia. (2017). *Economic report 2016/2017: Chapter 3 economic performance and prospects.* Retrieved from http://www.treasury.gov.my/pdf/economy/er/1617/chapter3.pdf

Mok, K. H. (2007). Questing for internationalization of universities in Asia: Critical reflections. *Journal of Studies in International Education, 11*(3), 433-454.

Montgomery, C. (2016). Transnational partnerships in higher education in China: The diversity and complexity of elite strategic alliances. *London Review of Education, 14*(1), 70-78.

Naidoo, R. (2004). Fields and institutional strategy: Bourdieu on the relationship between higher education, inequality and society. *British Journal of Sociology of Education, 25*(4), 457-471.

Nudzor, H. (2013). Interviewing Ghanaian educational elites: Strategies for access, commitment, and engagement. *International Journal of Qualitative Methods, 12*, 606-623.

Olssen, M., & Peters, M. A. (2005). Neoliberalism, higher education and the knowledge economy: from the free market to knowledge capitalism. *Journal of Education Policy, 20*(3), 313-345.

Othman, R., & Othman, R. (2014). Higher education institutions and social performance: Evidence from public and private universities. *International Journal of Business and Society, 15*(1), 1-18.

Pfotenhauer, S. M., Jacobs, J. S., Pertuze, J. A., Newman, D. J., & Roos, D. T. (2013). Seeding change through international university partnerships: The MIT-Portugal program as a driver of internationalization, networking, and innovation. *Higher Education Policy, 26*, 217-242.

Poole, G. S. (2016). Administrative practices as institutional identity: Bureaucratic impediments to HE 'internationalisation' policy in Japan. *Comparative Education, 52*(1), 62-77.

Qu, S. Q., & Dumay, J. (2011). The qualitative research interview. *Qualitative Research in Accounting & Management*, *8*(3), 238-264.

Reay, D., David, M., & Ball, S. (2001). Making a difference?: Institutional habituses and higher education choice. *Sociological Research Online, 5*(4). Retrieved from http://www.socresonline.org.uk.ezproxy.lancs.ac.uk/5/4/reay.html

Richardson, L., & and St. Pierre, E. A. (2005). Writing: A method of inquiry. In M. Denzin., & Y. S. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed.) (pp. 959-978). Thousand Oaks, CA: Sage.

Robinson, O. C. (2014). Sampling in interview-based qualitative research: A theoretical and practical guide. *Qualitative Research in Psychology, 11*(1), 25-41.

Saarinen, T. (2008). Position of text and discourse analysis in higher education policy research. *Studies in Higher Education, 33*(6), 719-728.

Sanderson, G. (2011). Internationalisation and teaching in higher education. *Higher Education Research & Development, 30*(5), 661-676.

Saunders, M., & Sin, C. (2014) Middle managers' experience of policy implementation and mediation in the context of the Scottish quality enhancement framework. *Assessment & Evaluation in Higher Education, 40*(1), 135-150.

Savills World Research. (2016). *Spotlight world student housing 2016/17*. Retrieved from http://pdf.euro.savills.co.uk/global-research/spotlight-world-student-housing-2016-2017.pdf

Schwandt, T. A. (1989). Recapturing moral discourse in evaluation. *Educational Researcher, 18*(8), 11-16.

Scott, J. (1990). *A matter of record*. Cambridge: Polity Press.

Scott, G., & Garner, R. (2013). *Doing qualitative research: Designs, methods, and techniques*. New Jersey, US: Pearson Education.

Shim, J. M. (2012). Pierre Bourdieu and intercultural education: it is not just about lack of knowledge about others. *Intercultural Education, 23*(3), 209-220.

Shore, C., & Wright, S. (Eds.). (1997). *Anthropology of policy: Critical perspectives on governance and power.* London, UK: Routledge.

Sin, I. L. (2009). The aspiration for social distinction: Malaysian students in a British university. *Studies in Higher Education, 34*(3), 285-299.

Singh, M. (2010). Re-orienting internationalisation in African higher education. *Globalisation, Societies and Education, 8*(2), 269-282.

Smeby, J. C., & Trondal, J. (2005). Globalisation or europeanisation? International contact among university staff. *Higher Education, 49*, 449-466.

Stier, J. (2004). Taking a critical stance toward internationalisation ideologies in higher education: Idealism, instrumentalism and educationalism. *Globalisation, Societies and Education*, *2*(1), 83–97.

Tadaki, M., & Tremewan, C. (2013). Reimagining internationalization in higher education: International consortia as a transformative space?. *Studies in Higher Education*, *38*(3), 367-387.

Teichler, U. (2004). The changing debate on internationalisation of higher education. *Higher Education, 48*, 5-26.

Tham, S. Y. (2013). Internationalizing higher education in Malaysia: Government policies and university's response. *Journal of Studies in International Education, 17*(5), 648-662.

The Commissioner of Law Revision. (2006). *Act 555 Private Higher Educational Institutions Act 1996*. Putrajaya, Malaysia: Percetakan Nasional Malaysia Bhd.

Tierney, E. G., & Dilley, P. (2002). Interviewing in education. In J. F. Gubrium., & J. A. Holstein (Eds.), *Handbook of interview research* (pp. 453-471). Thousand Oaks, CA: Sage.

Trahar, S., & Hyland, F. (2011). Experiences and perceptions of internationalisation in higher education in the UK. *Higher Education Research & Development, 30*(5), 623-633.

Viczko, M., & Tascón, C. I. (2016). Performing internationalization of higher education in Canadian National Policy. *Canadian Journal of Higher Education, 46*(2), 1-18.

Vincent-Lancrin, S. (2009). Cross-border higher education: trends and perspectives. In S. Vincent-Lancrin., & K. Kärkkäinen (Eds.), *Higher education to 2030 Volume 2: Globalisation.* (pp. 63-88). Paris: OECD.

University of Essex key performance indicators: KPI 4 Global. (2010). Retrieved from http://www.essex.ac.uk/strategy/kpi/kpi4.aspx

Walker, P. (2015). The globalisation of higher education and the sojourner academic: Insights into challenges experienced by newly appointed international academic staff in a UK university. *Journal of Research in International Education, 14*(1) 61-74.

Wan, C, D. (2007). Public and private higher education institutions in Malaysia: Competing, complementary or crossbreeds as education providers. *Malaysian Studies, 25*(1), 1-14.

Wengraf, T. (2001). *Qualitative research interviewing: Biographic narrative and semi-structured methods.* Wiltshire, UK: Sage.

Whitsed, C., & Volet, S. (2011). Fostering the intercultural dimensions of internationalisation in higher education: Metaphors and challenges in the Japanese context. *Journal of Studies in International Education, 15*(2), 146-170.

Wiers-Jenssen, J. (2008). Does higher education attained abroad lead to international jobs?. *Journal of Studies in International Education, 12*(2), 101-130.

Yang, R. (2004). Openness and reform as dynamics for development: A case study of internationalisation at South China University of Technology. *Higher Education, 47*, 473-500.

Yonezawa, A., & Shimmi, Y. (2015). Transformation of university governance through internationalization: challenges for top universities and government policies in Japan. *Higher Education, 70*, 173-186.

Appendix A

The Interview Guide

The role of legislation in private higher education internationalisation

1. Do you refer to the Malaysian legislation to manage teaching permits for international scholars? If yes, how so? If no, why not?

2. Do you refer to the Malaysian legislation to manage the discipline and conduct of international students? If yes, how so? If no, why not?

3. Do you refer to the Malaysian legislation to conduct the courses of study in your department/university? If yes, how so? If no, why not?

4. Do you refer to the Malaysian legislation to control the advertisement of recruiting international students or scholars in your department/university? If yes, how so? If no, why not?

5. Do you think the Malaysian legislation impacts the management of your department/university? If yes, how so? If no, why not?

6. Do you think the Malaysian legislation impacts the inspection of your department/university? If yes, how so? If no, why not?

Internationalisation policy and practice in private universities

Academic programmes

1. Does your department/university adopt any internationalised curricula? If yes, how so? If no, why not?

2. Can your students study or work abroad while undertaking their undergraduate or postgraduate degree in your department/university? If yes, how so? If no, why not?

3. Does your department/university offer any academic staff mobility programmes? If yes, how so? If no, why not?

4. Is cross cultural training provided in your department/university? If yes, how so? If no, why not?

5. Are there any visiting lectures and scholars in your department/university? If yes, how so? If no, why not?

6. How many international students do you have in your department/university?

7. How do you recruit the international students in your department/university?

8. Does your department/university provide any joint or double degree programmes? If yes, what are they? If no, why not?

Research and scholarly collaboration

1. Are there any international joint research activities in your department/university? If yes, what are they? If no, why not?

2. Does your department/university organise any international conferences and seminars? If yes, what are they? If no, why not?

3. Do academic staff participate in any international conferences and seminars? If yes, what are they? If no, why not?

4. Are academic staff active in publishing journals and papers? If yes, how so? If no, why not?

Cross-border relations

1. Does your department/university offer any commercial transnational education programmes? If yes, what are they? If no, why not?

2. Is your department/university developing a global alliance with any international partner universities? If yes, how is the progress? If no, why not?

3. Does your department/university organise any alumni-abroad programmes? If yes, what are they? If no, why not?

Extracurricular activities

1. Does your department/university have any student clubs and societies? If yes, what are they? If no, why not?

2. Do the clubs and societies organise any international and intercultural campus functions? If yes, what are they? If no, why not?

3. Does your department/university provide any peer support groups and programmes? If yes, what are they? If no, why not?

4. How do the local and international students participate in the peer support groups and programmes?

Governance

1. Do you think that the governance structures of your department/university are effective to contribute to internationalisation? If yes, why? If no, why not?

2. Does your department/university have any articulated rationale and goals for internationalisation? If yes, what are they? If no, why not?

3. Is there an international dimension in the institutional mission statement, planning and policy documents in your department/university? If yes, how so? If no, why not?

Human resources

1. How does your department/university recruit and select international expertise?

2. Does your department/university provide any rewards for the faculty and staff that contribute to internationalisation?

3. Does your department/university organise any faculty and staff professional development activities which promote internationalisation? If yes, what are they? If no, why not?

4. Does your department/university provide faculty and staff with the support for international assignments and sabbaticals?

Services for internationalisation

1. Does internationalisation of your department/university receive support from institution-wide service units?

2. Does internationalisation of your department/university involve academic support units?

3. Does your department/university offer student support services for incoming and outgoing international students?

Appendix B

Our Ref: PA

Participant Information Sheet

Title of Project:
Correspondence or discrepancy? A multi-method examination of internationalisation agendas in Malaysian private higher education

I am Shin Pyng Wong and I am a PhD student in the Department of Educational Research at Lancaster University. I would like to invite you to take part in a research study which is part of my doctoral studies. Before you decide you need to understand why the research is being done and what it would involve for you. Please take time to read the following information carefully. Talk to others about the study if you wish. Ask me if there is anything that is not clear or if you would like more information. Take time to decide whether or not you wish to take part.

What is the purpose of the study?
This study seeks to examine the ways in which legislation, policy and practice interrelate in private higher education internationalisation. Over the past decade, internationalisation has become an important agenda in higher education institutions globally. Malaysia represents a growing world education hub, housing more than 30 private universities. The rapid development of Malaysian private higher education has increased the process of internationalisation in private universities. Within the vast territories of the 14 states in Malaysia, the extent to which national legislation relates to private university internationalisation policy making and implementation becomes a crucial yet under-researched issue. Various factors interact and significantly influence the process of internationalising private tertiary institutions.

Why have I been invited?
You have been invited to participate in the study because you practice internationalisation, and represent various academic and administrative backgrounds.

Do I have to take part?
No. Your participation is voluntary, and you can withdraw at any stage of the study with no penalty. If you withdraw within two weeks of participation, all data collected and related to you will be destroyed and not used in this study. You can also withdraw after 2 weeks of participation, but data may be used as it may already have been analysed and/anonymised. Your interview will be audio-recorded and transcribed by the researcher only. If you do not want your interview to be audio-recorded, you can choose not to participate in this study.

What will happen to my data?
'Data' here means my audio recordings and any email exchanges we may have had, which are related to this study. The data will be securely stored for a minimum of 10 years after the successful completion of the PhD *Viva* as per Lancaster University requirements, and after that any personal data will be destroyed. Before the recordings are transferred, encrypted and stored on the personal laptop, the audio recorder will be stored in a locked cupboard at the researcher's house. Only the researcher has the key to unlock the cupboard, and accesses the audio recorder. Within one week after the interviews, audio recordings will be transferred, encrypted and stored on my personal laptop, which is password protected. After transferring audio recordings to my laptop, they will be deleted from portable media.

You can request to listen to the audio at the end of the interview, and any parts you are unhappy with will be deleted from the data. The completion of this study is estimated to be by April 2017 although data collection will be complete by November 2016. The data may be used in my thesis, and potentially in any journal articles and conference presentations.

The data collected for this study will be stored securely, and only the researcher conducting this study will have access to this data:
- The files on the researcher's personal laptop will be encrypted (that is no-one other than the researcher will be able to access them), and the laptop itself password protected.
- The typed version of your interview will be made anonymous by removing any identifying information including your name. Anonymised direct quotations from your interview may be used in the reports or publications from the study, so your name will not be attached to them.
- All your personal data will be confidential and will be kept separately from your interview responses. This means the personal data is encrypted and stored in a portable hard disk, which is locked in the cupboard at the researcher's house. The researcher is the only person who has the key to unlock the cupboard, and also the access to the personal data.
- Any paper data, which include the typed version of the interview, will be stored in a locked cupboard at the researcher's house. Only the researcher has the key to unlock the cupboard, and also accesses the paper data.

There are some limits to confidentiality. If any serious consequence occurs due to your involvement in the study, the decision to override agreements on confidentiality and anonymity will be made after meticulous reasoning. If what is said in the interview makes me think that you, or someone else, is at significant risk of harm, I will have to break confidentiality and speak to a member of staff about this. If possible, I will tell you if I have to do this.

Are there any risks?
There are no risks anticipated with participating in this study. However, if you experience any distress following participation you are encouraged to inform the researcher.

What are the possible benefits of taking part?
You gain insights into the university internationalisation practice through perceptions, and the various rationales that influence internationalisation in higher education. These findings can enrich your experience as a higher education internationalisation policy maker and a practitioner. It also assists you to reflect on and facilitate the internationalisation agents and processes in your university.

What will I have to do?
You will sign the consent form and attend the interview during the allocated slot.

Who has reviewed the project?
This study has been reviewed and approved by members of Lancaster University Research Ethics Committee.

Where can I obtain further information about the study if I need it?
If you have any questions about the study, please contact the researcher:
Shin Pyng Wong
Email: wongsp@exchange.lancs.ac.uk

Complaints
If you wish to make a complaint or raise concerns about any aspect of this study and do not want to speak to the researcher, you can contact:

Dr Kirsty Finn
Supervisor
Tel: +44 (0)1524 595123
Email: k.finn1@lancaster.ac.uk
Educational Research Department
County South
Lancaster University
LA1 4YD
Thank you for taking the time to read this information sheet.

Shin Pyng Wong

20 September 2016

Appendix C

Consent Form

Title of Project: Correspondence or discrepancy? A multi-method examination of internationalisation agendas in Malaysian private higher education

I would like to invite you to take part in a research project that examines the ways in which legislation, policy and practice interrelate in private higher education internationalisation. Before you consent to participating in the study I ask that you read the participant information sheet and mark each box below with your initials if you agree. If you have any questions or queries before signing the consent form please speak to the researcher, Shin Pyng Wong.

<div align="right">Please initial
each statement</div>

1. I confirm that I have read the information sheet and fully understand what is expected of me within this study.

2. I confirm that I have had the opportunity to ask any questions and to have them answered to my satisfaction.

3. I understand that my interview will be audio recorded.

4. I understand that my participation is voluntary and that I am free to withdraw at any time without giving any reason.

5. I understand that once my data have been anonymised and incorporated into themes it might not be possible for it to be withdrawn, 2 weeks after my participation.

6. I understand that the information from my interview will be pooled with other participants' responses, anonymised and may be published.

7. I consent to anonymised information and quotations from my interview being used in reports, conferences and training events.

8. I consent to Lancaster University keeping written transcriptions of the interview for a minimum of 10 years after the successful completion of the PhD *Viva* as per Lancaster University requirements.

9. I consent to take part in the above study.

Name of Participant_____ **Signature** _____ **Date** _____

Name of Researcher _____**Signature** _____**Date** _____

Appendix D

The List of Interviewees

University	Typology	Interviewees	Position
A	The transnational university	R2	Dean
		R8	Professor
		R10	Dean
		R12	Head of School
		R18	Senior Manager
B	The internationalised university	R1	Vice Chancellor
		R4	Provost
		R6	Centre Director
		R9	Senior Manager
		R11	Senior Executive Director
		R14	Deputy Dean
		R19	Director
C	The localised university	R3	Head of Department
		R16	Senior Lecturer
		R20	Professor
		R5	Senior Manager
D	The comprehensive university	R7	Associate Dean
		R13	Senior Lecturer
		R15	Deputy Vice-Chancellor
		R17	Dean