

CHAPTER 8

QUALITY MATTERS

BACKGROUND

8.1 Post-secondary education is resource intensive and demands substantial investment from users as well as the Government through the provision of financial support and land. A sound, robust and transparent quality assurance mechanism is essential so that the society can be sure of the nature of the product. While philosophies vary around the globe, we do not believe that “*caveat emptor*” can be allowed to freely apply where so much public and personal expenditure and sacrifice are involved. There is a balance to be struck here. Institutions at the post-secondary and higher level need a marked degree of freedom to operate successfully and distinguish themselves, but that should be within the framework of a sound and trusted quality assurance system.

8.2 Of growing importance is also the need, and high desirability from a societal perspective, for increasing opportunities and pathways to articulate, particularly “vertically” between the various post-secondary providers. This is also associated with the drive to promote and facilitate lifelong learning. The introduction of qualifications frameworks by many governments around the world, including the Government, is a sign of the importance of this.

8.3 Finally, the internationalisation and globalisation of higher education, and the Government’s policy initiative to develop Hong Kong into an education hub, have underlined an urgent need to establish robust frameworks for quality assurance that can help maintain and enhance the international competitiveness of our institutions and the entire post-secondary education sector.

CURRENT ARRANGEMENTS

8.4 The concept of external quality assurance through peer reviews is not novel to Hong Kong’s post-secondary education sector. The Hong Kong Council for Academic Accreditation was established in 1990 to provide advice on academic qualifications and standards, with much of its initial work concerning the validation of degree programmes. It became the Hong Kong Council for Accreditation of Academic and Vocational Qualifications

(HKCAAVQ) in 2007. The UGC has long performed an important role in assuring the quality and value for money of higher education provision in UGC-funded institutions through the conduct of various reviews, such as the Management Review (1998-1999), the Teaching and Learning Quality Process Reviews (1995-1997 and 2001-2003), and the Performance and Role-related Funding Scheme (2004).

8.5 A more significant development in the UGC sector was the establishment of the Quality Assurance Council in 2007 as a semi-autonomous body under the UGC to oversee, amongst other things, the conduct of quality audits of all first degree and above programmes offered by UGC-funded institutions regardless of the source of funding. Though the first round of audits of the eight institutions has yet to be completed, the six audit reports that have been published so far have helped the institutions concerned to reflect on whether their internal quality assurance mechanisms have been fit for purpose, and to identify areas for improvement. It is important to note that UGC-funded institutions enjoy self-accrediting status and thus the audit does not lead to formal external validation or accreditation.

8.6 The quality of the self-financing sub-degree programmes offered by the UGC-funded institutions is assured by the Joint Quality Review Committee, which is an independent corporate quality assurance body established in August 2005 by the Heads of Universities Committee [E34]. It provides for peer reviews of the quality assurance processes of self-financing sub-degree programmes offered through continuing education units and community colleges, or other departments of UGC-funded institutions. The Joint Quality Review Committee does not publish the reviews it has undertaken. Apart from reviewing the quality assurance processes and promoting good practice, the Committee also advises institutions on the classification of these sub-degree programmes into the Qualifications Framework, details of which will be discussed in paragraph 8.18 below. Again, the programmes offered are self-accredited by the (UGC-funded) institution involved.

8.7 The programmes offered by all non-UGC funded local post-secondary institutions are accredited by the HKCAAVQ. The work ranges from vocational qualifications and sub-degrees (including those of the Vocational Training Council) to undergraduate degrees and above. The HKCAAVQ is a statutory body and has been appointed by the Secretary for Education as the Accreditation Authority and Qualifications Register Authority under the Qualifications Framework. As an accreditation body, the HKCAAVQ is responsible for, amongst other matters, assessing whether a college has the proper academic and institutional structures in place that befit the status of a university. Areas covered in the accreditation process include the

institution's past performance, governance structure, academic standard and quality, teaching staff, quality assurance framework and financial position. Apart from accrediting local programmes, the HKCAAVQ also assesses the courses offered by non-local institutions.

8.8 With the Government's initiative to encourage the establishment of private universities, it is expected that the HKCAAVQ will have an increasingly important role to play, because any post-secondary college wanting to seek the Government's approval to register as a university will need to acquire, amongst other things, programme area accreditation status from the HKCAAVQ. An institution with such status may develop and offer learning programmes and award qualifications within the scope of that programme area, without prior accreditation by the HKCAAVQ. The programme area accreditation status is subject to external review, usually at five-yearly intervals. The former Open Learning Institute and Hong Kong Shue Yan College underwent this process before being granted "university" status by the Government in 1996 and 2006 respectively. The HKCAAVQ does not publish its programme area accreditation reviews – it only announces that the institutions in question have been awarded the relevant status.

LIMITATIONS OF THE EXISTING SYSTEM

8.9 The current division of responsibilities among the various quality assurance bodies is largely the result of evolution. In the past decade, the rapid expansion of the post-secondary education sector in terms of size and diversity called for new initiatives, and new quality assurance bodies were established to address new concerns. While these initiatives served Hong Kong well in the past, it is now appropriate to re-think whether a unified quality assurance body for the entire post-secondary sector would make it easier to develop a clear and coherent framework for quality assurance and enhancement, and give the Qualifications Framework a more coherent background.

8.10 As argued in Chapter 3, it is both necessary and desirable to conceive of the different parts of the post-secondary sector as functioning as one cohesive system. This enables policy makers to examine different parts of the system as part of the totality, with a view to developing more coherence and mobility within the entire sector. In this context, the existing quality assurance system, with different players each responsible for certain parts of the system, may have become too fragmented to remain fit for its purpose.

8.11 The present arrangements cannot provide effective support for students to navigate and understand such a complex quality assurance system

and to make well-informed choices. For example, it is difficult for a prospective sub-degree student to compare the quality of a self-financing sub-degree programme provided by a UGC-funded institution and those offered by a private institution or the Institute of Vocational Education, as these three sub-degree programmes are quality-assured by two different bodies. The same problem applies at the undergraduate level. In terms of articulation pathways, a sub-degree graduate has to check with individual institutions about the possibility of or requirements for articulation. Reference to, and reliance on, information provided by the various quality assurance agencies is almost unheard of. The present loose arrangements also inhibit vigorous implementation of the Qualifications Framework in Hong Kong.

8.12 The extent of articulation and student mobility is another concern. While the Government and the UGC have done well to provide 2,000 articulation places each year at present, that represents only about 10% of the graduating sub-degree cohort. The recent announcement in the Chief Executive's 2010 Policy Address of a phased increase of 2,000 more articulation places a year, is a welcome move to allow more of the burgeoning number of sub-degree graduates to articulate. But the demand will still not be met. In addition, there is little significant student mobility within the post-secondary sector, which may be explained by the lack of a unified quality assurance system and the absence of credit transfer arrangements.

8.13 As for education providers, there are concerns about possible inconsistencies in quality assurance practices being applied to different institutions. One practical issue is the greater speed at which UGC-funded institutions can offer new programmes to meet changing demand compared to other institutions, which need to go through the HKCAAVQ process. The differences in regulatory frameworks for different categories of providers may also distort their decisions on whether and how they should participate in the Hong Kong post-secondary education sector. This is particularly relevant to the continuing education units and community colleges of UGC-funded institutions. Changes in their relationships with the institutions proper bring about changes in their external quality assurance mechanisms. This complication may prevent the institutions from making the most rational decisions when they re-consider the relationships between the institutions proper and their self-financing arms.

Similarities and Differences between UGC-funded and Other Institutions

8.14 It is worth spending some time considering whether there *are* material differences between UGC-funded institutions and the increasing

number of other degree-awarding institutions. It must be acknowledged that there are big differences in the level of funding available to UGC-funded institutions (and the Hong Kong Academy for Performing Arts) compared with the rest of the system. Being in receipt of large amounts of public funds in addition to tuition fees should clearly make it far easier for publicly funded providers to create the necessary conditions of high and continuing quality. There is a legitimate presumption that such institutions should be capable of maintaining high quality without formal re-accreditation. Yet it is worth noting that several UGC-funded institutions were subject to HKCAAVQ accreditation (or its various predecessors) in their early years before obtaining self-accrediting status from the Government.

8.15 It is also reasonable to have concerns that self-financing institutions – particularly “young” self-financing institutions – may not have the necessary conditions from the outset to develop and maintain a high quality environment. Their funding, staffing, governance structures, *etc.* may all need work – indeed all of the areas looked at by the HKCAAVQ. Yet as such institutions mature and gain credibility and stature, they should be trusted to maintain their quality independently. Again, this is now the position taken by the HKCAAVQ.

8.16 Hence, in time, it would seem reasonable for the methods employed by the Quality Assurance Council, the Joint Quality Review Committee and the HKCAAVQ to converge. This convergence may be facilitated by the establishment of a single quality assurance body as detailed in paragraph 8.23 below.

8.17 A very obvious remaining difference lies in whether or not an institution has been granted self-accrediting status by the Government. This has practical implications (as set out in paragraph 8.13) and status implications. However, the difference may be more apparent than real. The self-accrediting status of UGC-funded institutions is neither perpetual nor unconditional. In granting such status, the Government decided that the status should be subject to regular external reviews. This was the reason for the development of the Teaching and Learning Quality Process Reviews. In other words, both UGC-funded institutions and institutions with Programme Area Accreditation status from the HKCAAVQ are subject to regular external reviews.

Qualifications Framework and CATS

8.18 To provide clear progression pathways, the Government announced in 2004 the introduction of the Qualifications Framework, which was formally

implemented in 2008. The aim of establishing the Framework was to define clearly the standards of different qualifications, ensure their quality and indicate the articulation ladders between different levels of qualifications. The Qualifications Framework should facilitate articulation amongst academic, vocational and continuing education through the establishment of a comprehensive network of learning pathways, thereby helping individuals to pursue their goals according to their own roadmaps. The integrity of the Qualifications Framework is underpinned by an associated quality assurance mechanism provided by the HKCAAVQ, which is the designated Accreditation Authority. The Qualifications Register has also been set up to provide a web-based database of qualifications recognised under the Qualifications Framework. The purpose is to facilitate employers in identifying training opportunities, and for students to map out their learning pathways. It was hoped and expected that the development of the Qualifications Framework would facilitate credit accumulation and transfer arrangements between sectors and training providers by providing a unified platform and common benchmarks.

8.19 Despite the Qualifications Framework and Qualifications Register initiatives, a Credit Accumulation and Transfer System (CATS) across the entire post-secondary system has not been developed. Even at the institutional level, there is no clear policy on articulation arrangements. Admission of students to senior years in UGC-funded institutions varies from one department to another, and most of the applications for places in the senior years are handled on a case-by-case basis. Coherence and student mobility between the different parts of the post-secondary education system have yet to take shape.

8.20 It is appropriate here to reflect on why a CATS has not become more established, as it was one of the recommendations in the 2002 Review Report. Chapter 6 of that Report set out a clear vision of how a CATS could and should develop. However, the CATS actually conceived [E35] and taken forward after the 2002 Review Report was one centred on the UGC sector (alone), built around “money following the student” and viewed as a funding tool. When “money following the student” fell away, the remaining scheme was largely “horizontal” in its objectives – to allow students at one UGC-funded institution to take credits at and have credits acknowledged from other UGC-funded institutions. No real effort was made to establish a cross-sectoral “vertical” CATS, as the authors envisaged for the future, and the idea withered. As explained in paragraph 8.28 below, we believe that focusing on a “horizontal” scheme was a fundamental flaw.

8.21 We expect that the problem associated with the lack of a unified quality regulator will become more apparent following the expansion of the

private higher education sector as a result of Government's policy to encourage the growth of private universities. As discussed in paragraph 8.8, private institutions need to be accredited by the HKCAAVQ before they seek the Government's approval to register as universities. The HKCAAVQ is also responsible for the regular external reviews of these private universities, the number of which stands at two but may increase significantly in future. Therefore, under the current regulatory framework, more universities will be subject to HKCAAVQ reviews, while the eight UGC-funded institutions will continue to be quality assured by the Quality Assurance Council. With the anticipated expansion of the private university sector, the problem of asymmetry in regulation between the UGC-funded and non-UGC-funded sectors will become more apparent.

8.22 The lack of a unified quality assurance body may also undermine Hong Kong's engagement in regional and international activities in such areas as information-sharing, the conclusion of agreements or establishment of cooperation arrangements with overseas counterparts or international quality assurance bodies, and the acceptance or recognition of overseas qualifications and credits, *etc.* While it may be technically possible for the three quality assurance bodies to participate in international activities on their own, it would be neither efficient nor desirable for the three different bodies with different quality assurance methodologies and responsibilities to interact or negotiate with their overseas counterparts and international quality assurance bodies. This is not conducive to helping the Hong Kong post-secondary education sector play a more significant role in key international quality assurance issues.

NEED FOR A UNIFIED QUALITY ASSURANCE BODY AND CATS

8.23 With the above considerations in mind, we feel strongly the need for a unified body to oversee the quality assurance of the programmes and institutions in the entire post-secondary sector. The body should help rationalise the functions currently performed by different quality assurance bodies, to achieve regulatory consistency in quality assurance amidst the anticipated growth in the private sector. At the more macro level, a single regulatory body will provide a single locus for (1) the development and execution of quality assurance policies; (2) underpinning and reinforcing the impact of the Qualifications Framework; (3) participation in international activities; and (4) the development of a comprehensive communication strategy to turn the work of the body into useful and practical information for stakeholders' reference. The body should have sufficient autonomy and financial independence to allow it to operate effectively and be free from any possible or perceived conflicts of interest. To enhance transparency and the

monitoring of institutional performance, the new body may engage in the compilation of sector-wide data and monitor performance in areas such as student selection, entry and exit standards, and graduate employment, *etc.* Such data will provide valuable information for students to make well-informed choices, and for providers to plan and improve their education efforts.

Recommendation 35:

There should be a single quality assurance body for the whole post-secondary system.

8.24 In the longer run, the unified quality assurance body should go beyond the amalgamation of existing quality assurance bodies under one roof, and seek to:

- (a) develop a more integrated regulatory approach that is easier for students to navigate to improve pathways;
- (b) promote interconnection and partnership amongst different providers; and
- (c) expand the work of the body to address the public's concern about the standard of educational offerings.

A More Integrated Approach to Quality Assurance

8.25 The new body should review the approaches and methodologies adopted by the HKCAAVQ, Joint Quality Review Committee and the Quality Assurance Council, and consider how they may be rationalised. Some may argue that institutions with or without self-accrediting status (UGC-funded and non-UGC-funded institutions, respectively) should not be subject to the same type of external scrutiny. However, it is not unreasonable to subject institutions offering the same level of programmes (for instance, sub-degree or undergraduate programmes) to the same quality assurance mechanisms – provided that they are employed with due regard to maturity and proven competence/quality of the institution. Moreover, as argued in Chapter 6, one of the roles of UGC-funded institutions is to provide benchmark high quality teaching and learning to raise the standards of the entire system. This mission of the publicly funded sector will not be achievable if UGC-funded and non-UGC-funded institutions continue to be subject to fundamentally different quality assurance mechanisms.

Recommendation 36:

The single body should integrate the methods and approaches of quality assessment, validation and accreditation across the system.

Partnership amongst Providers and a CATS

8.26 The most apparent benefit of developing partnerships amongst providers would be the development of a more comprehensive and “vertical” CATS. With a CATS, learners can systematically accumulate the credits of learning and training gained from various courses with a view to converting the accumulated credits into a recognised qualification. We believe that the acceptance and transfer of credits would have a far better chance of working if both the sending institution and the receiving institution were quality assured by the same body. That body could also facilitate the CATS by supporting policies that promote careful consideration of transfer requests from other institutions.

8.27 As discussed in paragraphs 8.19 to 8.20, we have yet to see the emergence of a comprehensive CATS. We consider it imperative to create infrastructure that is favourable to the development of a CATS for the following reasons.

- To provide a more flexible and transparent system for students to progress through award courses with maximum efficiency by recognising that students may attain the objectives of components of the courses at different institutions and at different times.
- To facilitate the movement of students between institutions and between courses of various levels.
- To assist in the efficient use of educational resources by minimising duplication in training, and allowing students to build on the credits obtained in earlier years, at the sub-degree level for instance, to obtain a higher-level qualification.
- Cost reduction: a CATS will make it possible for students to complete certain courses at institutions that are less generously provided for than universities, as long as the necessary quality assurance is in place.

8.28 It is worth noting that in contemplating the idea of establishing a comprehensive CATS, we are focusing on the “vertical movement” of students, i.e. the articulation of sub-degree graduates to undergraduate programmes (and indeed at all levels of the Qualifications Framework), which may take place within the same institution or across different institutions. The aim is to systemise and make more transparent the articulation arrangements that are already in place but on a more *ad hoc* basis. Overseas evidence suggests that “vertical” CATS schemes are far more valuable and valued by students and institutions than “horizontal” CATS schemes. Thus, in trying to implement a successful CATS – which overseas experience shows is extremely difficult – it is much more productive to focus on the vertical. We are also aware of the distinction between the acceptance of credits and admission of students, which is similar to the distinction between a university’s minimum entry requirements and the actual admission of students. In other words, while an institution’s decision to accept certain credits can assist students in choosing appropriate courses, the completion of these courses by the students does not create an obligation for the institution to admit those students.

8.29 We recognise that the development of a CATS in the past few years has not been significant. However, with the appropriate infrastructure, such as the establishment of a unified quality assurance body for the entire post-secondary sector, it would be possible to develop a more comprehensive CATS to facilitate articulation in view of the following new developments.

- Implementation of “3+3+4”: Under the new four-year curriculum, universities or other degree-awarding institutions are expected to devote more attention to general or whole person education. It is not unreasonable to expect considerable commonality in such courses offered by different post-secondary institutions. That will make it possible for sub-degree providers to offer preparation for the more discipline-specific programmes at the degree level.
- Establishment of private universities: The senior year places currently provided by UGC-funded institutions are limited, and hence only about 10% of sub-degree graduates are able to articulate into UGC-funded institutions (with the additional 2,000 places the percentage will increase to about 20%). Given the current relatively small population of such students, the demand for a comprehensive CATS is limited. However, with the increase in publicly funded senior year places and the expansion of private universities, we can reasonably expect a significant increase in the availability of articulation places, which should justify the

development of a more comprehensive and structured CATS to facilitate student progression.

8.30 We are under no illusion that the development of a CATS will be easy and straightforward. It will take real effort by all of the players involved. Some incentive funding (to deploy institutional staff to work on the matter) may be necessary. Yet if Hong Kong can create a successful CATS, it will greatly benefit the general public.

Recommendation 37:

The development of a Credit Accumulation and Transfer System for the whole system requires it to be appropriate for articulation between different levels and across different institutions at the same level.

Recommendation 38:

There should be greater transparency and public disclosure of quality assessment so that the public may make better-informed choices over time.

Standards of Education Offerings

8.31 In paragraph 8.24(c), we observed that the audits conducted by the Quality Assurance Council currently focus on the fitness for purpose of the institutions' internal quality assurance mechanisms. The light-touch approach does not, and is not intended to, provide external scrutiny of individual programmes, and neither does it define of set benchmarks. There are concerns that a quality assurance framework focusing primarily on inputs and processes may not give sufficient weight to assuring and demonstrating outcomes. The concept of looking at and assuring standards is not developed, as the notion of having externally imposed standards on higher education institutions is vigorously resisted by institutions as treating university education as a simple commodity.

8.32 However, discussing and evaluating standards need not involve straightjacketing institutions. Indeed, defining outcomes is a form of pursuing standards. It may thus be appropriate for the quality assurance framework to evaluate or review academic standards by describing the level of achievement that a student has to reach to gain an academic award, defining performance indicators in relation to teaching and learning outcomes, and reviewing how well

the learning opportunities available to students help them to achieve their awards. This would help inform the public about whether an institution is providing higher education of an acceptable quality, and about the academic standards of its awards. Moreover, quality assurance bodies in other parts of world, such as in the UK and Australia, are moving towards the assessment of standards and outcomes. For the Hong Kong post-secondary education sector to remain globally competitive, the new quality assurance body/mechanism should encompass the concepts of standards, quality assurance and accreditation (or validation).