



香港學術及職業資歷評審局
Hong Kong Council for Accreditation of
Academic & Vocational Qualifications

**Hong Kong Council for Accreditation of
Academic and Vocational Qualifications
(HKCAAVQ)**

**EXTERNAL REVIEW OF COMPLIANCE WITH
THE GOOD PRACTICE GUIDELINES OF THE
INTERNATIONAL NETWORK FOR QUALITY
ASSURANCE AGENCIES IN HIGHER EDUCATION
(INQAAHE)**

July 2015

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Foreword

Hong Kong has three bodies overseeing the quality of the post-secondary education sector. The *Quality Assurance Committee* (QAC), a semi-autonomous non-statutory body under the *University Grants Committee* (UGC), conducts quality audits of UGC-funded institutions and their programmes, at undergraduate levels and above, regardless of sources of funding. A second body, the Joint Quality Review Committee (JQRC) conducts peer review for self-financing sub-degree programmes offered by the continuing education units, community colleges, and other departments / divisions of the eight institutions under the aegis of the UGC.

The third of the quality assurance agencies is the *Hong Kong Council for Accreditation of Academic and Vocational Qualifications* (HKCAAVQ) which is the subject of this external review against the Good Practice Guidelines of the *International Network for Quality Assurance Agencies in Higher Education* (INQAAHE).

HKCAAVQ was formerly the *Hong Kong Council for Academic Accreditation* (HKCAA) and was established in 1990 as an independent statutory body to provide authoritative advice on academic standards of degree programmes in higher education institutions in Hong Kong. In 2007, the Council was reconstituted under the Hong Kong Council for Accreditation of Academic and Vocational Qualifications Ordinance (Chapter 1150) and now has responsibilities spanning the vocational sector as well as statutory roles as both *Accreditation Authority* and *Qualifications Register Authority* under the *Hong Kong Qualifications Framework under the Accreditation of Academic and Vocational Qualifications Ordinance (Chapter 592)*.

The HKCAAVQ provides quality assurance and assessment services to education and training institutions, course providers and to the general public. In addition to its statutory roles, the HKCAAVQ also provides advisory and consultancy services in education qualifications and standards to government bureaux and other organisations in Hong Kong and the Asia-Pacific region.

Background to the Review

The Hong Kong Council for Academic Accreditation (HKCAA) was established in 1990 as an independent statutory body to perform academic accreditation for non-university institutions funded by the then University and Polytechnics Grants Committee. In 2007, HKCAA was re-constituted as the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ or, the agency), continuing as a statutory Accreditation Authority, but with an expanded mandate and responsible for academic accreditation for non-university institutions, or Operators, working mainly at degree level but latterly also concerned with sub-degree qualifications as well as vocational operators.

In addition to developing and implementing standards leading to the mandated accreditation of academic and vocational qualifications to underpin the Qualifications Framework (QF) the agency, on behalf of the Education Bureau (EDB), determines the procedure for entry into, or removal, from the Hong Kong Qualifications Register (QR).

Optional services provided by HKCAAVQ include Institutional Reviews (IR) for post-secondary institutions seeking registration under Cap 320 which if the outcome is successful, may be used as part of an application for approval to the Permanent Secretary for Education. A second optional accreditation service provided by HKCAAVQ is aimed at those non-local programmes (NLPs) registered under/exempted from registration under the *Non-local Higher and Professional Education (Regulation) Ordinance* (Cap 493). NLPs who opt to undertake this accreditation process may gain recognition under the QF with benefits that include their students becoming eligible for government financial assistance.

HKCAAVQ aspires to become a *locally, nationally, regionally and globally recognised QA agency*¹. To this end, the agency decided to commission an external review against a set of guidelines developed by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) in order to benchmark its policies, processes and practices against international standards.

INQAAHE is a world-wide association of over 200 organisations active in the theory and practice of quality assurance in higher education. The professional practices that INQAAHE believes should be embedded in all quality agencies are set out in the Guidelines of Good Practice in Quality Assurance (commonly referred to as GGP) which are the collective work of QA agencies from over 65 countries.

¹ Hong Kong Council for Accreditation of Academic and Vocational Qualifications. Self-Review Report to the INQAAHE Panel, March 2015

In cases where a member agency has been found to be comprehensively adhering to the Guidelines, INQAAHE will, at the member's request, record this fact on the INQAAHE website. This listing is the goal being sought by HKCAAVQ through the External Review.

Terms of Reference

An external Panel of local and international experts, and an independent Secretary, were appointed by the Council of the HKCAAVQ following endorsement of Panel membership by INQAAHE. (Appendix A)

The terms of reference for the review were:

- (a) To conduct a review of the HKCAAVQ's higher education operations against the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) Guidelines of Good Practice in Quality Assurance (GQP) to assess if HKCAAVQ operates in alignment with the GQP ; and
- (b) To prepare a report on the Panel's views, including commendations and recommendations, in relation to (a) above to be used for HKCAAVQ's application to INQAAHE for GQP Alignment.

The Panel was required to conduct an *adherence review* against the 12 Good Practice Guidelines and benchmark the HKCAAVQ's accreditation work in higher education against international standards. In addition to determining if the agency *fully, substantially, partially, or fails to meet each of the Guidelines* the Panel needed to ensure that several *core* Guidelines were met including: Guidelines 2 (Resources); 3 (Quality Assurance of the agency); 4 (Public reporting); 5 (the Relationship between the agency and higher education institutions); 6 (Institutional or programmatic performance); and 9 (Decisions by the agency)².

The review focused only on the agency's academic accreditation activities for higher education which are a subset of HKCAAVQ's activities; it was not concerned with services and activities in areas such as vocational accreditation or qualifications assessment.

In preparation for the external review, HKCAAVQ conducted a self-review (SR) using the *Approach-Deployment-Results-Improvement* (ADRI) model as an analytical framework. This task involved staff across the agency including from Academic Accreditation and Audit (AAA); Research, Consultancy and Training (RCT); Corporate Services; and the Council Secretary. The report of the self-review was

² International Network for Quality Assurance Agencies in Higher Education. Guidelines of Good Practice in Quality Assurance. 2007

approved by the HKCAAVQ Council at its March 2015 meeting and forwarded to the Panel.

The initial phase of the review required each Panel member to independently analyse the SR, including the comprehensive set of appendices, and report their initial comments to the Secretary as a basis for requests for additional information and planning the site visit. The site visit was held from 8-11 June 2015 with the first day reserved for Panel deliberations and planning prior to the conduct of interviews with stakeholders on the succeeding days. Approximately 70 internal and external stakeholders were interviewed. Requested documents, additional to those already provided directly to the Panel members before the site visit in response to their requests, were available for examination on site.

The site visit proceedings concluded with consideration of all sources of evidence examined during the review process and the framing of a determination of the extent to which HKCAAVQ meets each of the INQAAHE GGP. The Panel also framed a number of commendations and a number of recommendations for the improvement of good practice at the agency.

Acknowledgements

The Panel wishes to acknowledge, with gratitude, the support and assistance from HKCAAVQ in the conduct of the external review. The staff of the agency were exemplary in the manner in which they provided background briefings papers for the Panel; provided the necessary documents and other sources of evidence for the review task and managed the site visit. The Panel is also very grateful to the large number of internal and external stakeholders who met the Panel in person, or through teleconferences, and shared their considered views and observations of HKCAAVQ and its higher education accreditation processes. The task of the review Panel was greatly facilitated by the open and frank discussions it had with these stakeholders.

The Guidelines

1: Governance

The EQAA has a written mission statement or set of objectives that takes into account the cultural and historical context of the EQAA. The statement explicitly provides that external quality assurance is a major activity of EQAA, and it requires a systematic approach to achieving the mission or objectives of EQAA. There is evidence that the statement of objectives is implemented pursuant to a practical management plan that is linked to EQAA resources. The ownership and governance structure is appropriate for the objectives of the agency.

The Hong Kong Council for Accreditation of Academic & Vocational Qualifications (HKCAAVQ) is an independent statutory body established under Cap 1150 and it is appointed as the Accreditation Authority and Qualifications Register Authority under the Hong Kong Qualifications Framework under Cap 592.

Governance

HKCAAVQ is governed by a Council that is responsible for setting policies and guidelines for operation of the agency and the discharge of its responsibilities. The Council members, including the Chairman, are appointed in their personal capacities by the Chief Executive of Hong Kong and normally serve no more than a total of six years. The Permanent Secretary for Education (or his/her representative), and the Executive Director of the agency, are ex officio members.

The Council has three standing committees, with each Council member serving on at least one of these committees, plus a standing review committee required by legislation, and ad hoc working groups established as required.

There is an induction process for Council members and frequent informal interactions through which members are kept up to date. The Council's Code of Conduct was reviewed in 2012 and the Panel noted a strong emphasis on financial probity and conflict of interest although rather less is included on roles and responsibilities

Council meetings are held twice annually and in addition locally-based members participate twice per year in the Local Members' Meetings (LLM) to informally discuss ideas and proposals. There are currently 14 local and four overseas members out of the maximum allowable 21 members of Council. The Panel spoke with local and international members of Council and was impressed by the level of commitment to participation in the business of Council. The local members carry a

relatively heavy load but there is also substantial input from international members who attend two meetings per year in Hong Kong and participate in regular teleconferences of Council committees. The international members considered that their views are taken seriously and their input valued.

The Panel learned of a planned review of governance and suggests that in seeking to improve the workload of Council (which is currently heavily involved in management of staffing and finance) it be re-focused on core accreditation business and monitoring the agency's performance.

Vision, Mission and Strategic Plan

The Council's current Vision and Mission Statements were formulated in 2009 along with five Strategic Objectives and take account of historical and cultural contexts. A three year Strategic Plan (2012-2015) builds on the Vision and Mission with implementation of the Plan monitored through annual progress reports from the Secretariat to the Council. While these statements do not explicitly state that the agency's role is external quality assurance, this is implicit, and the statements are clear and practical and give a good foundation for action by the agency.

Work has begun on a new strategic plan for the next four years with the time frame of the new plan designed to be in alignment with the terms of office of Council members. It will be supplemented by both annual and mid-term reviews to ensure timely attention to external factors internationally, in the PRC generally and in Hong Kong.

The progress reports for the 2012-2015 Strategic Plan reference the KPIs identified in the Strategic Plan, group areas of similar activity in relation to each Objective and demonstrate progress through a *traffic light* system. The Panel considered that there was room for a sharper focus in the KPIs and annual progress reports of functional areas and encourages the Council to ensure that the KPIs associated with the new Plan are unambiguously set to expect a high level of organisational performance and provide data that allows critical analysis of the agency's performance against established targets.

Secretariat

Oversight of the Secretariat is the responsibility of the Executive Director (ED), assisted by two Deputy Executive Directors (DED) one of whom oversees the higher education academic accreditation operations. Support is provided by a corporate services team and the Secretariat operates through an internal committee structure.

The Secretariat is the executive arm of Council and operates under a schedule of delegations from Council in preparing guidelines and implementation strategies. The

Secretariat flagged to the Panel the intention to seek reconsideration of the current delegations to increase operational efficiency. The Panel understands that there are legislative constraints on what may be delegated but supports the intention to review delegations and urges Council to spell out not simply the delegations but also to be explicit about the powers it reserves for itself.

The Panel heard about constraints and requirements placed on the Secretariat in relation to matters that would in most organisational circumstances be handled by management but are required under the agency's legislation to be sent for Council approval (such as approval of all staff appointments, regardless of level). While some interviewees considered that the agency should take the approach of similar HK statutory agencies and find pragmatic solutions without recourse to changes in legislation, the Panel formed the view that these options had been appropriately explored by the Secretariat using external advice before being discarded.

The Panel concluded that HKCAAVQ has an appropriate ownership arrangement, a clear mission statement with associated strategic planning and monitoring approaches and that the agency fully meets the Guideline.

- **Commendation** The Panel commends HKCAAVQ for the clarity of the Vision, Mission and Objectives statements and for the way these have been put into practice through the agency's strategic planning processes.
- **Commendation** The Panel commends HKCAAVQ for the high level of commitment to the goals of the agency demonstrated by the Council members and the Secretariat as a whole.
- **Recommendation** The Panel recommends that the Council of HKCAAVQ in the planned review of its schedule of delegations make explicit the powers which it reserves for itself as the governing body.

2: Resources

The EQAA has adequate and accessible human and financial resources to conduct external evaluation effectively and efficiently in accordance with its mission statement and its methodological approach. The EQAA's resources are also adequate for the appropriate development of the agency.

Financial

HKCAAVQ is mainly financed through income from fees for academic and vocational accreditation services and any advisory, consultancy or other services it is asked to provide. Provision of academic accreditation services contributes over 30% of total revenue with fees set on the principle that they should cover the direct costs, salary costs and overheads for the services provided. There is some cross-subsidisation of smaller Operators through the use of discounted fees to support them to achieve accreditation. A number of Operators expressed concern about what they considered as a lack of transparency in the way that fees and discount levels are set.

Government funds made available to the agency are ear-marked for specific projects, such as the move to the premises in Chai Wan. In the absence of recurrent government funding the agency faces challenges in balancing its budget so it can continue to discharge its statutory roles and functions.

The agency had an operating deficit in 2013/14 owing to one-off factors but is expecting to benefit from the re-location to Chai Wan (because of the government-subsidised rent). The Panel learned that Council policy requires that reserve cash and short term deposits be kept at a level that is sufficient to meet four months of normal operational expenditure. The Panel examined the agency financial statements and noted the impact of growth and decline in demand for services over seven years and the use of reserves to achieve a smoothing of deficits over the period as a whole

It was noted that the agency, while it is expected to be largely self-financing is, nonetheless, subject to requirements and government procedures through the Education Bureau (EDB) that are not usually associated with a business or self-financing organisation. For example, HKCAAVQ is required to seek permission from the Secretary for Education to raise service fee levels. While the level of fees had not kept pace with costs over a number of years, an agreement has been reached for a one-off increase that will to some extent re-balance the level, along with a strategy for appropriate future annual increases.

The Panel was impressed with the recent work undertaken to explore a range of alternative business models for HKCAAVQ and the efforts to extend fee-based consulting activities as well as the deftness with which finances had been managed through some difficult years. But the Panel was concerned, on the evidence provided to it (including a review of government funding models for similar agencies around the world) about the longer term financial ability of the agency to carry out its mandated responsibilities. The agency has many constraints on its freedom of action, given that it is a statutory body. In addition, there are the expected impacts on the private higher education sector from environmental factors such as the declining Hong Kong student population. These challenges will need to be managed carefully by the agency to ensure its ongoing viability.

Human resources

The senior management team of ED and the two DEDs are supported by several committees. The AAA area which is responsible for higher education was established following a re-organisation in 2012 and manages academic accreditation; quality audits/institutional reviews; assessment of non-local courses; and assessment of non-Specification of Competency Standards based Continuing Education Fund (CEF) courses.

The Human Resources (HR) team conducts an induction briefing for all new appointees. Orientation programmes are provided each year for new appointees and give more in-depth learning about the HKCAAVQ through mentoring, a comprehensive staff development programme and opportunities to engage in further studies including in quality assurance.

In the AAA area, the Registrars act as Case Officers in accreditation exercises and serve as secretary-cum-member on accreditation panels. The Case Officer is responsible for guiding all stages of an accreditation exercise including liaison with the institution and providing advice to chairs and panel members; preparing all documentation and drafting the accreditation report for submission to the Council via delegated authority to the DED (Academic).

An Assistant Registrar assists the Case Officer with various tasks and experienced Assistant Registrars may also be assigned to oversee accreditation exercises in the role of Case Officers as appropriate. Executive Officers and Executive Assistants maintain the operation of the General Office of AAA, and provide a range of logistical support to accreditation exercises.

The Panel learned that there had been a high staff turnover rate in 2007-2008 which was attributed to younger, less experienced junior staff seeking new opportunities. In addition, the 2012 office relocation to Chai Wan was also said to be a factor in staff turnover but this is no longer considered a major issue. The pressure remains,

nonetheless, to ensure that the agency continues to take all necessary steps for maintenance of the quality and consistency of the Registrar and Assistant Registrar group through careful attention to entry requirements; support and training; remuneration levels; and general conditions in the marketplace. In discussions with external stakeholders, the Panel was told that there had been a welcome increase in recent years in the level of openness and customer focus among the staff of the agency. At the same time there was a suggestion that there was need for more understanding of the priorities and constraints in business and industry to balance the education expertise of Case Officers and colleagues although the primacy of knowledge of education and customer focus were acknowledged.

IT resources

An Information Technology (IT) team provides desktop support, infrastructure support, and related technical and policy advice. The first phase of a new knowledge management system, the Quality Management System (QMS), which went live in early 2015, involves an upgrade of IT infrastructure with a central database system integrating the Specialist and Panel Member Database (SPMD), Management Information System (MIS) and offline documents into a single platform. It is expected to offer the opportunity to streamline and shorten the accreditation process and is already providing opportunities for data driven decision-making.

The Panel concluded that HKCAAVQ has the necessary human and financial resources to discharge its accreditation responsibilities and that the agency substantially meets the Guideline.

- **Commendation** The Panel commends HKCAAVQ for its handling of financial and external constraints during a challenging period while at the same time maintaining the quality of operations and services to stakeholders.
- **Recommendation** The Panel recommends that HKCAAVQ vigorously pursue its exploration of alternative business models for the agency and continue to expand its revenue-based services such as consulting.
- **Recommendation** The Panel recommends that HKCAAVQ maintain a strong focus on maintaining the quality and continuity of its Registrar and Assistant Registrar group to ensure continuing consistency of approach in the work of the agency.

3: Quality Assurance of the Agency

The EQAA has a system of continuous quality assurance of its own activities that emphasises flexibility in response to the changing nature of higher education, the effectiveness of its operations, and its contribution towards the achievement of its objectives.

The EQAA conducts internal self-review of its own activities, including consideration of its own effects and value. The review includes data and analysis.

The EQAA is subject to external reviews at regular intervals. There is evidence that any required actions are implemented and disclosed.

The agency's own framework for quality assurance of its activities as an external quality assurance agency is based on its Vision and Mission statements and a Strategic Plan with associated KPIs for monitoring progress against objectives. Each functional area develops a business plan with more specific KPIs to put the strategic objectives into effect at the different levels of the organisation. An annual progress report is submitted to Council to allow it to track the quality of the agency's operations and progress against HKCAAVQ objectives.

In addition to the annual cycle of review of Strategic Objectives, the agency conducts self-reviews from time to time such as comprehensive review (2011–2013) of the Four-stage QA Process which constitutes the framework for accreditation by the agency.

Notwithstanding the recent review of the Four-stage Process and the introduction of developmental stages into accreditation processes, the Panel's attention was drawn to stakeholder perceptions of a rigidity in the agency's methodology, and it wondered whether a more differentiated approach, reflective of Operator circumstances and more attuned to the sector's increasingly commercial nature, might be contemplated. The challenge for HKCAAVQ is how to walk the fine line between consistency of approach and perceptions of inflexibility through the use of a *one-size fits all* approach to implementation of accreditation frameworks. The agency has to ensure it maintains a balance between what might be described as a policing role for newer entrants to the sector and a more developmental engagement with mature Operators through focus on monitoring their quality assurance regimes. (Further discussion in Guideline 5).

The agency has two mechanisms for regularly collecting feedback from stakeholders. The first is the annual outsourced survey of institutions with the second mechanism based on a survey distributed by RCT to panel members and financial experts

engaged to give advice to panels. This INQAAHE compliance review is viewed by the agency as a benchmarking exercise against quality assurance agencies deemed already to be in compliance with the GGP. It is intended to conduct an INQAAHE review every five years to ensure that HKCAAVQ continues to operate against the GGP.

As a statutory body in Hong Kong, the agency is subject to ad hoc external reviews and oversight by the Audit Commission and the Independent Commission Against Corruption (ICAC). A number of reviews by these bodies led to changes in the agency's procedures including the method of appointing Specialists.

The introduction of the QMS provides a good data-driven foundation for HKCAAVQ to monitor what is happening in the sector and to adapt its services as appropriate to changed needs and circumstances. In general the Panel found that the agency is open to advice and guidance and that it is quick to note international developments in quality assurance and make improvements in its own approaches.

The Panel concluded that HKCAAVQ has a robust quality assurance system in place, demonstrates capacity to take action on the basis of internal and external review and that the agency substantially meets the Guideline

- **Commendation** The Panel commends HKCAAVQ for its openness to advice and guidance and to external review as well as its desire to benchmark against international best practice

4: Reporting Public Information

The EQAA informs and responds to the public in accordance with applicable legislation and the cultural context of the EQAA. This includes full and clear disclosures of its relevant documentation such as policies, procedures and criteria.

The EQAA also demonstrates public accountability by reporting its decisions about higher education institutions and programmes. The content and extent of reporting may vary with cultural context and applicable legal and other requirements.

If the external evaluation leads to a decision about the higher education institution or programme, the procedures applied and the criteria for decision-making are public, and the criteria for review are transparent, public, and ensure equality of treatment.

The objective of the HKCAAVQ Communications Plan is to *provide information, professional advice and consulting services that improves client, community and stakeholder understanding of qualification standards and quality assurance.*

The agency maintains two important websites that are accessible to the public. The comprehensive, main, HKCAAVQ website includes detailed policies and procedures information relating to accreditation services as well as documents on the Four-stage QA Process such as guidelines, application forms, submission guides and so on. These fully detail the agency's accreditation approach as well as the standards and criteria for decision-making. Public announcements about significant changes are included in the News section.

In addition, HKCAAVQ provides written guidance and documents to Operators with whom it has signed a service agreement for conduct of an accreditation activity and also holds workshops for institutions and panel members for general information and training in accreditation processes. The agency is currently working on a government-funded project to provide an on-line platform to allow sharing of best practices between Operators that will record local and international good practices and make them available in a *knowledge base*.

The agency also operates a policy of disclosure of accreditation decisions. When Operators are successful in accreditation they can upload relevant information to the QR website. (The uploading is checked by HKCAAVQ.) There are links from HKCAAVQ main website to both the QR (see below) and QF websites and these collectively represent an authoritative source for Hong Kong qualifications. In addition, the agency publishes summary reports on Initial Evaluation (IE) and

Learning Programme Accreditation (LPA) of local programmes with the aim of providing transparency and guidance to stakeholders. The publication of summary reports was made possible with the amended Cap 1150 that took effect in 2007. The Panel was pleased to note this relatively recent development and encourages the agency to extend the practice to include the reports from the optional NLP accreditation activities at the earliest feasible time.

The main HKCAAVQ website includes an on-line facility for receipt of complaints and suggestions from the HK community. In addition the agency makes available the annual report it provides via the Chief Executive to the Legislative Council, as well as reports from external reviews of government oversight bodies that are not required to be kept confidential, such as those from the Audit Commission.

To enhance disclosure generally the HKCAAVQ website was redesigned in 2012 to improve the level of user accessibility. In addition, the Specialists Register of approximately 400 local and international specialists was made available for public information. It is intended to review the usability and effectiveness of the agency's website in 2017, building on regular monitoring carried out on the use of the site.

A second website maintained by HKCAAVQ, on behalf of the EDB, is the QR website which was upgraded and re-launched in late 2013. The aim of the upgrade was to provide a more convenient platform and facilitate downloading of information about qualifications and programmes. Informal feedback to the agency suggests that the qualifications and the institution/assessment agencies search pages are particularly useful although as yet there has not been a formal evaluation of the revamped site.

Looking ahead, the agency plans to explore the possibility of publishing full accreditation reports and other quality assurance documents on its main website. To this end, institutions will be consulted before any decisions are made.

The agency acknowledges the challenges of engagement with various stakeholder groups notwithstanding the existence of a Communication Plan. The Panel understood that HKCAAVQ is held in high regard in many quarters, although not consistently across the higher education sector, so it will be important to raise the profile and understanding of the functions of the agency. In addition, the agency is encouraged by the Panel to renew its focus on outreach to the community at large so that the role of HKCAAVQ is more widely understood.

The Panel concluded that HKCAAVQ provides full disclosure of policies, procedures and criteria used in accreditation decision making, demonstrates public accountability through publication of various reports and that the agency fully meets the Guideline.

- **Commendation** The Panel commends HKCAAVQ for its commitment to, and success in, disseminating documentation for the policies, procedures and criteria it uses in accreditation activities.

5: Relationship between HKCAAVQ and Higher Education Institutions

The EQAA:

- ***recognises that institutional and programmatic quality and quality assurance are primarily the responsibility of the higher education institutions themselves;***
- ***respects the academic autonomy, identity and integrity of the institutions or programs;***
- ***applies standards or criteria that have been subject to reasonable consultation with stakeholders; and***
- ***aims to contribute to both quality improvement and accountability of the institution.***

Roles

The Panel met local and international stakeholders and noted that the agency is held in high regard. HKCAAVQ sees itself playing a dual role in the higher education sector in encouraging and supporting the quality of higher education in Hong Kong. On the one hand it sees itself to be a *gate-keeper*, that is, it upholds standards and accountability and on the other hand it works as a *gate-opener* to improve the quality of institutions and their programmes which requires attention to ensuring an appropriate balance between the roles. HKCAAVQ states that it strives to ensure there is community understanding that the agency is a QA body rather than a regulator and at the same time why EDB requirements are built into accreditation processes.

In discussions with staff it was clear that the two agency roles were well understood. However, there appeared to be some conceptual confusion among external stakeholders about where each role might begin and end in the case of HKCAAVQ. The issue seemed to the Panel to be partly a function of the ambiguity of the opener/keeper metaphor and consequently it is suggested that the agency ensure that in describing its dual role there should be absolute clarity and more direct expression of what regulation, as opposed to quality assurance, means in a practical sense.

The *gate-keeper* role of the agency relates to the fact that in Hong Kong it is mandatory for non-self-accrediting institutions to seek accreditation from HKCAAVQ for offering local programmes with the award titles of Associate Degree, Higher Diploma, Bachelor's Degree and higher level degrees.

The accreditation process for institutions and programmes is based on a Four-stage QA Process within which is nested a series of steps and procedures for particular accreditation requirement as described in Guideline 6. In addition, at institutional level, HKCAAVQ conducts Institutional Reviews (IR) for Operators seeking the authority to offer degree programmes through registration as a Post Secondary College.

Operating Principles

In terms of the relationship between HKCAAVQ and its stakeholder institutions, the activities in the Four-stage QA Process, in its various manifestations, are based on a set of internationally applied principles. These are *Fitness for purpose; Evidence-based decisions; Peer review; and reference to Threshold standards.*

In its role as *gate-opener*, HKCAAVQ implements a range of strategies built around the principles just mentioned. In practical terms these provide opportunities for accreditation of discipline areas in institutions with a track record in the area; freedom for Operators to choose their objectives and how they fulfil them; focus on self-review as a fundamental element in accreditation; and support in establishment of internal quality assurance systems.

The Operators expressed concerns that requirements for documentation to be submitted with each application can often duplicate what has been submitted in an earlier context. This requirement impacts particularly on institutions that are expanding and submitting multiple applications in a short time frame. It was noted, however, that the less experienced Operators had no such issues and reported that HKCAAVQ is very helpful in guiding them. All Operators, however, need to understand the rationale behind various practices, for example, the reasoning behind the requirement for re-submission of background documents with each accreditation application. Likewise the agency needs to provide a convincing argument as to why particular documents need to be duplicated if that is absolutely necessary.

The dilemma for HKCAAVQ is that it needs to find the balance between maintaining standards and the natural inclination of Operators to seek a lighter touch from the accrediting authority. In essence, the agency has to be a gate-keeper for new entrants to the sector and more of a gate-opener for the more mature institutions.

Engagement with Stakeholders

Several approaches are used to collect feedback from stakeholders including an annual survey of Operators and feedback from panel members following each accreditation activity. In addition, stakeholders are consulted during projects such as the review of the Four-stage QA Process. Workshops also provide multiple opportunities for stakeholders to engage with HKCAAVQ.

Nonetheless, in discussions the Panel heard that some local Operators would like to have more interaction with the agency. They appreciate the Annual Operator Briefings but would like to be more regularly informed of the outcomes and actions from feedback they give through the various surveys and arenas. More opportunities for general updating on new developments (as opposed to more training activities), would be valuable in building relationships and mutual understanding.

The Operators also said they would appreciate more engagement and opportunity to bring influence to the agency's work particularly through a presence on the governing body of the agency although it was recognised that there would be potential for conflict of interest in such an arrangement. The Panel considers that the establishment of an industry advisory committee, or similar mechanism, would be mutually beneficial in terms of providing an arena for Operators to offer their perspectives and improve their understanding of the parameters within which HKCAAVQ operates. For the agency, this would be valuable in extending understanding of the commercial sector and extend the range of feedback currently collected through the annual stakeholder survey. The Panel suggests that informal meetings could provide a forum for also engaging Operators from the University Grants Committee (UGC) and Joint Quality Review Committee (JQRC) spheres.

Looking to the future and the relationship between the Operators and the Council, the Panel supports the intention expressed by Council to closely monitor external factors in the next four years particularly as there is a need for risk management around transnational education. The agency's primary focus is on private sector operations and these may well be volatile in the future given the potential for stress on Operators in a situation of declining student demand. Problems among Operators may well impact on the reputation of HKCAAVQ as the community could, rightly or wrongly, ascribe Operator problems to inadequate oversight by the agency. The agency will need to be nimble in anticipating problems that might arise if and when the sector comes under stress. Flexibility of approach will be essential notwithstanding the necessity for the agency to maintain standards as gate-keeper for the private higher education sector.

The Panel concluded that HKCAAVQ appropriately recognises that the primary responsibility for quality assurance rests with the Operators, respects institutional autonomy in methods used to apply standards and criteria and that the agency substantially meets the Guideline.

- **Recommendation** The Panel recommends that HKCAAVQ establish mechanisms, such as an industry advisory committee, to augment current methods of ensuring Operator input to the agency and facilitate two-way communication more generally.

- **Recommendation** The Panel recommends that HKCAAVQ explore options which would allow more differentiation in how accreditation frameworks are applied to more mature Operators with a solid track-record and also ways to lighten the documentation load for Operators submitting multiple applications.

6: Requirements for Institutional / Programme Performance

The EQAA has documents that indicate clearly what the EQAA expects of the institution. Those expectations (which may for example be called standards or factors or precepts) are appropriate for the core activities of an institution of higher education or program. The standards should explicitly address all areas of institutional activity that fall within the EQAA's scope, such as teaching, learning, research, community work, etc. and necessary resources such as finances, staff/faculty, and learning resources. Standards may refer to specific areas, levels of achievement, relative benchmarking and types of measures, and may provide general guidelines. They may also include specific learning goals.

HKCAAVQ provides an extensive set of documents setting out requirements for the range of accreditation exercises the agency conducts. These documents are underpinned by the *Four-stage Quality Assurance Process* and are the quality assurance system for the Hong Kong QF and the framework for NLPs seeking to offer programmes in Hong Kong. The most recent review of the Process conducted in 2011-2013 resulted in a number of refinements, including changes in terminology, rather than a major shift in approach. Other materials provide information on the expected standards associated with each criterion, potential validity periods for accreditation and suggestions regarding the type of evidence that might demonstrate achievement of the different criteria.

The elements of the Four-stage QA Process are:

Stage 1 - Initial Evaluation (IE) aimed at determining whether Operators are able to achieve their stated objectives and operate learning programmes that meet the QF standards.

Stage 2 - Learning Programme Accreditation (LPA), or LPA re-registration, requires demonstration of achievement of ten criteria at the appropriate QF level and standard.

Stage 3 - Programme Area Accreditation (PAA) is open to mature Operators and if successful, they may develop and operate learning programmes within an approved scope of programme area at specified QF levels) without having to go through the normal route of programme accreditation or re-accreditation by HKCAAVQ.

Stage 4 - Periodic Review (PR) requires evidence of Operators' quality assurance management capabilities to continuously meet the QF standards in the approved programme area(s) since the previous PAA or PR exercise.

Additionally, Operators seeking to register as a Post Secondary College under Cap 320 may undertake an Institutional Review (IR) to form part of their case for registration through the Secretary for Education.

The Panel noted the comprehensive nature of the documentation and guidelines on the Process and the fact that these are frequently updated. There were, however, some stakeholder comments about the difficulty in recent years of keeping track of versions of documents and changes in terminology as the agency opts to issue revised documents on an on-going basis rather than at pre-determined dates as is more usual.

The Panel observed that aspects of the framework and standards of the Four-stage QA Process are expressed in rather generic terms like *adequate* and *effective* which may be subject to interpretation and heard of some difficulties in interpreting these terms in different circumstances. The Panel also learned, however, that with the professional support of experienced Case Officers and the leadership of qualified panel chairs, satisfactory shared interpretations and implied standards are generally reached during accreditation exercises and that the terms are sufficiently clear and consistent for practical use by Operators and accreditation review panels. This challenge emphasises the importance of ensuring that the Case Officers are well prepared to deal with debates and discussions about conceptual matters as well as procedural questions. On-going training of Case Officers on how to interpret the substance of the agency's frameworks, the different levels of the QF, and so on, will be crucial to ensuring continuing consistency of approach on matters of interpretation as discussed under Guideline 2 above.

For new and inexperienced Operators and review panel members, the accreditation documents may look rather long, complex or even confusing. Again, the impact of this problem is significantly mitigated by a group of highly professional Case Officers who provide important advice and support to both accreditation panel members (especially in the pre-visit briefing) and to Operators in the preparation of their submission for accreditation.

The Panel concluded that HKCAAVQ provides a comprehensive set of documents specifying what is expected of Operators in all major areas of institutional activity as well as resource requirements and that the agency substantially meets the Guideline.

- **Commendation** The Panel commends HKCAAVQ for the consistency it maintains in application of its accreditation through explicit procedures, briefing and guidance of Panels and careful compilation of accreditation reports for Council via delegated authority to the DED (Academic).
- **Recommendation** The Panel recommends that HKCAAVQ establish protocols for release of revised or new documents to ensure that there is no ambiguity or confusion among stakeholders about the currency of requirements or documents.

7: Requirements for Institutional Self-evaluation and Reporting

The documentation concerning self-evaluation explains to the institutions of higher education the purposes, procedures, process and expectations in the self-evaluation process. The documents also include the standards used, the decision criteria, the reporting format, and other information needed by the higher education institution.

Typically, an EQAA review process includes a self-evaluation through self-study by the institution or programme, external peer review, and a follow-up procedure.

As necessary and appropriate, the EQAA guides the institution or programme in the application of the procedures of the quality assurance process, such as self-evaluation, external review, or solicitation of assessment/feedback from the public, students, and other constituents.

Prior to seeking accreditation at programme, discipline or institutional level, institutions are required to undertake a self-review and report the outcomes in their submission to HKCAAVQ.

The agency provides extensive documentation on how to conduct a self-evaluation with a wide range of web-based documents available for use by institutions including general guidelines and guidance notes such as the *Submission Guide for Learning Programme Re-accreditation*.

Besides the comprehensive set of documents, regular workshops are also offered to Operators which may, or may not, have an immediate intention to seek accreditation from HKCAAVQ. These workshops cover general topics such as the QF and the Four-stage QA Process as well as more specialised areas including the preparation of self-evaluation reports. The Panel heard from a range of Operators that these workshops are well conceived and useful activities.

More focused advice is available from their nominated Case Officer to Operators undertaking self-review. The Officer is available for consultation throughout the accreditation process. The recent introduction of a Facilitation Phase before formal commencement of the Four-stage QA Process as a whole allows new and inexperienced Operators to work with the close guidance of the Case Officer in the preparation of their submissions.

HKCAAVQ also has a procedure for the period after the determination of the result for follow-up on matters that stipulates (a) actions that the operator/institution is required to take before (pre-conditions) or after (requirements) accreditation status is

granted, and (b) what the operator/institution will need to do in order to be re-accredited at the same QA stage or to be accredited at the next QA stage.

The Panel concluded that HKCAAVQ explains and guides Operators regarding the purposes, procedures, process and expectations of the self-evaluation process for each of the four stages of the quality assurance process and that the agency fully meets the Guideline.

- **Commendation** The Panel commends HKCAAVQ for the introduction of an optional Facilitation Phase into its procedures to guide inexperienced Operators through the requirements for submission of applications for accreditation.
- **Commendation** The Panel commends HKCAAVQ for the high quality and expertise of the Case Officers appointed to support the entire process of accreditation and work as members of Panels.

8: Evaluation of Institution and/or Programme

The EQAA has clear documentation concerning the external evaluation that states the standards used, assessment methods and processes, decision criteria, and other information necessary for external review. The EQAA also has specifications on the characteristics, selection and training of reviewers. The EQAA's system must ensure that each institution or programme will be evaluated in an equivalent way, even if the external panels, teams, or committees (together, the "external panels") are different.

The system ensures that:

- ***The external reviewers meet the EQAA specifications, and the external reviewers are adequate to the tasks to be accomplished.***
- ***External reviewers have no conflict of interests.***
- ***External reviewers receive necessary training.***
- ***External reviewers' reports are evidence-based and clear, with precisely stated conclusions***

As indicated earlier, one of the guiding principles for the conduct of accreditation processes conducted by HKCAAVQ is peer review, that is, the involvement of external reviewers (Specialists) who have expertise and experience in the discipline or industry relevant to the accreditation task. More general experts in QA are often also involved as Specialists and in addition, individuals with relevant financial and corporate governance expertise and experience may be engaged as Experts. At the time of the Review there were around 400 Specialists on the Specialist Register.

Locally-based Specialists participate in training workshops and activities designed to keep them up to date with the knowledge and skills to perform panel duties. Importantly, the training is also aimed at maintaining consistency in how Specialists approach the accreditation process. Non-local Specialists are recruited based on their track record in quality assurance and are briefed, one-on-one, immediately prior to participation in an accreditation exercise.

All Specialists have access to an on-line resource which was introduced in 2013 and is still in an early stage of development. It includes a training manual and guidance on aspects of conduct of site visits. The resource will be reviewed in three years following implementation of all planned features.

The main stages in implementation of an accreditation process from the agency perspective are:

Formation of accreditation panel

This activity involves identifying panel members with the appropriate expertise and assigning a Registrar (or occasionally, an experienced Assistant Registrar) to be the Case Officer/Panel Secretary and a full panel member.

Initial Review of accreditation documents

The panel is provided with the institution's accreditation documents along with terms of reference, background notes and panel guidance notes and requested to give their initial comments on the materials.

Site Visit

The site visit is designed to enable the panel to pursue any issues relating to the accreditation criteria and meet with stakeholders including students and staff.

Report writing and determination of outcome

The institution is informed of the panel's recommended outcome in an Interim Report within five days. When (if) the report is finalised and it has been endorsed by the Council via delegated authority to the DED (Academic), a Statement of Accreditation Approval (SoA) is issued.

The agency is also starting to work with professional bodies, exploring the potential for sharing the work of accreditation although this is complicated by the different purposes and frameworks for accreditation. The Panel recognises the complexity and often slow pace of these negotiations and that coordination with professional bodies is a challenge for most accreditation agencies. Nonetheless, it was considered that HKCAAVQ needs to pursue this goal with a little more drive than at present.

External panel chairs praised the Case Officer briefings they receive before each accreditation process and mentioned the rigour in oversight and support to the Panels. Some reservations were expressed to the Panel about the fitness-for-purpose approach generally and the inherent dangers of not also considering fitness-OF-purpose, particularly in relation to newer, smaller and/or for-profit institutions. The Panel was informed that this is generally addressed through the use of the QF as the common basis.

The Panel noted that notwithstanding the emphasis on achievement of consistency in implementation of the Four-stage QA Process there are challenges for the agency in achieving this goal because a small measure of variability is a feature of any peer review. Institutions generally state that they want absolute consistency on the one hand but they also say that their particular circumstances and level of maturity should be recognised with a concomitant adaptation in accreditation processes.

The Panel heard about the strategies used by HKCAAVQ to ensure fairness and consistency, the crucial role of the Case Officers and the substantial leadership contributions by senior officers in the Secretariat in ensuring the quality and consistency of outcomes across time and accreditation exercises. Nonetheless, as indicated in Guideline 5 the Panel believes there would be value in exploring the potential for more tailoring of the processes particularly for more mature Operators who are not at the stage of seeking PAA and, indeed, might not ever seek that status.

There was discussion with Operators about the definition and procedures for notifying *substantial change* which appear to be creating some challenges. NLP Operators commented that the HKCAAVQ process is onerous and can act as a brake on innovation in the shape and delivery of programmes at their home campuses as parity in offerings between home and Hong Kong offering is required. The recent changes to the Four-stage QA Process may resolve some of these difficulties but there is need to monitor this aspect of procedures as the revised Process is rolled out.

The Panel concluded that HKCAAVQ has clear documentation for conduct of accreditation activities and works to ensure consistency across external review activities. The agency also specifies requirements for reviewers and, overall, fully meets the Guideline.

9: Decisions

The EQAA evaluations address both the higher education institution's own self-assessment and external reference points, such as judgments by knowledgeable peers or relevant legislation. An EQAA must be independent, i.e. it has autonomous responsibility for its operations, and its judgments cannot be influenced by third parties. The EQAA's decisions must be impartial, rigorous, thorough, fair, and consistent, even if the judgments are made by different panels. Consistency in decision-making includes consistency and transparency in processes and actions for imposing recommendations for follow-up action. The EQAA's reported decisions are clear and precise.

When the EQAA advises the government or other public bodies, the decisions made by each agency should be made as independently as practicable.

Accreditation decisions of HKCAAVQ are based on panel recommendations following the application of criteria, standards and requirements such as the *Revised Common Descriptors for Associate Degree and Higher Diploma Programmes under the New Academic Structure* published by the EDB. The determination of the level of a programme is based on benchmarking against the Generic Level Descriptors in the QF. For programmes at Associate Degree level, institutions have to demonstrate that they meet requirements of the *Revised Common Descriptors for Associate Degree and Higher Diploma Programmes under the New Academic Structure* published by the EDB.

The recommendations from panels for applications under the *Post Secondary Colleges Ordinance* (Cap 320) are referred through HKCAAVQ to the Permanent Secretary for Education who takes into account of the outcome of review reports; requirements of Cap 320; relevant regulations under Cap 320A; and other *appropriate considerations* in making a registration decision.

Specialists are required to declare any interest in an application for accreditation before they can be formally appointed as panel members. Panel decisions are made based on the evidence presented and identical sets of criteria and standards.

Accreditation reports sent to Council via delegated authority to DED (Academic) for accreditation decisions outline the outcomes of the panel's work and provide the rationale for conclusions. Ensuring consistency in accreditation reports is one of the responsibilities of the Case Officers who work through an internal system of cross-checking of reports at various levels including by the Head of AAA and the DED (Academic).

A number of panel chairs commented that accreditation reports are sometimes *toned down* in the post site-visit period but it was not possible to discern why this might occur or to determine if this was positive (such as correcting errors of fact) or negative (softening requirements). Panel members, chairs in particular, expressed the desire to be kept informed more consistently than at present of progress with finalising of reports and follow-up generally, notwithstanding the sometimes long time frames for Operator's fulfilment of requirements. Having engaged in the demands of the accreditation activity they feel a sense of ownership of what happens after the site visit but acknowledge that the agency's motivation for not involving them in all post-visit detail is probably due to a desire not to place heavy demands for continuing involvement.

Accreditation reports follow a standard pattern and the panel, as necessary, also proposes pre-conditions or requirements and the actions to be taken by institutions to fulfil the conditions by a specified date. These pre-conditions or requirements are tracked and documentation cross-checked with panel members when an institution submits evidence that demonstrates fulfilment. Decisions are restricted to either *yes* (with or without pre-conditions and/or requirements) or *no*. Discussion with Operators did not reveal any dissatisfaction with decisions of the Council and there have been only five cases since 2008 where the outcome of the accreditation process has not led to an approval.

Team chairs interviewed by the Panel suggested that it would be useful for the agency to expand the list of possible options during accreditation site visits to include a *revise and re-submit* option notwithstanding the many opportunities there are for Operators to respond to requests for additional information during the accreditation process.

If the Operator has made a satisfactory case and the Council approves an application or upon satisfactory fulfilment of all pre-condition(s) by the Operator in cases for which pre-condition(s) are set, a *Statement of Accreditation Approval (SoA)* is then issued. Summary accreditation reports for IE, LPA and re-LPA of local accredited programmes are posted on the agency website 30 days after issuing the SoA.

The Panel was pleased to hear that the new QMS will greatly expand the capacity of HKCAAVQ to analyse decisions and identify patterns in aspects such as pre-conditions and requirements as well as in the characteristics of Operators. This data will be valuable for education and training efforts and also in interactions between the agency and individual Operators.

The Panel concluded that decisions of the HKCAAVQ are impartial, rigorous, thorough, fair, and consistent with decisions reported in a clear and precise manner and that the agency fully meets the Guideline.

10: Appeals

The EQAA has appropriate methods and policies for appeals. Appeals should be conducted by reviewers who were not responsible for the original decision and who have no conflict of interest, but appeals need not necessarily be conducted outside the EQAA.

There are two separate mechanisms for appealing against decisions of HKCAAVQ.

The first is for appeals against QF-related accreditation determinations of HKCAAVQ and is governed by the legislative requirements and procedures in Cap 592 and 592A. Appeals are free of charge to the appellant and are handled by an independent appeal board established by the Secretary for Education with a Secretary appointed by the EDB.

Appeal boards consist of individuals who are neither members of HKCAAVQ nor members of the original review panel, although this is not explicitly stated in the relevant legislation. Unusually for appeals processes, the appeal board can review the substance of the original decision and not merely the procedures applied.

The appeal board makes a final decision to confirm, vary or reverse the HKCAAVQ decision; substitute a decision; or direct the agency in its capacity as Accreditation Authority to review the appeal. Two appeal cases have been dealt with through this mechanism since the establishment of HKCAAVQ.

The second appeal mechanism is for reviews under Cap 1150 and is designed for non QF-related accreditation determinations. Typically these are related to institutional reviews for registration under the *Post Secondary Colleges Ordinance* (Cap 320).

Under the provision for these appeals, institutions or individuals who are not satisfied with a determination may apply to the Council for review under the principles and procedures set out by the Council itself for its review committees generally. These applications require the payment of a fee but refunds are to be made if the case is substantiated. This mechanism has not been used at any time for review of non QF-related accreditation decisions since the establishment of HKCAAVQ.

The agency intends to liaise with government to review the Appeal rules of the Appeal Board which were legislated in 2008 and in the event it is judged that some refreshment of the rules is necessary.

The Panel concluded that HKCAAVQ has appropriate methods and policies for appeals in place and that the agency fully meets the Guideline.

11: Collaboration

The EQAA collaborates with other EQAAs, if possible, in areas such as exchange of good practices, capacity building, review of decisions, provision of transnational education, joint projects, and staff exchanges.

The HKCAAVQ 2012-15 Vision and Mission statements, and an objective in its 2012-15 Strategic Plan commit the agency to participating in local and international quality assurance communities through meeting regularly with other QA agencies in Hong Kong; signing memoranda with other QA bodies and being active in the Asia Pacific Quality Network (APQN) and INQAAHE. The ultimate goal of collaboration is stated as being to learn from others and share good practices thereby strengthening the QA capacity of the agency.

HKCAAVQ has built formal partnerships with some ten international QA agencies with agreements covering exchange of information, staff development, mutual recognition nomination of each other's reviewers and so on. Recently the agency drew on work by the NZQA (New Zealand) in developing its own approach to graduate profiles, and has worked with QAA (UK) and TEQSA (Australia) on issues relating to the quality of educational imports. The agency is a member of a group, *Quality Beyond Boundaries*, which includes representatives from countries that are major importers of non-local programmes.

The agency is a founding member of INQAAHE and APQN with agency directors involved at the APQN Board level from the start. It is a member of the International Quality Group (CIQG) of the Council for Higher Education Accreditation (CHEA). HKCAAVQ has been the recipient of two APQN Quality Awards.

The Panel observed that HKCAAVQ is well-regarded by its peers. Discussions with other agencies from the immediate region revealed that HKCAAVQ is respected as a leading, professional and internationally-oriented agency. Several agencies related experiences of collaboration to mutual benefit. Other agencies have sent observers to HKCAAVQ events and one agency from Mainland China spoke of their hope to work towards joint accreditation activities.

Sister agencies in the Asia-Pacific also noted that the HKCAAVQ maintains a high profile in the region, especially through its active participation in the APQN and regional conferences. It is considered by its peers to be a mature quality assurance agency which is well led and provides a benchmark for good practice.

Internally to Hong Kong, there are two other bodies besides HKCAAVQ that have responsibility for quality in higher education. They are the UGC, a funding body

which pursues its quality agenda through a Quality Assurance Committee; and the JQRC which is responsible for quality assurance of sub-degree programmes offered in the universities. Collaboration among the three bodies has mainly been low-key and achieved through overlapping membership of the various governing boards. There have also been some successful projects carried out such as the development of *Good Practices in Quality Assurance: A Handbook for the Sub-degree Sector* published by the EDB, HKCAAVQ and the JQRC. A Liaison Committee on Quality Assurance has been set up by the Hong Kong Government to promote sharing of good practices among local QA bodies and to enhance consistency and transparency in QA practices.

The Panel concluded that HKCAAVQ collaborates across a range of activities with other quality assurance agencies and that the agency fully meets the Guideline.

12: Transnational/Cross-border Higher Education

The EQAA has policies relating to both imported and exported higher education. These policies may be the same as those for domestic providers and domestic provision. In formulating its policies and practices, the EQAA should consider relevant guidelines issued by international agencies and other associations. All EQAAs should consult with appropriate local agencies in the exporting or importing countries, although this might not be possible or appropriate in situations such as those involving distance learning or small enrollment.

At the time of the Review, none of the HKCAAVQ-accredited programmes was offered wholly or partly outside Hong Kong although there was some indication that such arrangements are likely to emerge in the near future, a development that will need to be carefully tracked by the agency.

Hong Kong has long been a recipient of educational programmes and courses from overseas, and in 1997 passed legislation to control arrangements. All non-local programmes must be registered (or exempt from registration for appropriate reasons) with HKCAAVQ nominated as the body with responsibility for checking whether a non-exempt NLP satisfies the legislation and hence can be registered. . As at May 2015 there were close to 1,200 non-local programmes registered or exempted from registration under Cap 493.

HKVAAVQ has two main responsibilities in quality assurance of non-local programmes (NLPs), one framed as assessment and the second as accreditation.

Assessment

HKCAAVQ provides advice to the EDB's Registrar of Non-local Higher and Professional Education Courses in relation to non-local programmes delivered in Hong Kong (except those offered by local Operators listed in Schedule 1 of Cap 493) and using the registration criteria stipulated by the *Non-local Higher and Professional Education (Regulation) Ordinance* (Cap 493). Approval for registration is the responsibility of the Registrar of the Non-local Courses Registry.

The assessment process is mandated and is focused on comparability of a programme offered by a non-local Operator with the standard of the same programme when delivered in its home country. The process does not seek to benchmark to standards in the Hong Kong education system.

Accreditation

Registered / exempted non-local programmes have an option of seeking accreditation which will give the programmes similar status to those of local accredited programmes. In this case the qualification is placed on the QR, recognised under the QF and, in addition, students are eligible for financial assistance from Government. At the time of the Review, about 13% of registered / exempted NLPs have sought this optional accreditation service. The majority of the programmes are in the arts and business fields.

The policy for accreditation of NLPs was formulated with reference to the frameworks of agencies internationally, particularly those in sending countries. In carrying out this responsibility, HKCAAVQ collaborates with the quality assurance agencies in the main sending countries (UK, Australia, USA and Mainland China) which account for over 97% of the 1,200 NLPs.

While there are two branch campuses of NLP institutions in Hong Kong (University of Chicago Booth School of Business and the Savannah College of Art and Design) the usual arrangement involves NLPs entering collaborative arrangements with local institutions to deliver programmes that are awarded by overseas Operators.

The accreditation processes involving NLPs are the same as described in Guideline 6 for accreditation of programmes delivered solely by local institutions with the exception that the partners are required to complete only the first two phases of the Four-stage QA Process, namely IE and LPA. In addition, the accreditation site visits involve representatives of both local and non-local Operators.

HKCAAVQ has received international recognition for its approach to non-local education provision through one of the APQN awards won by the agency and invitations to present in prestigious professional arenas.

The Panel concluded that HKCAAVQ has appropriate policies relating to imported higher education and that the agency fully meets the Guideline

- **Recommendation** The Panel recommends that HKCAAVQ carefully monitor the growing interest among Hong Kong Operators to provide programmes in Mainland China and anticipate both the role it might wish to play in ensuring the quality of what is provided offshore and any implications for the quality of provision in Hong Kong.

Conclusion

The Panel concluded that HKCAAVQ *comprehensively adheres* to the INQAAHE Good Practice Guidelines as it demonstrates *substantial* (or *full*) alignment with all individual Guidelines including *core* Guidelines 2 (Resources); 3 (Quality assurance of the agency); 4 (Public reporting); 5 (the Relationship between the agency and higher education institutions); 6 (Institutional or programmatic performance); and 9 (Decisions by the agency).

The agency is, therefore, in the view of the Panel eligible for listing on the INQAAHE website as *comprehensively adhering* to the Good Practice Guidelines.

APPENDIX A: Panel Membership

Panel Chair

Dr David WOODHOUSE

Formerly President of the International Network for Quality Assurance Agencies in
Higher Education (INQAAHE)

AUSTRALIA

Panel Members

Professor Michael King Man HUI

Pro-Vice-Chancellor/Vice President and Choh-Ming Li Professor of Marketing
The Chinese University of Hong Kong

HONG KONG

Dr Anne L MARTIN

Independent Consultant and formerly Deputy Vice Chancellor and Vice-President
(Academic), Deakin University

AUSTRALIA

Professor Sir Howard NEWBY

Formerly Vice-Chancellor

University of Liverpool

UNITED KINGDOM

Panel Secretary

Professor Mairéad BROWNE

Higher Education Consultant and Emeritus Professor
University of Technology, Sydney

APPENDIX B: List of Abbreviations

AAA	Academic Accreditation and Audit
AD	Associate Degree
APQN	Asia-Pacific Quality Network
DED	Deputy Executive Director
ED	Executive Director
EDB	Education Bureau
EQAA	External Quality Assurance Agency
GGP	Guidelines of Good Practice in Quality Assurance
GLD	Generic Level Descriptors
HD	Higher Diploma
HKCAA	Hong Kong Council for Academic Accreditation
HKCAAVQ	Hong Kong Council for Accreditation of Academic and Vocational Qualifications
HR	Human resources
IE	Initial Evaluation
INQAAHE	International Network for Quality Assurance in Higher Education
IR	Institutional Review
IT	Information technology
JQRC	Joint Quality Review Committee
KPI	Key Performance Indicator
LPA	Learning Programme Accreditation
NLP	Non-local learning programme
PAA	Programme Area Accreditation
PR	Periodic Review
QA	Quality Assurance
QF	Qualifications Framework
QMS	Quality Management System
QR	Qualifications Register
RCT	Research, Consultancy and Training
Re-LPA	Learning Programme Re-accreditation

SEC	Senior Executives' Committee
SoA	Statement of Accreditation Approval
SPMD	Specialist and Panel Member Database
SR	Self-review
UGC	University Grants Committee