Collaborative Cross-border Joint Quality Assurance: Pilot Exercise by Hong Kong and UK Quality Assurance Agencies

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Abstract

Transnational education brings both challenges and opportunities in the process of internationalisation. One of the most important challenges is safeguarding the quality of education provided. Given the growth of cross-border programmes and the increasingly competitive market, quality assurance bodies have little choice but to work closely together to meet this challenge. The Hong Kong Council for Accreditation of Academic and Vocational Qualifications and the UK’s Quality Assurance Agency of Higher Education have developed a new model for collaboration, having recently conducted two pilot joint quality assurance exercises involving two partnerships between a UK higher education provider and a Hong Kong operator in April and May 2018.

This pilot project has proven to be a sound beginning for active collaboration with a view to formulating a joint quality assurance approach internationally. This paper describes the process, benefits and challenges in the conduct of UK-Hong Kong joint quality assurance exercises, which could become the basis for further collaboration.

Keywords

Joint exercise, Non-local programme, Transnational education
Transnational education (TNE), which also refers to cross-border higher education, has now become an integral part of the internationalisation of higher education. TNE not only provides global mobility for students, programmes and institutions, but also brings with it opportunities and challenges. One of the most important challenges is to safeguard the quality of education in such a highly competitive market. At the same time TNE also provides opportunities for cross-border collaboration among different stakeholders, particularly quality assurance agencies.

In view of the challenges brought about by the growth and scope of TNE, there is an increasing awareness among quality assurance agencies that they have to collaborate and work together to address these challenges (Stella 2006). The Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) and the UK’s Quality Assurance Agency for Higher Education (QAA) have developed a model for such collaboration, having conducted two pilot joint quality assurance exercises involving two partnerships between a UK higher education provider and a Hong Kong operator in April and May 2018. This paper describes the process, benefits and challenges in the conduct of UK-Hong Kong joint quality assurance exercises, which could become the basis for further collaboration.

Background

Higher Education in Hong Kong

In Hong Kong, the higher education sector has experienced significant growth over the past 20 years as a result of the government's effort to double the secondary school leavers’ participation rate to 60% (EDB 2018). Students in Hong Kong are provided multiple and flexible post-secondary pathways, which can be divided into three main categories:

Publicly-funded programmes: There are ten institutions offering publicly-funded programmes. Eight universities funded by the University Grants Committee (UGC) provide 15,000 first-year-first-degree places and 5,000 senior year undergraduate intake places. The Vocational Training Council (VTC) provides sub-degree programmes while Hong Kong Academy for Performing Arts offers programmes from Diploma to Master Degree level in performing art (EDB 2017b).

Self-financing local programmes: There are nineteen self-financing institutions which do not receive recurrent public subvention for their operation offering self-financing locally-accredited higher education programmes. Twelve of these institutions have local degree awarding powers, and can thus offer programmes at bachelor's level and above. The others are vocational institutions and community colleges providing locally-accredited sub-degree programmes (QAA 2018).

Self-financing programmes leading to non-local awards: Apart from local programmes, students also take non-local programmes leading to non-local awards. For the purpose of this paper, the term “non-local programme”, which is commonly used in Hong Kong, refers to an off-shore programme operated in Hong Kong leading to a non-local qualification. The number of non-local programmes expanded significantly in the late 1990s and early 2000s mainly to meet a rising demand for top-up courses for students who had completed sub-degree programmes (QAA 2018). These non-local programmes are regulated through either registration or exemption from
registration under the Non-local Higher and Professional Education (Regulation) Ordinance (Chapter 493) (EDB 2017a).

The self-financing sector plays a key role in providing students with alternative pathways to access higher education. This sector has grown in both size and diversity to about 150 and 300 self-financing programmes at the degree level and sub-degree levels respectively, vis-à-vis around 40 and 230 such programmes in 2005/06 respectively (EDB 2018).

**UK TNE Landscape in Hong Kong**

Hong Kong is a top territory for sending students abroad and also a TNE hot spot, alongside Australia and the UK (Ilieva et al. 2017). The Higher Education Statistics Agency (HESA) (2017) published the Aggregate Offshore Record showing that 27,390 Hong Kong students studied a UK award for the academic year 2016/17. According to this data, Hong Kong is the sixth largest host country or region for UK TNE, following Malaysia (74,180 students), Mainland China (70,240 students), Singapore (48,290 students), Pakistan (43,870 students) and Nigeria (32,925 students).

As of July 2018, there were 1,135 non-local programmes registered under the Non-local Higher and Professional Education (Regulation) Ordinance (Chapter 493), of which 854 led to UK qualification awards (EDB 2017a). UK higher education institutions are key players in TNE in Hong Kong, delivering 72% of non-local programmes. Most non-local programmes are in the business field and the majority are provided at bachelor’s degree level (Kristoffersen and Chong 2015).

Registration is compulsory in Hong Kong, but accreditation is voluntary. As of August 2018, the Hong Kong Qualifications Register (HKQR) shows that 175 non-local programmes were accredited by HKCAAVQ. 132 out of these 175 non-local programmes involved 26 partnerships between 20 UK higher education providers and five Hong Kong providers. The majority of UK TNE in Hong Kong is based on partnerships with local providers including university-based and vocational training partners (QAA 2018).

**Quality Assurance Systems for TNE in Hong Kong**

The Non-local Higher and Professional Education (Regulation) Ordinance (Chapter 493) was passed in 1996 and enacted in 1997 to serve three purposes: (i) to provide greater consumer protection; (ii) to provide greater transparency; and (iii) to enhance Hong Kong’s reputation and academic standards. Upon the enactment of this Ordinance, all programmes leading to overseas academic and professional qualifications are regulated. The standard of a non-local programme operated in Hong Kong has to be maintained at a level comparable with a programme in the home country. However, this registration requirement does not apply to purely distance learning programmes, which are encouraged to apply for registration and demonstrate that they fulfil the registration criteria. The authority to register non-local programmes in Hong Kong rests with the Registrar of Non-local Higher and Professional Education Courses (EDB 2017a).
In 2008, the Hong Kong Qualifications Framework (HKQF) was officially launched upon the enactment of the Accreditation of Academic and Vocational Qualifications Ordinance (AAVQO) (Chapter 592). HKCAAVQ is the Accreditation Authority under the HKQF. Following the successful pilot exercise of non-local programme accreditation in 2009, non-local programmes become eligible to undertake the same accreditation tests as local programmes in Hong Kong and if successful, be included on the HKQR. The number of accredited non-local providers of TNE has steadily increased. This may be due to various incentives provided by the Hong Kong Government. Hong Kong is one of the few regions which provide bursaries to students on non-local programmes (Ilieva et al. 2017). For example, students of full-time non-local programmes are eligible to apply for financial assistance if admitted to a programme accredited by HKCAAVQ. In addition, such qualifications attained by students are recognised under the HKQF as meeting the same standard of comparable qualifications at the approved HKQF level(s) obtained in Hong Kong.

**Approach**

The UNESCO Guidelines suggest that a coordinated effort among quality assurance bodies is needed to tackle the challenges brought about by the growth of TNE (Stella 2006). Knight (2007) also states that it is important to work in a collaborative and complementary fashion to build a system that ensures the quality and integrity of TNE and maintains the confidence of society in higher education. In 2018, QAA, on behalf of its funding bodies, conducted a TNE Review of Hong Kong. HKCAAVQ and QAA took this opportunity to advance inter-agency cooperation by conducting a joint exercise for differing natures of quality assurance activities: one is an accreditation while the other is a review. The following outlines the key aspects of the approach taken by QAA and HKCAAVQ for the joint exercises for the benefit of all stakeholders involved:

<table>
<thead>
<tr>
<th>Panel formation</th>
<th>The HKCAAVQ accreditation panel included two QAA reviewers who acted as both HKCAAVQ panel members (including acting as Chair) and QAA reviewers.</th>
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<tbody>
<tr>
<td>Information submission before the site visit</td>
<td>The information set submitted for the HKCAAVQ accreditation exercise was also received by QAA to ensure it can be used to inform its TNE Review. Additional information had been submitted to QAA exclusively for the purpose of the QAA TNE Review.</td>
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The HKCAAVQ accreditation panel undertook a standard HKCAAVQ accreditation visit, asking providers’ representatives a set of questions with reference to HKCAAVQ standards and criteria. Some of these questions might replicate questions that the QAA reviewers would plan to ask to inform the TNE Review. In this case the QAA reviewers were able to use relevant information collected during the HKCAAVQ accreditation exercise meetings to inform the QAA TNE Review. This allowed them to avoid unnecessary duplication of meetings and questions.

QAA reviewers did require some additional information for the QAA TNE Review. This additional information was collected in a range of ways:

a) at the end of each HKCAAVQ accreditation exercise meeting, by asking additional questions to participants at the meeting, the responses of which were used only for the QAA TNE Review.

b) by setting up an additional meeting at the end of the HKCAAVQ accreditation visit programme to explore with stakeholders not already included in planned HKCAAVQ accreditation exercise meetings any further questions not already asked by the HKCAAVQ accreditation panel. This additional meeting (if required) was only for the QAA TNE Review and did not form part of the formal HKCAAVQ accreditation exercise.

NOTE: During HKCAAVQ accreditation meetings, it was made clear to participants which questions were only for the HKCAAVQ accreditation exercise, which questions were asked for both HKCAAVQ accreditation and the QAA TNE Review, and which for QAA TNE Review only.

Separate reports were issued by individual agencies with reference to the relevant standards and criteria.

QBBG (2017) states that global institutions face a complex regulatory environment with quality assurance agencies, which typically have national focuses. As a result, additional work is created for those institutions and duplication of efforts arises due to the need to meet the requirements of separate quality assurance agencies. The planning for the joint QAA and HKCAAVQ exercises sought to identify commonalities and differences in the practices and processes adopted by the two agencies to allow for mutual recognition in future and reduce duplication of efforts.

The joint exercises identified that quality processes followed by HKCAAVQ are similar to that of QAA. The HKCAAVQ guidelines state four guiding principles in conducting the accreditation processes: threshold standard; peer review; fitness for purpose; and evidence based. These are similar to those used by QAA. As a result, there is duplication of effort and overlapping documentation that has the potential to be simplified (QAA 2018). “This is particularly true in university-based and vocational training partners which have well-developed quality assurance
systems used for both their own awards and those made by non-local providers" (QAA 2018, p.30).

A QAA TNE Review comprises two stages: desk-based analysis and visits. The reviewers conduct a preliminary desk-based analysis of the provider’s submission and other information. Review visits, either in the UK or overseas, are conducted by reviewers and managed by the International Review Manager. They normally take place over one day for each provider, and involve meetings with staff, including senior management, teaching and administrative staff, and students (QAA 2017b). For the purpose of the TNE Review, the HKCAAVQ panel also reviewed the submission followed by site visits to meet stakeholders including management representatives, teaching staff and students during two-day to three-day visits. The similar quality assurance process between the two agencies allowed for a single site visit to collect data on the delivery of TNE in Hong Kong to lighten the documentation load for providers.

The main difference between the practice of the two agencies in the joint exercises is that HKCAAVQ accreditation focuses on the programme level while TNE Review focuses on institutional aspects. In the second stage of HKCAAVQ’s accreditation model, Learning Programme Accreditation (LPA), the HKCAAVQ process provides an analysis of programmes that is more in-depth than a QAA TNE Review, including an analysis of relevant institutional aspects with a focus on programme-related matters (QAA 2018). In fact, such institutional aspects, including resources, quality assurance and internationalisation policies are also reviewed by HKCAAVQ in the first stage of accreditation, Initial Evaluation (IE), in which the partnership must demonstrate its competency and capacity to manage and resource effectively the development, delivery, assessment and quality assurance of its non-local programmes (HKCAAVQ 2018a). The scope of the two quality assurance exercises is comparable, but not identical (QAA 2018).

To better understand commonalities and differences in the quality indicators or standards, a comparison between QAA indicators of sound practice under the UK Quality Code for Higher Education and HKCAAVQ accreditation standards and criteria for non-local programmes was conducted. It was found that the two quality assurance agencies share similar quality indicators and standards. For example, one of the quality indicators used by QAA in its Quality Code is that “appropriate levels of resources (including staff) are committed to the activities to ensure that the necessary oversight is sustained” (QAA 2017a). Resources (including staff) at both institutional and programme levels are key accreditation standards used by HKCAAVQ. This allows common issues to be identified and addressed in a single joint exercise to enhance efficiency and avoid duplication of effort from HKCAAVQ and QAA.

HKCAAVQ conducts accreditation with a definite outcome (i.e. approval vs non-approval) while QAA TNE Review sets out to identify best practices and provides recommendations. The two quality assurance agencies needed to consider the nature of each exercise based on the principle of fitness for purpose. Therefore, separate reports were issued to address the different reference points used for HKCAAVQ accreditation and QAA TNE Review. However, there are some commonalities in the outcomes of the exercises as the HKCAAVQ panel also made recommendations which have a continuous improvement purpose and which are directly related to the accreditation standards. In addition, the HKCAAVQ panel provided advice for the sharing
of good practice in education and training among peers (HKCAAVQ 2018b). To some extent, HKCAAVQ accreditation outcomes are similar in nature to those of QAA Review.

These pilot joint quality assurance exercises allowed the two agencies to benchmark processes and reference points (QAA 2018). QAA also concluded that “through HKCAAVQ’s peer review panels and the use of the HKQF, QAA can confidently rely on HKCAAVQ’s accreditation decisions for UK TNE provision in Hong Kong” (QAA 2018, p.20).

Reflection

Stella (2006) states that much of the cooperation among quality assurance agencies results from informal exchanges of information. The UK and Hong Kong joint quality assurance exercises have proven to be a sound beginning to move the cooperation forward in a more formalised way. Such cross-border quality assurance collaboration gives rise to both benefits and challenges.

Benefits

Middlehurst (2001) states that most national systems are reluctant to cede power to supranational agencies. In this case, mutual recognition between quality assurance agencies may be a solution. The joint exercises provided the two quality assurance agencies with an opportunity to develop an innovative quality assurance framework and explore the feasibility of mutual recognition. Mutual recognition refers to an extension of acceptance of the decision of other quality assurance agencies (Woodhouse 2004). To achieve this QAA indicators and HKCAAVQ accreditation criteria were compared to show that the two quality assurance agencies have many commonalities in quality assurance standards, such as risk assessment and quality assurance control by award granting bodies. Through this pilot experience, QAA and HKCAAVQ have a deeper understanding of their respective standards and frameworks, a necessary pre-cursor to consideration of achieving mutual recognition.

From the quality assurance agencies’ perspective, engaging in cross-border quality assurance can expand their national and international profile and provide learning opportunities to improve their own processes and methodologies (ENQA et al. 2017). The UK-Hong Kong joint quality assurance exercise provided QAA and HKCAAVQ with the opportunity to gain more understanding of each other’s processes and methodologies. Woodhouse (2004) suggests that it would be desirable to avoid repetition or duplication when transnational programmes are subject to external quality assurance. Single site visits were conducted to collect data, some of which could then be used by both agencies while others were specific to the individual agency.

The joint quality assurance exercise lightens the documentation load for providers, which only have to prepare one set of documents and gather different stakeholders together for a single site visit. The providers were also given flexibility in presenting their documents. For example, even though they were encouraged to use the same documents for HKCAAVQ accreditation and QAA Review, they were also allowed to submit additional information via different sets of documents to address specific quality assurance agency needs.
While different quality assurance activities were conducted by the two agencies sharing many similarities in terms of the guiding principles and major processes, there are differences in focuses. HKCAAVQ and QAA conducted various briefing and training sessions for specialists involved in the joint exercises to help them better understand the standards of each agency. In addition, HKCAAVQ and QAA colleagues worked closely to ensure the understanding of commonalities and differences. The two quality assurance agencies also provided each other with the opportunity to join quality assurance visits as observers. As a result, specialists and colleagues of the two agencies had the opportunity to gain quality assurance knowledge and skills required by the different agencies.

Challenges

Having providers buy into this joint activity is a challenge. This is a new way of conducting an exercise so different parties may be uncertain about how it works. When liaising with the providers involved, some raised concerns about how different standards applied by the two quality assurance bodies are used and to what extent the decisions made by one affect the other. To address their concerns, HKCAAVQ and QAA worked closely to develop an approach which allows streamlining and flexibility for each party to engage in a combined quality assurance exercise. For example, only one set of documents was required and a single site visit was conducted. Additional information was requested by individual agencies to address specific standards and criteria. Guidelines were developed for all parties involved to ensure the same understanding of the process and the eventual outcomes.

The two joint quality assurance exercises were undertaken by a single panel, with all members being part of the HKCAAVQ accreditation panel and one or two panel members also acting as QAA reviewers (QAA 2018). It must be noted that specialists who played dual roles as HKCAAVQ panel members and QAA reviewers faced some difficulties when participating in the joint exercises. The learning curve was quite steep as they needed to understand the commonalities and differences of the standards adopted by the two agencies. They also needed to be aware of the difference in education systems in Hong Kong and the UK. In addition, specialists/QAA reviewers were required to provide written responses and lists of questions within specific timelines. The workload of specialists/QAA reviewers was quite demanding. Therefore, there is a need to identify specialists who not only have quality assurance knowledge but also experience in Hong Kong and the UK. Training is also important to prepare them to perform dual roles in the whole process.

Conclusion

Each country context is unique and has its own purposes for quality assurance (World Bank 2007). However, there is significant potential for cooperation between quality assurance agencies to make quality assurance exercises more effective and to reduce the effort required on both sides. In addition, quality assurance agencies are encouraged to share and rely on the assessments and decisions of other agencies (QBBG 2017). To this end, HKCAAVQ and QAA, which have a long history of collaboration, are committed to exploring innovative ways to enhance the efficiency of quality assurance. The joint quality assurance exercises conducted in Hong Kong can serve as a starting point to illustrate how two agencies can work in a collaborative and complementary fashion to develop a joint quality assurance approach to
reduce duplication of effort and achieve mutual recognition. More cross-border collaborative quality assurance projects are needed to further improve the quality of TNE.

Woodhouse (2004) says agencies differ greatly in purpose and scope; therefore mutual recognition must take these differences into account. For example, in these joint exercises, TNE Review focuses on the quality of institutional systems while HKCAAVQ accreditation focuses on programme offerings. Given the complexity of quality assurance of TNE, HKCAAVQ and QAA seek common ground while retaining differences. Throughout the joint quality assurance process, QAA and HKCAAVQ cooperated closely, including the sharing of data, information and intelligence on TNE Review and HKCAAVQ accreditation. Such close cooperation allowed the two agencies to deepen reciprocal understanding of commonalities and differences. As a result, reciprocal trust in each other’s quality assurance system was strengthened (QAA 2018). This pioneer exercise is based on core values of trust and respect between two quality assurance agencies.

Knight (2007) states that internationalisation is transforming the world of higher education. In the face of internationalisation of higher education, quality assurance agencies have little choice but to make connections locally and globally to address these changes. Engaging in joint quality assurance exercises provide significant benefits and challenges for quality assurance agencies, providers and specialists involved. The conduct of successful joint exercises relies on close communication with different stakeholders. Through collaboration among different stakeholders, the quality assurance mechanisms for transnational programmes can be further enhanced to ensure the long-term sustainability of higher education institutions and transform the student learning experience. The cooperation between QAA and HKCAAVQ in joint exercises can be regarded as an example of good practice in international cooperation as outlined in the Quality Assurance of Cross-border Higher Education (QACHE) Toolkit developed under the Erasmus Mundus Programme of the European Union and undertaken by a consortium coordinated by the European Association for Quality Assurance in Higher Education (ENQA).

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References


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