Cross-border Quality Assurance: Case study of Hong Kong and Macau.

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STRUCTURED Abstract (Maximum 250 words Total)

Purpose

This paper sets out the experience of the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) in carrying out cross-border quality assurance in Macau. In doing so it seeks to address the three research questions implicit in the conference sub theme: '*Quality assurance for competitive advantage in the markets for national and international students*'

Design/methodology/approach

The paper draws on case studies of two very different quality assurance exercises conducted by HKCAAVQ in Macau in 2015 and 2016. The first was a program accreditation conducted as part of a pilot of the external quality assurance standards and process developed by the Macau government's Tertiary Education Services Office (GAES) for potential use by all higher education institutions (HEI) in Macau.

The second was a learning programme review (LPR) conducted by HKCAAVQ following a request by a higher education institution in Macau using quality assurance standards and processes developed by HKCAAVQ.

Findings

The key findings from the case studies are that an agency engaging in cross border quality assurance needs to have a clear rationale for their engagement, ensure that they are 'fit-for-purpose' in terms of the context of the employing jurisdiction and the expectations of their

higher education institutions and have a clear understanding of the relevant legal framework.

Research limitations/implications-

The paper is based on experience gained from two case studies in Macau. Additional exercises have since been conducted and more lessons are being learnt about operating outside of Hong Kong.

Originality/value

HKCAAVQ is not the first QA agency to have undertaken cross-border quality assurance exercises but the experience is relatively recent and has implications for similar work in small jurisdictions and/or developing countries in Asia.

Keywords: Cross-border, Hong Kong, Macau, HKCAAVQ.

ARTICLE

Introduction

Under the principle of "one country, two systems' enshrined in the Basic Law following the transfer of sovereignty over Hong Kong from the United Kingdom to the People's Republic of China, Hong Kong is a Special Administrative Region able to operate its own higher education system and external quality assurance arrangements.

HKCAAVQ provides quality assurance and assessment services to non-self accrediting education and training institutions, course providers and the general public in Hong Kong. In addition to its statutory roles, 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.

Macau is also a Special Administrative Region of the People's Republic of China with similar but separate powers over education to that of Hong Kong. Hong Kong and Macau share a common language and similar culture and history and similar education system / demographic student/school profile / in-bound non-local students. There is considerable collaboration at different levels of education between Hong Kong and Macau.

Overview of Higher Education in Macau

(The following information is extracted from Macao Yearbook 2015 http://yearbook.gcs.gov.mo/files/yearbook/2015/myb2015e.pdf)

The Tertiary Education Services Office

Established in 1992 and currently headed by the Secretary for Social Affairs and Culture of the Macau SAR Government, the Tertiary Education Services Office (GAES) is a government department that coordinates, follows up and develops tertiary education in Macau. Further information about (GAES) can be found in their website: https://gaes.gov.mo/eng/overview/introduction

Higher Education Institutions in Macau

Macau started to develop modern tertiary education around 30 years ago. Since there were only a few tertiary education institutions in those early days, the range of programmes and disciplines offered by these institutions were relatively limited. However, as the number of institutions increased, and society demanded different types of expertise, the types of programmes have diversified.

Currently, Macau has 10 tertiary education institutions. Four of them are public and six are private.

Public
(a) University of Macau (UM)
(b) Macau Polytechnic Institute (MPI)
(c) Institute For Tourism Studies (IFT)
(d) Academy for Public Security Forces of Macao (ESFSM)

Private
(e) City University of Macau (CITYU)
(f) University of Saint Joseph (USJ)
(g) Kiang Wu Nursing College of Macau (KWNC)
(h) Macau University of Science and Technology (MUST)
(i) Macau Institute of Management (IGM)
(j) Macau Millennium College(MMC)

During the 2014/2015 academic year, there were 1,993 teaching staff and 30,771 registered students in these institutions, with 277 programmes including doctorate, master's and bachelor's degree programmes, higher diplomas, postgraduate certificates and diploma programmes.

Macau is a small jurisdiction and because of the scale of its higher education system and the costs involved in setting up and maintaining its own EQAA a policy decision was taken by the government to explore the engagement of external quality assurance agencies to provide quality assurance services to their HEIs at both institutional and programme levels.

HEIs in Macau have a history of using cross-border EQAAs and international professional accreditation bodies to conduct independent reviews. The essential difference in the government proposal under the proposed new Higher Education Act is that while the 'market' for EQAA services could still be maintained the quality assurance activities would be carried out under guidelines developed and approved by GAES and that the final decision making power in all of the evaluation exercises would lie with the Macau Government.

It was in the context of a pilot study on the proposed programme accreditation guidelines that HKCAAVQ as the EQAA conducted a programme accreditation of a bachelor degree of a Macau HEI against the accreditation criteria and standards set out in the Guidelines on New Programme Accreditation developed by GAES.

Separately, HKCAAVQ was approached by another Macau HEI, on their own initiative, to conduct a Learning Programme Review (LPR) of one of its bachelor degrees. This institution had previously engaged different quality assurance agencies and professional bodies to conduct external review for the institute and various programmes.

Research Methodology

Based on interviews with the Registrars that conducted the two exercises listed above, the case studies of a pilot program accreditation and a learning programme review in HEIs in Macau, will be used for illustrative purposes in answering the key research questions:

"International education is now a hugely competitive market, and national governments and individual providers often see agencies as key tools for developing positional advantage. *What are the implications for agencies in seeking to meet these expectations?* And, as some agencies position themselves to offer services outside their national jurisdictions, *are we also now seeing the emergence of a competitive international market in quality assurance itself?* Competition within countries is also intense in many places; *is QA seen as a help or a hindrance?"*

The development of the European Higher Education Area (EHEA) through the Bologna Process has contributed to an increase of cross-border exchanges and cooperation in higher education and supports the enhancement of trust and confidence among higher education systems. In the framework of the Bologna Process, cross-border quality assurance (QA) is supported.

In the European context cross-border QA refers to external QA activities of a QA agency carried out in a country other than the one in which it is based; this may be a voluntary process or part of the national mandatory QA.

In 2016 the European Association of Institutions in Higher Education (EURASHE) published a 'Roadmap for Cross-Border QA'. This roadmap is presented in the format of guiding questions and key considerations to be taken into account before engaging in and carrying out cross-border QA and includes the following:

A. Engaging in cross-border QA
- What is the rationale for engaging in cross-border QA?
- Which QA agency is fit for purpose for this specific case?
- What is the legal framework prescribing?
- What other aspects (beyond the legal framework) need to be considered beforehand?
- Has the institution communicated its decision to undergo cross-border QA to relevant stakeholders?

B. Carrying out cross-border QA
- What sort of preparation supports successful cross-border QA?
- How are the peer-review experts selected and trained?
- Are the practical specificities of carrying out cross-border QA clear for both parties?

The experiences in the two case studies will also be used to address some of the key factors identified in the conceptual framework of the EURASHE Roadmap.

Description of case studies

In the context of the Pilot Study on the Program Accreditation Guidelines, HKCAAVQ as the EQAA conducted Program Accreditation of a Bachelor program of an HEI in Macau against the accreditation criteria and standards set out in the Guidelines on New Program Accreditation developed by GAES.

The Guidelines were developed by the consulting arm of HKCAAVQ under contract to GAES and because of commercial-in-confidence considerations cannot be reproduced in this paper. Notwithstanding, the Guidelines are based on the Approach-Deployment-Results-Improvement (ADRI) quality audit methodology and adopt the principle of peer review through the use of expert peer review panels to evaluate the programs through consideration of the accreditation submission and a site visit.

To clearly signify that the decision-making power of all evaluation exercises lies with the Macau Government, the accreditation report included the following in the section covering accreditation outcome and decisions:

1. On the basis of the findings documented in previous sections, the Panel's overall recommendations are as follows:

2. Having considered the panel's recommended accreditation outcome and decisions as well as associated evidence and considerations documented in the final draft accreditation report, the Government of Macao SAR accepted the following accreditation outcome and decisions:

Accreditation outcome:
- *□ Approval*
- *□ Conditional approval*
- *□ Non-approval*

Accreditation decisions are as follows:

Table 1 – Approval Decisions

Approval
Program title and qualification title   *Discipline of program*   *Specialization (Majors) (if applicable)*   *Maximum number of enrolment and classes*   *Mode of delivery (e.g. full-time, part-time, online learning, distance learning, etc.)*
Conditional Approval
Condition(s), requirement(s) and deadline(s) for fulfilment   *Program title and qualification title*   *Discipline of program*   *Specialization (Majors) (if applicable)*   *Maximum number of enrolment and classes*   *Mode of delivery (e.g. full-time, part-time, online learning, distance learning, etc.)*
Non-approval
Not applicable

Post-accreditation Follow-up

In the case of a Conditional Approval, HKCAAVQ will provide, in consultation with the Panel, post-accreditation service as follows:

- evaluation of whether the HEI has fulfilled the specified condition(s); and

- issuing a written Confirmation of Fulfillment of Condition(s) to the HEI.

The second case study involved the conduct of a Learning Programme Review (LPR) in another HEI in Macau.

HKCAAVQ conducts accreditation for local programmes in Hong Kong while LPR is conducted as a consultancy project outside Hong Kong. Accreditation and LPR are similar in the aspects of guiding principles (transparency, evidence-based, fitness for purpose and peer review), panel formation, process and procedures. Their major differences are explained in the table

below:

Table 2 – Accreditation arrangements for local and non-local operators (outside of Hong Kong)

	Accreditation for degree programmes operated by local Operators	**Learning Programme Review for Macau HEI (non-local Operators and qualifications)**
Ordinance	HKCAAVQ conducts **accreditation** in the capacity of the Accreditation Authority as provided for under the Accreditation of Academic and Vocational Qualifications Ordinance (Cap 592).	LPR is an **evaluation** process conducted by HKCAAVQ for Operators under a Consultancy Service Agreement, pursuant to sections 4(1)(g) and 4(2)(b) of HKCAAVQ Ordinance (Cap 1150)
Outcome	Accreditation leads to an outcome of approval, approval with conditions, or non-approval.	LPR primarily offers recommendations to the HEI for its continuous improvement.
Reporting	The findings of the Panel will be presented in the form of "Pre-condition", "Requirement", "Recommendation" and "Advice"	The findings of the Panel will be presented in the form of "**Recommendation" and "Observation**".
Qualifications Framework	Qualifications accredited by HKCAAVQ are eligible for entry into the Qualifications Register (QR) at http://www.hkqr.gov.hk for recognition under the Hong Kong Qualifications Framework (HKQF).	Programmes reviewed by HKCAAVQ are not eligible for entry into the QR for recognition under the HKQF.

Panel Composition

The Panel is composed of 8 members from different disciplines pertaining to the programmes under review, and/or with substantial quality assurance experience in a higher education setting. To ensure that the panel is representative enough to benchmark the accreditation subject (HEI / programme) against international standards and practices, the majority of the panel members should come from **different overseas jurisdictions** operating different mainstream education systems where Macao students further their studies. The Panel includes:

- Non-local Chair
- 2 academics from Hong Kong
- 2 non-local academics

- 2 practitioners from Hong Kong
- 1 HKCAAVQ representative

Learning Programme Review (LPR) Criteria

The Guidance Notes on Learning Programme Review (LPR) sets out the criteria and standards for reviewing the Programmes. Similar to the accreditation exercises conducted for local programmes operated by institutes / operators in Hong Kong, the LPR has ten criteria as follows:

(a) Programme Objectives and Learning Outcomes
(b) Programme Content and Structure
(c) Admission Requirements and Student Selection
(d) Teaching and Learning
(e) Student Assessment
(f) Staffing and Staff Development for Learning Programmes
(g) Financial and Physical Resources for Learning Programmes
(h) Quality Assurance (including Programme Development and Management)
(i) Workplace Attachment and Student Support Services
(j) Student Records and Information Management

The site visit serves as another channel (other than the submission document) for the HEI to demonstrate how they meet the LPR criteria and standards, and for the Panel to gather further evidence to make "Observations" and "Recommendations". The Panel Chair will verbally convey to the senior management of the HEI the Panel's broad observations at the last session (Exit Meeting) of the site visit. Details about the Panels' conclusive views will be captured in the LPR Report in the form of recommendations to HKCAAVQ, which has the final authority on the LPR exercise.

Results

International education is now a hugely competitive market, and national governments and individual providers often see agencies as key tools for developing positional advantage. What are the implications for agencies in seeking to meet these expectations?

The Pilot Study on the Program Accreditation Guidelines under the Proposed Higher Education Framework of Macau was designed to test the accreditation and standards as well as the process by which a mandatory external QA procedure could be introduced through the jurisdiction's legal framework. The development of the knowledge and understanding of quality assurance among GAES staff through the process and the building of the quality culture in the pilot HEI were added value in the process.

HKCAAVQ aims to be a nationally and globally recognised independent quality assurance body in education and training, dedicated to high quality accreditation, assessment and consultancy services. The objectives in the HKCAAVQ strategic plan include providing consultancy and quality assurance services for the education and training community beyond Hong Kong. HKCAAVQ is regarded as an internationally recognised EQAA, and has been successfully audited against the Guidelines for Good Practice of INQAAHE.

Apart from positively assessing its expertise and capacity to conduct cross-border QA, engagement of HKCAAVQ as the EQAA in the pilot study had a strategic fit with its scope of activities.

With regard to the legal framework prescribing the cross-border QA, the EQAA should consult and liaise as appropriate with the jurisdictional regulatory bodies so as to have a proper understanding of the accreditation criteria and legal framework. Communication and mutual understanding are important.

If the EQAA is requested to make use of the guidelines issued by the jurisdictional regulatory body (as in this case), the EQAA should consider if it has a sufficient understanding of the guidelines. In case of doubt, the EQAA should seek clarification from the regulatory body. The EQAA should also ensure that the evaluation criteria contained in the guidelines are broadly comparable with international standards in light of the outcomes of the evaluation otherwise, the QA agency may risk jeopardising its professional standing and integrity.

In conducting the pilot accreditation for GAES, HKCAAVQ as the EQAA interpreted and implemented the guidelines to the best of understanding based on professional expertise and experience in other accreditation exercises. Due to the different interpretations of each party in a number of procedural steps, the process required considerable negotiation and hence took longer time than expected. Readability was hindered as Chinese and English guidelines are presented concurrently for each statement. Some templates required much adaptation for use by the Panel, however, most milestones were achieved ahead of the stipulated deadlines in the Service Agreement.

Overall, with close communication between GAES, the HEI and EQAA, the accreditation exercise, and the site visit in particular, was completed successfully.

From the perspective of the HEI their participation in the Pilot Study enabled them to gain insight into the likely quality assurance arrangements for program accreditation under the Proposed Higher Education Framework of Macau and also build their relationship with the regulatory body, GAES. From a program perspective where a maximum of 50% of the

student population can be drawn from outside Macau (largely from Mainland China), the accreditation by HKCAAVQ as an EQAA provided an additional benefit of external recognition of the program. Participation in the Pilot Study was clearly viewed by the program as a key means for developing positional advantage.

However, due to the nature of the Pilot Study and the necessary involvement of GAES and their consultants and the need for confidentiality, some of the ownership of the process by the HEI was lost. The exercise was largely conducted by the HEI through the agency of an institutional "champion' of the process and it was not clear as to whether the decision to undergo cross-border QA and the reasons for engaging HKCAAVQ were adequately communicated to the institutional community, including students. As a result, the opportunity for building up institutional quality assurance capacity was not taken up to the extent that it might have been.

In contrast to the Pilot Study, the HEI involved in the second case study of Learning Program Review had a clear purpose for engaging HKCAAVQ as the EQAA and the arrangement followed a number of deliberate activities designed to build up the institution's quality assurance capacity. Notwithstanding, the desire of the HEI to benchmark the standards of their programme with Hong Kong standards presented problems for HKCAAVQ in considering whether its procedures could remain the same in a cross-border context.

Specific adaptations were required based on the legal framework under which HKCAAVQ operates as set out in *Table 2 – Accreditation arrangements for local and non-local operators (outside of Hong Kong)* on page 7 above and unlike the Pilot Study outcome of accreditation by the regulatory authority in Macau, the outcome of the procedure was a review report only.

Prior to engaging in the LPR the HEI had undertaken an institutional review with another EQAA and included in its strategic plan a clear commitment to undertaking program review with another EQAA. The HEI has an internationalisation agenda and is keen to build up the reputation of the institute and attract high quality students.

The HEI has also engaged professional bodies to conduct reviews of their programs that lead on to professional employment before undertaking LPR. In addition in the 12 to 18 months prior to the LPR the HEI engaged HKCAAVQ to provide training for relevant staff to prepare them for the exercise and help to build up the quality culture of the institution.

These training sessions and meetings between HKCAAVQ and the HEI helped to ensure an understanding of the institutional context and the QA process. The Service Agreement

setting out the aims of the exercise and the responsibilities of all parties was also able to be satisfactorily negotiated over this time and taking into account that HKCAAVQ was able to conduct its QA activities in different ways in different contexts.

In this process it was important for HKCAAVQ to be mindful of the awareness of external QA and culture of internal QA within the HEI. There can be very different understandings of even well accepted QA terminology. The HEI, newly engaged with the HKCAAVQ accreditation model and process found it helpful to receive assistance/facilitation prior to undertaking external QA.

HKCAAVQ is not an accreditation authority in Macau and cannot issue a statement of accreditation approval nor benchmark overseas qualifications to the Hong Kong Qualifications Framework.

With regard to the outcomes of cross-border QA, it is essential that the EQAA has informed the institution in advance the extent of recognition the institution would gain. Gaining international recognition is a key incentive for an HEI to engage an international EQAA to review their programs. There is an expectation that their programs can be benchmarked against well-recognized standards, and the outcomes can be explicitly stated. Therefore, maintaining a good balance between the constraints the EQAA faces and the HEIs' objectives is important for effective collaboration.

The official language of the HEI also needs consideration. It is directly related to the language used in the submission and working documents, and communication during the site visit. This is one of the deciding factors for the selection of appropriate peer-review experts.

In the review process, a more enabling approach is needed to facilitate the HEI in making continuous improvement, which reflects the spirit of QA. In the case of Macau, some interim measures were employed with a view to providing the HEI with opportunities to fill the gaps between their current operation and the established criteria.

All in all the outcome for the HEI and HKCAAVQ from the exercise was a positive experience, and subsequent LPR exercises have been undertaken and further ones are planned.

And, as some agencies position themselves to offer services outside their national jurisdictions, are we also now seeing the emergence of a competitive international market in quality assurance itself?

In the case of Macau a competitive international market for both institutional and program quality assurance already exists. In the case studies described above two different HEI's in Macau are both being pro-active in accessing international quality assurance services but have selected different routes to achieve their goals.

In the Pilot Study the HEI has taken advantage of the Macau Government's initiative to regulate the market through the establishment of standard guidelines and approval processes for international EQAA undertaking program review in Macau.

Under these arrangements the EQAA and the HEI have to take account of the necessary steps to achieve recognition by the Macau regulatory body of any recommendations following the completion of the cross-border QA process.

Equally they have needed to consider the arrangements for the EQAA's follow up procedures for any recommendations or conditions and how these marry with the jurisdiction's proposed regulatory requirements.

Essentially, what the Macau Government is attempting to do through the Pilot Study on the Program Accreditation Guidelines under the Proposed Higher Education Framework of Macau is to establish a 'managed market' for international quality assurance services whereby the HEI's can choose an EQAA that is fit-for-purpose given the nature of their programs, institutional goals, language requirements etc. , while at the same time the selected EQAA must operate within the regulatory framework of standards and processes.

In the Learning Program Review the HEI had undertaken accreditation by professional bodies of its relevant programs first before seeking out program review by HKCAAVQ . Although the accreditation by the professional bodies was more in the nature of a compliance review, they provided a 'health check' for the HEI and stimulated their preparation for program review.

These preparations included attending and conducting conferences on quality assurance with the Asia Pacific Quality Network (APQN) and attendance by staff at INQAAHE conferences. For jurisdictions like Macau the international market for quality assurance includes training and conferences as well as direct quality assurance services.

HKCAAVQ was identified as a fit-for-purpose EQAA by the HEI as it sought to benchmark its program standards against those in Hong Kong and internationally. The choice of HKCAAVQ as a well- recognised EQAA that regularly used international panels in its accreditation exercises, was deliberate in order to meet their internationalisation goals and build up the reputation of the institute and its programmes. However, for another program area the HEI intends to use another well- recognised international EQAA in order to ensure that the programme standard can be benchmarked within Macau as this EQAA has already conducted reviews of these programs in other Macau HEIs.

Competition within countries is also intense in many places; is QA seen as a help or a hindrance?

There is no doubt that both of the HEI's in the case studies saw external quality assurance by an internationally recognized EQAA as helpful and essential for achieving their goals of internationalization, reputation building and benchmarking of professional programs to improve the employability of their students within their region.

However, in conducting the exercises it was recognized that there is potential for developing a more robust quality assurance culture within the HEIs. The knowledge and understanding of outcome based teaching and learning is limited and there is a capacity gap in terms of experience in quality assurance systems and processes. This lack of QA knowledge and experience, rather than QA of itself, may be regarded as a 'hindrance' to the future development of the HEI's given their strategic goals and the policy intent of the Macau Government to require all programs of Macau HEIs to undertake program accreditation using the Program Accreditation Guidelines under the Proposed Higher Education Framework of Macau.

Conclusions

Engaging in cross-border QA creates significant challenges for the EQAA and for the HEIs involved. Not least among which is the necessity for close communication with the jurisdictional regulatory bodies, which is essential to the conduct of successful cross-border QA. As such, apart from a preliminary meetings between the agency and the institution for ensuring a shared understanding of the jurisdictional and institutional context for the forthcoming QA process, it is good practice for the QA agency to meet regularly with the jurisdictional regulatory body to ensure that both parties have a common understanding of the key issues involved.

The experience of HKCAAVQ is that there are also significant benefits to be gained. For the EQAA these benefits include enhancement of their own reputation and recognition of their effectiveness and capacity. It is also professionally rewarding for the staff and panel members involved in that it expands their own range of knowledge and experience and allows them to contribute to the development of quality assurance in another jurisdiction.

Cross-border quality assurance is likely to grow in importance and activity in the coming years. The example of Macau provides a useful reference point for governments, HEIs and EQAA considering engaging in cross-border quality assurance activities.

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