Quality Assurance Responsiveness in an evolving higher education environment

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Abstract

Higher education has undergone unprecedented change in that last 25 years to meet the needs of a growing student population. For example new types of institutions have sprung up, alternative delivery modes are being developed, the mobility of students and educational delivery across borders are growing. This environment is one of the drivers of the establishment of external quality assurance agencies across the world to ensure that all students receive quality education. For quality assurance agencies it is part of their remit to not only ensure that minimum standards are met but also to support innovation and developments in higher education. It means that quality assurance agencies need to be able to apply approaches that can appropriately take new developments into account. This paper will share Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) efforts in future proofing its quality assurance approach for the self-financed higher education sector in Hong Kong.

Introduction

The evolution of the knowledge economy and globalisation of economies have led to an increasing demand for people with appropriate knowledge and skills able to perform new types of jobs and who are also able to continuously develop their existing or new knowledge and skills sets through life-long learning to support the changing needs of society. Between 2000 and 2016 the proportion of 25-34 year olds with a tertiary qualification grew by 7% points on average in the OECD countries.

The increased demand for higher education has impacted the landscape of higher education in a number of ways and has led to an increased diversity in types of institutions. The demand for higher education is increasingly met by private providers, including for-profit providers as a means to supplement publicly funded higher education institutions. According to PROPHE in 2010 the private share of global higher education was 31.3% and the share in Asia 36/4%.

Higher education institutions that are characterised by offering alternative approaches to teaching and learning are appearing as a means to better meet the evolving needs of the labour market. Competency-based education institutions, such as Southern New Hampshire University's self-paced adult learning arm: College for America, De Tao Group Masters Academy, whose programmes are designed as master classes and led by staff who are distinguished academics or have an industry background, and the California Community College Online Education Initiative that allows students to take courses across multiple campuses.

As the examples show the emergence of some of the new types of higher education institutions use alternative delivery modes driven by technologies such as MOOCs. However,
technology is impacting a large part of higher education and programmes are today often offered in a blended rather than a fully face-to-face mode.

Higher education has become internationalised with students and staff moving across borders. This is in addition to programmes being offered via partnerships or foreign institutions having a physical presence outside the country where they are registered. To mention some examples of internationalisation, in 2015 more than 3 million students in the OECD countries were studying outside their home country\textsuperscript{iii}. There were 249 branch campuses worldwide\textsuperscript{iv}. Online education is also contributing to internationalisation of higher education as education delivered electronically transcends borders.

Higher education is increasingly being defined with reference to qualifications frameworks that for the most part include the outcomes that graduates at a particular level of the higher education system are required to possess when they complete their studies. According to CEDEFOP, in 2015\textsuperscript{v} there were 87 national and 7 regional frameworks in the world. Qualifications Frameworks that define the outcomes of qualifications provide clearer information about articulation pathways within a local education system and can facilitate and support mobility of students across borders.

**Impact of trends on quality assurance**

External quality assurance agencies (EQAs) are now an integral part of the education landscape in most parts of the world. In 1991 the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) was established with nine member agencies and in 2011 the network had more than 240 members. Given that they provide their quality assurance services to higher education institutions, EQAs are also directly affected by the changes to the higher education environment. Based on the overview of some of the major trends in higher education presented some of their impacts on quality assurance are.

1. With the growth in the number of institutions and/or programmes to be quality assured, EQAs have to be able to cope effectively with the increase in their scope of work.
2. The diversity in types of organisations and organisational structures, including governance and financial models and motives for offering higher education, necessitates that EQAs and in particular the experts that they engage to make judgements have the ability to assess the adequacy of alternative models in the context of the standards applied by the EQAA. If EQAs dismiss alternative types of institutions on the basis that they are different from known and previously quality assured institutions, there is a risk that developments and innovation in higher education will be affected. Therefore EQAs need to revise and or develop policies, standards and/or reference points that can appropriately address new and innovative developments in higher education.

\textsuperscript{1} Definition of branch campus: “an entity that is owned, at least in part, by a foreign education provider; operated in the name of the foreign education provider; and provides an entire academic program, substantially on site, leading to a degree awarded by the foreign education provider.”
3. The growing internationalisation of higher education means that some institutions operate in more than one economy and are subject to multiple quality assurance arrangements. This raises the question for economies whether their quality assurance processes cover both local institutions’ work in the economy of origin, any exported education and any incoming international education. This can affect the scope and volume of EQAs’ work. Institutions that operate internationally also put EQAs under pressure to cooperate with respect to the quality assurance of education offered across borders to reduce the burden on the institutions as well as EQAs themselves.

The need for EQAs to adapt to a changing environment is not new. EQAs have always had to adapt to e.g. changes in national education policy, to changes in QA policy at the national and international level, and in response to feedback from their major stakeholders, such as their governance bodies and institutions.

Stephen Jackson summed up the evolution of EQAA’s in terms of overarching approach as follows:

*It can be argued that there is a life cycle to quality assurance. Institutional audit had its greatest impact in the first cycle when institutions reviewed their own arrangements for quality assurance and put in place new systems and procedures. Over time the process of audit has become less effective as quality assurance has become embedded within institutional practice and the methodology became both familiar and predictable.*

This conclusion can not only be considered in the internal institutional context. The effectiveness of a particular quality assurance approach is also affected by the developments in an institution’s external environment to be effective and of relevance to an institution.

**Principles of Quality Assurance**

Over the last decade EQAAs around the world have worked together in international groups and networks, such as INQAHE, the European Association of Quality Assurance (ENQA) and the CHEA International Quality Group (CIQG). EQAAs have based on joint practices and experiences of quality assurance come to an agreement on a set of guiding principles for external quality assurance. In summary they cover the following areas:

1. Assuring and achieving quality is an institutional responsibility
2. External quality assurance processes have a clear purpose
3. Institutional self-assessment based on fitness for purpose or fitness of purpose is a core component
4. Site visit by expert panel
5. Outcomes of the external quality assurance process is documented in a panel report

There are variations over how these principles are interpreted and implemented in different economies and different parts of the world, e.g. what constitutes a self-assessment process,
whether a site visit is a mandatory part of all quality assurance processes or whether a site visit may not be conducted for accreditation of e.g. new programmes/courses where it may be deemed to add less value to the quality assurance process. Notwithstanding the above a majority of quality assurance bodies adhere to these principles in their quality assurance processes.

**HKCAAVQ**

These principles also form the basis of HKCAAVQ’s accreditation processes. HKCAAVQ was established in 1990 and is an independent statutory body set up under its own Ordinance (Chapter 1150). In 2008 HKCAAVQ was appointed as the Accreditation Authority and Qualifications Register Authority under the Hong Kong Qualifications Framework under the Accreditation of Academic and Vocational Qualifications Ordinance (Chapter 592).

HKCAAVQ provides quality assurance and assessment services to non-self accrediting and self-financed 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 to government bureaux and other organisations in Hong Kong and the Asia-Pacific region. HKCAAVQ accredits operators and their learning programmes through a four stage quality assurance process that includes Initial Evaluation of the operator (IE), Learning Programme Accreditation and re-accreditation (LPA and Re-LPA), Programme Area Accreditation (PAA) and Periodic Review (PR). Operators that wish to have their learning programmes accredited are required to present evidence that they meet the set standards.

The non-self accrediting post-secondary sector in Hong Kong has grown since the introduction of associate degrees in Hong Kong in 2000. In 2017 there were 36 self-financed post-secondary institutions, 11 of which have authority to grant bachelor degrees and some also master degrees. 30 of these institutions seek a range of accreditation services from HKCAAVQ.

**Enhanced use of technology**

In 2015 HKCAAVQ introduced a Quality Management system (QMS). The QMS is an internal management tool. It consists of a centralised database that serves as a repository containing all case information on accreditation, including details of each accreditation exercise, profiles of specialists (i.e. subject experts who serve as members of accreditation panels) and records of operators (i.e. providers of the learning programmes seeking accreditation).

The QMS gives staff easy access to information and facilitates the internal sharing of information. The systematic presentation of information also enables HKCAAVQ to analyse case information to identify quality issues that relate both to individual operators and across operators. This has made it possible for HKCAAVQ to introduce a differentiation approach to accreditation that recognises operators’ track record in accreditation (See below).

The QMS also includes an external interface, known as the e-portal, that allows operators to submit and download accreditation documents in a secure environment. This online tool for submission makes the exchange of information less time-consuming than submission of hard copies. It also facilitates the sharing of information with panel members some of whom
reside overseas. Internally it saves time and space for filing documents and it facilitates sharing of information among staff members conducting accreditation exercises. The QMS is a critical platform for HKCAAVQ to manage growing numbers of exercises effectively and in a timely manner.

**Differentiation of accreditation approach**

As a response to market needs and due to increased competition for a decreasing number of senior secondary students since 2014, the operators HKCAAVQ work with regularly develop new programmes and they also continue to have existing programmes accredited. This means that the accreditation burden for both operators and HKCAAVQ continues to grow. It also means that a large number of institutions have had their programmes accredited regularly and many of them have been assessed to be implementing strong internal quality assurance mechanisms. The accreditation ordinances in Hong Kong (Caps 1150 and 592) defines HKCAAVQ’s responsibility to assess whether operators are competent to achieve their objectives and offer programmes that meet the standards set to achieve the objectives. Due to the focus on an operator’s competence, it is reasonable to recognise quality assurance capability that translates into good accreditation outcomes and quality assurance track record.

HKCAAVQ has defined track record on the basis of a number of indicators, such as successful outcomes in accreditation history, external recognition, performance in other types of assessment, compliance with rules and regulations under accreditation and assessment. If an operator is deemed, based on the assessment of these indicators, to have a good track record for a particular programme, it is eligible for a differentiated accreditation approach. A differentiated approach does not change the standards that a programme will have to meet. However, the differentiation approach affects the accreditation process e.g.

- There is no or a shorter site visit
- There is a focused scope of accreditation and possibly an accreditation panel with fewer members to reflect the focus
- An extended validity period may be granted, i.e. beyond the N+1 rule, with N being the programme duration

The value of this approach is that it recognises the achievement of the operators, reduces the burden of accreditation for both operators and HKCAAVQ and enables us to spend adequate resources on the accreditation of operators that require more attention.

**Alternative delivery modes**

An increasing number of programmes in Hong Kong are taught in blended mode, rather than fully face-to-face, using digital technology in the learning and teaching process. There is also a significant number of fully online non-local programmes registered or exempt from registration in Hong Kong. 216 programmes offered fully online were registered or exempt from registration as of 15 December 2017. HKCAAVQ has also met an interest from local, including vocational operators, for having programmes delivered online accredited. To address this development HKCAAVQ will, in the first half of 2018, be launching a service for
operators wishing to have programmes delivered online accredited. When developing this service we reviewed our accreditation standards and criteria and came to the conclusion that they are appropriate for assessing the quality of the online delivery mode. The standards and criteria have also been tested in a pilot project of a programme offered in blended mode, but with more than 50% of the delivery being online. However, in order to support operators and specialists in the accreditation process HKCAAVQ is developing a focused set of guidance notes that provides information about how to interpret the relevant standards in the context of blended or fully online delivery. We will also be offering targeted training for operators, specialists and our staff. The standards that are particularly relevant to consider in the context of online delivery are teaching & learning, assessment, student support services, quality assurance and financial and physical resources.

Accreditation of programmes offered outside Hong Kong

Hong Kong is a receiver of international education rather than a provider. Close to 1,200 programmes were offered by foreign awarding bodies in partnership with Hong Kong institutions in 2017.

Registration or exemption under the Non-local Higher and Professional Education Ordinance (Cap 493) is a requirement for non-local programmes offered in Hong Kong, except for programmes delivered fully online, whereas accreditation is voluntary. HKCAAVQ has been offering IE and LPA for non-local programmes since 2009.

Although it is not a government requirement for higher education programmes offered outside of Hong Kong to have been quality assured for that particular purpose by one of the quality assurance bodies in Hong Kong, HKCAAVQ has developed an accreditation service targeted primarily at the self-financed post-secondary institutions wishing to offer their programmes outside of Hong Kong, primarily in Mainland China. The accreditation process, if successful, will certify the quality of the programme and does not infer any recognition of the qualification(s) issued by the operator under the Hong Kong Qualifications Framework or in Mainland China. The benefit of the service is that the operator will be able to provide proof of the programme for its particular purpose outside its home jurisdiction.

Review of Standards

The standards that EQAAs use have an impact on the behaviour of institutions as they do set minimum requirements that institutions must adhere to even if they are not prescriptive in nature. Therefore it is important that the standards used are up-to-date and reflect the circumstances that prevail in the environment that accredited institutions operate in. Most EQAAs ensure that this is the case by conducting regular reviews of their standards, typically in cycles no shorter than 10-years unless extraordinary events, such as higher education reform, occur. The standards that HKCAAVQ uses under the Four-stage quality assurance process were developed in the lead up to the introduction of the Hong Kong Qualifications Framework (HKQF) in 2008. That means that they are close to ten years. Given that the introduction of the HKQF was an opportunity for HKCAAVQ to develop a new quality assurance mechanism, operators, industries, government bureaux as well as HKCAAVQ have gained valuable experiences over the last ten years and due to significant changes in the
education landscape, the HKCAAVQ Council in 2015 considered it timely to initiate a review of the standards to ensure that they are fit for purpose in the future.

The HKCAAVQ review of standards coincided with the Hong Kong Education Bureau’s review of the Generic Level Descriptors (GLDs) of the HKQF, i.e. the level specifications of the HKQF. The review of the GLDs was initiated after the completion of a comparability study between the European Qualifications Framework and the HKQF. The GLDs are an integral part of the HKCAAVQ Four-stage quality assurance process.

These two reviews mean that the standards have been future-proofed and are considered to appropriately reflect the post-secondary environment in Hong Kong.

International cooperation

The increased internationalisation with higher education institutions being subject to quality assurance requirements in multiple jurisdictions opens up for opportunities EQAAs to work together with the possibility of reducing the burden for both EQAAs and institutions. While most EQAAs are required by legislation to ensure that their local standards are met they often have flexibility in organising the quality assurance process. Due to the large number of non-local programmes delivered in Hong Kong, 15% (December 2017) of which are accredited by HKCAAVQ, HKCAAVQ has over the last ten year invested resources in building up partnerships with EQAAs around the world, focusing on EQAAs from economies whose institutions are active in Hong Kong. These partnerships allow us to discuss how we can share information, standardise the format of the evidence requirements and conduct joint exercises. The most mature example of such partnerships is the Quality Beyond Boundaries Group (QBBG). The QBBG is a network of international EQAAs from major sending and receiving countries of cross border education that has been formed to address common challenges by creating a platform to collaborate, share information and best practices, and work together to improve quality assurance systems.

Good practices database

In order to help Hong Kong operators establish and continuously improve their quality assurance processes as well as teaching and learning processes, HKCAAVQ has developed a database of good practices that is available on our website, the QAOK. QAOK has been funded with support from the Quality Enhancement Support Scheme (QESS) of the Hong Kong SAR Government. The practices available have been identified from international scholars who have conducted workshops for HKCAAVQ staff and from representatives of institutions accredited by HKCAAVQ. Good practices identified and collected in QAOK share three common characteristics. They need to have been proven to have had an impact in the institution where they have been used, they have to be sustainable and lastly they have to be transferable across different institutional contexts. By the end of 2017 QAOK hosted 150 practices and HKCAAVQ will continue to expand the database by identifying good practices through its accreditation processes.
Conclusion

Due to the rapidly and continuously changing demands of the labour market, higher education institutions have to be able to respond and adapt at a fast pace to educate learners with adequate knowledge and skills. The society relies on higher education institutions being able to meet the changing needs while not compromising quality of provision. This environment equally puts pressure on EQAAs to organise quality assurance processes that respond adequately to the changing needs. The accreditation standards used are a key component for EQAAs to respond. In particular standards used for programme accreditation need to reflect the needs of society with respect to curriculum content, learning outcomes and delivery modes.

The number of EQAAs for higher education has grown over the last 25 years and there are very few economies without any form of quality assurance arrangements. As a consequence many institutions has gone through quality assurance on a regularly basis and have had their quality assurance arrangements and the quality of provision reviewed in regularly cycles.

Few EQAAs work with a homogeneous group of institutions, rather institutions are at different levels of maturity and experience when it comes to provision of education as well as internal quality assurance. The number of institutions and their programmes that fall under the remit of EQAAs tend to grow over time as the number of new institutions and programmes is higher than the number of institutions and programmes being closed down. In such an environment it is relevant for EQAAs to consider replacing a one-size fits all quality assurance approach with the right fit quality assurance approach that reflect the track record of the higher education institutions and the standards that require particular attention.

For EQAAs to make such a move they will have to ensure an appropriate balance between supporting innovation while still being effective in ensuring minimum standards and integrity of qualifications.

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1 OECD, Education GPS, accessed on 20 December 2017, at http://gpseducation.oecd.org/
4 OECD, Education at a Glance 2017: OECD Indicators, Indicator C4, Table C4.1, p. 300, OECD 2017
6 CEDEFOP, Global Inventory of National and Regional Frameworks Qualifications Frameworks – Volume II National and Regional Cases, November 2015
7 Regulating Higher Education: Risk-based approaches to quality assurance, by Stephen Jackson, Centre for Analysis of Risk and Regulation, May 2015, p. 20

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