

LC Paper No. CB(2) 359/05-06(03)

**Legislative Council Bills Committee on
Accreditation of Academic and Vocational Qualifications Bill**

Dear Chairman and Members of the Bills Committee,

I speak on behalf of the Concern Alliance on Training and Retraining regarding the Accreditation of Academic and Vocational Qualifications Bill. In general, our members all welcome the introduction of the Qualifications Framework and the Accreditation of Academic and Vocational Qualifications Bill put forward. This will enhance the competitiveness of Hong Kong's manpower in the global economy and benefit our economic development in the long run. It can also improve the standard and credibility of training providers and the courses provided by them, as well as ensure the general public can receive quality training services. We therefore support and endorse the legal backing for the Quality Assurance System which can protect the integrity of the Qualifications Framework.

In the past one year, a lot of briefing sessions, visits and pilot runs have been ongoing. We welcome the openness of the government departments and various other parties involved. This seems to show that we are heading in the right direction. We are also happy to know from paragraph 23 of the Legco brief that training providers are considered to be members of HKCAA, to achieve a better balance of academics and non-academics.

Through our observation and understanding, however, there are several points which we would like to highlight. We believe that with these points being addressed, the policy put forward can be even more successful and well received by the general public.

In paragraph 39 of the Legco Brief, clients of HKCAA are mainly concerned about the level of fees to be charged by HKCAA in future. Regarding this, we understand that the purpose to set up the Qualifications Framework is that the general public can have a clear ladder path in their academic and vocational study. This is especially true for those low educated skill workers, so that they can benefit from the mechanism and can ultimately upgrade themselves in their career. However, if fees are to be charged on accreditation tests and entry of qualifications into the Qualification Register, the costs are likely to be imposed back to the clients for those private courses. This will surely increase the burden of the low income group and will not

encourage further study. The purpose of the Qualifications Framework is, therefore, defeated. In addition, how the Secretary for Education and Manpower will monitor the fee charging of HKCAA should be well considered, as this will greatly affect the benefit to the general public, especially for those who need continuing education and training the most.

Even for training programmes (e.g. Employees Retraining Scheme, Skills Upgrading Scheme and Continuing Education Fund) directly funded by the government, it is logical that the fees or costs should be borne by the government. As such, to avoid complications, we suggest that the fees should be waived for these projects or that the government will channel such costs directly to the HKCAA.

Regarding the Recognition of Prior Learning (RPL) mechanism, it is mentioned in paragraph 10 of the Legco brief that assessment agencies will be appointed for such purpose. We are concerned whether the appointment of the assessment agencies will be transparent and fair. Due to the possible great demand of assessment, to make it feasible and to ensure the integrity of the mechanism, we suggest that the number of assessment agencies should not be confined to any single one agency, but should include all agencies which possess the accreditation requirement of the HKCAA.

We understand that a number of Industry Training Advisory Committees (ITACs) have been set up by EMB to formulate the specification for competency standards of the respective industries. HKCAA also has formed various Subject Panels to help assess the competence of the operators and learning programmes. We hope that these ITACs and Subject Panels can include expertise in the industries who are neutral and without conflict of interest in the training field, so that a fair judgment can be made during their assessment.

Finally, we would like to emphasize that the Qualifications Framework and the related policies will greatly affect the benefit of the working class. This means that over a million of the working population may need to know what QF is and how it will benefit or affect them. Our contacts with the working class show that they have a fear that the imposition of QF will affect their career. Apart from considering the points mentioned above, a more comprehensive promotion campaign is, therefore, required to avoid any confusion among the general public.

We do hope that our views can have the endorsement of the Members.