Submission from Kaplan Business and Accountancy School

Issues related to the governance and regulation of the self-financing post-secondary sector

JQRC report on 2012/13 HD/AD over-enrolment of JQRC member institutions

According to the Joint Quality Review Committee (JQRC) report on the over-enrolment of JQRC member institutions offering Associate Degree (AD) and Higher Diploma (HD) programmes, it remarked that "In the face of the larger demand, some SSPUs [self-financed Sub-degree programme Units] decided to change their plans and enroll over the initial planned intake." It seemed to be a responsible act to admit more HKDSE students who met the requirements for AD/HD. However, the above explanation was not convincing owing to the fact that many smaller, private self-financed institutions failed to admit enough students in the double cohort year as a consequence. Several private institutions admitted only 10 - 15 students, Kaplan was one of them. It is not cost effective to run a programme for such a small student number. Moreover, it is also a waste of tax payers' money if institutions decide to forego a validated programme. At present, the government subsidizes each programme validated by HKCAAVQ.

In the same report, JQRC found that "there had occurred a time lag between the admission of students and the completion of the planned resources in the case of individual SSPUs. This had undoubtedly led to unsatisfactory provision of space and resources for some students at the start of the academic year." Unfortunately, the rights to knowledge of many students have been jeopardized. Lingnan Community College is a case in point. This is, we think, a fundamental quality assurance fraud that we academics should not have committed. Moreover, some of the programmes on offer have not yet been fully approved by JQRC at the time of admission.

If we look at the practice of HKCAAVQ programme validation, institutions have to show in advance that there are adequate classrooms facilities and seats for the proposed students number before the programme would be approved. Space and resources should be in place before any promotion and admission activities could be carried out. Would it be fairer if all self-financed institutions in Hong Kong follow the same rule in Quality Assurance matters? We would suggest that an overall student number allocation policy similar to the one practiced by UGC for all UGC-funded institutions would be ideal. If the government needs to subsidize each UGC-funded student HK\$200K annually, would it be possible for a self- financed community college to provide quality education with the tuition income? We need urgently a single

regulatory body to oversee all the self-financed sub-degree programmes. This is the best way to promote the healthy development and maturity of the self-financed sector.

Liaison Committee on Quality Assurance

In response to the above incidents, the Government has recently transformed the tripartite Liaison Committee into the Liaison Committee and set up a platform, namely, "Concourse for Self-financing Post-secondary Education", and a "Liaison Committee on quality assurance". The goals of the liaison committee is twofold: a) to promote sharing of good practices among all the quality assurance bodies and enhance consistency and transparency so as to strengthen accountability; and b) to conduct periodic external audits and review on private community colleges or community colleges under the aegis of UGC-funded institutions. This is a good start but however not enough to properly regulate the present situation.

The way forward as suggested by UGC report

In the 2010 UGC report, "Aspirations for the Higher Education Systems in Hong Kong", it commented that the current division of responsibilities among various quality assurance bodies served Hong Kong well in the past, "it is now appropriate to re-think whether a unified quality assurance body for the entire post-secondary sector would make it easier to develop a clear and coherent framework for quality assurance and enhancement, and give the Qualification Framework a more cohesive background."vi Such QA results "enables policy makers to examine different parts of the system as part of the totality, with a view to developing more coherence and mobility within the entire sector." Without such a cohesive system, students would have difficulties - to compare the quality of a sub-degree programme provided by UGC-funded institutions and those offered by private institutions; - to understand the pathways for student progression and requirements for articulation, the extent of articulation, and student mobility. More importantly, the issue of Cross-subsidies of public funds and the complete separation of community colleges from their parent institutions also need to be revisited. The report asserted that "it is not unreasonable to subject institutions offering the same level of programmes... to the same quality assurance mechanisms." The said report recommended that a single quality assurance "body should integrate the methods and approaches of quality assessment, validation and accreditation across the system." ix

The self-financed education in Hong Kong has not yet been supported fully by parents, students and employers it is the right time to revamp the present structure. We sincerely hope that the government could speed up the creation of this regulatory body with a single quality assurance system so that the quality of self-financed education could be further strengthened.

¹ Joint Quality Review Committee Looks Into Enrolment Issues of Self-Financed Sub-degree Programmes, 23 November 2012, p.3 JQRC website.

¹¹ Joint Quality Review Committee Looks Into Enrolment Issues of Self-Financed Sub-degree Programmes, p.3

iii Ibid, p.3

iv Legislative Council Panel on Education, Discussion paper on 25January, 2013, LC Paper No. CB(4)318/12-13(01), p.12. http://www.edb.gov.hk/en/about-edb/legco/policy-a

^v 2010 Report of the University Grants Committee, UGC website: http://www.ugc.edu.hk/eng/ugc/publication/report/her2010/her2010.htm

vi 2010 Report of the University Grants Committee, p.114.

vii 2010 Report of the University Grants Committee, p.114.

 $^{^{\}text{viii}}$ 2010 Report of the University Grants Committee, p.127.

^{ix} UGC releases Aspiration for the Higher Education System in Hong Kong Report, http://www.ugc.edu.hk/eng/ugc/publication/press/2010/pr01122010.htm