

**CONSTRUCTION INDUSTRY TRAINING AUTHORITY**  
**建造業訓練局**



[ ESTABLISHED BY INDUSTRIAL TRAINING (CONSTRUCTION INDUSTRY) ORDINANCE 1975 ]

（依據一九七五年工業訓練（建造業）條例成立）

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OUR REF. 本局檔案：(6) in EDO/CO/1 (1)

YOUR REF. 來函檔案：CB2/BC/15/04

Clerk to Bills Committee on  
Accreditation of Academic and Vocational Qualifications Bill  
Legislative Council  
8 Jackson Road, Central  
Hong Kong

15 March 2006

(Attn: Mr. Raymond Lam)

Dear Mr. Lam,

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

I refer to your letter of 1 March 2006 to Mr. Eddie Yiu, Senior Manager of Construction Industry Training Authority (CITA) on the above.

CITA supports the notion of establishing a Qualifications Framework (QF) and the accreditation of vocational qualifications under the QF. As regards the Accreditation of Academic and Vocational Qualifications Bill (the Bill), I would offer my observations on a few provisions that are relevant to the operations of CITA.

HKCAA as an Accreditation Authority

Schedule 1 of the Bill specifies HKCAA as the Accreditation Authority and the Qualifications Register Authority. In response to the changes of HKCAA's functions, Para. 24 of the Legislative Council Brief on the Bill states that "HKCAA should maintain its existing size but with a wider spectrum of expertise and background in view of its modified functions" and that the "appointed members shall be persons ... of good standing in ... any industry". We welcome the notion that more persons with expertise in vocational accreditation would be appointed to the HKCAA. However, with a membership of 15 to 21, it is going to be a great challenge to pool people with the desired expertise together from appropriate sectors and at the same time to achieve an optimum balance of experts in both higher education and vocational training across a diverse spectrum of disciplines and industries.

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With regard to the implementation of accreditation by HKCAA, it is mentioned in Para. 3 of the document LC Paper No. CB(2)1374/05-06(01) on Arrangements for Forming Assessment Panels that “An independent panel comprising members with relevant knowledge and experience in the discipline is formed for each accreditation activity. The membership of accreditation panels is determined according to the principle of ‘peer review’ and balanced representation.” For construction-related industries, the composition of the accreditation panels should comprise knowledgeable practitioners, representatives from training providers and current license granting bodies, such that the accreditation tests are to be conducted against solid understanding of latest industry practice.

#### Mechanism for Recognition of Prior Learning (RPL)

Para. 46 of the Brief mentions that the Industry Training Advisory Committees (ITACs) are also required to formulate an appropriate RPL mechanism for their respective industries. However, the notion to establish an overarching body to coordinate the RPL mechanisms of related industries such that the qualifications so recognized are in the same or similar levels is not to be overlooked. In addition, the implementation details of RPL, such as the number of assessment agencies in relation to an industry, the composition of assessment panels, qualifications of the assessors and whether to include appropriate external assessors in the panel should be addressed. It would be beneficial also to develop a mechanism that ensures the qualifications granted under the QF are to be recognized by all accredited operators and granting bodies.

#### Accreditation of Courses and Qualifications

Clause 4 (1) (b) of the Bill states that one of the functions of the Accreditation Authority is “to conduct accreditation tests to determine the matters required to be determined by the Accreditation Authority under section 8 and Schedule 3”. Clause 4 (2) also states that the Accreditation Authority may perform its functions on its own or jointly with other persons or organizations. Currently CITA is conducting a number of certification tests and courses under relevant legislations including the Factories and Industrial Undertakings Regulations and other ordinances. CITA proposes that such recognized tests/courses are to be exempted from the accreditation process and the qualifications granted are allowed to be entered into the Qualifications Register (QR) without going through further accreditation process.

#### Fees to be charged

Under clause 4 (4) (a) of the Bill, the Accreditation Authority may determine the fees to be charged for the conduct of accreditation tests. CITA is concerned about the level of fees to be charged for the accreditation tests. Rather than empowering the HKCAA to determine the fees to be charged, it is prudent that the control mechanism on the level of fees is spelt out in this Bill.

Clause 7 (1) (a) of the Bill also states that the QR Authority may, on receipt of a fee, enter a qualification into the QR and specify the validity period of such an entry. There is no indication in the Bill whether this fee is separate from or included in the fee charged under clause 4 (4) (a). Should these fees be separately charged, CITA and other operators would be subject to heavy financial burdens.

Annex C of the Legislative Council Brief on the Bill states that the Administration is considering providing non-recurrent funding at the outset to subsidize the cost of accreditation borne by the providers of training courses on a matching basis. However, it is unclear whether the subsidy will be extended to all the training providers, or will only be provided to those organizations joining the Skills Upgrading Scheme or running the ERB courses. In either case, it appears that some control of the level of fee is needed. Early consultation on the funding criteria and related mechanism would be desirable.

#### Establishment of review committees

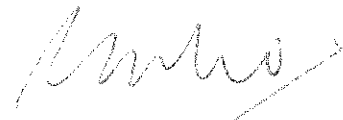
Under clause 10 (3) (b), members of a review committee should have good standing in the field of commerce, finance, education or training or in any industry. Similar to CITA's concern on the composition of HKCAA, the membership of the review committees should reflect optimum balance of the interests of all stakeholders.

#### Final decision of Accreditation Authority or QR Authority

Clause 12 provides that the final decision of the review will be made by the Accreditation Authority or the QR Authority. In order to have a fair review and an independent determination, it is considered more appropriate that the final decision of the review be made by a party other than the Accreditation Authority or the QR Authority.

I hope you could convey the Authority's concerns to the Bills Committee as appropriate. A copy of this submission is also sent to the Council via [shcheung@legco.gov.hk](mailto:shcheung@legco.gov.hk).

Yours sincerely,



Gordon W.F. Cho  
Executive Director