

Accreditation of Academic and Vocational Qualifications Bill

Response to the Views on the Bill provided by

The Council of Hong Kong Non-Profit Making Tertiary Institutions

Purpose

At the meeting of the Bills Committee on the Accreditation of Academic and Vocational Qualifications Bill (the Bill) held on 31 October 2006, the Education and Manpower Bureau (EMB) and the Hong Kong Council for Academic Accreditation (HKCAA) were requested to provide a written response to the views on the Bill submitted by the Council of Hong Kong Non-Profit Making Tertiary Institutions (the Council) on 27 October 2006.

Accreditation Fees and Grants

2. The Council considers that the current fees charged for programme validation are expensive and has proposed that the fees be significantly reduced upon enactment of the Bill. Besides, the Council has requested the Government to subsidize not less than 50% of the fees of institutional reviews and programme validations. The grant should cover both full-time and part-time programmes.

3. At the meeting of the Bills Committee held on 31 October 2006, the EMB submitted a paper to Members, setting out the proposed levels of accreditation fees to be charged by the HKCAA under the Qualifications Framework (QF). The HKCAA will introduce a new streamlined and “fit for purpose” quality assurance process, which will significantly reduce the scale and the cost of its accreditation work, and hence give considerable room for fee reduction.

4. At the same meeting on 31 October 2006, the EMB also submitted a paper to brief Members on the resources strategy being developed to support the implementation of the QF. We propose to make available a grant to education

and training providers to cover the full cost of the “initial assessment”¹, and 50% - 75% of the “programme validation” fees². We also propose to provide a grant to assist the better established non-profit making training providers to undergo Programme Area Accreditation to obtain self-accrediting status in specified programme areas. The grant will cover 50% of the accreditation fees. In addition, the EMB proposes to bear the full accreditation cost of the subsidized courses under the Skills Upgrading Scheme and Employees Retraining Scheme.

5. To avoid creating a recurrent financial burden on the Government/the public, the above schemes are provided on a non-recurrent basis and one-off in nature. They will be subject to approval by the Finance Committee of the Legislative Council after the enactment of the Bill.

Accreditation Guidelines and Procedures

6. The Council has proposed that the HKCAA should enhance the transparency of its accreditation guidelines and procedures. For a non-approved programme, the HKCAA should make clear in which area the programme does not reach the required standard. In addition, members of the accreditation panel should have a good understanding of the programme to be accredited, and no conflict of interest with the programme concerned. Furthermore, the HKCAA should have a performance pledge of completing the accreditation of a programme within three months.

7. We agree that accreditation guidelines and procedures should be transparent. In fact, the HKCAA has already provided to the institutions clear accreditation guidelines, setting out the existing quality assurance process. It will also brief the institutions on the four-stage quality assurance process under the QF. This will help the institutions to understand the accreditation standards and procedures, and prepare the accreditation documents and relevant

¹ Initial assessment of education and training providers is a new accreditation process introduced by the HKCAA to examine the suitability of the provider to provide education and training. A provider having undergone this procedure may proceed with the programme validation stage.

² The grant will cover 75% of the accreditation fees for programmes designed according to the Specification of Competency Standards developed under the QF. For other programmes, the subsidy level will be pitched at 50%

information. The criteria of programme validation are set based on whether the academic level of a programme reaches the level required in similar programmes offered in Hong Kong and overseas. Regarding the accreditation procedures, the HKCAA will adequately discuss with the relevant institution before drawing up the visiting programme. Also, members of an accreditation panel serve in their own personal capacity, and must have rich experience or good knowledge in the subject or industry concerned. In order to avoid conflict of interest, the HKCAA will communicate fully with the institution concerned before formulating the accreditation panel. After completing an accreditation item, the HKCAA will prepare an accreditation report and state clearly the accreditation outcome. For a non-approved programme, the reasons for the non-approval will be specified in the report.

8. The HKCAA has made its performance pledge which sets out the processing time for the various services provided to enhance the quality of services and efficiency. Regarding the accreditation service, as the time required of each project mainly depends on the complexity involved as well as the cooperation of the education and training providers concerned, it is not feasible to set a standardized completion time. However, the HKCAA believes that, under general circumstances, accreditation can be completed within three months for programmes that are relatively simple and at the lower QF levels.

Appeal Mechanism

9. The Council is of the view that an appeal mechanism should be established by the HKCAA and proposes that a representative of the Council be included in the Appeal Board. In addition, appeal fee should be covered by the existing accreditation fee and no extra fee should be charged.

10. Under the Bill, an operator, assessment agency or granting body aggrieved by a decision/determination made by the Accreditation Authority may apply for a review. In the paper submitted at the meeting of the Bills Committee on 31 October 2006, we propose changes to the review mechanism to enhance its independence and credibility. We propose to set up an independent Appeal Board under the Bill to review the decisions/determinations of the authorities concerned. The proposed Appeal Board will be appointed by the Secretary for Education and Manpower. To ensure a good mix of expertise

and experience, the Appeal Board should comprise persons with expertise in quality assurance or the conduct of accreditation tests, or persons of good standing in the field of law, commerce, finance, education or training or in any industry. To ensure the independence of the Appeal Board, all its members should be appointed in their own personal capacity, rather than as representatives of any individual organizations. An appellant will not be required to pay any appeal fee under the latest proposed appeal mechanism.

Composition and Independence of the HKCAA

11. On the other hand, the Council has proposed to include its representative in the Council of the HKCAA and considered that the work of the HKCAA on programme validation should be monitored by the EMB.

12. Given that the HKCAA will undertake the role of quality assurance under the QF and having regard to the diversity of its accreditation activities, the HKCAA should have a wider spectrum of expertise and background. To this end, under the Bill, we shall remove the requirement on the number of appointed members who are academics. Appointed members of the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) shall be persons with expertise or experience in quality assurance or the conduct of accreditation tests, or persons of good standing in the field of commerce, finance, education or training or in any industry. All of the members serve in their own personal capacity, rather than as representatives of any individual organizations.

13. The HKCAA and the future HKCAAVQ are independent statutory bodies responsible for accreditation of training providers and programmes. The EMB respects their independent judgement on individual accreditation cases and trusts that the specialists/academics involved in the accreditation work will handle each accreditation task in a professional, impartial, fair and responsible manner.