## HONG KONG SHUE YAN UNIVERSITY

## Response to the Report of the University Grants Committee "Aspirations for the Higher Education System in Hong Kong" (December 2010)

## Introduction

Hong Kong Shue Yan University (HKSYU) would like to congratulate the University Grants Committee (UGC) on the publication of a most comprehensive review of the current landscape of post-secondary education provision in Hong Kong.

Following a decade of rapid expansion of self-financing post-secondary programmes and the emergence of new providers at both sub-degree and degree granting level, we share the view that it is timely to create a unified interlocking quality assured system of post-secondary education.

The definition of post-secondary education in the Report is comprehensive, encompassing both sub-degree and degree level education. Nevertheless, rather than differentiating between sectors on the basis of the level of qualifications they offer, the Report assumes that the key distinction for policy purposes should be made on the basis of source of funding.

Our responses to selected recommendations contained below reflect our concerns as one of the two non-publicly funded universities cited in the report. They are provided in a spirit of constructive criticism and we look forward to many opportunities to discuss them further in the coming months.

## **Recommendations of the Report**

**Recommendation 2** is that there should be a single oversight body for the non-publicly funded part of the post-secondary education system.

Para 3.44 states that private universities would be operating in line with the public interest policies implemented by the oversight body. In our view, the credibility and coherence of the whole university sector would be better served by providing a single policy oversight body for all universities which would reflect public policy concerns relevant to the sector. We would suggest that to subsume policy oversight of universities within the proposed post-secondary oversight body (in parallel with the remit of the proposed unified QA body) would be to overload it. Rather we would refer to the findings of the Sutherland Report on Higher Education (2002) (Para 2.18) that "a clear and effective division of labour would be to allocate responsibilities for all work at degree level to the UGC and to create a Further Education Council to be responsible for work at the Associate Degree Level".

We also share the view (*Para 3.48*) that the provisions of CAP320 the Post-secondary Colleges Ordinance should be reviewed as they do not adequately meet the needs of post-secondary

institutions today. We believe that it may be necessary to enact a new Private Universities Ordinance.

From our perspective, the continued identification of private universities with the sub-degree sector perpetuates a perception in the public that we are not part of the university system. This view is reflected in the Report itself by the use of inverted commas in Para 8.8: *HK Shue Yan College underwent this process before being granted "university" status by the Government in 2006*; and by the fact that Chapters 4, 5 and 6 of the Report, dealing with internationalisation, relationship with Mainland China, teaching and learning, research and role differentiation, all of which are issues of concern for all universities irrespective of their funding regime, are contained in Part II of the Report entitled "Issues specific to the UGC sector".

With this in mind we are pleased that the Report recommends (**Recommendation 26**) that access of private universities to competitive research funding should be reviewed periodically.

We strongly endorse **Recommendation 35** that there should be a single quality assurance body for the whole system, believing that its establishment is essential if the goal of a unified system that enjoys public confidence is to be achieved. We would also envisage that such a body would have the authority to exercise appropriate discretion in applying a light touch approach to well-established institutions that is based on their track record rather than their funding regime.

Moreover, in the interests of creating a fair, level playing field for all institutions in the sector, we support **Recommendations 33 and 34** which promote clarity about the relationship between UGC-funded institutions and their self-financing community college operations.

While we support the HKQF as an instrument for the classification of quality assured qualifications according to agreed criteria which may result in improved transparency, access and progression for students between and across levels and systems, we are not convinced that the development of a comprehensive Credit Accumulation and Transfer (CAT) System for the whole post-secondary system (**Recommendation 6**) is either feasible or timely. In order to support the transfer or recognition of learning, credit systems operate by quantifying the 'volume' of learning achieved. Such systems worldwide have proved notoriously difficult to implement successfully, and it will be recalled that the last attempt by EDB in 2005 to gain simultaneous buy-in from the post-secondary sector for both the HKQF and the Credit Accord was thwarted by stakeholder resistance that was based on fundamental differences between the measure of a credit between different institutions across the sector. Even if a HK CAT system is established, since institutions will continue to preserve their autonomy in matters relating to the admission of students, and senior year places on degree programmes are likely to remain in limited supply, programme providers will continue to discriminate between applicants on the basis of their confidence in the quality of the prior learning and the reliability of the results obtained. We would suggest that the first priority of the EDB should be to establish a common quality assurance regime for all programmes at the same level, which would then promote confidence in the qualifications offered, before reopening the debate about establishing a CAT system.