

# Follow-up Report on ENQA Agency Review

August 2023

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# I. Introduction

- 1. Under the Accreditation of Academic and Vocational Qualifications Ordinance (AAVQO) (Cap. 592), the Hong Kong Council for Accreditation of Academic & Vocational Qualifications (HKCAAVQ) is named as the Accreditation Authority and the Qualifications Register (QR) Authority in Hong Kong. HKCAAVQ is the sole statuary body in Hong Kong empowered to conduct accreditation for non-self-accrediting operators, including selffinanced higher education institutions. HKCAAVQ takes its statutory quality assurance role to safeguard the quality and standards of learning programmes recognised under the Hong Kong Qualifications Framework (HKQF). Passing the accreditations of HKCAAVQ is a prerequisite to list a qualification in the Qualifications Register, which is supported and funded by the government of Hong Kong and managed by HKCAAVQ.
- 2. HKCAAVQ's main function is to ensure a threshold standard for programmes offered by operators in operating and ensuring the quality of their learning programmes. To this end, the Four-stage Quality Assurance Process (Process) has been developed. The Process addresses the delivery of programmes and internal quality assurance by the operators in different stages. Additionally, the Process also aims to encourage operators' progressive development of organisational competence for continuous enhancement.
- 3. HKCAAVQ has requested ENQA to perform an agency review against the ESG in 2019. As HKCAAVQ is neither one of the signatory states of the Bologna Declaration nor offering services in the European Higher Education Area (EHEA), HKCAAVQ does not aim at ENQA membership or registration on the European Quality Assurance Register for Higher Education (EQAR). The Agency Review is a fully voluntary review aiming at enhancement with the provision of an external perspective based on the ESG. The review was conducted from May 2019 to July 2021, with the review report was issued in September 2021.
- 4. Part 1 of the ESG relates to internal quality assurance of Higher Education Institutions. As the standards are not directly relevant to HKCAAVQ's functions and activities, they were not assessed in the review, notwithstanding that an alignment table for ESG Part 1 vs HKCAAVQ accreditation standards was presented in the submission under ESG 2.2. The Panel found that "external quality assurance by HKCAAVQ supports operators in developing internal

quality assurance mechanisms and thereby the quality of the programmes they offer."

- 5. According to the Terms of Reference, the Review 'will evaluate the way in which and to what extent the core quality assurance activities of HKCAAVQ meet the ESG'. The following accreditation activities based on the Four-stage Quality Assurance Process under Hong Kong Qualifications Framework (HKQF) were covered in the review:
  - Accreditation of local academic programmes
  - Accreditation of non-local programmes
  - Accreditation of online programmes

# II. Outcomes of ENQA Agency Review

- 6. Among the 14 ESG standards, there is full compliance with 9 ESG standards, substantial compliance with 3 ESG standards, and partial compliance with two. No non-compliance is found.
- 7. The panel made 8 commendations and 9 recommendations. Details are listed as follows.

ESG Part 3	Standards		
3.1	Activities, Policy, And Processes for Quality Assurance (Substantially compliant)		
	<ul><li><u>Recommendation:</u></li><li>(i) The agency is recommended to develop a culturally sound approach towards the inclusion of students in the work and governance of the agency.</li></ul>		
	<ul> <li>(ii) The agency is recommended to complement its quality assessment activities represented by accreditations with quality enhancement activities.</li> </ul>		
3.2	<b>Official Status</b> (Fully compliant)		
3.3	Independence (Fully compliant)		
3.4	Thematic Analysis (Partially compliant)		

	Commendation:		
	<ul> <li>The panel commends the thoroughness of analytical activity of HKCAAVQ with regards to the continuous improvement of their own operations.</li> </ul>		
	Recommendation:		
	<ul> <li>(iii) The agency is recommended to advance and extend plans for the publication of the analysis of the findings of its external quality assurance activity, producing regular, timely reports that identify trends, areas of good practice, common challenges and persistent difficulty together with more detailed analysis of selected topics.</li> <li>(iv) The agency is recommended to immediately develop ways to make fuller use of the findings of accreditation activity in advance of the extension of HKCAAVQ's sophisticated MIS.</li> </ul>		
3.5	Resources		
	(Fully compliant)		
3.6	Internal Quality Assurance and Professional Conduct (Fully compliant)		
	Commendation:		
	• The panel commends HKCAAVQ for the sound and participatory process of revising its accreditation standards.		
	<ul> <li>The panel commends the implementation of the QMS providing simplification of the bureaucracy associated with accreditation procedures.</li> </ul>		
3.7	<b>Cyclical External Review of Agencies</b> (Fully compliant)		
ESG Part 2	Standards		
2.1	<b>Consideration of Internal Quality Assurance</b> (Substantially compliant)		
	Commendation:		

 The panel commends HKCAAVQ on the clearly defined criteria for design and approval of programmes in relation to the HKQF, which operators highly appreciate.

# Recommendation:

- (v) The agency is recommended to address student engagement in operators' internal quality assurance processes in the agency's accreditation standards.
- (vi) The agency is recommended to include a standard on accessible learning resources and student support for a diverse student population more explicitly at stage 1 or 2 of the Process.
- (vii) The agency is recommended to integrate relevant aspects of the Code into the accreditation standards of relevant stages in order to further align internal and external quality assurance, as well as the ESG Part 1 and the HKCAAVQ standards.

2.2	<b>Designing Methodologies Fit for Purposes</b> (Fully compliant)
	Commendation:
	<ul> <li>The panel commends HKCAAVQ for introducing the Differentiation Approach following feedback from operators.</li> </ul>
2.3	Implementing Processes
	(Substantially compliant)
	Recommendation:
	(viii) The agency is recommended to implement consistent follow-up
	procedures or instruments in all accreditation procedures irrespective of the result.
2.4	Peer-review Experts
	(Partially compliant)
	Commendation:
	• The panel commends HKCAAVQ for its strong and systematic
	engagement of international reviewers in its review panels. Recommendation:
	(ix) The agency is recommended to involve students in review panels.
2.5	Criteria for Outcomes
2 (	(Fully compliant)
2.6	<b>Reporting</b> (Fully compliant, ENQA Board's decision: substantially compliant)
	(runy compliant, enca board's decision, substantially compliant)
	Commendation:
	• The panel commends HKCAAVQ for the well organised and
	consistent report production process, that is supported by a detailed written and automated workflow, clear report templates and close
	working between case officers, panels, and institutions to ensure
	reports that are well phrased and accurate, and which are
	accepted and understood by operators.
	• The panel commends the commitment of HKCAAVQ to change
	reporting practice to align with international norms and to take its sector with it through the careful and measured way in which the
	move to the publication of full reports has been introduced.
2.7	Complaints and Appeals
	(Fully compliant)

# III. Follow-up Plan

- 8. HKCAAVQ benefited much from the external agency review which provided a platform as well as a framework for reflections and self-review during the processes from preparation, including the SAR, discussions with the review panel on matters related to the agency's strategies, operations and activities, and subsequently to internal deliberations and considerations of the commendations, recommendations and suggestions received from the review panel and drafting of the follow-up plan with a view for development and enhancement of HKCAAVQ's quality assurance services.
- 9. In the report, the review panel "is satisfied that HKCAAVQ is in substantial compliance with the ESG", and "believes that HKCAAVQ has initiated an enhancement-oriented development over the past years to establish and develop its role not only as a gatekeeper of the Qualifications Register but also as a partner in supporting the quality enhancement of self-financing higher education institutions."
- 10. The validity period of the review is five years. The ENQA Board requested submission of a follow up report by September 2023. HKCAAVQ considered all the recommendations acceptable and developed an action plan to guide the progress of addressing issues raised in the recommendations with targeted accomplishments by two stages. Throughout the development and implementation processes of the action plan, stakeholders will be engaged as far as possible. The 2-stage action plan depicts the developmental approach, with Stage I generally focuses on policy review, processes update, consultation with stakeholders, and piloting new measures or approaches, while Stage II aims at the outcomes of implementation, with some processes being on-going, particularly engagement of students and other stakeholders.
- 11. The following section describes details of the actions planned for each recommendation under the relevant ESG standard. Where recommendations under different ESGs refer to the same topic area, they are considered together to avoid duplication.

# **ESG** with Recommendation

# 3.1 Activities, policy and processes for quality assurance

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

#### Recommendation (i):

The agency is recommended to develop a culturally sound approach towards the inclusion of students in the work and governance of the agency.

#### 2.4 Peer review experts

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

# Recommendation (ix):

The agency is recommended to involve students in review panels.

# <u>Response</u>

Students as essential stakeholders of the post-secondary education community should be able to provide valuable feedback on the effectiveness of educational programmes to the institutions. Students are expected to be engaged to provide relevant input and feedback from their perspectives in the QA processes to support the internal quality assurance processes of the institutions. We will follow up on the enhancement of our accreditation standards in line with other improvement required (refer to Recommendations (ii) & (v)).

With regard to students as stakeholders, their engagement with HKCAAVQ can be found in three levels, namely, governance, operation, and accreditation. The scope of engagement at each level should be relevant to their role and perspectives, and thus be qualified by the principle of fitness for purpose and peer review. A policy on student engagement will be developed to delineate the objectives, roles and scope of student engagement at the three levels.

	Action Plan - Stage I (by end-2023)		Action Plan - Stage II (by mid-2025)
а.	<ul> <li>The Learner Engagement Committee</li> <li>(LEC) is to set up with 2 student</li> <li>members to oversee the</li> <li>development of:</li> <li>a policy on student engagement</li> </ul>	a.	Set up a pool of Student Specialists according to the policy developed by LEC by mid-2024
	on:	b.	Pilot two accreditation exercises with one Student

- objectives and roles of student engagement at different levels (governance and operations)
- recruitment / selection / appointment of studetnts
- training programme for different roles (governance, QA, research, accreditation)
- strategies for recruitment students
- an implementation plan
- b. Provide training for student representatives on HKCAAVQ governance; QA principles and accreditation process
- c. Invite trained students to attend site visit as observers and conduct briefing and debriefing sessions with observers

Specialist in the accreditation panel by mid-2025

c. Recap the experiences of appointing students as Specialists for drawing up forward plan on student engagement

# 3.1 Activities, policy and processes for quality assurance

#### Recommendation (ii):

The agency is recommended to complement its quality assessment activities represented by accreditations with quality enhancement activities.

	Action Plan - Stage I (by end-2023)		Action Plan - Stage II (by mid-2025)
a.	Include commendations of good practices in accreditation report	a.	Regular sharing of good practices (in seminars / workshops)
b.	Update Guidance Notes to encourage operators to report on enhancement activities in the accreditation process	b.	Publish regular reports on analysis of findings in accreditation reports (including good practices)
C.	Expand the scope of panel's recommendations and advice in reports to specifically include areas for continuous quality enhancement and excellence in education and training		and the Quality Assurance Online Knowledgebase of HKCAAVQ

# 3.4 Thematic analysis

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

# Recommendation (iii):

The agency is recommended to advance and extend plans for the publication of the analysis of the findings of its external quality assurance activity, producing regular, timely reports that identify trends, areas of good practice, common challenges and persistent difficulty together with more detailed analysis of selected topics.

# Recommendation (iv):

The agency is recommended to immediately develop ways to make fuller use of the findings of accreditation activity in advance of the extension of HKCAAVQ's sophisticated MIS.

# <u>Response</u>

In the self-assessment report (SAR) submitted to ENQA, HKCAAVQ provided three examples of activities as supporting evidence for achieving this Standard:

- 1. Review of accreditation standards
- 2. Review of differentiation approach to accreditation
- 3. Set up the Quality Assurance Online Knowledgebase (QAOK)

Although the Review Panel acknowledged HKCAAVQ's efforts to review and revise its approaches with thorough analysis, stakeholders, and consultation to ensure internal rigour and to drive improvement, they found that the focus, especially in (1) and (2), "has been on information gathering and analysis of its own procedures and their impact, to a certain extent it is primarily internally oriented". As for (3), "whilst the QAOK enables the ready access of examples of practice, and is organised by topic, it does not feature an analytical part or chapter". The Panel considered the examples not able to include analysis of the general findings of external quality assurance activities.

The Panel further explained the requirements under this Standard:

"Activity falling under this standard more typically looks across the detailed outcomes of external quality assurance reports, identifying common themes, be it examples of good or effective practice, examples of shared challenges or recurring areas for development and action. Analyses of this type are primarily externally oriented; they use the outcomes of EQA, mining information in reports, to help the higher education sector gain insights into ways to address issues or to build on effective practice."

The purpose of HKCAAVQ's thematic analysis will thus be redefined as:

- To produce structured analysis of programmes and institutions captured in accreditation reports and the Quality Management System (QMS) to identify and reflect on development needs, trends, good practices and challenges face by operators; and to develop and support the culture of quality enhancement in the education and training sector;
- To produce thematic reports to inform stakeholders of the latest development of the education and training sector on based on analysis of specific topics of new trends, themes and projects evolved.

The publication schedule will be:

- One regular report published annually on analysis of findings and outcomes of accreditation based on institution and programme data in QMS; and
- At least one thematic report on specific topic published every two years, with detailed analysis based on multiple sources of information, including policy development, learner data, industry needs, stakeholders views and values, etc..

For regular reporting, a set of quality indicators based on accreditation standards will be identified as framework. Both quantitative and qualitative data will be analysed and reported as general statistics, with examples of good practices captured from accreditation report, and with common challenges and difficulties discussed.

Stakeholders consultation, mainly through the two liaison panels (Liaison Panel for Academic Accreditation, and Liaison Panel for Vocational and Professional Accreditation) which comprise representatives from operators, professional bodies, and specialists, and Student Liaison Meeting in which student representatives are engaged, will be conducted for collecting feedback on the reports and suggestions for thematic analysis on specific topics.

Action Plan - Stage I	Action Plan - Stage II
(by end-2023)	(by mid-2025)
a. Develop methodology for data analyse based upon the existing QMS system and data fields	a. While the system enhancement is ongoing, the publication of regular reports, which is mainly based on QMS data, can be rolled out

- b. Add new data fields such as good practices based on the accreditation panels' commendations
- c. Enhance the system to learner data, e.g. admission and graduate profiles, learning performance, career development, etc., to be transferred from the Education Bureau

only the framework is set. It is expected that the first regular report be published by mid-2024.

- b. Consult the Liasison Panel for Academic Accreditation, Academic Operators, the Education Bureau, and compile a list of possible topics and issues for thematic analysis
- c. Publish the first thematic report by mid-2025

# 2.1 Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

## Recommendation (v):

The agency is recommended to address student engagement in operators' internal quality assurance processes in the agency's accreditation standards.

## Recommendation (vi):

The agency is recommended to include a standard on accessible learning resources and student support for a diverse student population more explicitly at stage 1 or 2 of the Process.

## Recommendation (vii):

The agency is recommended to integrate relevant aspects of the Code into the accreditation standards of relevant stages in order to further align internal and external quality assurance, as well as the ESG Part 1 and the HKCAAVQ standards.

Action Plan - Stage I	Action Plan - Stage II
(by end-2023)	(by mid-2025)
Review Accreditation Standards, including Minimum requirements and Matters for consideration under each standard to determine the necessary revisions to: a. encourage student engagement in operators' internal QA processes and to ensure sufficient student support for diverse student population	Complete the proposed revisions by end of 2024 for implementation

b. ensure alignment with ESG Part 1 and Code of Good Practices on Governance and Quality Assurance for the Self-financing Post secondary Education Sector published by the Education Bureau.

# 2.3 Implementing processes

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

# Recommendation (viii):

The agency is recommended to implement consistent follow-up procedures or instruments in all accreditation procedures irrespective of the result.

Action Plan - Stage I (by end-2023)	Action Plan - Stage II (by mid-2025)
a. Review the legal basis for possible consistent follow up actions taken within the Four Stage QA Process to inform and propose relevant changes of Accreditation Stanadards, and in parallel to evaluate the limitations and resources implications of the implementation of the proposed changes	Complete the proposed revisions and implement by end of 2024
b. Consult stakeholders on proposed changes	
c. Wrap up the implementation plan with administrative procedures and work flow	

# IV. Conclusion

- 12. HKCAAVQ is currently in the process of developing its strategy plan for 2024-29. The new strategy plan will continue the development of a quality enhancement culture. The actions for addressing the recommendations received from the ENQA review panel will be incorporated, as well as the suggestions for improvement will be carefully considered.
- 13. HKCAAVQ thanks the review panel's recommendations and suggestions and the Board of ENQA for receiving this follow-up report.