

Session 4-2

NQF and QA: The Case of Hong Kong

Yiu-Kwan Fan

Executive Director, Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ)

Peter Cheung

Secretary-General, Federation for Self-funded Tertiary Education (FSTE)

Anthony Chan

Project Coordinator (Further Education), Education Bureau of the Hong Kong Special Administrative Region (EDB)

Abstract

This paper will outline the implementation of the Hong Kong Qualifications Framework (HKQF) and associated quality assurance arrangements and analyse the lessons learnt and the drivers behind the creation of the HKQF. The implementation of the HKQF has proceeded in tandem with the development of new arrangements in quality assurance leading to the creation of the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ). As the HKQF further develops to incorporate credits and the promotion of articulation pathways the quality assurance arrangements are also facing change and realignment.

Introduction

Across the world, more than 126 countries or 60%¹ are at some stage of NQF development. Many of these countries and regions are investing heavily in NQF development and implementation and in some instances the development of a Regional Qualifications Framework (RQF).

NQFs are intimately linked to the qualifications systems they comprise. As such, they differ quite widely from country to country. Based on a study of existing and emerging qualifications frameworks in 16 countries, Michael Young, Stephanie Allais and David Raffe (2009) argue that evidence-based policies cannot justify the surge in NQFs. Although the policy literature presents qualification frameworks as a consequence of rational policy decisions by countries in a globalising world, the fact that so many countries chose the same policy response to a wide variety of challenges, despite the limited empirical evidence for its effectiveness, suggests that other forces of globalisation are at work.

Why a Qualifications Framework (QF), what can it achieve, the elements going for it, the inherent difficulties in design and implementation, the ways to overcome them, the dangers and the pitfalls, the central role of QA in it, are all interesting topics, especially with reference to the real-life example of Hong Kong.

Of additional interest is the ability of QF in drawing together different sectors and inducing them to interact, say for example between business and education, amongst mainstream education, vocational education, skills training and learning on the job. These interactions will upset current regimes and produce new dynamics, e.g. with a strong QF, it is now more likely that curriculum will be designed according to the wishes of the end-users, rather than the convenience of the providers; and a qualification is recognized more by the learning outcome it represents, rather than by the way teaching is done (hence the recognition of diverse providers, diverse pathways and, in particular, on-the-job or prior learning).

Whatever the drivers of a qualifications framework a qualification is only as strong as the *quality assurance system* supporting it. Tuck (2007), suggests that quality assurance is an essential element of an NQF and notes this is vital if stakeholders within the country and the international community are to have confidence in the NQF in that country. He suggests that the three important measures of quality assurance are: validation of qualifications and/or standards; accreditation and audit of training institutions; and quality assurance of assessment leading to the award of qualifications. The quality assurance of qualifications includes meeting the requirements of the NQF and the quality of the providers awarding the qualifications.

¹ Centre international d'études pédagogiques, 2011, p.56.

Quality assurance which is stringent, criteria-based, with open access and which is very transparent is essential to any meaningful QF. A central authority with government backing is required. Together with this, there has to be a clear hierarchy of qualifications, possibly with level descriptors and competence standards, consistent nomenclature and, where possible, a coherent system of credits to demonstrate the volume of learning behind.

The public face of a QF is a Qualifications Register, with effective entry control and regular updating. The credibility and the utility of the QF depend on it. It has to be in safe hands (of a QA agency).

A QF is not successful unless it is used. For that, there has to be an implementation strategy and a PR strategy, both of which will need to be resourced and coordinated. To achieve this, there ought to be a branch of the government responsible and a structure of consultative bodies to underpin it, with membership from communities with a direct stake in the QF (e.g. industries, labour, employers, educational institutions, professional bodies, students and parents). The QA agency has to be part of the effort.

The Role of Government

The Hong Kong Special Administrative Region (HKSAR) Government has played a key role in providing policy and funding to support HKQF development and ensure fit with other relevant educational policies.

Hong Kong has taken a step by step or ‘incrementalist’ approach to implementing its framework, focusing first on areas that impact most on social and educational goals such as expanding vocational education and widening access to higher education.

HKQF has been in place since 2008. Set up by legislation, the QF has seven levels covering all forms of learning from the equivalent of traditional Senior Secondary to a Doctoral Degree. The Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) is appointed as the Accreditation Authority and the Qualifications Register Authority which has the dual role of being the gate-keeper and the gate-opener for the QF. For this, HKCAAVQ specifically has developed a 4-stage accreditation process and a ‘group approach’ to deal with initial bulge in demand for accreditation services. The latter is not without difficulties or controversy.

HKQF is a mixture of both a regulatory and voluntary framework. In Hong Kong, only accredited qualifications can be placed on the Qualifications Register (QR, www.hkqr.gov.hk) and the burden of proof is placed on the provider to demonstrate that the learning outcomes match the generic level descriptors of the appropriate level

on the QF. However most qualifications, in all sectors, have been voluntarily placed on the QR by way of one of the three accreditation processes that currently operate in Hong Kong.

Development of the HKQF

HKQF is an initiative of the Education Bureau (EDB) of the HKSAR Government to enhance the quality of manpower and competitiveness of the workforce through **lifelong learning**.

HKQF was conceived by the then Education and Manpower Bureau (EMB) in 2002 and its establishment with its associated quality assurance mechanism was endorsed by the then Executive Council in 2004. The Government introduced a new piece of legislation, namely the **Accreditation of Academic and Vocational Qualifications Ordinance, Cap. 592 (AAVQO)**, which took effect on **5 May 2008**. On the same date, the HKQF was officially launched.

The HKQF is a **seven-level hierarchy** that orders and supports qualifications of academic, vocational and continuing education sectors. Through objective and well-defined standards in the Generic Level Descriptors (GLD), qualifications are level-rated under the HKQF.

The Qualifications Framework Secretariat (QFS)

The HKQF is set up by the Secretary for Education under the law, and Education Bureau (EDB) is, in effect, the authority responsible for policy formulation, strategy and direction on the development of HKQF. The Qualifications Framework Secretariat (QFS) is subsequently set up as the executive arm of EDB to oversee the development of QF infrastructure, implementation and promotion of HKQF.

Key features of HKQF

Industry Training Advisory Committees (ITACs)

The local industries play a pivotal role in the strategic development of QF in Hong Kong. To ensure that qualifications and learning programmes are relevant to the needs of industries, we have so far assisted **19 industries²** in setting up ITACs which comprise key representatives of the employer associations, trade unions, professional bodies and relevant regulatory bodies in the industry concerned. The 19 ITACs cover about 46% of the total labour force in Hong Kong. ITACs are tasked to

² 19 industries include Printing & Publishing, Watch & Clock, Chinese Catering, Hairdressing, Property Management, Electrical & Mechanical Services, Jewellery, Beauty, Logistics, Automotive, Information Communications & Technology, Banking, Import & Export, Testing, Inspection & Certification, Retail, Insurance, Manufacturing Industry (Tooling, Metals, Plastics), Elderly Care Service and Security Services (*which was set up on 1 January 2013*).

draw up **Specification of Competency Standards (SCS)** in the respective industries. The Chairmen and members of ITACs are appointed by the Secretary for Education.

Specification of Competency Standards (SCS)

SCS sets out the skills, knowledge and outcome standards required of employees in the industry and provides a basis for course providers to design education and training courses that best suit the needs of the industry. Employers/enterprises show increasing interest in making reference to SCSs for in-house training and human resources development such as recruitment, job specification etc., appraisal of staff performance and criteria for recruitment, etc. In addition, it forms the basis for assessing and recognizing the skills and experience acquired by practitioners through the Recognition of Prior Learning (RPL) mechanism under QF.

Specification of Generic (Foundation) Competencies (SGC)

QFS have also developed the competency standards for four strands of generic skills, namely, *English, Chinese (including Putonghua), Information Technology* and *Numeracy*, collectively known as the **Specification of Generic (Foundation) Competencies (SGC)**, as a complement to the industry-specific SCSs.

Recognition of Prior Learning (RPL) Mechanism

A Recognition of Prior Learning (RPL) mechanism has been introduced under HKQF to facilitate further learning of workers. The RPL mechanism gives formal recognition to the knowledge, skills and experience previously acquired by workers in the workplace. It is particularly useful to employees who have a low level of academic attainment but have worked for many years in the industry concerned. Through RPL, these employees do not need to start from scratch when they pursue further education/training.

The RPL mechanism has been implemented with effect from June 2008 and has been implemented in **eight**³ industries.

QF Support Schemes (QFSS)

In 2008, the HKSAR Government launched a number of financial assistance schemes, collectively known as QF Support Schemes (QFSS) to facilitate education and training providers, RPL assessment agencies, learners and industries to participate in the QF.

³ 8 industries include Printing & Publishing, Watch & Clock, Hairdressing, Property Management, Jewellery, Logistics, Automotive and Chinese Catering (*just started on 7 January 2013*)

Promotion of QF

Public awareness and stakeholder involvement are both important factors for the success of QF. Publicity and promotion activities for QF are on-going and jointly undertaken by EDB and QFS. Apart from the industry-based promotional activities like seminars, exhibitions and events to widely promote QF and its related initiatives to industry practitioners, various TV/Radio APIs (Announcements in the Public Interest) and documentary videos have been broadcasted to increase the public awareness. An official QF website (www.hkqf.gov.hk) is also built to serve as a portal in providing latest information on the development of QF.

Internationalisation of QF

With the advent of globalization and rapid development of national and transnational qualifications frameworks in various regions and countries of the world, the need for HK to establish and strengthen collaboration with overseas QF authorities is increasing. EDB and QFS have already started establishing network with Mainland China and overseas QF authorities by signing Memorandum of Understanding and co-organising conferences, in the aim of enhancing the profile of HKQF internationally and providing a basis for referencing or recognition of qualifications with our overseas counterparts. We will continue to extend and strengthen our international network and to explore the possibility of further collaboration with our overseas partners.

Contributions of QF to quality education and training

Quality assurance is the cornerstone to underpin QF development in Hong Kong. Most stakeholders are familiar with the accreditation of the HKCAAVQ for their learning programmes and registration of such qualifications in the QR. However, the infrastructure of the HKQF which ensures transparency, relevancy and fitness-of-purpose of QF-recognised programmes is in fact crucial to the quality of the education and training environment.

The three major components of the HKQF, namely level, credit and award title, give indication on the depth and size of learning as well as nature and subject area of a learning programme. The launch of the Award Titles Scheme (ATS) and Use of Credit under QF in 2012 make qualifications and their expected learning outcomes more transparent to learners.

How relevant a learning programme is to the industry at the workplace is often of major concern to learners. The Specifications of Competency Standards (SCSs) developed under the steer of industry leaders set out the competency requirements and outcome standards of the industry concerned. It serves as a basis for developing programmes that are relevant to the workplace requirement of the industries. To ensure that a learning programme is “fit for the purpose”, the direct input from

stakeholders of industries (rather than the provider) is absolutely essential. This would mean the industries must be able to take the lead in curriculum development of learning programmes. In this regard, the Government of the HKSAR has proposed commitment of extra resources to encourage industries to develop training packages based on the manpower needs of the industries.

Underpinning Quality Assurance (QA) Mechanism

The QF is underpinned by a robust quality assurance mechanism. All qualifications recognised under the QF are locally accredited by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (**HKCAAVQ**) or by the self-accrediting higher education institutions in Hong Kong. HKCAAVQ is specified under AAVQO as the **Accreditation Authority** responsible for QA of qualifications recognised under HKQF.

Qualifications Register (QR)

The Qualifications Register (QR) has been set up upon commencement of the AAVQ Ordinance. As the public face of HKQF, it is a centralised web-based database containing information on providers as well as qualifications and their associated learning programmes, and that have been quality assured and recognised under HKQF. HKCAAVQ is specified as the QR Authority under AAVQ Ordinance.

As at end of February 2013, there are over 7 600 qualifications registered in the QR.

QF and the QA Mechanism

Participation in the QF by stakeholders is on a voluntary basis. Education and training operators are diversified in nature, and varied in terms of scope, size and maturity. To encourage participation of all operators in the QF, the QA mechanism must be able to serve a gate-opening role as well as a gate-keeping role.

Design of the QA Mechanism

The existing QA mechanism (Four-Stage Quality Assurance Process) used by the HKCAAVQ is designed to enable the Accreditation Authority to perform the gate-keeping and gate-opening roles under the QF, e.g. Initial Evaluation (IE) is an upfront quality test which allows new and less-well-established operators to participate in QF, while Programme Area Accreditation (PAA) allows mature operators to develop and offer programmes in which they are competent without programme-by-programme review by an external party.

With the launch of the QF, the Government made provision for further quality assurance of non-local programmes (NLP) in Hong Kong through accreditation on a voluntary basis. An NLP Accreditation model based on the 4-stage process was

developed by the HKCAAVQ for this purpose.

The HKCAAVQ is currently reviewing the 4-stage process, in the light of experience since 2008, whether the existing QA mechanism is still capable of achieving the original purposes of its design and is supporting the further development of the QF.

Development of the QF underpinned by law

To ensure the credibility of qualifications awarded by a wide range of education and training providers under the QF, the AAVQO lays down the quality assurance framework to underpin the QF. This includes specifying the HKCAAVQ as the Accreditation Authority (AA) and Qualifications Register (QR) Authority (Schedule 1, AAVQO), with statutory power to assure the quality of qualifications recognised by the QF and awarded by non-self-accrediting operators. Self-accrediting operators specified in the Schedule of the AAVQO assure the quality of their qualifications entered into the QR by themselves, following the requirements stipulated in Schedule 3. Therefore, self-accrediting operators are outside the remit of the HKCAAVQ.

Legal Requirements in Accreditation

Given the statutory responsibilities, the HKCAAVQ is required to address the legal requirements stated in AAVQO in designing its accreditation model that underpins the QF. Section 4(1) of the AAVQO states that “the functions of the Accreditation Authority are:

- (a) subject to the direction of the Secretary (Secretary for Education), to develop and implement the standards and mechanism for academic or vocational qualifications accreditation to underpin the Qualifications Framework; and
- (b) to conduct accreditation tests to determine the matters required to be determined by the Accreditation Authority under Section 8 and Schedule 3.”

The matters outlined in Schedule 3 relevant to the AA’s role are

- (a) the determination of operator’s competency to operate learning programmes that meet QF standards (s1(a), Schedule 3, AAVQO);
- (b) the determination of the learning programme that meets a QF standard (s1(b), Schedule 3, AAVQO);
- (c) the determination of the competency of the operator to ensure and determine that the programmes operated by the operator meet QF standards (s3(a), Schedule 3, AAVQO).

The accreditation tests as defined in the AAVQO (section 2) relevant to s1 (a), (b) and 3(a) of Schedule 3 “means any assessment, evaluation or other activity to determine:

- (a) in relation to an operator, whether the operator is competent to achieve the objectives as claimed by the operator
- (b) in relation to a learning programme, whether the programme meets a standard to achieve the objectives of the programme as claimed by its operator;
- (c) in relation to a qualification, whether the skills, knowledge or experience recognised by the qualification meet a particular standard.

In summary, the AA’s determination of the operator and learning programme for the purpose of entering the qualification of the learning programme into the QR for QF recognition is on the basis of the following legal requirements:

- (a) Operator
to determine whether the operator is competent to achieve the claimed objectives as well as to operate learning programmes that meet QF standards (S2, AAVQO; s1(a), Schedule 3, AAVQO)
- (b) Learning Programme
to determine whether the programme meets a standard to achieve the claimed programme objectives and the QF standard (S2, AAVQO; s1(b), Schedule 3, AAVQO)

Regarding the provision under s3(a), Schedule 3, AAVQO, in relation to the operator, it is observed that this is for mature operators to self-assure the quality of the learning programme, befitting the purpose of the QF. Of course, the accreditation consideration still needs to address the defined accreditation test function (Section 2, AAVQO) “in relation to an operator, whether the operator is competent to achieve the objectives as claimed by the operator.”

The Four-stage QA Process Model



Stage 1 sets an upfront quality test for potential providers. It is attained by providers of education and training that meet a minimum threshold of quality. It is conducted in conjunction with any intended Programme Validation (PV) (Stage 2), but the two quality assurance stages should be kept conceptually distinct. Programme Validation is a voluntary process, necessary only if the provider wishes to have its programmes or qualifications entered into the Qualifications Register. Programme Area Accreditation (Stage 3) bestows self-accrediting status on an institution for a specified scope of activity, which can be related to level on the QF and / or subject

area. Periodic Review (PR) (Stage 4) is cyclical quality assurance to ensure that a provider with institutional accreditation status continues to deserve the status of being able to validate its own programmes within an agreed scope. Providers who have successfully passed Stages 1 and 3 are subject to periodic review.”

The initial design of the model was to address the following parameters as well as to meet the legal requirements to be enacted in the AAVQO .

(a) **maturity** of the operator (non-self accrediting) as exemplified via the respective stages of its development, i.e. from inception to maturity as follows:

- early stage of institutional formation & development
- programme development and operation
- operation with demonstrable competency and track record in operation to ensure consistent quality of its learning programmes befitting the claimed purposes as well as any other legal and sector specific requirements
- Self-monitoring with demonstrable quality operation and the competency to make enhancement on a regular basis, drawing reference from input by stakeholders and the public at large

(b) the gate-**keeping** and gate-opening roles of AA, were associated with the concept of “enabling”, ex-ante (before) and ex-post (after) approaches in quality assurance. In the context of the Process, ex-ante quality assurance requires the operator to prove that it meets the stipulated standard before running a recognised learning programme. Ex-post quality assurance allows the operator to start operation of the learning programme without going through an external accreditation provided the operator has demonstrated maturity and competency with an approved PAA status. To this end, ex-post is “gate-opening” and enabling while ex-ante is gate-keeping and compliance based.

The HKSAR is now, again incrementally, moving to more centralised control of quality assurance that is deemed necessary for public assurance that quality standards are being met and that stakeholders are protected. More centralised quality assurance is also seen as essential for the development of public confidence in qualifications and to the creation of the environment of credibility and trust needed for the future development of the HKQF to include both articulation and credit transfer systems.