

## **INQAAHE CONFERENCE 2013**

*Sub theme 2 : Innovative Approaches to external QA in tertiary education : not a single approach towards excellence*

### **“External Quality Assurance under a Self Accreditation System : Promoting and Assessing Internal Quality Assurance”**

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#### **Synopsis**

This paper sets out the concept and practice of “Self-accreditation” in the external quality assurance of education. As a model of External Quality Assurance, Self-accreditation is suitable for the more mature institutions, and not all institutions or education systems are suited to this system. Under a Self-accreditation system, external Quality Assurance (QA) and internal QA play different roles. Although institutions have ultimate responsibility for programme quality, the external QA agency assesses and advises on the QA systems of institutions and adds an external check on the internal QA systems.

The external QA (EQA) bodies, in carrying out reviews or audits, are influencing the development of internal QA models of the higher education institutions (HEIs), but they do so without imposing a particular model of internal QA on the institutions. It is this practice of institutional autonomy which underlies the concept of self-accreditation.

#### **Self Accreditation**

Self-accreditation (S-A) is the status accorded to institutions which, by virtue of the maturity of their internal quality assurance systems, are exempted from the external accreditation of their programmes. Self-accreditation status is practised in some jurisdictions where groups of institutions or selective individual institutions are awarded this status.

The trend of public accountability demands that higher education institutions, whether they be Self-accrediting or not, should be subject to some form of external scrutiny. The common forms of external QA is conducted through **reviews** or **audits**. These differ from accreditation in terms of outcome. Where accreditation results in an “approval/non-approval” outcome, reviews/audits often result in recommendations for improvement.

In the U.K., self-accrediting institutions are subject to continuous external review by QAAHE. In, Australia, self-accrediting institutions are reviewed by AUQA previously, and at present by TESQA.

In Hong Kong, the S-A institutions are subject to audit by the Quality Assurance Council at the degree level, and subject to review by **Joint Quality Review Committee (JQRC)** for their Self-financed Sub-degree (SFSD) programmes– while Non S-A institutions are accredited by the HKCAAVQ – this means the institutions are able to offer degree-level programmes only if they and their programmes are accredited.

Joint Quality Review Committee (JQRC) is an External QA body established by the Heads of Universities Committee of Hong Kong constituted by the eight institutions under the aegis of the University Grants Committee (UGC). Its major function is to provide for the peer review of the quality assurance processes of the self-financed sub-degree programmes of member institutions. JQRC member institutions are self-accrediting.

Joint Quality Review Committee conducts **Institutional Reviews**, which provide for a peer review of the institutional structures and processes adopted for ensuring the quality of Self-financed Sub-degree programmes. The Reviews are conducted through a 3-stage process of of Self-evaluation, Site Visit, and Report. Instead of outcomes of approval or non-approval, there is a Report with recommendations for improvement

The Institutional Reviews conducted by **JQRC** examine the following areas:

*Institutional Plans and Policies*

*Institutional polices and plans for the development of programmes*

*Processes / responsibilities for formulating plans*  
*Institutional policies for the quality assurance of programmes*

*Programme Approval Authority*

*Authority for the approval of SFSD Programmes*

*Relationship between approval authority and central academic authority*

*Programme Approval, Delivery, and Monitoring*

*The design and approval of programmes*

*Standards and Processes for admission, assessment*

*Benchmarking and monitoring of standards*

*The involvement of different stakeholders*

*Institutional Support for Programmes*

*Staff appointment, appraisal and development*

*Allocation of resources to programmes*

*Student support services*

*Information Access and Management*

The areas that are examined in reviews /audits are not vastly different from those for accreditation, but the emphasis and the outcomes are different. The reviews/audits normally result in outcomes of recommendations/ commendations, rather than stipulations of requirements or conditions.

The external QA for S-A institutions is based on the premise that institutions should have ultimate responsibility for the quality of their programmes. They should be allowed flexibility in adopting internal QA systems; the external reviews are intended to assist self-improvement without imposition of specific models of institutional structures or processes.

Therefore, JQRC's model of Quality Assurance

- ▣ Values independence of HEI
- ▣ Respects institutional autonomy
- ▣ Aims at improvement rather than judgment alone
- ▣ Encourages the sharing of good practices among institutions

## **Impact of External QA on Internal QA**

There is no fast and hard rule as to what constitutes an effective internal QA system. The QA bodies, through external reviews and the recommendations made, influence the development of internal QA systems. There are good practice principles that are commonly acknowledged, with reference to which institutions devise their own modes of internal QA, taking into account their mission and structure, their traditions and culture, programmes offered, and other circumstances.

Flexibility is accorded to the HEI, within a broad framework of good practice principles. It is this flexibility which respects the autonomy and choice of the HEI, that underlines the Self-accrediting system.

Some examples of good practice principles relating to Internal QA systems are suggested below, to illustrate the flexibility that HEI have in developing internal QA models to suit their particular circumstances. ( QA systems refer to all QA structures and processes governing programmes and institutional management which have a bearing on quality)

### **Academic Planning**

Institutions may have different concepts and practices of where actual responsibility for QA should lie. One of the important roles of the highest academic authority (eg. Senate) is the formulation of strategic plans and long-term directions for all its internal schools and units. However, these decisions are sometimes “delegated”. The delegation of authority often has to do with tradition, culture, or structure, or the division of power within the institution, eg. where there are relatively independent colleges, such as those which offer self-financed programmes or sub-degree programmes, or international programmes, which develop more independently and often have greater autonomy than the other internal departments.

Where this type of intended, or de facto delegation happens, it is a good practice principle that the central academic authority (eg. Senate) should always be consulted, be kept informed, to ensure there the plans of the school or division are aligned with the institution’s goals and mission, and QA policies, and ensure that it

has ultimate control and responsibility for academic development and academic quality.

### Programme Approval

Another type of decisions relates to *programme approval*. Which authority should be responsible for approving programmes -- at the Senate level, Faculty level, or the department or committee level?

Although the Senate may have ultimate responsibility the **actual** approval or the in-depth examination of programme proposal may be done at committee level, or the Faculty Board or School Board level. The level where detailed scrutiny of the programme is conducted may be determined by internal management structures, or power structures, such as in the case of the independent colleges or schools; it may also be determined by the nature or level of programmes, the tradition of the HEI; its size; or stage of development. Higher level programmes may need to be considered by more senior bodies. In some cases, there are different types of approval : A mature institution may feel comfortable with delegating the actual approval to lower-level bodies while keeping the “in-principle” approval at the central level. A smaller institution may find it easier for the central authority to handle all approval decisions, (and vice-versa). It is not the role of the External QA Body to rule on where authority should be delegated. Different institutions may have their own models of governance, with some being more centralized or decentralized than others, and with their own built-in cultures and traditions.

If there is delegation to a lower authority, there should be proper and regular reporting to the highest academic authority The role of the EQA Body is to ascertain that there is clear designation of authority and responsibility, with good reasons; that there are clear reporting routes and mechanisms, and that there is consistency in the system; and most importantly, that the highest academic body always bear the ultimate responsibility. It should know where there is failure in academic quality, or where this might likely occur.

### Quality assurance framework

A question that is often raised is whether a uniform set of quality assurance mechanisms should be adopted throughout the institution. It is not expected that the EQA Body provides a definitive answer to this,

Where there are relatively independent internal colleges/schools, it would not be expected that the QA systems of these colleges or schools exactly replicate the quality assurance mechanisms in the rest of the institution. An adaptation or revised or even different model should be acceptable, or even desirable in some cases.

Where there is much decentralization in the adoption of QA systems, the institution's governing academic body or central QA authority would normally retain a core role in quality assurance, such as stipulating QA principles, and core QA requirements; it should also exercise a monitoring role over implementation, and review the system on a regular basis.

### Internal QA model and Stage of Development

Other than institutional culture, structure, nature and level of programmes etc., the maturity of the institution is an important factor influencing the choice of QA model. Institutions which are relatively young or have newly acquired the self-accrediting status, often duplicate the external accreditation model and put in place stringent internal programme validation procedures and other QA procedures. There may also be a heavy use of external experts for all programme validations/approvals. As the institution matures, there may be less involvement of external experts – or these may function in a different capacity. The institution may also move away from frequent programme validation and re-validation, towards the more macro models of departmental or discipline evaluation. The internal QA model may change in form and focus, in line with its maturity. This is one positive effect of the model of EQA in a self-accrediting system, allowing diversity in the development of internal QA models, and the pace of institutional development.

## **Advantages of EQA in Self-accrediting system**

The major principle underlying S-A is the respect for **institutional autonomy**. This is both a basic principle and an advantage of the system. As it allows diversity in institutional development, it encourages self-evaluation and improvement when institutions search for their own model of QA. This trust in institutions also engenders better cooperation and ownership in the process, and makes for a collaborative working relationship with the EQA Body. It avoids the so-called compliance culture where HEI make up their documentation and systems to suit external requirements for the sake of compliance and obtaining approval, rather than out of a genuine concern for quality.

Self-improvement can also be relied upon to keep the QA agenda going, even after the EQA body has left the campus and before the next review takes place. And for HEI which have not yet attained S-A status, the prospect of S-A propels continuous improvement.

## **EQA for Non Self-accrediting Institutions**

There is another system of EQA for the Non-SA institutions – usually in the form of accreditation. This is a system suitable and beneficial for newly established or developing institutions, with less mature QA systems - as the EQA body will set out more clearly the accreditation requirements, some relating to the basic capabilities or hardware of the Institution, sometimes quantitative in nature; and where programme validation is a central part of the process, there will be clear requirements relating to the programme such as syllabus and staffing etc. The criterion of assessment is the meeting of threshold standards. There are clear requirement and timelines for the HEI to follow; HEIs also benefit from the advice of external peers, where in-house expertise is not rich enough. Therefore the system has its merits.

On the other hand, as institutions are keen to obtain a favorable outcome, they may comply with requirements mainly for this purpose rather than as a form of self improvement. Programme validation could also be a costly form of EQA.

## **Environment for Self Accreditation system**

On the other hand, Self-accreditation does not fit all institutions, nor is it suitable for all systems or countries.

For individual institutions, these have to be judged to be mature in their QA systems, usually with established track record. For a country/ area to consider introducing this system, it also needs to have a mature QA system, where the concept and culture of self-regulation are accepted and well understood, and where there are effective external supports to reinforce the self-regulation of self-accrediting institutions.

A Self-accrediting system thus has double layers of quality assurance : at the internal institutional level, and at the external level, and these reinforce each other. Those who are unfamiliar with the S-A system may feel uncomfortable with or even criticize the seeming lack of enforceable regulations or regulatory control. Rather than strict rules and requirements, the preferred model of external QA is to use exhortation and examples, rather than penalty and enforcement. The critics may be unaware, or do not believe that quality improvements sprout faster and more efficiently under conditions of permitted freedom and autonomy; that the elements of flexibility and institutional choice are fundamental to the concept of Self-Accreditation; and that the upholding of QA is tacit and mutually accepted between the EQA Body and the institutions. No system of quality assurance is perfect : trust and respect are fundamental to the maturity of any quality assurance system.

### **References**

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*The views expressed in this paper are those of the author and do not necessarily represent the views of Joint Quality Review Committee.*

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