

Report on

**Study on Implementation of the Code of Good Practices
on Governance and Quality Assurance for
Self-financing Post-secondary Education Sector**

**By Hong Kong Council for Accreditation of
Academic and Vocational Qualifications
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EXECUTIVE SUMMARY

1. This report presents the findings of the study on the implementation of the Code of Good Practices on Governance and Quality Assurance for the Self-financing Post-secondary Education Sector (Code). The Code was promulgated by the Committee on Self-financing Post-secondary Education (CSPE) in June 2015 for voluntary adoption by the self-financing post-secondary education (SFPE) sector to enhance the sector's quality, transparency and sustainable development. CSPE is an advisory body to the Secretary for Education on the development of the SFPE sector from macro and strategic perspectives.

The SFPE Sector

2. The SFPE sector includes all publicly-funded or non-publicly-funded-institutions (institutions) and their self-financing units (SFUs) offering full-time locally-accredited self-financing local and / or non-local sub-degree and / or undergraduate programmes. Sub-degree programmes refer to associate degree and higher diploma programmes at Hong Kong Qualifications Framework Level 4.

Focus and Purpose of the Study

3. The study on the implementation of the Code (Study) focused on the SFPE sector as a whole and not on individual institutions. The purpose of the Study is to inform the extent, impact and effectiveness of the sector's implementation of the Code. This refers to whether or not specified good practices in the Code have been implemented. It is the policy intent for the institutions and the SFUs of the SFPE sector to flexibly apply the

good practices in the Code to fit the purpose of their operations. The voluntary nature of the Code speaks for itself.

4. The Code contains altogether 27 good practices under three areas, i.e. *1. institutional governance, 2. programme design and delivery* and *3. staff, other resources and student support*. 10 of the good practices can be further broken down into 30 sub-code items (i.e. parts within a code item of good practice with different focus of implementation), e.g. Code *1.2.1. develop strategic and operational plans* can be further broken down into sub-code *1.2.1a develop strategic plan* and *1.2.1b. develop operational plan*, for the purpose of this Study.

Guiding Principles of the Study

5. The Study was conducted on a trust basis. The Study focused on whether the Code was implemented and the impact and effectiveness of the implementation. How well the Code was implemented was outside the scope of the Study. The Study was not an external quality assurance (QA) exercise. In this respect, the findings and outcomes of this Study cannot be used to impact on subsequent QA activities of the QA bodies.

Scope of the Study

6. The Study started with a syntactic analysis of the Code in May 2016. The analysis provided the framework for the design of the instruments and processes of the Study. The instruments were pre-tested and / or pilot-tested in June and July 2016. Under the guidance of the Education Bureau (EDB), the main clauses of each of the good practices in the Code were defined as the core good practices to be covered in the Study; supplementary guidance concerning the manner and expected deliverables of the implementation of the core good practices was outside the scope of the Study but agreed to be included in the study for information only. The supplementary guidance reflecting “how” the respective core good practices are implemented is expressed in defining clauses, phrases and / or words in the Code.

Study Targets and the Processes of the Study

7. The Study was conducted in three phases: desktop review, survey and face-to-face interviews to collect data and evidence concerning the extent (i.e. whether the core good practices are in place), impact and effectiveness of the implementation of core good practices. Information

regarding the manner of implementation (i.e. supplementary guidance in the Code) was also collected from the survey and face-to-face interviews.

8. Altogether 40 institutions and their SFUs (study targets) were identified and agreed with EDB as the full population of the SFPE sector. The full population was covered in the desktop review phase. Desktop review was conducted by the Project Team. Information concerning implementation of core good practices gathered from desktop review was transferred to the survey questionnaire for the study targets' verification of factual accuracy. Of the 37 study targets invited to participate in the survey, 26 study targets returned the verified questionnaires or written response. Through stratified sampling, 7 survey respondents were selected to participate in the face-to-face interviews. The three phases took place in June – early December 2016. The study targets' participation in the survey and interviews was voluntary, as agreed with EDB.

Findings and Observations

9. Within one year of the promulgation of the Code, 25 of the 27 core good practices in the Code have been implemented by 80% - 100% of the sector (**Tables 1 and 2**). About half of them have been fully implemented by the sector.

Table 1: Desktop Review (N=40)
(For publicly available information covering around 20 core good practices and their sub-code items, verified by survey respondents and where necessary supplemented by internal information of the study targets)

Implementation Rate	Number of Code Items
100%	12
90% - 99%	6
80% - 89%	2
Total	20

Table 2: Survey (r=26) and Interview (n=7)
(For information not publicly available)

Implementation Rate	Number of Code Items
90% - 99%	1
80% or more	4
60% or more	2
Total	7

r: number of respondents

10. 20 of the core good practices are related to transparency or operational practices where information was available in the public domain (**Table 1**). The remaining 5 deal with internal systems and mechanisms, operational principles and processes where implementation information not available in the public domain was provided by the respondents (**Table 2**). The 25 core good practices come under the following areas of the Code:

10.1 all 6 code items under *Area 2 Programme Design and Delivery* and 7 code items under *Area 3 Staff, Other Resources and Student Support* of the Code; and

10.2 12 code items under the following sub-areas of *Area 1 Institutional Governance* of the Code:

- 1 code item under sub-area *1.1 Mission and vision*
- 2 code items under sub-area *1.2 Strategic and operational plans*
- 2 code items under sub-area *1.3 Strategic and financial reports*
- 5 code items under sub-area *1.4 Governing structures and processes*
 - Code 1.4.1 Governing body ... have (a mix of) stakeholders and expertise
 - Code 1.4.2 Formulate clear lines of responsibility, delegation of authority and terms of reference for its governing body and key committees
 - Code 1.4.4 Ensure that members of its governing body and key committees are aware of their roles and responsibilities
 - Code 1.4.6 Have a system of periodic audits of its institutional processes on governance
 - Code 1.4.7 Publish the latest composition, membership and terms of reference of its governing body and key committees
- 2 code items under sub-area *1.5 Fee-setting*

11. Of the remaining 2 core good practices under sub-area *1.4 Governing structures and processes*, 4 sub-code items have implementation rates below 80% (**Table 2**). They are:

11.1 Sub-code 1.4.3b Have procedure for periodic review of the performance of key committees, 73%;

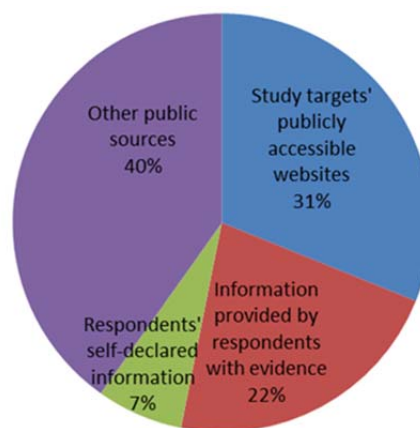
- 11.2 Sub-code 1.4.3c Have procedure for periodic review of the performance of members of key committees, 62%;
- 11.3 Sub-code 1.4.5a Have written code of conduct for members of governing board, 77%; and
- 11.4 Sub-code 1.4.5b Have written code of conduct for members of key committees, 69%.

Some survey respondents advised that these sub-code items were comparatively difficult to implement as they contained sensitive terms. They suggested that the sector should be allowed to use instruments in lieu of those specified in the sub-code items to achieve the same purpose. Examples were “performance” to be replaced by “effectiveness” and committee manual or proceedings, staff manual in lieu of code of conduct.

- 12. The Code had a positive impact on the sector given that the sector found it a good reference to enhance their governance and QA practices to operate in a transparent and accountable manner with quality. 97% of the survey respondents had implemented 80% or more of the Code, including 15 that claimed full implementation. 4 claimed having fully implemented the Code even before its promulgation. They considered that the Code was a reflection of common good practices of the sector.
- 13. The majority of the survey respondents indicated that they had aligned their systems or practices with the Code. Such alignments were mostly in areas related to programme design and delivery (Codes 2.1, 2.2) and staff, other resources and student support (Codes 3.1-3.3). About two-thirds of the survey respondents advised that they had made reference to the Code to make changes where appropriate to their systems and / or practices after its promulgation. The respondents considered the Code a good reference document to the stakeholders, particularly the management and staff with QA responsibilities, when executing their respective functions.
- 14. The above findings signify that the Code has been well received by the sector. The majority of the survey respondents agreed that the Code provided relevant guidance on good practices concerning institutional governance and quality assurance and facilitated the SFPE sector to operate in a transparent and accountable manner. All 7 interviewed study targets agreed that the Code was useful to the SFPE sector for various reasons: as a common benchmark, for institutional enhancement and to drive good practices.

15. Information regarding individual institutions or SFUs' operation was accessible from different sources (**Figure 1**). About 31% of the information was identified from the institutions' or SFUs' publicly accessible websites and 40% from other reliable public websites such as those of the parent institutions, Concourse, iPASS, HKQR, EDB, Companies Registry, quality assurance bodies, etc. The remaining 29% was provided by the respondents, including 22% supported by evidence, 5% (self-declared) related to the 4 sub-code items with implementation rates below 80% (**paragraph 10**) and another 2% self-declared.

Figure 1: Data Source Analysis



16. However, the more remote the information is from the study target, the more effort and expert knowledge and know-how are required to locate the desired information. There can also be inconsistent information among various websites about the same topics. Besides, to internal stakeholders such as staff, current students, governing body and committee members, the most convenient and accessible information sources can be intranet or other internal communication means. To facilitate easy access to information and enhance transparency, **the Project Team puts forth a recommendation for EDB to centralise as much of the information source as practicable in one single location, e.g. Concourse which can be the portal to Code implementation.**
17. It was observed that institutions and SFUs varied in the manner of the implementation of the core good practices to fit the purposes of their operations. They also shared information with stakeholders on a need to know basis. These practices were observed to be in line with the policy intent for the SFPE sector to flexibly apply the good practices in the Code to fit the purpose of their operations.
18. Some study targets identified potential interpretation issues relating to the presentation, choice of words, prescription of implementation manner and

transparency expectation, etc. To address the interpretation issues, **the Project Team puts forth the following recommendation to enhance understanding of the Code:**

- 18.1 Separate the main clauses of the good practices from the defining clauses, phrases and / or words (manner or expectation of implementation) by a comma, so as to signify the intended flexibility of the manner of implementation.
 - 18.2 Provide more information to set the expectation of the Code upfront, and to highlight the built-in flexibility for the manner of implementation of the Code. Such information can be provided in the Frequently Asked Questions Section of the Code so as to cover the expectation, the purpose, the expected implementation with flexibility, and terms, code items and sub-code items that the study targets have identified as posing potential interpretation issues.
19. To facilitate full implementation of the Code, the interviewed study targets also put forth the following recommendations to the Government for consideration: provision of support measures to the sector and community education with the general public on “good practices” and “good governance”.