



Submission of Our Hong Kong Foundation’s Views and Comments on the ‘Consultation Document on the Post Secondary Colleges Ordinance (Cap. 320)’

This submission aims to supplement the Public consultation on review of Post Secondary Colleges Ordinance (“the Consultation Document”), which covers numerous relevant issues in the parallel development of the publicly funded and self-financing post-secondary education sectors in Hong Kong.

We believe that a transparent and fair, but also flexible set of mechanisms that provides diverse pathways, facilitates lifelong learning, and upholds the quality of the self-financing education programmes is of paramount importance, for nurturing talents of our future generation and fulfilling the city’s future manpower needs.

OHKF’s recommendations are presented below in 4 main areas:

- Coverage of institutions
- Admissions
- Staff
- Strategic planning

1. Coverage of institutions

*Paragraph 12 of the Consultation Document suggests that **all operators of self-financing post-secondary education programmes at both degree and sub-degree levels would be subject to a uniform regulatory framework.** Furthermore, **consequential amendments to the Education Ordinance (Cap. 279) will also need to be made.***

OHKF welcomes the proposal to subject all operators of self-financing post-secondary programmes at both degree and sub-degree levels to a uniform regulatory framework.

1.1. Reforming the regulatory framework for self-financing arms of publicly funded institutions in addition to institutions regulated under Cap. 320 and Cap. 279

As Recommendation 12 of the Review Report prepared by the Task Force on Review of Self-financing Post-secondary Education in December 2018 has suggested, all institutions providing self-financing programmes at degree and



sub-degree levels should come under a unified regulatory regime. The Government should explore further how University Grants Council (UGC)-funded institutions' self-financing arms can be regulated under a uniform regulatory framework as institutions under the Education Ordinance (Cap. 279) and the Post Secondary Colleges Ordinance (Cap. 320).

The entire self-financing post-secondary education sector could then be better coordinated to promote coherence in quality assurance, governance, and positioning, thus allocation of degree and sub-degree places; this could contribute to the healthy and sustainable development of the higher education sector.

The Annex of the Consultation Document stipulates that a Post Secondary College shall be eligible for registration under section 3 and thereafter to remain on the register where the Permanent Secretary is satisfied as to the courses offered being suitable in all respects for Post Secondary Colleges meeting a community need and including major courses extending over at least 4 years suggests, and **it proposes to delete “and including major courses extending over at least 4 years” from subsection 4(c).**

1.2. Introducing innovative course and programme formats, such as MOOCs and micro-credentials, within the self-financing post-secondary education sector

OHKF welcomes the proposal to remove the outdated restriction on the length of courses provided by Post Secondary Colleges and is hopeful to see the future introduction of more flexible courses and programmes, such as MOOCs or micro-credentials, that make use of new digital technologies to promote more accessible opportunities of lifelong learning for all citizens.

2. Admissions

The Annex of the Consultation Document highlights that **the Colleges should also have in place an open, transparent, and fair set of policy and procedures to ensure that students admitted are qualified to pursue the relevant academic programmes** in the new Section 4(g) of Cap. 320. Furthermore, **the minimum academic requirement and age of entry of students are repealed due to its prescriptive nature** in Section 6 of Cap. 320A.



OHKF welcomes that the updated Cap.320 would be an “enabling” ordinance, allowing colleges to customize their sets of policy and procedures of admission.

2.1. **Gravitating towards an aptitude-based admission mechanism that accepts industry and other qualifications**

In addition to being ‘open, transparent, and fair’, the Government could consider adding the word ‘flexible’: colleges should increase the flexibility of their admissions policy and procedures to ensure that a broad range of talents and aptitudes will be considered for students to be admitted to suitable study programmes. To enable the admission of students with suitable interests and talents for specific academic programmes and, thus, provide more education opportunities for all secondary school graduates, self-financing institutions shall consider increasing aptitude-based admission quotas for education programmes at both degree and sub-degree levels. Priority should be given to admitting suitable talents into relevant programmes and maintaining tight quality assurance for graduation, instead of a lop-sided focus on low attrition rate; the latter risks shutting the door for talents with non-academic attributes but huge development potential in certain areas.

3. **Staff**

Paragraph 16 of the Consultation Document proposes that the ***College must have in place an open, transparent, and fair set of policy and procedures for the employment and appointment of staff who are competent, fit, and proper and having the appropriate experience and qualifications to perform the functions of their respective roles and capacities.***

The Annex of the Consultation Document further suggests that the Colleges should also ***have in place an open, transparent, fair, and robust system and procedures*** as recommended by the Academic Board and approved by the Board of Governors ***to ensure that the titles of its academic staff are commensurate with their academic qualification, experience, and achievement*** in the updated Section 2(g) of Cap. 320A.



OHKF welcomes the amendment of Section 2(g) of Cap. 320A. In addition, the Government should consider:

3.1. Introducing more flexible employment mechanisms in self-financing institutions to encourage guest teaching opportunities, increase faculty diversity, and foster greater school-industry partnership in delivering the most socially relevant knowledge and skills

The self-financing sector can respond more flexibly to new developments in society and industry to best equip their students for a rapidly changing world with unprecedented challenges and opportunities. More flexible employment mechanisms and part-time opportunities (such as adjunct professorships) should be allowed so that teaching staff could be encouraged to continuously participate in industries and bring the most updated and relevant insights into respective self-financing institutions.

3.2. Enabling the Colleges to support teaching staff through continuous professional development

In Australia, academic staff at universities participate in work-integrated training activities through incentive structures; in the United Kingdom, compulsory training courses ensure that TVET teachers possess up-to-date competencies. Hong Kong should institute similar regular continuous professional development programmes and provide incentives to enable practitioners' participation, thereby continually enhancing the quality of academic and applied tertiary education provided at self-financing institutions.

4. Strategic planning

Paragraph 18(g) of the Consultation Document proposes that a new subsection requiring that the Colleges submit strategic plans and annual reports should be added. Paragraph 18(h) further requires that the development and institutional capabilities of the Colleges should be consistent with their objects and strategic plans as amended from time to time in the light of changing circumstances and prescribed standards.



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4.1. Explicitly enabling more school-industry partnership in drafting the Colleges' strategic plans

To optimise educational outcomes and to strengthen self-financing institution's positioning and status as compared to UGC-funded institutions, self-financing institutions should be required to work with industry partners and sector skills councils to develop overall strategic plans and implement such plans accordingly through curriculum development and various teaching and learning activities.

5. Conclusion

The Consultation Document has provided a thorough review of the current strategy and has made key recommendations that target some of the flaws of the current strategy. We hope that a more comprehensive report would help the Government in forming a holistic approach towards the parallel development of the publicly funded and self-financing post-secondary education sectors in Hong Kong.

Should you have any queries, please contact Victor Kwok, Head of Education and Youth by email at Victor.Kwok@ourhkfoundation.org.hk.

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