

HKEAA's Response to the Ombudsman's Report on System for Development of Questions Papers in Public Examinations

The Hong Kong Examinations and Assessment Authority (HKEAA) would like to make the following response to the Ombudsman's "Direct Investigation Report on System for Development of Questions Papers in Public Examinations" issued on 2 June 2009:

The HKEAA has carefully considered the findings and recommendations regarding the System for Development of Questions Papers in Public Examinations and will take appropriate follow-up actions.

We are grateful that the Ombudsman recognizes our efforts to instill in staff a culture of receptiveness, transparency and continuous improvement. In fact, the majority of the Authority's staff are committed to providing reliable and high quality examinations and assessment services in a professional and efficient manner. With this in mind, we have reservations about the Ombudsman's comments regarding staff mindset as a general issue.

The HKEAA has always endeavored to provide reliable and equitable examinations and assessment services to the public. Since 2007, the HKEAA has established a set of principles to guide the professional work of the organization: (1) guarding the standards of the qualifications conferred by the HKEAA, (2) satisfying the reasonable needs of clients; (3) investing in staff capacity building. These guiding principles are upheld when the Authority plans and implements a wide range of optimization measures.

Prior to the direct investigation of the Ombudsman, the Authority has already reviewed and implemented appropriate measures (see *Annex for some highlights*) to optimize the validity, reliability and credibility of public examinations.

Smooth delivery of large scale public examinations depends on the participation and cooperation of education professionals. We are grateful to subject experts from secondary schools and tertiary institutions whose support and cooperation have enabled us to administer reliable and equitable public examinations over the years.

The Authority understands that members of the public have great expectations of public examinations and assessment services and a number of initiatives have already been introduced to enhance our service delivery. In the past four years, a large number of new systems and procedures have been incorporated with a view to keeping human errors to the minimum. However, it is equally important to have robust mechanisms in place to avert negative consequences and to minimize the impact of any error. This is where our various expert committees and adjustment mechanisms come in, similar to those adopted by other international examination bodies.

Committed to continuous improvement and professional development, the Authority would appreciate feedback from various stakeholders with a view to enhancing the quality of our services.

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HKEAA's response to the recommendations of the Ombudsman

1. Roles and responsibilities of assessment development personnel

The roles and responsibilities of subject managers in the Assessment Development Division are clearly stipulated in their job descriptions. In order to further reinforce management of assessment development, the Authority accepts the Ombudsman's recommendations and will review the guidelines to further clarify the roles and responsibilities of all personnel involved in the development of question papers. The relevant revised guidelines will be effective from 1 September 2009.

2. Checking and proofreading of question papers

The proofreading guidelines and checklists focus on both details and principles and include the checking of all aspects of the question paper such as the syllabus coverage, the content of the questions, the clarity of the instructions, and the layout. They have already been revised after the 2008 examinations as a result of the Authority's annual post-examination review exercise. To enhance the quality of proofreading, the Authority accepts the recommendations of the Ombudsman to continue to review and reinforce the proofreading procedures. The Authority will also provide more training for the staff and examination personnel concerned.

3. Monitoring the performance of examination personnel

Regarding the recommendation that disincentives or even penalty for mistakes and negligence be introduced, the Authority would like to clarify that for full-time HKEAA staff, a performance appraisal system is in place, under which poor levels of performance are recorded and appropriate consequences are enforced.

For part-time examination personnel who are experienced teachers, university professors and subject experts, a performance record system was introduced in 2008, and only those who consistently meet the performance standards will be re-appointed.

4. Revision of marking schemes

Revision of marking schemes is part of the HKEAA's normal professional process and the main purpose is to allow flexibility in assessing unexpected responses from candidates. On the rare occasions when marking schemes need to be adjusted as remedial measures for errors or ambiguities in the relevant papers, such adjustments must be based on sound professional grounds and have the endorsement of the General Manager – Assessment Development. From 2009 onward, this also requires approval from the Director of Public Examinations.

At present, significant cases of errors are already reported to the HKEAA Council during the examination period. A Conduct of Examinations Report will also be presented to the Council at the end of the examination period via the Public Examinations Board (PEB).

The Authority agrees that identifying the cause of and the responsibility for errors would be conducive to further improvement. With effect from the 2009 examination cycle, any revision of marking schemes resulting from errors will be reported to the PEB and the Council with full details as well as an action plan for improvement.

5. Examination report and question papers (ERQP)

The recommendation that questions with errors be rectified before being posted on ERQPs is accepted. Errors have always been rectified before publication, whereas ambiguities have been handled differently depending on the nature of the ambiguity and the remedial action taken. In the case of the 2008 Use of English Section A paper, the ambiguity in the instructions and the remedial action taken were detailed in the examiner's report. This practice has been reviewed and starting from the 2009 examinations, any ambiguity in question papers will be rectified and explained in ERQPs for better wash-back effect on teaching and learning.

6. External feedback

Mechanisms are already in place to solicit external feedback at various levels of operation. At the subject level, there is the subject committee which is a standing committee under the PEB, with members from the Education Bureau, secondary schools and tertiary institutions. Post-examination reviews are conducted every year. The conduct of examination reports are submitted to the PEB and the HKEAA Council, which comprise members from different sectors appointed by the Chief Executive. Parents, employers and relevant professional sectors are also well represented in various committees.

The HKEAA will consider this recommendation and continue to explore further channels for obtaining feedback from relevant stakeholders.

7. Handling of complaints

The Authority established an "Examination Administration Policy and Procedure Review Task Group" (the Task Group) in March 2008, as part of its ongoing examination administration review to improve services to candidates.

The Task Group has reviewed the detailed procedures for handling complaints. As a result, the guiding principles for handling complaints cases are now made explicit. The relevant decision making process and complaint handling procedures have also been streamlined, with clear internal guidelines provided to staff on classification and processing of different complaint cases.

A summary of the Task Group's report on "Review of Complaint / Examination Irregularities Handling Process" and the updated Guidelines on Handling Complaints were sent to the Ombudsman's office on 28 April 2009 for reference.

8. Future review

The Ombudsman recommends further review of the Authority's systems, procedures and staff mindset from a broader perspective.

We fully appreciate that due to the importance of the public examinations, the community have high expectations of the performance of the HKEAA. As a learning and quality conscious organization, the Authority is committed to continuous improvement both in the professional realm and in the way it interacts with various key stakeholders. Over the years, many systems and procedures have been developed to minimize error and to ensure the highest quality of service.

However, it should be recognized that the development of question papers is a professional process involving much human judgment and effort. It is therefore equally important for any able organization to develop a capacity to manage and minimize the impact of any possible error while continuing to pursue further improvement.

In conclusion, the Authority will continue its effort to strive for professional and operational excellence. We also agree that frequent system reviews, a mechanism for which is already in place, will help to further improve our services.

The Secretariat will further study the recommendations of the Ombudsman and formulate proposals for consideration by the HKEAA Council.

Date: 2 June 2009

Highlights of recent improvement measures implemented by the HKEAA

- (1) A Quality Assurance Unit has been established since 2006 to monitor the quality of the Authority's service delivery, and to undertake internal audit and risk management.
- (2) Following a risk assessment review conducted in 2006, a comprehensive framework for internal audit and risk management has been established. All divisions have nominated a risk management officer to assist in the management of risk related tasks. All these new measures have proved to be helpful in raising the awareness of risk management among staff.
- (3) A quality assurance system has been set up to achieve annual internal and external audits on every examination process and to maintain the Authority's ISO9001:2000 accreditation for its examinations and assessment services.
- (4) A Public Examinations Information Centre was established in 2007 to handle enquiries from candidates, and to provide immediate assistance to allow them to complete the public examination smoothly.
- (5) An enhanced staff performance appraisal system has been implemented since 2007 to more systematically review performance of all staff and to ensure the quality of services provided.
- (6) Overseas examination experts are invited to the Authority regularly to review the procedures and professional standing of the examinations. The latest report delivered by a British examination expert from Cambridge International Examinations (CIE) was completed in 2007. This report has confirmed that all of HKEAA's examination procedures, as well as the design of its examination papers are of a standard comparable to best international practice.
- (7) With effect from the 2008 examination, the quality assurance measure of examination papers has been further enhanced by the introduction of the Examination Paper Quality Audit (EPQA). Examination papers are audited with respect to their psychometric properties by the Authority's Assessment Technology and Research Division (ATRD). The results of the evaluation will be used for improvement of future examination papers so that the standard of the qualifications conferred by the Authority is guaranteed.