



National Commission for  
**Further and  
Higher Education**  
Malta

# National Quality Assurance Framework for Further and Higher Education

Proposal for Consultation  
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# Forward

The National Quality Assurance Framework for Further and Higher Education is a key deliverable of ESF Project 1.227 'Making Quality Visible', which is led by the National Commission for Further and Higher Education (NCFHE). Through this project the NCFHE intends to implement its legal obligation to set up a national external quality audit system that complements the internal quality assurance mechanisms of individual further and higher education entities. The Framework provides the conceptual context for this work, and situates it in the paramount need to develop a national quality culture.

In the **first stage** which refers to the present document, the scope of the Framework shall be to implement the provisions on internal quality assurance and periodic external quality audits in Legal Notice 296 of 2012. The Framework refers to further, higher and adult formal education provision in both state and non-state sectors.

The provider and programme/course accreditation procedures presently in operation will be retained until further notice. At a **second stage**, the Framework shall be expanded to incorporate revised provider and programme/course accreditation procedures for all categories of entities.

In the **third stage** of the development of the Framework, it will be reviewed to consider how best to incorporate quality assurance requirements for informal and non-formal learning.

This three-stage approach will allow the Framework to be fine-tuned with the benefit of experience.

This document is being launched in a Consultative Conference with stakeholders that ushers in a three-month consultation period. The Framework will be finalised in October 2014.

I would like to thank my colleagues within the partner institutions of the ESF Project 1.227; NCFHE Chairman Mr Martin Scicluna and the Board members of the NCFHE; NCFHE CEO Ms Edel Cassar; Professor John Portelli, Chairman of the Quality Assurance Committee within the NCFHE, and the members of the Committee; as well as my colleagues within the NCFHE for their support in this project and in concluding this publication.

**Sandro Spiteri**  
*Director for Quality Assurance*



# Glossary

APQRU	Academic Programmes Quality and Resources Unit, within the PVC
AQA	Austrian Agency for Quality, Austria
CEDEFOP	European Centre for the Development of Vocational Training
DLLL	Directorate for Lifelong Learning
ECTS	European Credit transfer System
ECVET	European Credit System for Vocational Education and Training
EFL	English as a Foreign Language
EFQM	European Foundation for Quality Management
ENQA	European Association for Quality Assurance in Higher Education (previously the European Network for Quality Assurance in Higher Education)
EQA	External Quality Audit
EQAR	European Quality Assurance Register
EQAVET	European Quality Assurance in Vocational Education and Training
EQF	European Qualifications Framework
ESF	European Social Funds
ESG	Standards and Guidelines for Quality Assurance in the EHEA
ETC	Employment and Training Corporation
IQA	Internal Quality Assurance
ISO	International Organisation for Standardisation
ITS	Institute for Tourism Studies
MCAST	Malta College for Arts, Science and Technology
MQF	Malta Qualifications Framework
NCFHE	National Commission for Further and Higher Education
Net-QAPE	Network of Quality Assurance Professionals in Further and Higher Education
OAQ	Centre of Accreditation and Quality Assurance in Higher Education, Switzerland
PVC	Programme Validation Committee, University of Malta
QA	Quality Assurance
QAA	Quality Assurance Agency, UK
QALLL	Quality Assurance in LifeLong Learning with a Focus on Vocational Education and Training and adult education
QMS	Quality Management System
RAQAPE	Agency for Quality Assurance in Pre-University Education, Romania
VET	Vocational Education and Training







- 1.1 The National Quality Assurance Framework for Further and Higher Education is a key deliverable of ESF Project 1.227 'Making Quality Visible', which is led by the National Commission for Further and Higher Education (NCFHE).
- 1.2 In the **first stage** which refers to the present document, the scope of the Framework shall be to implement the provisions on internal quality assurance and periodic external quality audits in Legal Notice 296 of 2012. The Framework refers to further, higher and adult formal education provision in both state and non-state sectors.
- 1.3 The provider and programme/course accreditation procedures presently in operation will be retained until further notice. At a **second stage**, the Framework shall be expanded to incorporate revised provider and programme/course accreditation procedures for all categories of entities.
- 1.4 In the **third stage** of the development of the Framework, it will be reviewed to consider how best to incorporate quality assurance requirements for informal and non-formal learning.
- 2.1 As part of the ESF Project the NCFHE conducted a Scoping Exercise with both state and non-state further, higher and adult formal education service providers, that was intended to explore the complexity of provision and the state of preparedness and practice of providers in terms of quality assurance. This Scoping Exercise took the form of one-to-one interviews from January to March 2014 with 76 % of all provisional license holders at the time, as well as 63% of regular license holders. Interviewed entities included the Project partners.
- 2.2 The Scoping visits indicated that:
  - a) providers approved of the development of an overarching Further and Higher Quality Assurance Framework with the European Standards and Guidelines (ESG) at its heart;
  - b) with very few exceptions, all providers had a good measure of explicit or implicit internal quality assurance procedures in place;
  - c) providers could be categorised according to five types of clients they serviced and seven types of courses they provided;
  - d) there is a wide spectrum of variance in the types of contractual relationship between local representatives and the parent service providers who for the most part are operating in the UK. This ranged from 'strong' to 'weak' quality assurance practices by the parent provider;
  - e) *bona fide* education providers in Malta already have in place many key elements of what would constitute good practice in internal quality assurance. In some cases the structures and procedures may be informal, but they are nonetheless underpinned by the intent of ensuring a fair deal and a valid educational experience for students. In these cases, the Scoping Exercise served to bring to consciousness and to systematize the good practice already in place, as well as to highlight the lacunae that required particular attention;
  - f) the local providers that act as representatives of foreign course and degree providers are subject to the due diligence and quality assurance procedures of the parent provider. This has many times led to a beneficial transfer of experience and expertise that has led to a steady improvement and expansion of services.
- 3.1 The feedback received indicated that the internal and external quality assurance measures proposed in the Framework had to be flexible enough to cater for all these variances. These measures needed to be at par with accepted international standards to ensure the integrity and credibility of the Framework, whilst not being so cumbersome, especially for micro operations, as to overwhelm them and be an actual disincentive to the development and sustainability of a quality culture.

3.2 The need for convergence and harmonization between different quality assurance mechanisms and tools is being increasingly highlighted at EU level. Malta is responding to these developments by proposing a National Quality Assurance Framework that is customized for the realities and needs of Maltese education, and is sufficiently overarching and flexible to effectively address further, higher and adult formal education provision. This will address Malta's commitments with respect to quality assurance both for higher education in terms of the Bologna process, as well as for VET in terms of the Copenhagen Process.

3.3 A number of important initiatives have been taken recently in Malta and internationally to compare different quality assurance mechanisms. In sum, one can conclude that the identification of a quality assurance common conceptual core for further, higher and adult formal education, which is situated within the ESG and enriched by EQAVET perspectives, and that is in harmony with a whole range of quality management systems that may already be used by Maltese providers, is an achievable target for Malta.

4.1 The Framework is underpinned by **six principles** that determine the remit and function of the Framework and the relationship between internal and external quality assurance to enhance learning outcomes.

- a) **The Framework is based on the ESG and enriched by the EQAVET perspective.**
- b) **The Framework contributes to a National Culture of Quality**, through:
  - increased agency, satisfaction and numbers of service users;
  - an enhanced international profile and credibility of providers in Malta, and
  - the promotion of Malta as a regional provider of excellence in further and higher education.

Figure 3.1<sup>1</sup> represents the concentric nature of the national culture of quality.

- c) **The Internal Quality Assurance (IQA) is fit for Purpose.**
- d) **The External Quality Assurance (EQA) is a tool for both development and**



Figure 3.1: Malta's National Quality Culture

**accountability.** The EQA shall ensure that the internal quality management system of the provider is:

- fit for purpose according to the provider's courses and service users;
- compliant with standards and regulations and contributing to the development of a national quality culture;
- contributing to the fulfilment of the broad goals of Malta's Education Strategy 2014-2024, and
- implemented with effectiveness, comprehensiveness and sustainability.

- e) **The Quality Cycle is at the heart of the Framework.**
- f) **The integrity and independence of the EQA process is guaranteed.**

5.1 In parallel to the ESF Project 1.227, the NCFHE is working on the development of the accreditation and audit of e-learning based providers and programmes using international standards and tools. This development will be in harmony with the principles and standards of the Framework, and will in effect constitute part of the Second Stage of the Framework as indicated in the Forward. It is envisaged that the accreditation and auditing procedures and tools for e-learning based providers and programmes will be concluded in the second half of 2014.

5.2 Table 4.1 indicates the applicability of the various components of the Framework to the different types of entities accredited with the NCFHE.

<sup>1</sup> Numbered as it appears in the main text.

Table 4.1: Applicability of the Framework

Type of Entity	IQA	External Review of IQA	EQA
Self-accredited	X	X	X
University	X	X	X
Higher Education	X	X	X
Further and Higher Education	X	X	X
Local rep./ franchise	X	X	X
Further education	X	/	X
English language school	X	/	X

6.1 The **Standards for internal quality assurance** are:

- a) An effective policy for quality assurance
- b) Institutional probity
- c) Appropriate design and approval of programmes
- d) Student-centred learning, teaching and assessment
- e) Student admission, progression, recognition and certification
- f) Competence of teaching staff
- g) Appropriate learning resources and student support
- h) Appropriate information management
- i) Appropriate public information
- j) On-going monitoring and periodic review of programmes
- k) Cyclical external quality assurance.

6.2 The **Standards for external quality assurance** are:

- a) Consideration of internal quality assurance
- b) Designing EQA methodologies that are fit for purpose
- c) Implementing processes that are reliable, useful, pre-defined, implemented consistently and published
- d) Review by expert peers
- e) Explicit and published criteria for formal outcomes

f) Public reporting

g) Clearly defined complaints and appeals.

7.1 **Scope of EQAs:** EQAs shall be carried out under the responsibility of the Commission. The EQAs shall:

- a) examine the fitness for purpose and effectiveness of the internal quality assurance processes used by the provider;
- b) examine the regulatory compliance by providers;
- c) include appropriate investigatory mechanisms to ensure institutional and financial probity.

7.2 **Composition of Peer Review Panel:** the EQA shall be conducted by a Peer Review Panel that shall be selected by the Commission. The composition of such teams shall be as given in table 6.1.

7.3 **The selection of providers** undertaking an EQA is at the discretion of the NCFHE.

7.4 The NCFHE shall give providers not less than six months' **notice of an EQA.**

7.5 **Data and documentation for the EQA:** Providers undertaking an EQA shall be requested to make available to the NCFHE specific documentation before and during the EQA, and shall provide access its staff during the EQA.

7.6 **Prior to the EQA,** the Peer Review Panel shall determine the specific terms of reference, aims and objectives, as well as the research questions of a particular EQA. The Panel shall discuss the process of the EQA with the provider.

Table 6.1: Peer Review Panel Members

Head of Peer Review Panel	<i>A recognised expert in the field of delivery of the target institution, and/or in EQAs</i>
External experts	<i>Between one and three, depending on the size of the target entities, being recognised experts in the field/s of delivery of the institution</i>
NCFHE QA personnel	<i>Up to two NCFHE staff personnel, with expertise in EQA procedures</i>
Student	<i>Up to two students selected by the NCFHE</i>

- 7.7 **During the EQA** the provider shall make available specific facilities to the Panel.
- 7.8 **After the EQA**, the Panel shall submit its report within two weeks of the EQA Quality Assurance Committee of the NCFHE. Following the approval by the Committee of the report, this is submitted to the CEO NCFHE with a recommendation for the endorsement of the NCFHE Board.
- 7.9 The Report shall have a **specific structure**.
- 7.10 **Publication of the Report:** the NCFHE shall send the report to the provider, which shall be allowed a time limit of six weeks to submit its views. The finalised Report shall be published. The Report and its appendices shall be available to the provider.
- 7.11 **Consequences of EQA and follow-up procedure:** the NCFHE shall confirm or revoke provider or programme accreditation status as well as make recommendations and assign conditions, as the case may be, on the basis of the EQA report, in accordance with Legal Notice 296/2012.
- 7.12 **Appeals procedure:** A provider may appeal from decisions or actions taken by the NCFHE under these regulations to the Court of Appeal in its inferior jurisdiction in the manner provided in article 20(11) of Legal Notice 296/2012.
- 7.13 **The role of cross-border EQA:** Once the NCFHE is a full member of the European Quality Assurance Register (EQAR), providers may request the NCFHE to fulfil their EQA requirements through the services of a quality assurance agency that is also on EQAR.
- 7.14 **The EQA parameters** shall be customised for different forms of entities.



## 2.1 Legal Remit and International Obligations

The National Commission for Further and Higher Education (NCFHE) is both empowered and committed to develop and implement a national quality assurance mechanism that addresses further and higher education provision, in fulfilment of Malta's international obligations in this field.

The need for a quality assurance framework for further and higher education was first established in the Further and Higher Education Strategy 2020<sup>2</sup> for Malta that was published in 2009. This Strategy outlined twelve priority areas of action and identified three areas of policy development as an immediate priority. The priority directly related to quality was the promotion of excellence in further and higher education and in research by creating a quality culture across the sector, mainly through the development of a new licensing, quality assurance and accreditation framework for further and higher education and the setting up of a Quality Assurance Agency for the sector.

The formation of the NCFHE was a direct consequence of this Strategy. The NCFHE was legislated by the revised Education Act which came into force on the 1st August 2012, and was formally launched on the 14<sup>th</sup> September of that year. However, the foundations of this Commission go back to 2005 when the Malta Qualifications Council was set up. The NCFHE in fact incorporates both the Malta Qualifications Council as well as the National Commission for Higher Education.

By virtue of Legal Notice 296 of 2012, the NCFHE has the power to make and publish guidelines and criteria for the internal quality assurance system required by providers, and to make guidelines containing the criteria and procedures to be used in accreditation and external quality assurance activities undertaken by it. In doing so, the NCFHE is obliged to apply the relevant European and international standards, guidelines and criteria and respect for international treaties and agreements

relevant to further and higher education provision as ratified or endorsed by Malta<sup>3</sup>.

Specifically, Malta was one of the founder members of the European Higher Education Area in 1999, which led to the development of the European Standards and Guidelines for the fostering of internal and external quality assurance in higher education institutions.

Malta is also signatory to the Copenhagen Declaration of 2002 on enhanced European cooperation in vocational education and training (VET), that led to the development of the European Quality Assurance Reference Framework for VET in 2009, and subsequently to the EQAVET system of quality assurance in VET. The Council Conclusions of November 2010 stated that by the end of 2015 Member States should establish at national level a common quality assurance framework for VET providers, which also applies to associated workplace learning and which is compatible with the EQAVET framework. In 2013 the NCFHE led a project that adapted the EQAVET model for the Maltese context with respect to VET institutions.

With respect to adult learning, the European Commission adopted a Communication<sup>4</sup> in October 2006, followed up by an Action Plan<sup>5</sup> in 2007 that was endorsed in May 2008 by the Education Ministers of the countries that are signatories to the Bologna Declaration. The Action Plan identified the need for quality assurance systems for providers.

Malta is also committed to achieving the Education and Training 2020 targets that include improving the quality and efficiency of education and training by, amongst other things, developing effective quality assurance systems<sup>6</sup>. Indeed, the Framework for the Education Strategy for Malta 2014-2024 launched by the Ministry for Education and Employment in February 2014 includes the quality assurance of education programmes as one of the seven strategic pillars for policy development.

<sup>2</sup> 'Further and Higher Education Strategy 2020. Recommendations of the National Commission for Higher Education'. NCFHE, Malta. April 2009.

<sup>3</sup> LN 296/2012, article 34 (2)

<sup>4</sup> 'Adult learning: It Is Never Too Late to Learn', communication from the European Commission, 2006. <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52006DC0614>

<sup>5</sup> Action Plan on Adult learning - It is always a good time to learn, communication from the European Commission, 2007. <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52007DC0558>

<sup>6</sup> Council conclusions of 12 May 2009 on a strategic framework for European cooperation in education and training ('ET 2020'), Strategic Objective 2.

## 2.2 Overview of further, higher and adult formal education provision

In 2013 the NCFHE received European Social Funds, through Project no. 1.227 'Making Quality Visible', to develop a national internal and external quality assurance framework for further and higher education, and related procedures and tools. One of the deliverables of this Project was a Scoping Exercise with both state and non-state further, higher and adult formal education service providers, that was intended to explore the complexity of provision and the state of preparedness and practice of providers in terms of quality assurance. This Scoping Exercise took the form of one-to-one interviews from January to March 2014. 76 % of all provisional license holders at the time, as well as 63% of regular license holders which represent a good cross-section of this category, were interviewed to provide as comprehensive a picture as possible. Interviewed entities included the Project partners and the ETC.

The general feedback received during the Scoping visits was that these were welcomed, and that providers approved the development of an overarching Further and Higher Quality Assurance Framework with the European Standards and Guidelines at its heart, as is explained further on in this document. With very few exceptions, all providers had a good measure of explicit or implicit internal quality assurance procedures in place, and appreciated that this would be taken into consideration once the Framework and audits were up and running, to avoid needless overlap.

The Scoping Exercise highlighted that providers could be categorised by the type of clients they serviced and by the type of courses they provided. Five categories of clients were identified:

- a) 'local' students following full-time or part-time whole courses;
- b) international residential students;
- c) students attending short courses;
- d) pre- and post-16 year olds in the same entity;
- e) students with vulnerable backgrounds.

Seven categories of providers were identified by the type of courses they provide:

- a) self-accrediting institutional providers: the University of Malta, MCAST and ITS;
- b) state entities such as the ETC and the Malta

Tourism Authority that develop courses, outsource their provision, and then undertake quality assurance on the course process and outcomes;

- c) local administrators of foreign accredited courses;
- d) local EFL providers for foreign clients;
- e) providers of home-grown courses;
- f) providers of distance learning courses;
- g) micro providers, typically an operation run by one or two persons and providing very few courses per year.

Of course the same entity could fall within different student and course type categories.

The Scoping Exercise also highlighted the wide spectrum of variance in the types of contractual relationship between local representatives and the parent service providers who for the most part are operating in the UK. This ranged from 'strong' to 'weak' quality assurance practices by the parent provider. A typical 'strong control' scenario meant that student selection would be made or confirmed by the parent provider, who also sent some or all of the trainers, and provided some or all of the teaching, learning and assessment resources. Scripts would be sent abroad to be marked and the results and certificate would be respectively communicated and disseminated by the parent provider. The parent provider would also send regular moderators or evaluators to assess the learning environment and outcomes, at least once a year.

In a 'weak control' scenario, students and trainers would be selected locally, examinations would be corrected and the certificate generated locally. Quality assurance would be through spot-checks to ensure compliance with regulations and sample verification of results.

The feedback received indicated that the internal and external quality assurance measures proposed in the Framework had to be flexible enough to cater for all these variances. These measures needed to be at par with accepted international standards to ensure the integrity and credibility of the Framework, whilst not being so cumbersome, especially for micro operations, as to overwhelm them and be an actual disincentive to the development and sustainability of a quality culture.

### 2.3 Local current practice in Quality Assurance

The Scoping Exercise mentioned in the previous section also highlighted that there is already a lot of practice in place in the development and implementation of quality assurance mechanisms in both state and private further and higher education provision. This can serve as an excellent basis for further development.

In 2008 the University of Malta set up its Programme Validation Committee (PVC) which is a standing committee of the University Senate and which replaced the Senate Sub-Committee on Approval of Courses and Regulations. The main functions of the PVC, which is composed of academic members of staff nominated for this purpose by the Rector, are as follows:

- To provide quality assurance mechanisms acceptable to Senate and appropriate for internal and external audit purposes;
- To ensure that academic programmes are of appropriate standards;
- To ascertain the validity of the programmes on offer;
- To ensure optimal use of available resources.

The PVC is assisted in its task by the Academic Programmes Quality and Resources Unit (APQRU) which also provides on-site and off-site assistance to departments and faculties, institutes and centres with regard to validation procedures.

The University of Malta has based its quality assurance procedures on the European Standards and Guidelines (ESG). As from January 2014 the University of Malta has started a process of periodic programme review. Programme review is an ongoing process and has as its basis the existing audit practices which take place as part of quality assurance mechanisms in place at the University. These audit practices include, for example, the study-unit feedback exercises which are held twice a year, the course experience survey, the consideration of external examiners' reports, the collation of data in relation to student progression, and ongoing and periodic consultation with stakeholders involved. However, collation of data only represents the first step in quality assurance. The real use of such an exercise is effective analysis of the data and conclusions as may be drawn from it. Periodic Programme Review is the stage at which this data is formally considered in order to evaluate the quality and standards of programmes offered by the various academic entities. From such review, the University can design action plans which help map the way

forward in favour of quality enhancement and maintenance.

All departments within the University are required to undertake Periodic Programme Review, which essentially involves an evaluation of the complete portfolio of undergraduate and postgraduate taught programmes on offer. Such a review generally involves external stakeholders. This process is an important aspect of the University's quality assurance procedures, and serves to ensure that programmes are of an acceptable quality, appropriate academic standard and relevant to the needs of society.

The Malta College for Arts, Science and Technology (MCAST) set up its Quality Assurance Department in 2008. The ethos of the Department is that quality assurance needs to be focused on the added value to the customer, both internal and external as identified by the Organisations' Mission Statement and Quality Policy. All Quality Assurance initiatives therefore need to be supported and consolidated by a formal and structured Quality Management System (QMS).

The scope of the QMS operated by MCAST covers two core operational areas: the design, development, approval of VET programmes and courses; and the realisation of VET and support services to learners and Industry. The purpose of the QMS is therefore to consolidate the various key processes in order to ensure that the VET objectives are met through continuous improvement. In order to ensure the effective implementation of the QMS, the College promotes and implements the 'Plan-Do-Check-Act' Quality Cycle approach:

PLAN: Planning for improvement through:

- a) setting of strategic and quality objectives;
- b) design and development of full time and part time accredited vocational education programmes;
- c) development of student support services.

DO: Realisation of:

- a) VET programmes/courses;
- b) VET related student support services;
- c) Industry related services;
- d) research and innovation initiatives.

CHECK: Measurement, monitoring and analysis of results of:

- a) Strategic objectives;
- b) EQAVET indicators;
- c) internal and external customer feedback;
- d) employee feedback;
- e) internal and external auditing;
- f) Internal verification;
- g) management review.

ACT: Implementation of corrective, verification and preventive actions.

The various Quality Management System processes are incorporated within the College Quality Manual. The structure and content of the Quality Manual is intended to meet the requirements of the ESG (February 2014); International standards or quality management system requirements (ISO9001 / BV Standard for Maritime Training Institutes), and the EQARF Quality indicators for assuring quality in VET.

Quality assurance has always been present at the Institute for Tourism Studies (ITS) in various forms and shapes. In 2013 it participated in the EQAVET Project aimed at developing a Quality Assurance Tool to help vocational institutions implement a Quality Assurance System.

In the second half of 2013 the ITS reconstituted its quality assurance structures. The major aim of the ITS Academic Quality Assurance System is to improve quality in all aspects of the Institute's operations whenever and wherever possible. The ultimate objective is to guarantee the quality of students' holistic learning experience both academically and in areas of social and personal development.

In September 2013 a formal Academic Quality Assurance Committee was set up to coordinate the implementation of a formalized quality assurance system and processes. The Committee embarked upon a robust programme aimed at consolidating all quality assurance activity within the Institute with the ultimate purpose of fostering a quality culture within the institution. Against this background a Quality Assurance Policy is being developed to guide the practice based upon the expectations of the NCFHE particularly through participation of the ITS in ESF Project 1.227 'Making Quality Visible'.

The ITS Quality Assurance System places the onus of its implementation upon the entire Institute. It is mainly based on self-reviews operating in all institutional areas at different levels on a continuous cyclic basis, focused on continuous self-improvement and accountability to stakeholders.

The initial steps towards establishing this system have already been taken. A draft Quality Assurance Manual has been published and is at present under review by ITS staff. Information and training seminars are being held for consultation purposes.

The ITS Programme/Module validation system is being strengthened. As ITS was already having its courses validated by the Malta Qualifications Council for a number of years, a formal system was already in place. This has now been revised and up-dated especially in view of the fact that the Institute will be offering MQF Level 6 courses as from October 2014.

Other basic documentation has also been reinforced: rules & regulations, examination policies, regulations and procedures. A Code of Ethics is also being drawn up. These should all be available on-line towards the end of this Summer 2014.

The Directorate for Lifelong Learning (DLLL) was established in 2009 within the Ministry for Education and Employment. The DLLL is responsible for the design and implementation of Malta's Lifelong Learning Strategy and is guided by a vision for quality lifelong learning that empowers citizens through more personalised and innovative approaches to adult education.

The DLLL has the mission to increase participation in adult learning and to address the imbalances in participation to achieve a more equitable state of affairs. It is responsible for the selection, recruitment and placement of adult educators within its different centres, namely the seven Evening Classes Centres, the Lifelong Learning Centre in Msida and courses offered at community level. The Directorate recruits adult educators who are specialised in various fields including digital competence, family learning, languages, maths, science and technology, initiative and entrepreneurship; social health and civic competences; vocational and educational training. It collaborates with the NCFHE to ensure that its courses are accredited according to the Malta Qualification Framework.

The DLLL is developing quality assurance and evaluation measures aimed at improving the quality and efficiency of over 200 adult learning courses. The DLLL engaged a quality assurance adult courses



coordinator who together with the Directorate's senior management has the responsibility of ensuring that a number of processes and procedures are in place. These include:

- a) ensuring that learning outcomes are developed with and distributed to all educators and then processed by area/subject coordinators;
- b) planning two observations per year to be conducted by the area coordinators using standardised templates and level descriptors. A second visit may then be conducted by the Education Officer for Lifelong Learning;
- c) gathering feedback from learners through a standardised on-line questionnaire distributed at end of course;
- d) designing standardised assessment criteria for each course.

Work is currently in progress to ensure that effective measures are in place for the new learning year 2014/2015.

The Employment and Training Corporation (ETC) is Malta's public employment agency and a major provider of VET courses. To enhance the quality of its training services, the Corporation set up a Training Programme Design and Quality Assurance Unit in 2011. This Unit was set up specifically to develop and update training programmes, as well as provide and implement a quality assurance framework for training programme delivery. The Unit has adopted and implemented quality standards that range from the qualifications required by trainers to deliver training programmes, to classroom facilities, learner's course notes, training material and delivery, assessment methodology, certification and code of conduct. Since this Unit is also responsible for obtaining MQF/EQF level ratings for training programmes, the QA Unit also performs checks on recruited trainers or Contractors to ensure that the latter are abiding by the course layouts, which are aligned with the applications submitted for the accreditation process. This Unit also assesses the feedback received from trainers or Contractors and trainees at the end of each course module. Such feedback assists the Unit in designing new courses or updating of current courses.

The private sector has also actively pursued good quality assurance practices. One of the conclusions of the Scoping Exercise was that *bona fide* private sector education providers in Malta already have in place

many key elements of what would constitute good practice in internal quality assurance. In some cases the structures and procedures may be informal, but they are nonetheless underpinned by the intent of ensuring a fair deal and a valid educational experience for students. In these cases, the Scoping Exercise served to bring to consciousness and to systematize the good practice already in place, as well as to highlight the lacunae that required particular attention.

Many local providers act as representatives of course and degree providers that are established overseas, and are subject to the due diligence and quality assurance procedures of the parent provider. This has many times led to a beneficial transfer of experience and expertise that has led to a steady improvement and expansion of services. Here the Scoping Exercise highlighted both the good practices in place, as well as the role that the local provider always has, insofar as Maltese jurisdiction is concerned, to be the primary guarantor of quality of the education experience of its students.

## 2.4 Need for a National QA Framework

The European Standards and Guidelines (ESG)<sup>7</sup> were originally developed by the European Network for Quality Assurance in Higher Education (ENQA) in cooperation with the European Students' Union, the European Association of Institutions in Higher Education and the European University Association, and are intended to ensure quality in higher education provision. They came about as a result of an invitation by the Ministers of the Bologna Process signatory states in September 2003 to develop an agreed set of standards, procedures and guidelines on quality as well as ensuring an adequate peer review system. They were accepted by the Council of the Ministers in 2005 and revised in 2009.

During the Scoping Exercise mentioned earlier all further education providers agreed that the ethos and scope of the ESG could function as the basis for a national quality assurance framework that catered not only for higher but also for further and lifelong educational provision, for both state and private sectors. Indeed Legal Notice 296 of 2012, 'Further and Higher Education (Licensing, Accreditation and Quality Assurance) Regulations' is situated within the discourse of the ESG: it defines quality assurance in terms of complementary internal and external processes whilst placing the responsibility for the former on the provider. It is worth noting that since the passing of this Legal Notice, the NCFHE has been requesting

<sup>7</sup> 2009 version available at: [www.enqa.eu/wp-content/uploads/2013/06/ESG\\_3edition-2.pdf](http://www.enqa.eu/wp-content/uploads/2013/06/ESG_3edition-2.pdf)

both further and higher education providers in Malta to develop their internal quality assurance system on the basis of the ESG. The Scoping Exercise thus indicated that both state and private sector further and higher education providers were ready, willing and able to take on board, and make best use of, a more systematic quality assurance mechanism in the form of a comprehensive national framework.

At the same time, providers expressed the need for a QA framework that was not only process but also outcome oriented, and had a greater sensitivity to stakeholder (including employer) involvement and employability issues than the 2009 version of the ESG. The Legal Notice itself is not circumscribed by these Guidelines, and goes beyond them in stipulating measures to ensure due process in, for example, accreditation and effective student safeguards.

All this is in line with the direction of the European Council Conclusions of May 2014 on Quality Assurance Supporting Education and Training. These have urged the European Commission to: "work (...) towards closer coordination and improvement of EQAVET and European tools for quality assurance in higher education, notably by incorporating a learning outcomes approach and with the support of transparency instruments such as the EQF, Europass and European credit systems"(p.5)<sup>8</sup>. Indeed in April 2014 the Commission concluded a wide-ranging stakeholder consultation on the European area of skills and qualifications<sup>9</sup> that included the following questions:

- a. Is it possible to identify some common basic principles and guidelines of quality assurance valid across sectors and applicable to all qualifications?
- b. Should there be a core of common European quality assurance principles for the provision of learning opportunities in all sectors of education and training?"<sup>10</sup>

It is worth noting that the ESG are currently being revised and will be addressing some of the issues raised by Maltese providers. The European Commission<sup>11</sup> considers that the ESG have helped the convergence of quality assurance in higher education across countries, but due to their generic nature they tend to be understood and applied unevenly. Their revision is intended to keep the strengths of the 2009

version of the ESG, such as the integrated concept and understanding of QA, and its broad applicability and ownership, whilst addressing the weaknesses that have been highlighted through experience. These include elements of vagueness, redundancies and inconsistencies. Also, the Council Conclusions of May 2014 recommended the broadening of the scope of the ESG to include issues such as access to higher education, assessment of learning outcomes, retention of students, completion of studies and employability of graduates, and promoting cooperation on quality assurance with relevant education and training sectors.

Malta is responding to all these developments by proposing a National Quality Assurance Framework that is customized for the realities and needs of Maltese education, and is sufficiently overarching and flexible to effectively address further, higher and adult formal education provision. This will address Malta's commitments with respect to quality assurance both for higher education in terms of the Bologna process, as well as for VET in terms of the Copenhagen Process.

## 2.5 Comparing different QA models

A number of important initiatives have been taken recently to compare different quality assurance mechanisms. In March 2014 the EQAVET Network published on its website a comparative analysis of the EQAVET Framework, the ISO 9001 Standard and the EFQM Excellence Model. This analysis concluded that although these three models developed historically from completely different origins and, consequently, differ substantially in terms of focus and tools used, they do share important common elements. All three models are concerned with the same issues and are built on the Shewhart/Deming Cycle (Plan-Do-Check-Act) to achieve continual improvement.

In 2014 MCAST completed an exercise that cross references the support and operational processes of its customised Quality Management System (QMS) with the requirements of three specific external standards/recommendations, namely the ESG, the EQAVET model (as adapted for the Maltese context<sup>12</sup>) and the Bureau Veritas Standard for Quality Management Systems of Maritime Training Institutes.

From this cross-referencing exercise it was concluded that the structure of the MCAST QMS is compatible with and fulfils the requirements of these three

<sup>8</sup> Available at: [www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/educ/142694.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/educ/142694.pdf)

<sup>9</sup> 'Stakeholder Consultation on the European Area of Skills and Qualifications. Background Document' European Commission March 2014.

<sup>10</sup> Ibid. p. 20

<sup>11</sup> Ibid. p. 11

<sup>12</sup> 'Implementation of Quality Assurance in Vocational Education and Training (VET) Institutions. A Manual for VET Providers' NCFHE, Malta. 2013.

systems. In fact, it has been possible for the College to design the QMS in a modular structure that will allow for the adaptation to future changes in both internal and external stakeholder requirements.

The NCFHE also conducted an internal exercise in 2014 that compared the ESG<sup>13</sup> with the EQAVET Malta model including the Quality Indicators, the Framework Factors and the six Key Principles on which to base a QA system. It concluded that at a conceptual level all the Factors and Principles and 65% of the Indicators were reflected in the ESG. Both systems allow for both institutional-level and programme-level quality assurance. The conceptual differences are that the ESG are more explicit in their process orientation, in the relationship between internal and external quality assurance functions, and in placing the primary responsibility of quality assurance on the provider. On the other hand the EQAVET model is more explicitly oriented towards employability and employment, with a clearer reference to employers' involvement. The Shewhart/Deming Quality Cycle is an explicit component of the EQAVET model, whereas it is subsumed within the ESG and certainly does not act in contradiction to it. These differences are likely to be reduced with the revised version of the ESG.

Kelly (2010)<sup>14</sup> compared the ESG and the EQAVET models. She concluded that both ESG and EQAVET outline the importance of developing a culture of quality. Both seek to promote greater consistency of quality policies (EQAVET) and standards (ESG) across their sub-sectors thereby increasing mutual trust among Member States and institutions which will greatly facilitate the recognition of qualifications. They both make reference to the need for internal and external evaluation mechanisms and processes. There are a number of key stages that can be found in both ESG and EQAVET that are essential for embedding a culture of quality across the entire education and training sector and provide a basis for future cooperation among the further, higher and adult education providers. These are:

- the development and ownership of the QA system;
- self-assessment or internal evaluation;
- external assessment or evaluation;
- review and enhancement.

Kelly observed that neither the ESG nor EQAVET prescribe how quality assurance should be implemented. Both set out a framework reference for providers within their respective sub-sectors that

highlight what should be done but not how it should be done. However, there are significant differences in the detail between ESG and EQAVET. In general ESG is more explicit and sets out specific standards and accompanying guidelines for internal and external quality assurance of higher education institutions and of the agencies.

Finally, two important initiatives by the European Commission looked at the quality assurance requirements for adult education. In 2009 the Commission initiated a three-year Thematic Network of 14 national agencies for lifelong learning, in order to increase the impact of innovative projects in VET and adult education. The Network was entitled QALLL which stands for "Quality Assurance in LifeLong Learning with a Focus on Vocational Education and Training and Adult Education". The project aimed to improve the quality and efficiency of education and training by highlighting good practice and developing recommendations. One of its ten key recommendations was the adoption of the EQAVET quality cycle to ensure constant improvement in the provision of adult education.

The second initiative was the 2013 report 'Developing the adult learning Sector - Quality in the Adult Learning Sector'. The report concluded that the EQAVET and ESG quality reference frameworks are applicable to the situation of the adult learning sector, acknowledging that the adult learning sector is less uniform in terms of objectives, organisation, target groups, and societal results (especially for the nonformal part of adult learning). Most cases studied in the report were based on the same philosophy (the quality cycle), and similar descriptors were in place.

In sum, one can conclude that the identification of a quality assurance common conceptual core for further, higher and adult education, which is situated within the ESG and enriched by EQAVET perspectives, and that is in harmony with a whole range of quality assurance systems that may already be used by Maltese providers, is an achievable target for Malta.

## 2.6 Framework development and consultation process

The partners Project no. 1.227 'Making Quality Visible' are:

- The NCFHE (leading partner);
- The University of Malta;

<sup>13</sup> 2009 version.

<sup>14</sup> Barbara Kelly 'Towards a quality assured and integrated lifelong learning implementation strategy' in Belgian EU Presidency Conference 'Quality Assurance and transparency as interface between Vocational Education and Training, Schools and Higher Education to enhance mobility and to support easier pathways to Lifelong Learning'; December 2010, Brugge.

- The Malta College for Arts, Science and Technology (MCAST);
  - The Institute for Tourism Studies (ITS);
  - The Directorate for Lifelong Learning (DLLL);
  - The Employment and Training Corporation (ETC);
  - ACQUIN, the transnational partner of the project and an established cross-border Higher Education Quality Assurance Agency based in Germany.
- RAQAPE - the Romanian Agency for Quality Assurance in Pre-University Education (*which includes VET provision*)
- v) The final step was a public consultation of the draft Framework that was launched in July 2014 through the present document, and shall be concluded by October 2014.

In the process of developing this Framework a five-fold consultation process was undertaken:

- i) The Project partnership itself was the first arena of consultation and feedback on the Framework.
- ii) The Scoping Exercise already mentioned was undertaken with registered further and higher education institutions.
- iii) A Network of Quality Assurance Professionals in Further and Higher Education (Net-QAPE) was also set up as part of the project. The Network counts as members the quality assurance personnel in the state education providers mentioned previously, effectively covering all state provision in further and higher education<sup>15</sup>, as well as 22 private further and/or higher education providers, including most of the bigger providers. Thus, Net-QAPE members service an overwhelming majority of the further and higher student population in Malta. The aim of Net-QAPE is to bring together all personnel involved in quality assurance in the sector so as to serve as a sounding board for the Framework as it developed, and to provide concrete and ongoing support, upskilling and continuous professional development.
- iv) A number of national and transnational institutions in further and higher provision or quality assurance have been asked to provide feedback on the draft document. These are:
  - ENQA - the European Association for Quality Assurance in Higher Education
  - CEDEFOP – the European Centre for the Development of Vocational Training
  - AQA - the Austrian Agency for Quality Assurance (*focusing on higher education*)
  - OAQ - the Swiss Center of Accreditation and Quality Assurance in Higher Education
  - QAA – the UK Quality Assurance Agency (*which focuses on higher education but also covers Further Education provided overseas*)

<sup>15</sup> This includes the Junior College which is part of the University of Malta, but excludes all state and private VI Forms which for the purposes of quality assurance are considered with compulsory education institutions.

Malta's National Quality Assurance Framework for Further, Higher and Adult Formal Education, which hereinafter will be referred to as the Framework, is underpinned by six principles that determine its remit and function and the relationship between internal and external quality assurance to enhance learning outcomes.

### 3.1 A Framework based on the ESG and enriched by the EQAVET perspective

The Framework shall be based on the Standards of the ESG and adapted to the Maltese context, taking into consideration Legal Notice 296 of 2012. The IQA standards of the Framework shall be enriched by EQAVET components that relate more directly to outcomes and employability.

### 3.2 A Framework that contributes to a National Culture of Quality

The Framework shall contribute to a national quality culture, by supporting providers to develop and improve their internal quality management systems which are regulated, monitored and supported by external quality audits. The Framework thereby contributes to:

- increased agency, satisfaction and numbers of service users;
- an enhanced international profile and credibility of providers in Malta, and
- the promotion of Malta as a regional provider of excellence in further and higher education.



Figure 3.1: Malta's National Quality Culture

Figure 3.1 represents the concentric nature of the national culture of quality. At its core is the internal quality assurance process conducted by the provider. This may be augmented by external review that is sought by the provider. The third cycle in the quality culture is the external quality audit conducted by the NCFHE, as explained below. Finally, the NCFHE will itself be peer reviewed by other quality assurance agencies within the context of the due diligence process of the European Quality Assurance Register.

### 3.3 Internal Quality Assurance (IQA) that is Fit for Purpose

Providers shall have the primary responsibility for the quality of their provision and its quality assurance. Each IQA needs to be designed to be fit for purpose according to the provider's courses and service users. The Framework shall provide the necessary guidelines for the development of these IQAs whilst allowing for established quality management systems adopted by providers that are in harmony with the Framework.

### 3.4 External Quality Assurance (EQA) that is a tool for both Development and Accountability

The EQA process shall have both a developmental and an accountability perspective. It shall be developmental by giving providers access to independent data and recommendations to promote excellence. It shall also ensure accountability to stakeholders, including learners and employers, and the fulfilment of national goals in further, higher and adult formal education. The EQA shall ensure that the internal quality management system of the provider is:

- fit for purpose according to the provider's courses and service users;
- compliant with standards and regulations and contributing to the development of a national quality culture;
- contributing to the fulfilment of the broad goals of Malta's Education Strategy 2014-2024, and
- implemented with effectiveness, comprehensiveness and sustainability.

### 3.5 The Quality Cycle at the Heart of the Framework

The learning and improvement dynamic of the Framework shall be the Quality Cycle, which is itself learning outcomes-based. For the purposes of this Framework the EQAVET version shall be adopted as per Diagram 3.2, but this can be taken to represent the different equivalent versions of the quality cycle embedded in other quality management systems.



Diagram 3.2: The Quality Cycle

The Quality Cycle informs both the learning process of the IQA as well as the developmental perspective of the EQA and its interaction with the IQA. The developmental relationship between the IQA and the EQA that is driven by the Quality Cycle is illustrated by Diagram 3.2. It is the provider's IQA that is the primary driver for enhanced quality and output, assisted by the EQA process.



Diagram 3.3: Relationship between IQA and EQA

### 3.6 Integrity and Independence of the EQA Process

The NCFHE shall act, and be seen to act, with integrity and independence in its EQA function, by:

- having autonomous responsibility for its operations;
- ensuring that the conclusions and recommendations made in its EQA reports and the outcomes thereof shall not be influenced by any third parties;
- ensuring that the definition and operation of its procedures and methods, and the nomination of its external experts shall not be influenced by any third parties;
- operating a no-conflict-of-interest mechanism in ensuring that while relevant stakeholders, particularly students and teaching staff, are consulted in the course of quality assurance processes, the final outcome of any quality audit or accreditation decision remains its responsibility.



Table 4.1 below indicates the applicability of the various components of the Framework to the different types of entities accredited with the NCFHE.

As can be seen, all entities are required to have an IQA mechanism in place for all accredited courses and programmes, and to undertake EQA.

Self-accrediting institutions, universities, higher education institutions and local providers that are acting as representatives of overseas educational institutions are additionally required to have an external review component in their IQA. This can take the form of external examiners, moderators or validators, and/or ad hoc reviews, audits or inspections by third parties requested by the provider to undertake this service. Such external reviews do not replace the EQA process. However the EQA will take the external review process and outcomes into account.

Entities that are licensed as further and higher education institutions require an external review only of their higher education component. EQAs of entities that are required to undertake an external review of their IQA shall expect to see evidence of such a review at least once during the EQA five-year cycle.

Entities licensed as further education institutions or centres are not required to undertake external review of their IQAs. Neither are English language schools. The IQA and EQA of such schools shall be regulated

by a specific protocol between the NCFHE and the EFL Monitoring Board in line with Article 4 (6) of Legal Notice 296/2012.

The EQA shall eventually encompass both institutional and programme levels of audit. However the first EQA cycle shall focus on the institutional level so as to implement the developmental orientation of the EQA.

In parallel to the ESF Project 1.227, the NCFHE is working on the development of the accreditation and audit of e-learning based providers and programmes using international standards and tools. This development will be in harmony with the principles and standards of the Framework, and will in effect constitute part of the Second Stage of the Framework as indicated in the Forward. It is envisaged that the accreditation and auditing procedures and tools for e-learning based providers and programmes will be concluded in the second half of 2014.

Table 4.1: Applicability of the Framework

Type of Entity	IQA	External Review of IQA	EQA
Self-accredited	X	X	X
University	X	X	X
Higher Education	X	X	X
Further and Higher Education	X	X	X
Local rep./ franchise	X	X	X
Further education	X	/	X
English language school	X	/	X



As indicated in the first Principle of Section 3 earlier in this document, the Standards of this Framework are based on the 2014 proposed version of the ESG, and adapted to take into account the VET reality, the local context and Legal Notice 296 of 2012. The Standards in this Framework are not standards for quality, nor do they prescribe how the quality assurance processes are implemented.

They are intended to provide guidance, covering the areas which are vital for successful quality provision and learning environments in further, higher and adult formal education. These Standards should be considered in a broader context that also includes the Malta Qualifications Framework, the use of ECTS<sup>16</sup> and ECVET<sup>17</sup> learning credits as indicated in the Malta Referencing Report of 2012<sup>18</sup>, and the use of diploma and certificate supplements that also contribute to promoting the transparency and mutual trust in Maltese further and higher educational provision.

The focus of these Standards is on quality assurance related to learning and teaching, including the learning environment and where applicable, relevant links to research and innovation. In addition, entities have policies and processes to ensure and improve the quality of their other activities such as governance, and research where applicable. The Standards apply to all further, higher and adult formal provision in Malta regardless of the mode of study or place of delivery, including transnational and cross-border provision. In this document the term “programme” refers to the full range of provision, from short courses up to full programmes as indicated by the Maltese Referencing Report of 2012.

These Standards are fully compatible with Legal Notice 296 of 2012. No interpretation of these Standards that is not in line with the Legal Notice is permissible.

## 5.1 Standards for internal quality assurance

### 5.1.1 Policy for quality assurance

Entities shall have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders shall develop and implement this policy through appropriate structures and processes, while involving external stakeholders. Such a policy should include:

- reference to the relationship between research and learning & teaching, where applicable;
- the organisation of the quality assurance system;
- the responsibilities of departments, schools, faculties, institutes and other organisational units as well as those of institutional leadership, individual staff members and students with respect to quality assurance;
- procures for ensuring academic integrity and freedom, where applicable;
- procedures for guarding against intolerance of any kind or discrimination against the students or staff;
- the involvement of external stakeholders in quality assurance;
- procedures for the quality assurance of any elements of an entity’s activities that are subcontracted to, or carried out by, other parties.

### 5.1.2 Institutional probity

Entities shall ensure that they have appropriate measures and procedures in place to ensure financial probity. Universities, self-accrediting and higher education institutions, accredited entities that are bodies corporate, and other accredited entities with a turnover of more than €50,000 per annum shall have yearly audited accounts and regular budget plans<sup>19</sup>.

<sup>16</sup> European Credit Transfer System

<sup>17</sup> European Credit System for Vocational Education and Training

<sup>18</sup> ‘Referencing of the Malta Qualifications Framework (MQF) to the European Qualifications Framework (EQF) and the Qualifications Framework of the European Higher Education Area (QF/EHEA)’. Malta Qualifications Council, Ministry of Education and Employment, Malta, 2012.

<sup>19</sup> These can be on a yearly basis or else on a rolling budget system of up to three years.



Other accredited entities shall have yearly financial statements and regular budget plans. Where the provider is a body corporate it shall ensure that the members of the body corporate, the legal representative and the persons occupying a headship position are fit and proper persons to deliver further or higher education programmes.

### 5.1.3 Design and approval of programmes

Self-accrediting entities shall have processes for the design and approval of their programmes that have the following characteristics:

- they define the expected student workload in terms of ECTS or ECVET learning credits;
- they indicate the target audience and the minimum eligibility and selection criteria, where applicable;
- they are learning outcome-based, distinguishing between knowledge, skills and competences;
- they indicate appropriate learning dynamics and a measure of tutor-learner interaction as is appropriate for the course level and content;
- they indicate appropriate resources and forms of assessment;
- they indicate the minimum requirements in terms of qualifications and competences for teaching staff;
- they are in line with the MQF and the Malta Referencing Report 2012 and subsequent updates<sup>20</sup>;
- the process of the identification of training/ programme needs involves the participation of external stakeholders who are likely to benefit from the outcomes of such provision;
- programmes that are employment-oriented involve stakeholders from the world of work in their design and review;
- they involve students in their design and review;
- they are designed so that they enable smooth student progression;
- they are subject to a formal institutional approval process.

Other entities accredited by the NCFHE shall follow the programme accreditation procedure of the NCFHE, which shall be in line with this Standard.

### 5.1.4 Student-centred learning, teaching and assessment

Entities shall ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the

assessment of students reflects this approach. The implementation of student-centred learning and teaching shall:

- respect and attend to the diversity of students and their needs, enabling flexible learning paths;
- consider and use different modes of delivery, where appropriate;
- flexibly use a variety of pedagogical methods;
- regularly evaluate and adjust the modes of delivery and pedagogical methods;
- encourage a sense of autonomy in the learner, while ensuring adequate guidance and support from the teacher;
- promote mutual respect within the learner-teacher relationship.

Quality assurance processes for assessment shall take into account the following:

- assessors are familiar with existing testing and examination methods and receive support in developing their own skills in this field;
- the criteria for and method of assessment as well as criteria for marking are published in advance;
- the achieved learning outcomes are analysed in relation to the intended outcomes. Students are given feedback, which, if necessary, is linked to advice on the learning process;
- where possible and applicable, assessment is carried out by more than one examiner;
- the regulations for assessment take into account mitigating circumstances;
- assessment is consistent, fairly applied to all students and carried out in accordance with the stated procedures;
- a formal procedure for student complaints and appeals is in place.

### 5.1.5 Student admission, progression, recognition and certification

Entities shall consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification. In particular:

- admission processes and criteria are implemented consistently and in a transparent manner;
- induction to the institution and the programme is provided;
- both processes and tools are in place to collect, monitor and manage information on student progression;
- while accredited entities retain the right

<sup>20</sup> Such updates shall be discussed with providers within Net-QAPE.

to determine their own selection criteria, they have mechanisms in place to take into consideration relevant qualifications that are accredited or recognised by the NCFHE, and relevant periods of study and prior learning, including the recognition of non-formal and informal learning;

- on successful course completion, students receive documentation explaining the context, MQF level, amount of learning credit, content and status of the qualification gained, in line with NCFHE regulations. By 2017, locally accredited full qualifications at both further and higher education levels shall include reference to achieved learning outcomes.

### 5.1.6 Teaching staff

Entities shall assure the competence of their teaching staff. They shall apply clear, fair and transparent processes for the recruitment, conditions of employment and professional development of such staff. Entities shall promote innovation in teaching methods, and continuous professional development. Higher education institutions shall encourage scholarly activity to strengthen the link between education and research, where applicable. In the case of part-time teaching staff providing limited and specific service, entities shall ensure that such staff is constantly *au courant* with developments in their fields and with the methodological requirements of their programmes.

### 5.1.7 Learning resources and student support

Entities shall have appropriate funding for learning and teaching activities. They should provide a range of resources to assist student learning commensurate to the type and level of course/s. These resources may vary from physical or virtual libraries, learning equipment, study facilities and IT infrastructure to human support in the form of tutors, counsellors and/or other advisers.

The needs of a diverse student population (such as mature, part-time, employed and international students as well as students with disabilities), and the shift towards student-centred learning should be taken into account when allocating, planning and providing the learning resources and student support.

All resources should be fit for purpose and accessible, and students should be informed about the services available to them. In delivering support services the role of support and administrative staff is crucial and therefore they need to be qualified and have opportunities to develop their competences.

### 5.1.8 Information management

Entities shall ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities. This information shall include:

- profile of the student population, including prevalence of vulnerable groups;
- course participation, retention and success rates;
- students' satisfaction with their programmes;
- employment rates and career paths.

Various methods of collecting information may be used. Sources of such information may include the NCFHE yearly statistics for further and higher education, which will be reformulated to provide this service. Students and staff should be involved in providing and analysing information and planning follow-up activities.

### 5.1.9 Public information

Entities shall publish information about their activities, including courses/programmes, which is clear, accurate, objective, up-to date and readily accessible. The information should include:

- the selection criteria for the courses/programmes;
- their intended learning outcomes;
- the qualifications they award, including information on the EQF/MQF level and ECTS/ECVET learning credits;
- the teaching, learning and assessment procedures used;
- the pass rates, and
- the further learning opportunities available to their students.

The information available shall be sufficient for prospective applicants to be able to make an informed choice in terms of the knowledge, skills and competences they are likely to acquire on successful completion of the programme.

### 5.1.10 On-going monitoring and periodic review of programmes

Entities shall implement the Quality Cycle by monitoring and periodically reviewing their programmes in terms of their IQA policy and standards, to ensure that they achieve the objectives set for them and respond to the needs of students and society. Such reviews shall include input from students and, where applicable, input from EQA reports. They shall include students as well as other stakeholders that are benefiting from the outcomes of the programme; in

the case of employment-oriented programmes this includes stakeholders from the world of work. These reviews shall lead to continuous improvement of the programmes. Any action planned or taken as a result shall be communicated to all those concerned.

#### **5.1.11 Cyclical external quality assurance**

Entities should undergo external quality assurance by, or with the approval of, the NCFHE on a cyclical basis according to NCFHE guidelines.

### **5.2 Standards for external quality assurance**

#### **5.2.1 Consideration of internal quality assurance**

The EQA shall address the effectiveness of the internal quality assurance of the entity previously with respect to IQA Standards described in section 5.1.

#### **5.2.2 Designing methodologies fit for purpose**

The EQA shall be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders shall be involved in its design and continuous improvement.

#### **5.2.3 Implementing processes**

EQA processes shall be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent;
- an external assessment that includes a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

#### **5.2.4 Peer-review experts**

The EQA shall have a professional system of peer review at its core, carried out by groups of experts selected or approved by the NCFHE that include student members.

#### **5.2.5 Criteria for formal outcomes**

Any outcomes as the result of external quality assurance shall be based on explicit and published criteria that are applied consistently.

#### **5.2.6 Reporting**

The EQA reports shall be published, clear and accessible to the staff of the institution, external partners and other interested individuals. If the NCFHE

takes any formal decision based on the reports, the decision shall be published together with the report.

#### **5.2.7 Complaints and appeals**

Complaints and appeals processes shall be clearly defined as part of the design of the EQA processes and communicated to the entities.

The next Section develops these Standards into concrete parameters for the undertaking of EQAs for further and higher education providers in Malta.



## 6.1 Scope of EQAs

EQAs shall be carried out under the responsibility of the Commission. They shall be conducted applying the relevant European and international standards, guidelines and criteria for external quality assurance and respect for international treaties and agreements relevant to further and higher education provision as ratified or endorsed by Malta.

In making arrangements for EQAs, the Commission shall adhere to the following standards:

- EQAs shall examine the fitness for purpose and effectiveness of the internal quality assurance processes used by the provider, including an examination of the system’s structure, the documentation it produces and the evaluations of quality conducted by the provider;
- EQAs shall examine the compliance by providers with obligations of licence holders under these regulations, where applicable, as well as any conditions or restrictions imposed by the Commission on the licensee under these regulations;
- EQAs shall include appropriate investigatory mechanisms to ensure financial probity, and where the provider is a body corporate, to ensure that the members of the body corporate, the legal representative and the persons occupying a headship position are fit and proper persons to deliver further or higher education programmes.

## 6.2 Composition of Peer Review Panel

The EQA shall be conducted by a Peer Review Panel that shall be selected by the Commission. The composition of such teams shall be as per tabel 6.1 below:

Students shall be selected according to the following criteria:

- selection shall be through an open call issued by the NCFHE;
- selected students shall be at least 20 years old at the point of application;
- selected students are required to have a regular attendance record for at least the full scholastic year at the relevant further or higher education entity. This shall be determined by a written declaration by Head of Department/ entity. This criterion implies that eligible students need to be on a programme of studies that is longer than two years. As a rule of thumb, attendance is deemed to be regular if it is at least 80% of possible attendance to lectures/teaching sessions. In the case of part-time courses, these must have at least two sessions per week for the duration of the scholastic year. These parameters will ensure that eligible students are well grounded in further and higher education practices and procedures;
- selected students are required to have a clean behavior record. This shall be determined by a written declaration by Head of Department/ entity;
- to avoid possible conflict of interest issues, the target institution may opt for either a) a current student from a different further/higher education entity, or b) a recent graduate (not more than two years) from its own courses.

Selected students shall receive training by the NCFHE to ensure appropriate and effective service within the EQA Panels. The NCFHE shall also organize training courses from time to time for students wishing to apply to undertake this service. Students participating

Table 6.1: Peer Review Panel Members

Head of Peer Review Panel	<i>A recognised expert in the field of delivery of the target institution, and/or in EQAs</i>
External experts	<i>Between one and three, depending on the size of the target entities, being recognised experts in the field/s of delivery of the institution</i>
NCFHE QA personnel	<i>Up to two NCFHE staff personnel, with expertise in EQA procedures</i>
Student	<i>Up to two students selected by the NCFHE</i>

in EQA Panels shall be remunerated at rates set from time to time by the NCFHE. Participating students shall focus on particular Standards during the EQA according to the direction of the Panel leader, in the context of parameters set from time to time by the NCFHE.

The target entities shall be allowed to comment on the composition of the Panel which shall undertake the EQA and the Commission shall consider such comments before a final decision on the Panel membership is made. All Panel members shall be required to sign a Declaration of Interest Form prior to starting work on the EQA.

### 6.3 Selection of providers undertaking an EQA

The NCFHE shall have complete discretion in the selection of entities to undertake an EQA. During the first cycle of EQAs the NCFHE shall agree on a suitable way forward with partners in Net-QAPE so as to implement the developmental orientation of the EQA. However, this does not preclude the NCFHE from undertaking specific EQAs if circumstances and events indicate that this is appropriate.

### 6.4 Notice of EQA

The NCFHE shall give entities not less than six months' notice of an EQA. During the first cycle of EQAs the NCFHE shall agree on a suitable timeline with partners in Net-QAPE so as to implement the developmental orientation of the EQA.

### 6.5 Data sources and documentation

6.5.1 Providers undertaking an EQA shall be requested to make available to the NCFHE the following documentation, not less than one month before the EQA:

- a) Structure of the entity, namely:
  - management structure
  - list of faculties/departments/institutes/units
  - names, qualifications and emails of faculty/lecturing staff, both full-time and part-time;
- b) the full report of the last IQA undertaken by the entity;
- c) the full report of the external review undertaken by the entity, where applicable;
- d) documentation related to the quality management system (QMS) of the provider, namely:
  - the structure of the QMS and the person/s responsible

- the QMS policies/manual in place
  - evidence of implementation of QMS policies and monitoring thereof;
- e) information on the programmes and courses provided:
    - competences that the programmes/courses aim for
    - number of students per programme/course during the last full academic year.

6.5.2 If this information is available on the entity's website, the entity need only submit the webpage URL for each requested item.

During the EQA entities shall make available to the EQA Peer Review Panel the following documentation:

- a) all documentation pertaining to the last IQA undertaken by the entity, as requested;
- b) all documentation pertaining to the last external review undertaken by the entity, where applicable and as requested;
- c) any other documentation that the Panel may reasonably request as having a significant bearing on the quality and effectiveness of the IQA and the external review. Such request shall exclude the personal data or files of students. Such request may include the personal data or files of staff employed or providing services to the entity, provided that the person involved is informed of this request and may choose to be present when such data or files is reviewed by the Panel.

6.5.3 During the EQA, the Peer Review Panel shall, if the Panel so requests:

- a) have access to the members of the governing structures of the entity;
- b) have access to any staff member or service provider of the entity, including but not limited to management, administration, quality assurance staff and academic staff to conduct confidential group or individual interviews;
- c) have access to observe any aspect of the entity's operations and provision;
- d) have access to students / service users to conduct confidential group or individual interviews;
- e) have the possibility to access third parties interacting with the entity as well as past students, to conduct confidential group or individual interviews.

## 6.6 Prior to the EQA

The general terms of reference, aims and objectives of the EQA are included in the present document. On the basis of the documentation collected prior to the EQA, the Peer Review Panel shall where applicable determine the specific terms of reference, aims and objectives, as well as the research questions of a particular EQA. These shall be included in the final report. In determining the specific terms of reference, aims, objectives, and research questions, the Panel shall take into consideration any progress made by the entity in terms of the recommendations made during previous accreditation and quality audit processes.

During the month prior to the EQA, the Head of the Peer Review Panel shall discuss the process of the EQA with the head in charge of the entity and the person in charge of quality assurance within the entity, to ensure that the entity has a correct understanding of the aims, objectives and procedures of the EQA.

## 6.7 During the EQA

During the EQA the entity shall make available the following facilities to the Peer Review Panel:

- a secure office for its exclusive use during the EQA, with a secure cupboard;
- the office shall have telephone and internet access;
- tea/coffee facilities within the office;
- access to a printer;
- access to a photocopier.

Further education institutions and centres may request a waiver from any or all these requirements if their premises do not have such facilities.

## 6.8 The post-audit process

The post-EQA process shall be as follows:

- the Peer Review Panel shall submit its draft report within two weeks of the EQA to the Quality Assurance Committee;
- the Committee may request the Panel to revise certain aspects of the report, giving its reasons in writing;
- the Panel shall resubmit its final report within two weeks of the request by the Committee;
- following the approval by the Committee, the report is submitted to the CEO NCFHE with a recommendation for the endorsement of the NCFHE Board.

## 6.9 Structure of the report

The EQA report shall have the following structure:

- a) the names of the members of the Peer Review Panel;
- b) reference to the general terms of reference, aims and objectives of the EQA process
- c) any specific terms of reference, aims and objectives of the particular EQA, as well as the research questions developed for this EQA;
- d) findings, including highlighting of good practice. The findings shall be for each Standard of the IQA, leading to one of three judgements for each Standard:
  - Does not satisfy Standard
  - Satisfies Standard
  - Satisfies Standard with Distinction;
- e) recommendations for improvements;
- f) any recommendations for conditions or formal outcomes in terms of the Sanctions Procedure of the Quality Assurance Committee within the NCFHE;
- g) appendices, as follows:
  - Appendix 1: Evidence underpinning the findings;
  - Appendix 2: recommendations with respect to identified staff members, if any;
  - Appendix 3: any data or documentation that the Review Team feels would provide significant value added in enhancing the understanding of the context and findings of the main report.

## 6.10 Publication of the report

The NCFHE shall ensure that EQA reports are in accordance with the following standards:

- it shall publish the report of the quality audit, including any decisions, recommendations, conditions or other formal outcomes;
- all reports shall be published and written in a style which is clear to the intended reader in terms of any decisions, commendations or recommendations made;
- reports containing recommendations for action or which require a subsequent action plan, should determine a follow-up procedure which is to be implemented consistently, and
- the NCFHE shall send the report to the provider, which shall be allowed up to six weeks to submit its views.

Once the report is finalised the NCFHE shall deliver the report with full appendices to the provider. It will make arrangements with the provider so that the report with appendices 1 and 3 is freely available to its staff and

its students. It shall also publish the report without appendices on its website.

### **6.11 Consequences of EQA and follow-up procedure**

The NCFHE shall confirm or revoke provider or programme accreditation status, as the case may be, on the basis of the EQA report. Additionally, the NCFHE may make recommendations and assign conditions to the entity in accordance with Legal Notice 296/2012. Where, in the course of an EQA, a entity is found to have deficiencies that warrant immediate action, the NCFHE may grant provisional accreditation in accordance with regulation 34(2)(d) of the said Legal Notice, contingent upon conditions and recommendations on issues to be addressed and action to be taken by the entity.

Where, from the report of the EQA, and after the entity has submitted its views in accordance with point 6.10 previously, the Commission finds fundamental defects concerning the provider or the programme, the entity shall be allowed a reasonable time period, as determined by the Commission, to undertake measures to rectify such defects. Any such action taken by the NCFHE shall have due regard for the interests of the students undertaking a programme with the respective entity, ensuring that solutions are found to ensure that they are given the opportunity to complete any programme they had commenced.

### **6.12 Appeals procedure**

A provider may appeal from any decision or action taken by the NCFHE under these regulations to the Court of Appeal in its inferior jurisdiction in the manner provided in article 49 of Legal Notice 296/2012, and within the relevant time period prescribed therein. Such an appeal shall however not concern the merits of a decision taken by the Commission under these regulations in relation to the granting or refusal of a licence or accreditation or the revocation or suspension thereof or the imposition of restrictions or conditions on licensees.

### **6.13 The role of cross-border EQA**

Once the NCFHE is a full member of the European Quality Assurance Register (EQAR), entities may request the NCFHE to fulfil their EQA requirements through the services of a quality assurance agency that is also on EQAR. Such an EQA can be either at institutional level or at programme level. Each request will need to show that:

- the EQA will fully satisfy the parameters of the National Quality Assurance Framework and for

the undertaking of EQAs as defined from time to time by the NCFHE, and

- the selected agency has sufficient experience and expertise in the specific field of operations of the entity and/or in the specific programme being reviewed.

The NCFHE shall consider each request on a case by case basis. The NCFHE may accept such a request with specific conditions, for example that the EQA would include a person representing the NCFHE as observer or member of the Peer Review Panel.

The quality assurance agency undertaking the EQA shall present the report to the Quality Assurance Committee for its approval. If the Committee has serious reservations with the conduct of the review and/or the main findings or recommendations of the report, it shall discuss the issues of concern with the quality assurance agency. Once the final version of the report is approved by the Committee, the report is forwarded to the NCFHE Board for endorsement.

### **6.14 Customised EQA parameters**

The NCFHE shall ensure that the EQA parameters are customised for different forms of entities, such as outsourcing, micro, EFL and distance learning providers.

