

External Quality Assurance Audit Report



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

**Directorate for Research,
Lifelong Learning and
Employability**
Carried out between the 25th and
28th June 2018.

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Abbreviations List

ECTS	European Credit Transfer System
EQA audit	External Quality Assurance Audit
IQA	Internal Quality Assurance
MQF	Malta Qualifications Framework
NCFHE	National Commission for Further and Higher Education
NQAF	National Quality Assurance Framework for Further and Higher Education

1. Executive Summary

1.1 Section A: Background

This report is a result of the External Quality Assurance process undertaken by an independent peer review panel. The panel evaluated the documentation submitted by the educational institution and conducted an on-site audit visit. The panel was responsible for giving judgements on Standards 1 and 3 – 11. As outlined in the External Quality Audit Manual of Procedures, the NCFHE sought external expertise to evaluate and give judgement on Standard 2. Through this report, the panel also highlighted areas of good practice, which in view of an NCFHE peer review panel, make a positive contribution to academic standards and quality and are worthy of being emulated and disseminated more widely.

1.1.1 The Peer Review Panel

The Peer Review Panel was composed of:

Chair of Panel: Dr Sandro Spiteri

External Peers: Prof Isabel Stabile, Dr Robert Suban

Student Peer Reviewer: Mr Wilbert Tabone

QA Managers (NCFHE): Ms Angelique Grech, Mr Marius Mifsud

1.1.2 Specific Terms of Reference and Main Lines of Inquiry

Following the desk-based analysis and the scoping visit held with the provider on the 31st May 2018, the panel agreed on the areas which needed to be covered during the EQA process. Given that the entity is a state licensed institution, its rich history and the challenges and opportunities to lifelong learning provided by the National Lifelong Strategy of 2014, the main lines of enquiry of this audit were:

- How was the provider handling the lifelong learning, personal development and employability drivers and orientations that influenced its work and strategic direction?
- How was the provider ensuring the quality of learning, teaching, assessment, resources (especially learning venues) and tutor support?

1.2 Section B: Key Findings, Judgements and Recommendations

1.2.1 Standard 1 - Policy for Quality Assurance

Summary of Main Findings

- The Panel saw evidence of a self-reflective process by which senior personnel of the Entity were actively weighing the future strategic direction of the Entity. However, the Panel heard different interpretations of the National Lifelong Strategy that would inform the strategic direction of the Entity, as well as differing emphases on the implications of this on the range and type of provision, in terms of the intersection between lifelong learning, personal development and employability.
- For the period under review the Entity did not have a formalised IQA Policy. However, there is evidence of a systematic approach to organically develop such a policy not just for the purposes of the EQA, but one that feeds into the Entity's focus on the quality of provision.
- The draft IQA Policy being developed is largely based on the European Standards and Guidelines rather than Malta's National QA Framework for Further and Higher Education developed in 2015 by the NCFHE. Apart from this latter document being the legal point of reference for the NCFHE, it also balances higher and vocational education QA requirements, and would be a better fit for purpose for the Entity.
- There are no policies or procedures in place to deal with adult students with learning needs, especially for the basic courses.

Good Practice Identified

1. The Entity is undertaking a comprehensive, grounded and organic procedure to improve and further advance as well as to formalise its IQA policy.
2. The Entity has a number of established practices in place that can serve as a good basis for the formation of its IQA policy and related procedures.

Judgement

Requires improvement to meet Standard 1.

Recommendations

KR	1.	The Entity shall clarify its ethos and identity as well as the operational implications thereof in terms of the intersection between lifelong learning, personal development and employability.
KR	2.	The Entity needs to finalise its IQA document, taking into consideration the feedback and recommendations from this EQA.
KR	3.	The development of this document shall include the participation of all stakeholders, including educators, students and employers.
KR	4.	As part of this IQA document, the Entity needs to develop, formalise or develop further policies for: <ol style="list-style-type: none"> teaching, learning and assessment student participation and feedback adaptation of provision and mitigation of assessment, including with respect to students with specific learning needs resits complaints and appeals staff CPD systematic gathering of data and use thereof public information.
KR	5.	The Entity shall develop the following SOPs: <ol style="list-style-type: none"> determination of participant capacity for each course procedure for course rationalisation procedure for vetting and approval of student selection and matching to course.
R	6.	The Entity should consider clarifying further the focus of its provision when compared to other state adult education and training entities
R	7.	The Entity should consider including employers on its Academic Board and/or its Think Tank.

1.2.2 Standard 2 - Institutional Probity

Summary of Main Findings

- Educational institutions within the public sector are already subject to stringent national financial and administrative regulations and oversight and to national legislation that regulates the appointment of senior personnel and the selection of staff. The EQA does not seek to duplicate the national regulatory structures and procedures already in place. Thus, for educational institutions within the public sector, Standard 2 is interpreted in terms of the capacity and resources of the provider to implement effectively its internal quality assurance procedures to improve the learning experience.

Good Practice Identified

N/A

Judgement

Meets Standard 2.

Recommendations

R	1.	The entity needs to invests in additional human resources at both management and administrative levels so that the vision of management in terms of the quality and scale of provision, the internal mechanisms of due diligence, and the capacity for data-informed review, can be fulfilled.
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1.2.3 Standard 3 - Design and Approval of Programmes

Summary of Main Findings

- The Entity has an established systematic practice of first piloting a course, and on the basis of initial experience formulating a course application for accreditation by NCFHE, using this process to review the course design and delivery.
- Teachers of craft courses were more involved in course design than teachers of the academic courses.
- The Panel found instances of mismatching between accredited course descriptions and actual course design and assessment. The Entity is currently engaged in a pilot project to review its Italian courses and thereby examining its whole accreditation and course development system. Until this review is undertaken, the Entity has decided not to develop any new courses.

Good Practice Identified

1. The Entity has an established systematic practice of first piloting a course, and on the basis of initial experience formulate a course application for accreditation by NCFHE, using this process to review the course design and delivery.
2. The Entity has taken a strategic decision not to develop new courses so as to prioritise the quality of provision of current courses and to review its courses.
3. For its National Diploma in Teaching Adults, the Entity set up a Board of Studies, which led it to identify the need for an Academic Board for all its provision.
4. The Entity forms part of EPALE, the European platform for adult learning in Europe.

Judgement

Meets Standard 3.

Recommendations

KR	1.	The Entity shall proceed with the setting up of the Academic Board.
KR	2.	The Entity shall proceed with and fast-track the review of its course for Italian, so that lessons learnt can be applied to all other language courses.
R	3.	The Entity should proceed with the development of pre-tests for all its language courses.
R	4.	The Entity should consider developing MQF L2 and L3 courses in areas where it is already providing lower Level courses and which are not serviced by SEC.
R	5.	The Entity should consider reviewing and updating the learning outcomes for all courses, starting with the academic ones.

1.2.4 Standard 4 - Student-centred Learning, Teaching and Assessment

Summary of Main Findings

- Students were generally very appreciative of the expertise and dedication of their teachers, both in academic and craft subjects. Indeed, the attachment that some learners formed with particular teachers, especially in craft courses, could be a hindrance in the correct matching of applicants to courses.
- Students of craft courses repeatedly stressed the value of such courses even if they did not lead to certification or employment. Many spoke about the therapeutic effect of attending such courses, and their importance in their social lives and in the context of active aging.
- The Entity has some checks and balances in place with respect to the assessment process. An unintended effect of the Entity's assessment procedures is that the communication chain with tutors and students is not complete.
- The more qualified and experienced teachers had less input in the assessment process.
- Craft teachers do not feel that centre coordinators are sufficiently trained to oversee their assessment of students' portfolios.

Good Practice Identified

- The Entity's craft courses are examples of good practice in student engagement and active learning, especially in the context of active aging.
- The Entity should be commended for its efforts in maintaining a cadre of teachers with expertise and dedication, both in academic and craft subjects, in spite of relatively low remuneration.

Judgement

Requires improvement to meet Standard 4.

Recommendations

CR	1.	The Entity needs to urgently address the current mismatch, where applicable, between the learning outcomes as indicated in the accredited course descriptions, and the actual syllabi used in teaching, and assessment. This needs to be in place by the end of 2019.
CR	2.	The Entity needs to urgently address the reliability of assessment, both through revised procedures and through enhanced human resources to effectively implement such procedures. This needs to be in place by the end of 2019.
KR	3.	The Entity shall ensure that all teachers are involved in the assessment cycle, from assessment design to communication of results and review of teaching, learning and course design accordingly.
KR	4.	The Entity shall fast-track the review of its course for Italian (as discussed in Standard 3), that will include focussing on student engagement in all language skills, so that lessons learnt can be applied to all other language courses.
R	5.	The Entity should enhance communication and coordination between its educators for the standardisation of teaching, and the sharing of resources and good practice.

1.2.5 Standard 5 - Student Admission, Progression, Recognition and Certification

Summary of Main Findings

- Information on dates of opening of applications for courses, mode of application with payment procedures, calendar dates for delivery of courses and any terms and conditions covering the whole course are specified in the Prospectus and made available on the website from a set date.
- Applications can be made online and through walk-in services at local councils, Government's one-stop-shops and the Entity's own Customer Service. Once a course is fully subscribed, applications are still accepted and put on a reserve list.
- e-applications can be made as from just after midnight. In some courses this leads to significant inconvenience to applicants, and access discrimination to students applying in-person through local councils.
- The Entity administers a pre-test to participants of Basic skills courses in English, Maltese and Mathematics. The Entity is working with a partner institution, NALA of Ireland, to develop a system of pre-tests for its language courses.

Good Practice Identified

1. The Entity has procedures in place to follow applicant no-shows and student dropouts.
2. The Entity offers pre-tests in all basic skills courses.
3. The Entity is working with a partner institution, NALA of Ireland, to develop a system of pre-tests for its language courses.

Judgement

Requires improvement to meet Standard 5.

Recommendations

CR	1.	The Entity needs to urgently ensure that students are not allowed to attend courses, even if not to achieve accredited certification, if there are health and safety considerations. This needs to be in place with immediate effect.
CR	2.	The Entity needs to urgently review the process for student registration for its course provision, especially with respect to the vetting of eligibility criteria. This needs to be in place by the end of 2019.
CR	3.	The Entity needs to review the process for student registration for its course provision, especially with respect to starting time of registrations, so that there is equality of access between e-applicants and walk-in applicants. This needs to be in place by the end of 2019.
KR	4.	Staff servicing course application requests by walk-in applicants, such as at local councils, should be trained to provide course information so as to inform applicants' decisions.
KR	5.	The induction for students, especially in vulnerable communities, shall be reviewed to ensure that all important information is effectively available.
KR	6.	The Entity shall ensure that course provision is in line with the advertised MQF level. Related to this, the Entity should review processes and procedures to ensure that repeat students are assigned to appropriate courses, so that first-time students in entry-level courses receive appropriate attention and support.
R	7.	The Entity should consider setting up virtual learning environments to enhance learning and access thereof.
R	8.	The Entity should consider setting up pre-tests for all academic courses.
R	9.	The Entity should consider requiring adult educators to keep logs of their regular monitoring of student progress.

1.2.6 Standard 6 - Teaching Staff

Summary of Main Findings

- The teaching staff of the Entity are all part-time educators. Some of these have a lower level of qualification than would be expected.
- The Entity finds it difficult to attract new staff because of unattractive remuneration when compared to similar service in other educational institutions. In spite of this, most of the teaching staff said they were very pleased with the opportunity to deliver these courses.
- The recruitment policy of the Entity rigorously follows public service recruitment policies.
- The Entity does not provide mandatory CPD to staff that do not have sufficient teaching experience and qualifications.

- The Entity does not have in place a virtual learning environment that the educators can use to facilitate resource production, sharing and dissemination.

Good Practice Identified

1. Although CPD provision is severely limited given the structural and financial constraints of the Entity, it offers optional CPD in a range of formats for its educators.
2. The Entity has participated in EU-funded programmes to develop new teaching and learning resources.
3. The Entity has a high number of committed and dedicated teaching educators.

Judgement

Requires improvement to meet Standard 6..

Recommendations

CR	1.	The Entity needs to urgently consider whether its current work practices and working conditions are contributing to the shortfall of fully qualified educators that are required to fulfil its course provision. This needs to be in place by the end of 2019.
CR	2.	The Entity needs to urgently set up effective systems and procedures that ensure adequate monitoring and support for low-qualified educators, especially in terms of lesson preparation, andragogy and assessment. This needs to be in place by the end of 2019.
KR	3.	The Entity needs to develop an educator CPD programme that distinguishes between core mandatory CPD especially for low-qualified educators, and other CPD. The Mandatory CPD needs to extend well beyond the current induction sessions, and working conditions need to be revised to ensure the sustainability of such input.
KR	4.	Apart from andragogy and assessment, this CPD programme needs to include identification and support of disability and specific learning needs in adult learning.
KR	5.	Human resources in the coordination of services to identified vulnerable communities and in local councils need to be enhanced so that the amount of educator observation and support matches that provided by centre coordinators.
R	6.	In the medium term, the Entity should consider enhancing further the role of the Centre Coordinators to transform centres into communities of reflective professional practice that focus on teaching and learning improvement for individual student progress and attainment.
R	7.	The Entity should consider setting up structures that allow for the systematic sharing of good practice, in person and/or virtually, between coordinators and educators.
R	8.	The Entity should consider streamlining tutor observations for tutors providing service in multiple sites.

1.2.7 Standard 7 - Learning Resources and Student Support

Summary of Main Findings

- The physical resources of the Msida centre, which is the main venue of tuition, are fit for purpose.
- The administrative and storage spaces in centres other than the Msida one are generally inappropriate or non-existent. Teaching spaces are not always fit for purpose.
- Repairs for essential equipment at the centres apart from Msida took very long to be carried out, if at all.
- Co-ordinators and students spoke of the territoriality exhibited by some heads of school hosting the Entity's provision, which made them feel like second-class educators, and the students like second-class learners.
- It was not always clear to students who they should speak to to raise complaints. Many were not aware that they could also use Servizz.gov to ensure anonymity.
- Although the Entity does take *ad hoc* measures to address the needs of learners with disabilities or specific learning needs, there is no systematic provision especially for the latter.

Good Practice Identified

- Given the significantly limited human resources available to the Entity at central level when compared to the range of provision and adult learners, the commitment of the managerial and administrative staff of the Entity is to be commended.
- The personal and professional commitment of the Centre Coordinators and Administrators are to be greatly commended.

Judgement

Requires improvement to meet Standard 7.

Recommendations

KR	1. The Entity needs to engage in a rights-based approach with its providers of venues and services, so as to ensure that the learning needs of and attendant resources for its adult learners are effectively, efficiently and sustainably addressed.
KR	2. The Entity needs to ensure that its centre coordinators have appropriate physical resources to support their duties and to minimise inconvenience for students.
KR	3. The Entity shall ensure that timely technical support is available at its centres, and/or that appropriate arrangements are made with other hosting entities to ensure timely technical support in case of malfunction of physical and technical resources.

KR	4. The Entity needs to enhance its capacity for policy and programme development, implementation and review through the engagement of more Education Officers and other support staff.
KR	5. The Entity needs to enhance its student support services especially with respect to students from vulnerable communities, and students with disabilities and/or specific learning needs.
KR	6. The Entity needs to enhance its processes and procedures for students wishing to raise issues and complaints.
R	7. The Entity should consider reviewing its participant information sheet.
R	8. The Entity should consider enhancing its WIFI provision and ensure better use of ICT in classes.
R	9. The Entity should consider providing childcare and homework supervision services to support the participation of adult learners with children who would not otherwise be able to attend.
R	10. The Entity should consider investing in virtual learning environments.
R	11. The Entity should ensure that students are aware of the possibility of processing comments, queries or grievances through the government service Servizz.gov, over and above the Entity's own customer care service.

1.2.8 Standard 8 - Information Management

Summary of Main Findings

- The Entity securely collects and stores applicants' data.
- There is no systematic collection of feedback from all students and all courses.
- There is no link between the student application database and the student attendance database.
- There is limited analysis of the data currently being collected in order to inform management decision making

Good Practice Identified

1. The Entity manages efficiently all queries raised through the Entity's website and the servzz.gov platform.

Judgement

Requires improvement to meet Standard 8.

Recommendation

KR 1. The Entity shall systematically collect data on student feedback.

KR 2. The Entity shall make better use of presently available data to inform its business information process as well as course design, review and range of offer.

KR 3. The Entity shall set up its Ideas Board, as discussed in Standard 1.

KR 4. The Entity shall revamp its data collection and management system so as to be able to mine and make strategic use of data on applicants and courses.

1.2.9 Standard 9 - Public Information

Summary of Main Findings

- The Entity uses analytical data generated by the website and social media platforms to inform its decisions.
- The Entity publishes information about its general procedures and courses in both soft-copy (website) and hard-copy formats (prospectus).
- General information available on the website is available in both English and Maltese. However, course details listed on the website are in English (except for Maltese language courses) even when the website language is set to Maltese.
- The Entity strives to reply to queries arising from the information available to its students within 48 hours.
- The Entity's website does not include a reference to the Servizz.gov service even though the Entity receives feedback and complaints from this system.

Good Practice Identified

1. Social media and website analytics are factored into decision-making related to the creation and distribution of public information

Judgement

Meets Standard 9.

Recommendations

KR 1. Student induction material shall be uploaded to the Entity's website.

R 2.	The Entity should consider reviewing its website so that it offers clear information regarding the opening of registration for applications.
R 3.	The Entity should consider checking that access to and the language used in course information provided online (including learning outcomes) are learner friendly.
R 4.	The Entity should consider including reference to the government service Servizz.gov on its website.
R 5.	The Entity should consider involving students and teachers in the review and design process of its public information.
R 6.	With respect to information for each course on the its website, the Entity should consider including links to information on MQF, ECTS, language of instruction, and assessment parameters.
R 7.	The Entity should consider including information on its website regarding the possibility for one-to-one explanatory meetings as required.
R 8.	The Entity should consider including information on its website on course pass-marks and pass rates.
R 9.	The Entity should consider providing course information in Maltese, especially for Introductory and MQF Level 1 courses.

1.2.10 Standard 10 - On-going Monitoring and Periodic Review of Programmes

Summary of Main Findings

- The Entity is the process of reviewing and rethinking its core functions and the quality mechanisms of its provision. The grounded reformulation of its QA Policy (as discussed in Standard 1) is an integral part of this process.
- The recent recruitment of the Entity's Director should relieve the Assistant Director to focus on core responsibilities. However, additional senior personnel are still required.
- The Entity undertook three external evaluations of two aspects of its provision, all funded from EU projects. Two of these, published in 2015 and 2017, reviewed its basic skills course provision. The Panel found no evidence that the earlier report was acted upon, nor was it clear why the same area of provision was reviewed twice in such a short period of time.
- The Entity does not currently systematically take learners' views in consideration in reviewing its provision.

Good Practice Identified

- The Entity has a review-to-improve mind-set.

- The Entity is currently piloting with its provision for Italian the comprehensive review of its accredited courses.
- The Entity has commissioned a number of independent studies to evaluate aspects of its provision.

Judgement

Requires improvement to meet Standard 10.

Recommendation

CR 1. The Entity needs to urgently take into consideration the recommendations made by the Grant Thornton and MISCO reports on its Basic Skills courses. An action plan showing how it intends to review this provision needs to be in place by the end of 2019.

KR 2. The Entity needs to prioritize review of its accredited course descriptions to address the mismatch between them and actual enacted provision.

KR 3. The Entity needs to recruit more Education Officers to be able to undertake its monitoring and review functions in an in-depth and systematic fashion.

KR 4. The Entity needs to set up its planned Academic Board and Think Tank.

KR 5. Programme review shall be based on data and evidence gathered from all stakeholders.

KR 6. The Entity shall systematically include student and teacher feedback in its course review.

KR 7. The Entity shall have a mechanism and tools in place for teacher feedback to ensure this is acted upon through a feedback loop.

1.2.11 Standard 11 - Cyclical External Quality Assurance

Judgement

Meets Standard 11.

2. About the External Quality Audit

2.1 Introduction

The External Quality Assurance audit is a tool for both development and accountability. The QA audit 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 2014-24;
- implemented with effectiveness, comprehensiveness and sustainability.

2.2 Reviewers

Evaluation subject		
Peer Panel Members	External Peers: Dr Sandro Sptieri Prof. Isabel Stabile Dr Robert Suban Student Peer Reviewer: Mr Wilbert Tabone QA Managers (NCFHE): Ms Angelique Grech Mr Marius Mifsud	
Timeline	Dates 27 th April 2018 31 st May 2018 21 st June 2018 26 th -28 th June 2018	Milestone Panel met to determine the specific terms of reference, aims, objective and research question of the QA process. Preliminary Provider Meeting Panel's pre-audit meeting On-Site Audit Visit

2.3 Institutional Context

The Provider is licensed by the NCFHE and carries license S2. The Education Act (Chapter 327 of the Laws of Malta) refers to the Directorate for Educational Services (DES) in terms of its role to "promote, support, coordinate and ensure lifelong learning services and initiatives, including educational and cultural services within the community, e-learning and distance learning, adult education, evening classes, and other initiatives related to complementary education."

For some years, the evening courses were managed under the DES through the Department of Further Studies and Adult Education. In June 2009, the department was renamed and restructured as the Directorate for Lifelong Learning within the DES.

The Directorate was set up to address the imbalances in participation to achieve a more equitable state of affairs and to ensure the quality of adult learning and encourage more adults in active citizenship. The Directorate is now part of the Department for Curriculum, Lifelong Learning and Employability. The Directorate now incorporates three main units: the Research Unit, the Adult Learning Unit and the Early School Leavers Unit.

The Adult Learning Courses cover the eight key competencies for Lifelong Learning and include both academic and vocational subjects. Courses offered cover six main areas: Creative Expression; Essential Skills; Healthy Living; Improving Education and Career Prospects; Vocational Education and Training, and Language Learning.

At the time of the EQA, the Directorate had the following types of accredited courses:

MQF Level	No. of courses
5	22
4	2
3	4
2	23
1	62

With its wide range of subjects, the course offer is of interest to various groups and individuals. Courses are open to all and the highly subsidised registration fees, regulated through Subsidiary Legislation 327.40 make the courses accessible. The Directorate does however prioritise target groups, in particular, low skilled and low qualified adults as well as vulnerable groups.

Target learners and organisations include:

- Those adults least likely to be involved in learning;
- Vulnerable learners including early school leavers, migrants and low skilled adults;
- Adults with basic skills needs;

- Adults who cannot attend full-time programmes;
- Adults with language learning needs (from core competence level to level 3);
- Adults looking for second chance education opportunities;
- Families at risk;
- Older Adults;
- Organisations working with vulnerable groups including disabled persons, offenders and migrants;
- Public Sector organisations working with vulnerable groups;
- Local Councils.

The courses are delivered from eight Adult Learning Centres - seven in Malta and one in Gozo. It has full operational control for its main centre in Msida, and makes use of other sites that have other primary uses, such as state schools, for the rest. The Directorate also collaborates with local councils and entities that work in the community, to extend its course offer through outreach schemes in various communities.

In 2017, the Directorate received 8,706 applications for courses starting in October. Out of these applicants, 67% were female, and 33% were male. Of these, 1,637 learners were attracted through the Directorate's outreach schemes in collaboration with 18 NGOs, 26 Local Councils and other public sector entities. These include the Leap Centres, Caritas (Dar Sant' Anna), the National Council of Women (NCW), the Active Ageing Centres, the Paulo Freire Institute, Dar Kenn Għal Sahħtek, St Jeanne Antide Foundation and the Malta Cottonera Resource Centre, University of Malta.

2.4 General Terms of Reference, Aims and Objectives of the EQA

Quality assurance in Malta is underpinned by six principles that determine the remit and function of the *National Quality Assurance Framework for Further and Higher Education*, and the relationship between internal and external quality assurance to enhance learning outcomes.

- The Framework is based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and enriched by the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET) perspective.
- 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,
 - the promotion of Malta as a regional provider of excellence in further and higher education.
- The Internal Quality Assurance (IQA) is fit for purpose.
- The External Quality Assurance (QA audit) is a tool for both development and accountability. The QA audit 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 2014-24,
 - Implemented with effectiveness, comprehensiveness and sustainability.
- v. The Quality Improvement Cycle is at the heart of the Framework.
- vi. The integrity and independence of the QA audit process is guaranteed.

The QA audit provides public assurance about the Standards of further and higher education programmes and the quality of the learning experience of students. It presents an opportunity for providers to demonstrate that they adhere to the expectations of stakeholders with regard to the programmes of study that they offer and the achievements and capabilities of students. It also provides a focus for identifying good practices and for the implementation of institutional approaches to the continuous improvement in the quality of educational provision.

NCFHE has a responsibility to ensure that a comprehensive assessment is conducted for all higher education providers in Malta. The QA audit provides an opportunity to assess the Standards and quality of higher education in Malta against the expectations and practices of provision across the European Higher Education Area, and internationally.

The QA audit examines how providers manage their own responsibilities for the quality and Standards of the programmes they offer. In particular, the following issues are addressed:

- The fitness for purpose and effectiveness of internal quality assurance processes, including an examination of the systems and procedures that have been implemented and the documentation that supports them.
- The compliance with the obligations of licence holders with established regulations and any conditions or restrictions imposed by NCFHE.
- The governance and financial sustainability of providers, including assurances about the legal status of the provider, the appropriateness of corporate structures and the competence of staff with senior management responsibilities.

The QA audit benchmarks the QA system and procedures within an institution against eleven (11) Standards:

1. Policy for quality assurance: entities shall have a policy for quality assurance that is made public and forms part of their strategic management.
2. Institutional and financial probity: entities shall ensure that they have appropriate measures and procedures in place to ensure institutional and financial probity.
3. Design and approval of programmes: self-accrediting providers shall have appropriate processes for the design and approval of their programmes of study.
4. Student-centred learning, teaching and assessment: entities shall ensure that programmes are delivered in a way that encourages students to take an active role in the learning process.
5. Student admission, progression, recognition and certification: entities shall consistently apply pre-defined and published regulations covering all phases of the student 'life-cycle'.
6. Teaching staff: entities shall assure the competence and effectiveness of their teaching staff.
7. Learning resources and student support: entities shall have appropriate funding for their learning and teaching activities and sufficient learning resources to fully support the

students' learning experiences.

8. Information management: entities shall ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.
9. Public information: entities shall publish information about their activities which is clear, accurate, objective, up-to-date and readily accessible.
10. On-going monitoring and periodic review of programmes: entities shall implement the 'Quality Cycle' by monitoring and periodically reviewing their programmes to ensure their continuing fitness for purpose.
11. Cyclical external quality assurance: entities should undergo external quality assurance, approved by NCFHE, at least once every five years.

Peer-review panels essentially ask providers the following question about their arrangements for quality management:

'What systems and procedures are in place and what evidence is there that they are working effectively?'

The approach to quality assurance can be encapsulated in a number of key questions which providers should ask themselves about their management of quality.

- What are we trying to do?
- Why are we trying to do it?
- How are we trying to do it?
- Why are we doing it that way?
- Is this the best way of doing it?
- How do we know it works?
- Could it be done better?

Answers to these questions should form the basis of the provider's critical assessment of and response to the self-evaluation questionnaire.

The approach of QA audit is not simply about checking whether providers adhere to the regulations; it examines how providers are developing their own systems in addressing the expectations of sound management of educational Standards and the quality of their learning and teaching provision. It does not involve the routine identification and confirmation of criteria -- a 'tick-box' approach -- but a mature and reflective dialogue with providers about the ways in which they discharge their obligations for quality and the identification of existing good practices.

2.5 Specific Terms of Reference and Research Questions

Following the desk-based analysis and the scoping visit held with the provider on the 31st May 2018, the panel agreed on the areas which needed to be covered during the EQA process. Given that the provider is a state licenced institution, its rich history and the challenges and opportunities to lifelong learning provided by the National Lifelong Strategy of 2014, the main lines of enquiry of this audit were:

- How was the provider handling the lifelong learning, personal development and employability drivers and orientations that influenced its work and strategic direction?
- How was the provider ensuring the quality of learning, teaching, assessment, resources (especially learning venues) and tutor support?

The review team decided that, as part of an enhancement-led approach, it would issue recommendations linked to all parts of the operations of the institute. The report therefore distinguishes between:

- Conditional recommendations (CR) which should be implemented by the end of 2019, however in one specific case related to participants' health and safety the provider was already alerted by the Panel during the EQA and is formally being advised to take action with immediate effect.
- Key recommendations (KR) which need to be implemented expediently by the institute to address weaknesses;
- Recommendations for improvement which are merely suggestions based on the panel analysis and observations.

3. Analysis and Findings of Panel

3.1 Standard 1: Policy for Quality Assurance

Policy for quality assurance: entities shall have a policy for quality assurance that is made public and forms part of their strategic management.

Main findings

- In the meetings with the management and coordinating staff of the Entity during the on-site visit, the Panel saw evidence of a self-reflective process, which is discussed in more detail in

Standard 10, by which senior personnel of the Entity were actively weighing the future strategic direction of the Entity. However, the Panel heard different interpretations of the National Lifelong Strategy that would inform the strategic direction of the Entity, as well as differing emphases on the implications of this on the range and type of provision, in terms of the intersection between lifelong learning, personal development and employability. For example, it was not always clear that the Entity had identified a particular focus for its courses in terms of both subject focus and ages that differentiated them sufficiently from provision by other state adult education and training entities such as Jobsplus, GEM16 and IPS. It is understood that the self-reflective process of the Entity was hampered by the lack of a Director General and a Director; now that both positions have been filled, the Entity needs to address with urgency the need for clarity as to its ethos and strategic direction. This would then inform the formulation of its IQA Policy.

- The Entity has a Quality Charter dated 2015; however during the on-site visit it became clear in conversations with the Entity's management that in practice it does not refer to it or consider it *in vigore*; in fact it only surfaced during the interviews of the on-site visit. The key structures of the 2015 Charter, the Quality Assurance Board and the Board of Studies, are not in place. Thus, for all intents and purposes, the Entity does not have a formalised comprehensive IQA policy. It does have a number of consistent practices in place that were evidenced during the on-site visit and which are backed up by some documentation that predate the present external quality audit (EQA) exercise, that clearly show that the Entity has a quality mind-set. Six months ago, approximately at the time that the Entity was advised of this EQA, it engaged a person specifically to develop the necessary IQA documentation. This has been done in a grounded fashion, considering both examples of good practice available internationally as well as the context and experience of provision of the Entity. By the time of the EQA, a comprehensive policy had been developed and was in the process of its first round of feedback by stakeholders.
- Thus, although for the period under review the Entity did not have a formalised IQA Policy, there is evidence of a systematic approach to organically develop such a policy, not just for the purposes of the EQA, but one that feeds into the Entity's focus on the quality of provision as illustrated in the following Standards.
- The findings in this section can thus be considered as part of the stakeholder feedback process in the formulation of the IQA Policy of the Entity.
- The Entity admitted that the draft IQA Policy being developed was largely based on the European Standards and Guidelines rather than Malta's National QA Framework for Further and Higher Education developed in 2015 by the NCFHE. This latter document is the legal point of reference for the NCFHE and balances higher and vocational education QA requirements, and should therefore be the principal point of reference to the developments of IQAs.
- The draft IQA Policy has a Mission Statement, an institutional organigram and addresses in some detail each of the 11 NCFHE IQA Standards at the level of policy as well as going into elements of procedure. However, it does not always provide sufficient detail with respect to procedure. Some accompanying procedure documentation, even when mentioned in the IQA Report itself, is missing or quite limited and derivative; for example with respect to student participation and feedback, adaptation of provision and mitigation of assessment, re-sits, complaints and appeals, and the systematic gathering of data and use thereof.

- The draft IQA Policy proposes the setting up of an Academic Board that will have a number of QA functions related to course design, oversight and review. This Academic Board will have a core number of members that will include third parties experts in adult education, and ad hoc members according to the course/s under consideration.
- The draft IQA Policy also proposes the setting up of an Ideas Board that will be composed of learners representing different groups whose feedback will feed into the programme design process.
- The draft IQA Policy does not go into detail with respect to institutional probity issues in terms of staff selection processes, probably because PSMC procedure by which the Entity is bound are taken as given.
- Neither the Academic Board nor the Think Tank will include input by employers.
- The Teaching, Learning and Assessment Policy and Procedures document referred to the IQA Policy is not available; however different parts of IQA Policy seem to be related to this.
- The draft IQA Policy makes reference to a complaints procedure, but it is not sufficiently detailed especially with respect to escalating unresolved issues.
- Admission, progression and recognition procedures are in place, and in fact predate the draft IQA Policy.
- The IQA Policy seems to confuse recognition of prior learning (RPL) with pre-testing in certain subjects, which is only a peripheral aspect of RPL.
- Section 5 of the draft IQA Policy makes reference to Key Performance Indicators (KPI), but there is no evidence of such indicators being in place, or that information management or review mechanisms are related to such KPIs.
- The staff selection terms of reference, selection criteria and QA responsibilities are generally well defined, although the appendices to the draft IQA Policy and the cross-referencing can be improved.
- The Entity's staff CPD policy, which was developed in tandem with the draft IQA Policy, needs to be systematically reviewed, as is discussed in Standard 6.
- Learner induction procedures are in place, which pre-date the IQA Policy.
- The Entity has detailed administrative procedures for its tutors with respect to the running of sessions and centres, which pre-date the draft IQA Policy.
- There is a detailed procedure for cooperation with community entities.
- The information management component of the draft IQA Policy does not include reference to its use for improvement; this aspect is in fact not included in the objectives of the relevant section.
- Section 8.5 with respect to lines of responsibility is limited to one sentence: "Responsibilities for collection, monitoring, management and analysis of Data on Participants shall be the responsibility of the Directorate as delegated to its appropriate staff." This is not sufficiently detailed and is not complemented with appropriate procedures.

- Section 9 of the draft IQA Policy seems fit for purpose, but not supported by complementary procedures.
- Section 10 of the draft IQA Policy is not sufficiently detailed – this is discussed in more detail in Standard 10.
- There are no policies or procedures in place to deal with adult students with learning difficulties, especially for the basic courses. The Panel was informed that these are handled on a case-by-case basis, but the administration of the Entity admitted that in practice they did not have the resources to address such needs in a comprehensive manner.

Good Practice Identified

- The Entity is undertaking a comprehensive, grounded and organic procedure to improve and further advance as well as to formalise its IQA policy.
- The Entity has a number of established practices in place that can serve as a good basis for the formation of its IQA policy and related procedures.

Overall judgement for Standard

Requires improvement to meet Standard 1.

Recommendations for improvement

KR 1.	The Entity shall clarify its ethos and identity as well as the operational implications thereof in terms of the intersection between lifelong learning, personal development and employability.
KR 2.	The Entity needs to finalise its IQA document, taking into consideration the feedback and recommendations from this EQA.
KR 3.	The development of this document shall include the participation of all stakeholders, including educators, students and employers.
KR 4.	As part of this IQA document, the Entity needs to develop, formalise or develop further policies for: <ul style="list-style-type: none"> a. teaching, learning and assessment b. student participation and feedback c. adaptation of provision and mitigation of assessment, including with respect to students with specific learning needs d. resits e. complaints and appeals f. staff CPD g. systematic gathering of data and use thereof h. public information.

KR 5.	The Entity shall develop the following SOPs: a. determination of participant capacity for each course b. procedure for course rationalization c. procedure for vetting and approval of student selection and matching to course.
R 6.	The Entity should consider clarifying further the focus of its provision when compared to other state adult education and training entities.
R 7.	The Entity should consider including employers on its Academic Board and/or its Think Tank.

3.2 Standard 2: Institutional Probity

Institutional and financial probity: entities shall ensure that they have appropriate measures and procedures in place to ensure institutional and financial probity.

Main findings

- Educational institutions within the public sector are already subject to stringent national financial and administrative regulations and oversight and to national legislation that regulates the appointment of senior personnel and the selection of staff. The EQA does not seek to duplicate the national regulatory structures and procedures already in place. Thus, for educational institutions within the public sector, Standard 2 is interpreted in terms of the capacity and resources of the provider to implement effectively its internal quality assurance procedures to improve the learning experience.
- The full-time management and administrative staff at central office of the Entity and the part-time coordinating staff at in the centres, are appointed according to established public service procedures that have in-built due diligence and fitness for purpose considerations. The lacunae and developments in the terms of reference of the coordinators are discussed in Standard 6.
- For a relatively long time, the acting head of the Entity was its Assistant Director. The lack of a Director during this period hindered the capacity of the Entity for strategic thinking and action, although as will be evidenced in the Standards below, more important work was carried out nonetheless. At the time of the on-site visit, the Director had just been appointed.
- There is a clear need for additional human resources at both management and administrative levels so that the vision of management in terms of the quality and scale of provision, the internal mechanisms of due diligence, and the capacity for data-informed review, can be fulfilled.
- This has implications both for increased budgeting for staffing and for recurrent line item expenditure to address specific needs. Additional funds are also required to upgrade the

maintenance capacity of the Entity with respect to its centres, and the other cost-sensitive requirements mentioned in the Standards below.

- Headship positions are deemed to be fit for purpose.

Good Practice Identified

N/A

Overall judgement for Standard

Meets Standard 2.

Recommendations for improvement

R	8.	The entity needs to invests in additional human resources at both management and administrative levels so that the vision of management in terms of the quality and scale of provision, the internal mechanisms of due diligence, and the capacity for data-informed review, can be fulfilled.
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RI: The entity needs to invest in additional human resources at both management and administrative levels so that the vision of management in terms of the quality and scale of provision, the internal mechanisms of due diligence, and the capacity for data-informed review, can be fulfilled

3.3 Standard 3: Design and Approval of Programmes

Design and approval of programmes: self-accrediting providers shall have appropriate processes for the design and approval of their programmes of study.

Main findings

- The Panel saw evidence during the on-site visit that the Entity systematically develops and presents a course for accreditation by NCFHE using the following procedure: it first pilots a course, then on the basis of initial experience it formulates a course application for accreditation by NCFHE, using this process to review the course design and delivery. Thus, the accredited courses parameters (as approved by the NCFHE) by definition satisfy Standard requirements.

- However, the accreditation of many of these courses pre-dates the revised accreditation protocol that NCFHE introduced in 2014, which required more specificity in the description of the learning outcomes and in the assessment to be used. An analysis of randomly selected courses by the Panel found that in some cases the actual course design and assessment did not match the accredited course description, typically because of developments in provision that did not feed back into the reviewing of course application for re-accreditation. This is further discussed in Standard 4.
- During interviews, Craft teachers reported that they were quite involved in course design, whilst some teachers of academic subjects, who were typically more qualified and experienced, expressed frustration at the lack of consultation in the course design.
- In setting up its National Diploma in Teaching Adults (which is discussed in Standard 6), the Entity set up a Board of Studies that included external expertise to ensure due process; this positive experience led it to identify the need for an Academic Board for all its provision, and this is now included in the draft IQA Policy.
- The Entity is currently engaged in a pilot project to review its Italian courses and thereby examining the whole accreditation system. Until this review is undertaken, the Entity has decided not to develop any new courses.
- Prior to this decision, the development of courses was generally demand-led and proposed by one or more of the following stakeholders: (a) Study or review by Directorate's staff to show that there is a demand/need related to specific courses; (b) Participants in a course or centre demanding a next level course, once they have finished a course. Drop-out rates for each course are also used to drive decisions regarding the need for new course offerings. The Panel saw evidence that this data was collected by coordinators and reported to management.
- The overlap with MCAST and JobsPlus provision discussed in Standard 1 was being addressed via discussions between entities some time ago, but this process was interrupted due to the vacancies in the posts of Director General and Director.
- The Entity has a dedicated Programme Accreditation Officer who is responsible for overseeing the process of accreditation. The course design and learning outcomes are drawn up in liaison with the Education Officer, adult educators and external experts. During interviews the Panel confirmed that feedback from students is not normally sought.
- A flow chart explaining how the learning outcomes for each course are prepared in the process of preparing for accreditation was presented by the Entity.
- The accredited course applications clearly indicate the minimum qualifications for tutors. However, some tutors that are actually used by the Entity do not satisfy these minimum requirements. This is discussed in more detail in Standard 6.
- The remit of the Academic Board that, as discussed in Standard 1, is part of plans by the Entity to revamp its quality processes, will include evaluating whether the requests for courses submitted are feasible and in line with the Directorate's objectives. The Think Tank discussed in Standard 1 will also consider new course proposals submitted by educators and students.
- The Entity forms part of EPALe, the European platform for adult learning in Europe; this informs its programme design.

Good practice identified

1. The Entity has an established systematic practice of first piloting a course, and on the basis of initial experience formulate a course application for accreditation by NCFHE, using this process to review the course design and delivery.
2. The Entity has taken a strategic decision not to develop new courses so as to prioritise the quality of provision of current courses and to review its courses.
3. For its National Diploma in Teaching Adults, the Entity had set up a Board of Studies, that functioned until the end of the provision of this course. The positive experience of this Board led the Entity to identify the need for an Academic Board for all its provision.
4. The Entity forms part of EPALE, the European platform for adult learning in Europe.

Overall judgement for Standard

Meets Standard 3.

Recommendations for improvement

KR 9.	The Entity shall proceed with the setting up of the Academic Board.
KR 10.	The Entity shall proceed with and fast-track the review of its course for Italian, so that lessons learnt can be applied to all other language courses.
R 11.	The Entity should proceed with the development of pre-tests for all its language courses.
R 12.	The Entity should consider developing MQF L2 and L3 courses in areas where it is already providing lower level courses and which are not serviced by SEC.
R 13.	The Entity should consider reviewing and updating the learning outcomes for all courses, starting with the academic ones.

3.4 Standard 4: Student-centred Learning, Teaching and Assessment

Student-centred learning, teaching and assessment: entities shall ensure that programmes are delivered in a way that encourages students to take an active role in the learning process.

Main findings

- During interviews, the Panel determined that students were generally very appreciative of the expertise and dedication of their teachers, both in academic and craft subjects. Indeed, Entity administration informed the Panel that the attachment that some learners formed with particular teachers, especially in craft courses, could occasionally be a hindrance in the correct matching of applicants to courses.

- During interviews with various stakeholders, the Panel saw consistent evidence that both academic and craft course teachers are clearly competent, knowledgeable and dedicated. Some expressed dissatisfaction at the relatively low hourly rate of remuneration. In some cases this may affect their willingness to spend extra time to prepare lessons and mark learners' work outside session hours, since this effort is not remunerated. However, in general the Panel did not see evidence that the current remuneration conditions had an adverse effect on the quality of teaching and learning.
- During interviews, Craft teachers reported better communication and sharing of resources and good practice with peers teaching the same subject than the teachers of academic courses. The Entity does not have systems in place for systematic physical and/or virtual communication and coordination between teachers of the same subject in various centres. The Msida centre coordinator, who is the only full-timer in this role, did organise staff meetings for administrative purposes and staff social events.
- Feedback from students and teachers during on-site interviews indicates that delivery tends to be whole-class for academic courses and more individual for craft courses. However, students were satisfied with the personalised attention and support they received, both in craft and academic courses.
- During interviews students of craft courses repeatedly stressed the value of such courses even if they did not lead to certification or employment. Many spoke about the therapeutic effect of attending such courses, and their importance in their social lives and in the context of active aging.
- Both students and teachers felt there was a great deal of mutual respect which enhanced the teaching/learning experience.
- Teachers admitted during interviews that they did not cater, nor did they feel prepared, for the possibility of students with learning difficulties in their courses, although they were ready to make *ad hoc* accommodation if required. Administration admitted that the Entity did not have sufficient capacity to pro-actively address and plan for this area of provision.
- The Panel commends the spirit of professional dedication of the central staff person coordinating the assessment process, who is highly experienced in the administration of examination paper setting and exams organisation. However, it is clear that one part-timer with teacher experience is not sufficient to effectively provide quality assurance of the entire assessment process for the whole range of assessments provided by the Entity, especially with respect to consistency, fitness for purpose and fairness.
- The Entity has some checks and balances in place with respect to the assessment process. A paper-setter is typically chosen from amongst the Entity's own teachers. The proposed examination paper is then checked by a paper reviewer who is another of the Entity's own teachers, and who is not expected to get in touch with the paper-setter. The Panel received contrasting explanations of the role of the paper reviewer: central staff maintained that the paper reviewer was meant to check the substance and level of the paper as well as to edit it, whilst some teachers said that the work was limited to editing for mistakes and formatting.
- An unintended effect of the Entity's assessment procedures is that the chain of communication from the assessment setters to the teachers does not always function properly. One example that was mentioned by learners was in a particular subject where the teacher informed learners that the assessment would be in a particular format and

prepared them accordingly. However during the examination itself the learners discovered that the format was quite different.

- The Panel determined during interviews with management that the Entity is aware that their assessment system has its flaws administration informed the Panel that they were considering introducing third-party subject experts in the paper-setting process.
- The Panel compared the course descriptions as accredited by the NCFHE with the actual examination papers for a number of subjects. It was clear that the assessment level for end-of-course examinations for some courses was above their specified MQF level. This is especially problematic for English Level 1 and 2 and English as a Foreign language courses.
- The Entity did adapt its assessment requirements on a case-by-case basis according to the learning needs of identified learners.
- Craft courses are generally assessed through portfolio-based course work by the class teacher, whilst the academic subjects are assessed through centrally-set end-of course examinations. This means that, ironically, the more qualified and experienced teachers had less input in the assessment process. Some 'academic' teachers, who tended to be retired, qualified and highly experienced, reported frustration at not being involved in the end-of-course examinations, and not even being allowed to view the paper before the examination itself. They felt this contrasted with the level of professional trust they had enjoyed as day-school teachers.
- The Portfolio assessment for the courses that was carried out by the class teachers was checked by the centre coordinators. This was the one area where the craft teachers expressed annoyance, since they felt that the centre coordinators did not have sufficient subject-specific knowledge to give substantive feedback and more so amend the judgments by the teachers on the quality of students' work. Entity administration emphasised the need for oversight of the assessment of students' portfolios as a checks-and-balances measure, but admitted that centre coordinators did not have such background and were not given relevant training.

Good practice identified

- The Entity's craft courses are examples of good practice in student engagement and active learning, especially in the context of active aging.
- The Entity should be commended for its efforts in maintaining a cadre of teachers with expertise and dedication, both in academic and craft subjects, in spite of relatively low remuneration.

Overall judgement for Standard

Requires improvement to meet Standard 4.

Recommendations for improvement

CR 14. The Entity needs to urgently address the current mismatch, where applicable, between the learning outcomes as indicated in the accredited course descriptions, and the actual syllabi used in teaching, and assessment. This needs to be in place by the end of 2019.
CR 15. The Entity needs to urgently address the reliability of assessment, both through revised procedures and through enhanced human resources to effectively implement such procedures. This needs to be in place by the end of 2019.
KR16. The Entity shall ensure that all teachers are involved in the assessment cycle, from assessment design to communication of results and review of teaching, learning and course design accordingly.
KR17. The Entity shall fast-track the review of its course for Italian (as discussed in Standard 3), that will include focussing on student engagement in all language skills, so that lessons learnt can be applied to all other language courses.
R 18. The Entity should enhance communication and coordination between its educators for the standardisation of teaching, and the sharing of resources and good practice.

3.5 Standard 5: Student Admission, Progression, Recognition and Certification

Student admission, progression, recognition and certification: entities shall consistently apply pre- defined and published regulations covering all phases of the student 'life-cycle'.

Main findings

- Information on dates of opening of applications for courses, mode of application with payment procedures, calendar dates for delivery of courses and any terms and conditions covering the whole course are specified in the Prospectus and made available on the website from a set date.
- Applications can be made online and through walk-in services at local councils, government's one-stop-shops and the Entity's own Customer Service. The website clearly indicates in real time how many placings per course (depending on classroom capacity) are still available as the applications come in. Once a course is fully subscribed, applications are still accepted and put on a reserve list. The Panel confirmed that these procedures are effectively in place.
- Due to the default website settings, e-applications can be made as from just after midnight of that date. Students consistently reported the inconvenience of applying for courses at this time on the opening date for applications in order to ensure a place on their chosen course; this was especially true for the craft courses. Students applying physically through local

councils on the morning of the same day reported during interviews that they often found that their chosen course to be fully subscribed already.

- These students also reported that only very basic course information is available at offices of Local Councils.
- The 2016 review of the Entity's basic skills courses by MISCO International Ltd, as discussed in Standard 10, included participants' feedback on alternative application routes. Participants suggested that this should not be predominantly through the Entity's website. This was particularly apposite when applying for ICT Introductory Level courses.
- In this review, participants emphasised difficulties related to the education levels of different adults. Participants claimed that having a mixture of education levels in the same classroom was not beneficial to anyone, since students with a lesser standard of formal education felt uncomfortable asking questions in front of the other students, while the more qualified students did not like to listen to an explanation more than once. This complaint was echoed by stakeholders during the site-visit of this EQA.
- Some participants claimed that even though they applied for the most basic course, as they are beginners in the language in question, the course was still not as basic as expected. This could also be solved through the use of a proficiency pre-test as the person will have an idea where he/ she stands.
- Entrance requirements and progression for each course are found on the website. However, applications and payments thereof are accepted, both on the website and for walk-ins, without preliminary verification of such requirements. The Panel ascertained during interviews that these are only vetted by the Coordinators when they first meet the students at the beginning of the course. The website application process does not currently allow certificates to be uploaded. Coordinators spoke about the undue pressure this puts on them, and on how difficult it is to explain to students at that point that they are not, in fact, eligible to attend a course. Students, tutors and coordinators reported during interviews that some Level 2 classes (especially languages) are attended by students at Level 1 and *vice versa*. This may happen due to convenience, because a student can only attend on a particular date, or due to other non-academic reasons such as wishing to continue to learn with a particular tutor. The Entity's policy is that the final decision regarding which course and/or course level to attend is made by students, which might well differ from the advice given by the Directorate's staff. Although this mis-match reportedly does not happen frequently, it does put further pressure on correct student-class matching as discussed earlier, and makes it harder for first-time students in entry-level courses to receive appropriate attention and support.
- For health and safety reasons, this *modus operandi* is particularly problematic for one course [Wireman License A] for which the Coordinator admitted that he found it very difficult to refuse requests by students without the minimum requirements to attend the course 'informally' but not be certified. This allowed for the possibility that students would consider themselves to have the *de facto* knowledge to undertake potentially dangerous electrical installation without being duly certified to do so.
- The Entity has procedures in place to follow applicant no-shows and student dropouts. The Panel confirmed that these procedures are effectively in place.

- Students, especially at the Msida Centre, reported that staff are helpful in terms of issues related to induction and progression.
- Students reported that MQF 1 Level 1 language courses hardly include any conversation. This is addressed in conversation-specific courses that are open to all students (including A level students who may be well versed in speaking the language), thus placing new students at a disadvantage.
- Basic skills courses such as English, Maltese and Mathematics are preceded by the administration of a pre-test to ascertain the most suitable level for students. There are no pre-tests available for any of the non-basic courses.
- Centre coordinators reported during interviews that the pre-test changes the students' choice of level in about 20% of basic skills classes while also revealing adult learning difficulties, which are not catered for by the classes offered by the Entity.
- The Entity is working with a partner institution, NALA of Ireland, to develop a system of pre-tests for its language courses. Online pre-testing screening tools are not yet in place.
- An induction presentation is offered to all learners at the start of the academic year by the Centre Coordinators. The PowerPoint presentation is written in English but delivered in both Maltese and English. Information on regulations covering all the phases of the courses is distributed to learners at all centres in both Maltese and English.
- International applicants who may have very basic English or Maltese, or those who miss the induction session, are reportedly provided such information on a one-to-one basis by the Centre coordinators. The Entity could not provide assurances that it was satisfied such information is understood by these vulnerable groups of students.
- A sample of the Certificate awarded to students on successful course completion confirms the level, credits, content and status of the qualification.

Good practice identified

1. The Entity has procedures in place to follow applicant no-shows and student dropouts.
2. The Entity offers pre-tests in all basic skills courses.
3. The Entity is working with a partner institution, NALA of Ireland, to develop a system of pre-tests for its language courses.

Overall judgement for Standard

Requires improvement to meet Standard 5..

Recommendations for improvement

CR19. The Entity needs to urgently ensure that students are not allowed to attend courses, even if not to achieve accredited certification, especially if there are health and safety considerations. This needs to be in place with immediate effect.

CR20.	The Entity needs to urgently review the process for student registration for its course provision, especially with respect to the vetting of eligibility criteria. This needs to be in place by the end of 2019.
CR21.	The Entity needs to review the process for student registration for its course provision, especially with respect to starting time of registrations, so that there is equality of access between e-applicants and walk-in applicants. This needs to be in place by the end of 2019.
KR22.	Staff servicing course application requests by walk-in applicants, such as at local councils, shall be trained to provide course information so as to inform applicants' decisions.
KR23.	The induction for students, especially in vulnerable communities, shall be reviewed to ensure that all important information is effectively available.
KR24.	The Entity shall ensure that course provision is in line with the advertised MQF level. In relation to this, the Entity should review processes and procedures to ensure that repeat students are assigned to appropriate courses, so that first-time students in entry-level courses receive appropriate attention and support.
R25.	The Entity should consider setting up virtual learning environments to enhance learning and access thereof.
R26.	The Entity should consider setting up pre-tests for all academic courses.
R27.	The Entity should consider requiring adult educators to keep logs of their regular monitoring of student progress.

3.6 Standard 6: Teaching Staff

Teaching staff: entities shall assure the competence and effectiveness of their teaching staff.

Main findings

- The teaching staff of the Entity are all part-time educators, many of whom are current or retired teachers, as well as experienced practitioners in the field for the craft courses. However, a number have low levels of formal qualifications. In some cases, the qualifications are below the expected level: for example, staff in charge of the Level 1 and Level 2 courses in Maltese, English and Mathematics would be expected to be warranted teachers with at least a Level 6 relevant qualification, but this is not always the case. The Entity administration explained that this was an emergency measure to meet course demand due to the shortfall of staff.
- However, the Entity does not address such an emergency by providing appropriate supervisory support to the lesser qualified educators (for example in lesson preparation, andragogy and assessment), by qualified and experienced teachers or higher level educational personnel.
- Administration explained that a significant number of existing staff are shortly expected to leave the Directorate's service due to age, and there is difficulty in recruiting new staff because of unattractive remuneration – which has not been revised for more than a decade

– when compared to similar service in other educational institutions. This issue was also underlined by the educators themselves.

- In spite of this, most of the teaching staff reported during interviews that they were very satisfied with the opportunity to deliver these courses.
- The recruitment policy of the Entity follows public service recruitment policies. The Panel was provided evidence that these policies are being followed rigorously.
- There is lack of clarity and a measure of internal contradiction in the call, selection, terms of reference and expectations of service by the centre coordinators of the Entity. This came out not only in the examination of documentation, but in the explanations given by the coordinators themselves during their interviews. This will now be addressed with a new call which makes a clear distinction between the role of teaching staff and centre coordinator.
- Management explained that educators are provided minimal induction, in the form of a number of introductory sessions that mainly focus on administrative issues.
- Also, the Entity does not provide mandatory CPD, even to staff that do not have sufficient teaching experience and qualifications as explained earlier. It does however provide multiple opportunities for voluntary CPD on a range of topics, in which educators are encouraged to participate. Topics vary but are mainly aimed at addressing issues that the central administration would have identified as priorities through feedback.
- These CPD activities are usually part of EU projects for which the Entity has successfully applied. For example, the Entity offered a National Diploma in Teaching Adults which was aimed at offering a teaching qualification in adult education, and especially targeted for educators who did not have a teaching qualification. A number of the Entity's educators successfully completed the Diploma. The Panel was able to notice the positive effects of this programme on the participating teaching staff in terms of their understanding of how to apply some of the knowledge acquired to improve their teaching for the benefit of the students.
- Educators that were interviewed were not confident that they would be able to effectively address learners with specific learning difficulties, and did not feel that they were sufficiently trained and informed to do so.
- The Entity has a supervisory observation system in place whereby educators are observed, mainly by centre coordinators, usually once every course, and also infrequently by central administration senior personnel. Interviews with different stakeholders highlighted that there seems to be some lack of coordination between coordinators because educators who are delivering courses at different venues are observed several times during the year. The coordinators of provision at local councils and NGOs have fewer opportunities to undertake observations due to their workload and the timing of classes.
- Staff observations by the centre coordinators is carried out by means of a checklist that includes both administrative and quality of teaching/learning considerations. Samples of completed checklists seen by the Panel were uneven in terms of quality, type and amount of feedback given. The coordinators and the Entity central administration admitted that the coordinators have not been trained in the required substantive observational skills and judgements related to the quality of adult teaching and learning. Nor do many of them feel

(also due to ambiguity in their terms of reference as discussed earlier), that they can provide substantive feedback to the educators, especially if they are highly experienced and competent teachers, particularly in arts and crafts. Many coordinators felt that after observing a highly competent teacher over a number of years, they have 'nothing else to say'. The observation checklist provided does not differentiate between different types of teachers and types of provision.

- The main centre at Msida, which is the only one with a full-time Centre Administrator since provision is throughout the day, has regular staff meetings which deal mainly with administrative issues. However, such meetings are not held at the other centres.
- Educators of the same subject do not have structured and systematic opportunities to meet and work together; the coordination that takes place is ad hoc and dependent on personal friendships.
- Given the low level of the qualifications being delivered by the Entity, the teaching staff are not expected to be engaged with academic research.
- The Entity does not have in place a virtual learning environment that the educators can use to facilitate resource production, sharing and dissemination.
- The Entity forms part of EPALE, the European platform for adult learning in Europe, which includes access to a wide range of resources for tutors available on the EPALE website: <https://ec.europa.eu/epale/en>.

Good practice identified

1. Although CPD provision is severely limited given the structural and financial constraints of the Entity, it offers optional CPD in a range of formats for its educators.
2. The Entity has participated in EU-funded programmes to develop new teaching and learning resources.
3. The Entity has a high number of committed and dedicated teaching educators.

Overall judgement for Standard

Requires improvement to meet Standard 6.

Recommendations for improvement

CR28. The Entity needs to urgently consider whether its current work practices and working conditions are contributing to the shortfall of fully qualified educators that are required to fulfil its course provision. This needs to be in place by the end of 2019.

CR29. The Entity needs to urgently set up effective systems and procedures that ensure adequate monitoring and support for low-qualified educators, especially in terms of lesson preparation, andragogy and assessment. This needs to be in place by the end of 2019.
KR 30. The Entity needs to develop an educator CPD programme that distinguishes between core mandatory CPD especially for low-qualified educators, and other CPD. The Mandatory CPD needs to extend well beyond the current induction sessions, and working conditions need to be revised to ensure the sustainability of such input.
KR31. Apart from andragogy and assessment, this CPD programme needs to include identification and support of disability and specific learning needs in adult learning.
KR32. Human resources in the coordination of services to identified vulnerable communities and in local councils need to be enhanced so that the amount of educator observation and support matches that provided by centre coordinators.
R33. In the medium term, the Entity should consider enhancing further the role of the Centre Coordinators to transform centres into communities of reflective professional practice that focus on teaching and learning improvement for individual student progress and attainment.
R 34. The Entity should consider setting up structures that allow for the systematic sharing of good practice, in person and/or virtually, between coordinators and educators.
R 35. The Entity should consider streamlining tutor observations for tutors providing service in multiple sites.

3.7 Standard 7: Learning Resources and Student Support

Learning resources and student support: entities shall have appropriate funding for their learning and teaching activities and sufficient learning resources to fully support the students' learning experiences.

Main findings

- When the Panel visited the Msida centre, which is the main venue of tuition, it verified that the physical resources are fit for purpose. Comments from students and tutors during interviews on the suitability of other (non-school) venues varied, from acceptable to inconvenient to unacceptable, with one site being a store room and others too small for the numbers of students involved. The Entity is aware of these deficiencies and is in the process

of taking remedial steps, for example by discussing on alternative hosting with local councils.

- Staff complained that the administrative and storage spaces in centres other than the Msida one are generally inappropriate or non-existent. This was confirmed by management. Co-ordinators do not have access to a proper office or lockable space, and storage facilities for frequently used resources is insufficient or non-existent, requiring students to carry (sometimes bulky) equipment with them for every lesson. Co-ordinators and students spoke of the territoriality exhibited by some heads of school hosting the Entity's provision, which made them feel like second-class educators, and the students like second-class learners.
- A physical library is available only at the Msida Centre, partly because of the aforementioned problems of space. Although it is not large and mainly focuses on language texts, it is used and praised by students.
- WIFI is available at the Msida Centre, although some students reported that there may be problems with bandwidth when there are many simultaneous users.
- Stakeholders reported that repairs for essential equipment at the centres (apart from Msida) took very long to be carried out, if at all. The Entity does not have its own resources to repair equipment, and in any case, there is lack of clarity as to whose responsibility it is to carry out such repairs since the venues do not belong to the Entity.
- The 2016 review of the Entity's basic skills courses by MISCO International Ltd, as discussed in Standard 10, included participants' feedback on having more locations to choose from, including increased usage of Local Councils - this was one of the most commonly suggested recommendations. More locations would mean that certain people who might have dropped out of the course or chose not to apply in the first place, due to inconvenient locations, would have the opportunity to apply for the course in the future. A particular suggestion was to increase locations in the southern area of Malta.
- The timing of courses was another issue mentioned in this review. Some participants suggested that lessons should start slightly later due to other work commitments that adults have. Some specified that since the majority of working adults work until five, this means that they regularly miss out on the first part of each lesson due to traffic and especially parking problems around the schools. This latter point was also brought up by many students who felt underserved as they were not allowed to park in the otherwise empty parking lot.
- Cooling and heating in some classrooms were noted to be a problem in some of the older schools.
- Summer courses were recommended by many participants of the 2016 MISCO study. Some even specified that these courses could be used as revision classes, especially for basic courses, allowing the opportunity to practice the subject over the summer. Additionally,

some participants stressed that as they have more free time during summer, this would be a good way for them to usefully spend their time.

- It was not always clear to students who they should speak to, to raise complaints. Many were not aware that they could also use Servizz.gov to ensure anonymity.
- During the on-site interviews by the Panel, students and staff suggested that the provision of childcare and/or homework club facilities would be a significant inducement for parents of young children to attend, for whom the use of extant childcare facilities was not a viable solution. The Entity does not have capacity for this provision or plans to review it.
- Both students and staff suggested that there could be a blended component to learning, through the use of a virtual learning environment, to enhance learning and improve access. The Entity does not currently have the capacity for this provision but does have plans to review it.
- Although the Entity does take *ad hoc* measures to address the needs of learners with disabilities or specific learning needs, there is no systematic provision especially for the latter, thus potentially excluding a vulnerable group of adult learners. Tutors and coordinators do not feel they are appropriately trained and resourced to address these needs, and at least one centre has problems with access. The Entity does not have the capacity for this provision or plans to review it.

Good practice identified

1. Given the significantly limited human resources available to the Entity at central level when compared to the range of provision and adult learners, the commitment of the managerial and administrative staff of the Entity is to be commended.
2. The personal and professional commitment of the Centre Coordinators and Administrators are to be greatly commended.

Overall judgement for Standard

Requires improvement to meet Standard 7.

Recommendations for improvement

KR 36. The Entity needs to engage in a rights-based approach with its providers of venues and services, so as to ensure that the learning needs of and attendant resources for its adult learners are effectively, efficiently and sustainably addressed.

KR 37. The Entity needs to ensure that its centre coordinators have appropriate physical resources to support their duties and to minimise inconvenience for students.

KR 38. The Entity shall ensure that timely technical support is available at its centres, and/or that appropriate arrangements are made with other hosting entities to ensure timely technical

support in case of malfunction of physical and technical resources.
KR 39. The Entity needs to enhance its capacity for policy and programme development, implementation and review through the engagement of more Education Officers and other support staff.
KR 40. The Entity needs to enhance its student support services especially with respect to students from vulnerable communities, and students with disabilities and/or specific learning needs.
KR 41. The Entity needs to enhance its processes and procedures for students wishing to raise issues and complaints.
R 42. The Entity should consider reviewing its participant information sheet.
R 43. The Entity should consider enhancing its WIFI provision, and ensure better use of ICT in classes.
R 44. The Entity should consider providing childcare and homework supervision services to support the participation of adult learners with children who would not otherwise be able to attend.
R 45. The Entity should consider investing in virtual learning environments.
R 46. The Entity should ensure that students are aware of the possibility of processing comments, queries or grievances through the government service Servizz.gov, over and above the Entity's own customer care service.

3.8 Standard 8: Information Management

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

Main findings

- Given that students apply online via the Entity's website, the Entity automatically collects data of applicants, such as name and surname, address, gender, nationality, name of course applied for, location of course delivery together with day and time of delivery.
- The student information collected on application is stored in an internal database administered by the Entity's administrative staff. This database is password protected and secure and is only accessible by the Entity's administrative officers. There are no paper records of students' applications.
- The information on the student/course database can be searched using a number of search criteria but these are limited to the information collected at application stage.
- Once the delivery of the courses is initiated in the centres, the Panel ascertained that the tutors/coordinators of the Entity manually collect data on student and tutor attendance. The

latter is used for payment purposes. This data is then inputted manually into an excel sheet and sent to the administrative staff of the Entity. The original paper attendance forms are kept for record purposes.

- The Panel noted that there is no link between the student application database and the student attendance database.
- The data gathered does not include rates of student satisfaction, passing, dropout, employment or career paths. However, the latter two are not relevant for the majority of the courses which are not linked to employment. Indeed a substantial proportion of the student population attending these courses are not doing so for the purpose of finding employment as they are retired.
- The Panel noted that, to date, no tracer studies had been completed. However, as already mentioned these are not relevant in this particular context for the majority of students. Interviewees stated that such studies might be difficult to conduct due to the growing number of international students that may be more difficult to keep in contact with given that these are more likely than local students to change residence or indeed return to their country of origin.
- There is no systematic collection of feedback from all students and all courses.
- However, the Panel was provided with examples of three separate specially commissioned studies (by MISCO and Grant Thornton, discussed further in Standard 10) whose aim it was to gather feedback from the students on specific sectors of provision.
- During the visit, the Panel was also given a demonstration of how queries or feedback can be made by current or prospective students via the Servizz.gov government platform, and how administrative staff of the Entity follow centrally-mandated procedures to ensure the successful resolution of such queries.
- However, to date there is limited analysis of the data being collected to inform management decision making.
- What minimal analysis is being conducted is not currently systematic. However, there was some evidence that the Entity has recently made attempts to formalise the process by organising meetings with its centre coordinators, where some of this data was used in discussions instead of just relying on anecdotal evidence provided by tutors or centre coordinators.
- The Panel noted that the main reason for this lack of systematic analysis is that the collected data is not centralised in a single database which would allow the possibility to issue reports automatically.
- However, the Panel was informed that the Entity is conscious of this issue and is in the process of commissioning a new database which will offer this search functionality and automatic reporting.

Good Practice identified

1. The Entity manages efficiently all queries raised through the Entity's website and the servzz.gov platform

Overall judgement for Standard

Requires improvement to meet Standard 8.

Recommendations for improvement

KR 47.	The Entity shall systematically collect data on student feedback.
KR 48.	The Entity shall make better use of presently available data to inform its business information process as well as course design, review and range of offer.
KR 49.	The Entity shall set up its Ideas Board, as discussed in Standard 1.
R 50.	The Entity should consider revamping its data collection and management system so as to be able to mine and make strategic use of data on applicants and courses.

3.9 Standard 9: Public Information

Public information: entities shall publish information about their activities which is clear, accurate, objective, up-to-date and readily accessible.

Main findings

- The directorate gives a great deal of importance to analytical data generated by the website and social media platforms, including the number of visitors, demographics and bounce rate. A number of decisions are made based on this information, including which platform marketing efforts should be targeted to.
- General information available on the website is available in both English and Maltese, making it more accessible to a wider audience. This respects the Entity's student profile.
- However, (except for Maltese language courses), all course details listed on the website are in English even when the website language is set to Maltese.
- The Entity publishes information about its general procedures and courses in both soft-copy (website) and hard-copy formats (prospectus).
- Key information on courses (such as learning outcomes, assessment methods and student progression) is not available on the printed prospectus. This information is only available

online because the large number of courses offered by the directorate would result in a voluminous prospectus which would be impractical for use.

- The Entity strives to reply to queries arising from the information available to its students in a 48-hour period. This applies to emails, queries sent through social media and feedback or complaints sent through the Servizz.gov system. In fact during a mystery shopper exercise carried out by the panel, a satisfactory answer to queries was immediately provided on the phone.
- The draft IQA Policy mentions that the Entity provides “alternative formats” of all published information on request. At this stage students are unaware of this facility.
- Student induction material is not found on the website.
- The application opening time is not listed next to the date on the website.
- The Entity’s website does not include a reference to the government service Servizz.gov even though the Entity receives feedback and complaints from this system.
- During interviews, students and teachers indicated that they had not been consulted in the updating of public information.
- Some course listings have missing information which is shown as N/A. This includes learning outcomes, general objectives, tutor information etc. There are instances where this persists even after applications have opened and the information is clearly available.
- The Entity states in its documentation that provision is made for the dissemination of information to its students with accessibility requirements. For example, potential students who were unable to access the publicly available information can attend a one-to-one meeting before applying. However, when asked, students indicated that they were not made aware of such a provision.
- Neither the website nor the prospectus include course pass-marks and pass rates.

Good practice identified

1. Social media and website analytics are factored into decision-making related to the creation and distribution of public information.

Overall judgement for Standard

Meets Standard 9

Recommendations for improvement

KR .	51. Student induction material shall be uploaded to the Entity’s website.
R .	52. The Entity should consider reviewing its website so that it offers clear information regarding the opening of registration for applications.

R	53.	The Entity should consider checking that access to and the language used in course information provided online (including learning outcomes) are learner friendly.
R	54.	The Entity should consider including reference to the government service Servizz.gov on its website.
R	55.	The Entity should consider involving students and teachers in the review and design process of its public information.
R	56.	With respect to information for each course on the its website, the Entity should consider including links to information on MQF, ECTS, language of instruction, and assessment parameters.
R	57.	The Entity should consider including information on its website regarding the possibility for one-to-one explanatory meetings as required.
R	58.	The Entity should consider including information on its website on course pass-marks and pass rates.
R	59.	The Entity should consider providing course information in Maltese, especially for Introductory and MQF Level 1 courses.

3.10 Standard 10: On-going Monitoring and Periodic Review of Programmes

Ongoing monitoring and periodic review of programmes: entities shall implement the 'Quality Cycle' by monitoring and periodically reviewing their programmes to ensure their continuing fitness for purpose.

Main findings

- From the many discussions with the Entity's management throughout this EQA, it became clear to the Panel that the Entity is in the process of reviewing and rethinking its core functions and the quality mechanisms of its provision. The grounded reformulation of its QA Policy, as discussed in Standard 1, is an integral part of this process.
- The monitoring of course provision is a key function of the Assistant Director, who, together with the EO for Adult Education was effectively running the Entity in the absence of a Director General and Director (as discussed in Standard 1). Subsidiary monitoring functions are also carried out by other more junior members of staff with respect to assessment and on-site course provision. Although the Entity should be commended for its efforts at monitoring and review by all its staff, its senior management is over-stretched by these and other functions, and some aspects of oversight, such as assessment (as discussed in Standard 4), need more senior personnel to ensure all pertinent issues are fully addressed. The recruitment of the

Director should help the Assistant Director to focus on core responsibilities, but additional senior personnel are still required.

- During interviews the Panel ascertained that the Entity is aware that its languages courses need to be reviewed to allow for a more balanced provision of the different language skills offered. It has started a pilot project to review its Italian courses, and intends to eventually extend this to all other courses. Its decision not to develop or accredit new courses until this process is concluded (as discussed in Standard 3) is further evidence of the Entity's review mind-set, which given its limited resources, is commendable.
- The Entity undertook three external evaluations of two aspects of its provision, all funded from EU projects. Grant Thornton was commissioned to undertake a telephone survey in order to obtain information on the effectiveness of the basic skills courses offered by the Entity. The report was published in October 2015. MISCO International Ltd was commissioned to undertake a similar review of the basic skills courses through telephone interviews and focus groups; this review was published in December 2017. These reviews had similar recommendations including on alternative methods of application, location of course, time of course, venue of courses, adults' education levels, basic and introductory courses, and summer revision classes. These have been discussed in the appropriate Standards.
- The administration of the Entity informed the Panel that since the MISCO Report had only recently been delivered, they had not had the time to reflect on the recommendations and consider remedial action. However, the Panel found no evidence that the earlier report by Grant Thornton was acted upon, nor was it clear why the same area of provision was reviewed twice in such a short period of time.
- Another review, also by MISCO International Ltd, focused on the National Diploma in Teaching Adults and was published in November 2017. Participants (adult educators) were generally satisfied with the course outcomes and would recommend it to others, but were dissatisfied with the entry requirements, course information, venue and some aspects of the course that were not considered as relevant as others. Partly as a result of this evaluation the Entity entered into discussions with the University of Malta so that a similar Diploma would be offered by them. This allowed the Entity to rationalise its resources and focus on its core function.
- The Entity informed the Panel that it plans to set up an Academic Board (as discussed in Standard 1); one of its functions will be the review of courses.
- The Entity does not currently systematically take learners' views in consideration in reviewing its provision. It plans to set up a Think Tank (as discussed in Standard 1); the student feedback that is made available will also feed into the course review process.

Good practice identified

- The Entity has a review-to-improve mind-set.
- The Entity is currently piloting with its provision for Italian the comprehensive review of its accredited courses.

- The Entity has commissioned a number of independent studies to evaluate aspects of its provision.

Overall judgement for Standard

Requires improvement to meet Standard 10.

Recommendations for improvement

CR 60.	The Entity needs to urgently take into consideration the recommendations made by the Grant Thornton and MISCO reports on its Basic Skills courses. An action plan showing how it intends to review this provision needs to be in place by the end of 2019.
KR 61.	The Entity needs to prioritize review of its accredited course descriptions to address the mismatch between them and actual enacted provision.
KR 62.	The Entity needs to recruit more Education Officers to be able to undertake its monitoring and review functions in an in-depth and systematic fashion.
KR 63.	The Entity needs to set up its planned Academic Board and Think Tank.
KR 64.	Programme review shall be based on data and evidence gathered from all stakeholders.
KR 65.	The Entity should systematically include student and teacher feedback in its course review.
KR 66.	The Entity should have a mechanism and tools in place for teacher feedback to ensure this is acted upon through a feedback loop.

3.11 Standard 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, once every five years.

Main findings

N/A

Overall judgement for Standard

Meets Standard 11.

4. Response by the Provider

1. Preamble

The first NCFHE External Quality Audit of the Department for Research, Lifelong Learning and Employability (DRLLE) was held between the 25th - 28th June 2018 at the DRLLE offices Ministry for Education and Employment Floriana. A draft version of the Audit Report was received on the 15th July 2019. This coincided with the introduction and implementation within the Directorate of the MySchools Data Management System and new Website. The implementation of the System and website required innumerable meetings of management and staff with the System providers so that the specific requisites of the DRLLE can be identified. Subsequently to the creation of the software and installation of the system the process of data migration to the new system ensued. This was followed by various interventions to check correctness of the data uploaded. Management and Staff of the DRLLE, Servizz. Gov, Local Councils and NGOs were invited for several training sessions on both the operations of the new System and Website. Although some issues with the functioning of the IT system have still to be addressed by the provider, the system is up and running.

Concurrently with the implementation of the IT System and Website the DRLLE yearly course provision of around 400 Adult Courses was launched for applications on the 11th July 2018. Courses delivery started on the 01/10/2018.

The foregoing taken into consideration, we are concurrently addressing the issues, comments and recommendations of the draft Audit Report, in particular those that have been termed CR. Some of the latter have already been implemented while others are still being considered. We are herewith attaching an interim response to the issues under consideration. The Entity shall continue to strive to retain and enhance good practice identified, while considering this document as a work in progress pending evaluation and implementation of other Comments and Recommendations that are fit for purpose of the Entity's remit to provide high quality part-time educational and vocational courses.

2. Response to comments and proposals made by the Peer Review Panel in connection with Standards where the judgment was "Standard met or surpassed".

Comments and Recommendations concerning Standards met are being taken on board concurrently with the Directorate's functions.

Standard 2: Institutional Probity

Meets Standard

RI: The DRLLE is currently employing additional human resources at all fields and levels of competence.

Standard 3: Design and Approval of Programmes

Meets Standard

- *“During interviews, Craft teachers reported that they were quite involved in course design, whilst some teachers of academic subjects, who were typically more qualified and experienced, expressed frustration at the lack of consultation in the course design. “*

Comment on the above quotation (*vide* **Main findings (Fact and Analysis)** bullet point 3), limitedly referring to academic teachers. Not all academic teachers were interviewed during the Audit and therefore we suggest that this shall not be taken as a sweeping statement.

Feedback on Recommendations:

- KR 1. The Academic Board was set up in July 2018
- KR 2. Review of Italian course has been completed. Recommendation that review of all language courses is to be done is being accepted.
- KR 3. Pre-tests are being conducted for all accredited language courses
- R 4. This recommendation is being taken into consideration and shall be addressed accordingly. It is to be considered that the creation of courses is demand lead.
- R 5. This recommendation is being noted and shall be addressed accordingly.

Standard 9 – Public Information

Meets Standard

- KR 1. This is being done through a link with the Student’s profile on the MySchool account
- R 2. The Website is being updated regularly in this regard
- R3. Recommendation noted and shall be addressed accordingly
- R 4. The New Website has a reference to the Servizz.gov services in the Terms and Conditions Section under “General Information” and “Application Procedure and Payment”
- R 5. This recommendation shall be addressed by the appropriate Entity’s Board for consideration
- R6. This recommendation is being noted and shall be addressed by the appropriate Entity’s Board.
- R7. This recommendation is already being implemented on an *ad hoc* basis. The question of adding this facility on the Entity’s Website shall be discussed with the appropriate Entity’s Board.
- R8. This recommendation has already been implemented on the Entity’s Website under the “Terms and Conditions Section”
- R9. This recommendation has already been implemented for certain courses. Eventually it will be extended to all courses.

3. Response to comments and proposals made by the Peer Review Panel in connection with Standards for which the Peer Review Panel decided “Improvement is required”.

Comments and Recommendations in connection with the Panel’s decision where “improvement is required” are being taken on board by the Directorate’s within its functions, albeit that these are being given priority over those where standards are met.

Standard 1 – Policy for Quality Assurance

Requires improvement to meet standard

Feedback on Recommendations for improvement

- The Lifelong Learning Strategy is not the Directorate’s strategy. It should be clear that the strategy includes 40 programmes covering initiatives and actions to be taken at national level by all public and private providers. It does not give direction on the focus that the Directorate should take. The mission and vision of the Directorate as presented in the SAR report prioritises vulnerable learners.
- The Audit Report (AR) specifies in paragraph 2.4(i) that the National Quality Assurance Framework (NQAF) is based on the ESG (2015). Consequently, though rightly said that the NQAF is the legal point of reference for the NCFHE, for the purposes of the IQA the primary source, being the ESG, had to be adopted. Nevertheless, it is stated in para (1) of the IQA that the main objective of both the ESG and the NQAF is high quality education for adult participants.
- The revised Student Centered Learning-Teaching and Assessment -Resource and Support policy and procedure that is to be uploaded in the IQA document caters for students with learning difficulties.

KR 1. The DRLLE is constantly striving to promote its identity and that of lifelong learning within the Maltese community whilst advocating the need for vigorous personal development that enhances the individuals’ employability potential.

KR 2. Finalisation of the entity’s IQA document is ongoing. This document shall reflect the outcomes of all types of recommendations and feedback of the EQA Audit.

KR 3. Development of the IQA document shall take on board the widest consultation bodies as reasonably and practically possible.

KR 4. Most of the suggested policies and procedures listed have been or are being developed. These shall be formalised upon final approval.

KR 5. (a) As the DRLLE’s core activity is to deliver part-time courses for adults, from various venues, participant capacity for each course cannot be determined a priori but has to be established on an ad hoc basis considering the availability of space, resources and

educators.

(b) The procedure for course rationalisation has been developed and is pending final approval.

(c) Pre-tests are being done to all MQF level rated courses as a matter of procedure.

R 6. The focus of the Entity concerning its provision is amply stated in both the SAR and IQA documents submitted to the Audit panel. This essentially consists in the delivery of high-quality NCFHE Accredited courses to adult learners (16+). Adult learners are free to choose the course that suits their needs and expectations. Consequently, the Entity's courses compare favourably with state adult education and training.

R. 7 This recommendation shall be implemented

Standard 4: Student-centred Learning, Teaching and Assessment

Feedback Comments on main findings

- *“However, it is clear than one part-timer with teacher experience is not sufficient to effectively provide quality assurance of the entire assessment process for the whole range of assessments provided by the Entity, especially with respect to consistency, fitness for purpose and fairness.”*

This issue has been tackled as we now employ 5 part-time adult educators assisting on various processes including accreditation.

“Craft courses are generally assessed through portfolio-based course work by the class teacher, whilst the academic subjects are assessed through centrally-set end-of course examinations. This means that, ironically, the more qualified and experienced teachers had less input in the assessment process.”

Both academic subjects and craft courses have an element of formative assessment. Here the class educator has full control over the assessment. Since the exam papers assess common learning outcomes and past papers are available, it does not promote good practice to share the actual exam paper before the exam is held.

Recommendations for improvement

CR 1. Adult educators were briefed during this year's induction session to ensure that outcomes and course materials are aligned. The assessment coordinator also reviewed all courses and updated the relevant list and information to ensure that there are no gaps or mismatches.

CR 2. 5 coordinators who were previously based at centres, are now assisting with internal processes including assessment. 5 new adult educators were engaged over the past year.

KR 3. All teachers are already involved by way of consultancy in the assessment cycle, communication of results and review of teaching and course design. Consultancy being more practical than mandatory involvement due to the number of teachers (around 200) who offer

their service to the DRLLE.

- KR 4. Fast track review of the Italian course has been done and the main educator working on the initiative is now a member of the Academic Board and so eventually this review can be applied across the board to all courses.
- R 5. This Recommendation is being accepted and shall be implemented accordingly.

Standard 5 – Student Admission, Progression, Recognition and Certification Requires improvement to meet standard

- CR 1. It is not clear what this section is referring to. It is our understanding that this might be referring to one course which is the Electrical Installation Course Licence A. If so action has been taken and all applicants are called beforehand and no applicants without a qualification at MQF Level 3 in Maths and Physics are accepted.
- CR 2. This has already been tackled in July 2019. A new Course applications management system (MySchools) was introduced and applicants can upload documents.
- CR 3. New application allows for walk-ins even by applicants who do not have an email address. Opening of online course application time shall be moved to 08:00 am so as to give equal access to walk-in applicants.
- KR 4. Staff at Servizz.Gov, EDU Sevizz.Gov Floriana, and all Local Councils wherefrom course applications and queries are received have undergone training sessions on both the new IT system (MySchool) and the new website. Trainees are also given course information to provide applicants with any required assistance.
- KR 5. This Key Recommendation is being taken in consideration
- KR 6. The Entity has always instructed all educators to ensure that course provision is effectively in-line with the advertised MQF level. A second layer of scrutiny on this issue is being conducted by the Entity’s venue coordinators.
- R 7. This recommendation shall be taken in consideration.
- R 8. This is being done for certain courses. It will eventually be extended to all academic courses
- R 9. The New IT System provides for educators, at their discretion, the ability and opportunity to upload comments concerning monitoring of students’ progress. For VET courses monitoring of student process is an ongoing activity as these courses are assessed through portfolios. It is the Directorate’s intention to extend regular ongoing monitoring of student progress to all accredited courses.

Standard 6 – Teaching Staff:

- CR 1. In October 2019, the hourly rate for educators’ remuneration has been increased from 11.65 euro to 20 Euro.

CR 2. UoM will be starting the National Diploma in teaching Adult in February 2020. Work is also in progress with the Institute For Education to provide an online course. Moreover, in October 2019 the Directorate introduced a mentoring session for new and/or low qualified educators.

KR 3. Kindly refer to the preceding CR 1 and CR 2 of this standard.

KR 4. This Key Recommendation is noted and shall be addressed accordingly.

KR 5. This Key Recommendation ties with KR. 4 and shall be addressed accordingly.

R 6. Centre coordinators are constantly being empowered to focus on improving the teaching and learning environment, whilst enhancing professional practice. One needs to remember that most of our centres are public schools which are utilised after compulsory school hours, for a short evening period, for course delivery.

R 7. This recommendation is being noted and shall be addressed accordingly.

R 8. Every tutor now receives only two observation visits irrespective of how many venues lessons are delivered.

Standard 7 – Learning Resources and Student Support

KR 1. The Entity has entered into MOUs with the respective Heads of Schools against a specified remuneration so that these entities place at the DRLLE's disposition basic logistic requirements for the delivery of its provision namely, classrooms, restroom facilities, office space, use of telephone and internet, access for persons with special needs.

KR 2. The Entity closely monitors physical resources available to coordinators so that the latter can actively support their duties towards the wellbeing of students attending courses delivered by the Entity.

KR 3. This Key Recommendation ties with KR 2 and is being addressed accordingly.

KR 4. Calls for applications and interviews for new recruits are underway this year.

KR 5. This Key Recommendation is being noted. The Entity takes measures in those areas where support services, particularly for students with disabilities and/or special learning needs are required, on a case by case basis.

KR 6. The Entity's new website gives instructions on "How to file a Complaint" in the Terms and Conditions section. A Contact button on the Terms and Conditions section of the Website directs the enquirer to a message form that can be completed accordingly by the complainant. This form also gives the Sevizz.gov. contact number- 153. Moreover, the Entity developed a Complaints and Grievances Policy and Procedure document. Subject to its being confirmed by the Academic Board the Policy shall be integrated within the Entity's IQA document.

R 7. The participants information sheet has been reviewed and enhanced.

R 8. The Entity's WIFI is supplied by the internet provider of the Ministry for Education and Employment through MITA and as such it is beyond the Entity's powers. WIFI provision in classes is supplied by the respective school entity hosting the DRLLE. Better use of ICT in classes is on the Entity's agenda through the introduction of online and blended courses this current scholastic year.

- R 9. This recommendation is noted and shall be addressed accordingly.
- R 10. This recommendation is noted and shall be addressed accordingly.
- R 11. Students have already been made aware of this possibility during the Induction sessions.
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Standard 8 – Information Management

Requires improvement to meet standard

- KR 1. This Key Recommendation is noted and shall be addressed accordingly KR 2. This Key Recommendation is noted and shall be addressed accordingly.
- KR 3. The Ideas Think Tank Board shall be constituted during this scholastic year.
- KR 4. Data collection and management is being revamped through the Entity's New data Management System (MySchool), which is already functioning. Data shall be utilised inter alia precisely for the recommended purpose.
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Standard 10 – On-going Monitoring and Periodic Review of Programmes Requires improvement to meet standard

- KR 1. An action plan is in place and work with the European Basic Skills network has already started for the revamp of basic skills courses with the help of 5 international experts.
- KR 2. This Key Recommendation is presently being implemented as far as matching between assessment papers and accreditation instruments is concerned.
- KR 3. 3 coordinators have been permanently assigned to the Education Programmes and Initiatives unit catering for Quality, Projects, welfare and guidance of the Entity.
- KR 4. The Academic Board was setup in June 2018. The Think Tank Board members composition has been constituted. Functioning to start as soon as practicably possible.
- KR 5. This Key Recommendation shall be implemented according to data and evidence available which is fit for purpose of the Entity.
- KR 6. This Key Recommendation shall be implemented according to teacher and student feedback i.
- KR 7. Revamped policies and procedures have been established to create a feedback loop with the Educators and Coordinators. This ensures that even follow-up on recommendations shall be monitored.

Annex: Review Panel Bio Notes

In the setting up of the review panel for **Directorate for Lifelong Learning and Employability** the NCFHE sought to maintain a high degree of diligence in the process of selection of the members of Peer Review Panel. The Panel sought to be composed of specialists in quality assurance to act as External Peers, professionals and practitioners of quality assurance frameworks, as well as students who, prior to the audits, attended professional Training Seminars organised by the NCFHE.

The following bio notes present the profiles of the members of Peer Review Panel. The bio notes are correct as at the time of when the QA audit was carried out between the **25th and 28th June 2018**.

Head of Review Panel: Dr Sandro Spiteri

Dr Sandro Spiteri has taught and trained in the primary, secondary and tertiary sectors since 1989. From 2001 to 2008 he set up the first national family literacy and parent leadership programmes in Malta, and has worked and published with UNESCO on these issues. For 10 years from 2001 he was founding Head of the Malta Writing Programme, the first affiliate site in Europe of the National Writing Project in the USA, which also included a range of programmes for families and parents. From 2008 to 2009 Sandro was the first Principal of St Margaret College. In 2009 he was appointed Director for Quality Assurance and later Director for Curriculum Management for compulsory education. In these roles he set up the school external review system, the mentoring system for newly qualified teachers, and the first national literacy strategy. In 2013 Sandro was appointed as the first Head of Quality Assurance at the National Commission for Further and Higher Education; in this role he set up the QA system and authored the National QA Framework for the sector. He also co-ordinated the first three external quality audits (EQAs) and participated in the EQAs of the University of Malta and MCAST. Since November 2015 Sandro is Senior Executive at the QA Unit of the University of Malta. In 2017 he has awarded an educational doctorate from the UCL Institute of Education, London, with a focus on quality assurance in higher education.

External Peer: Profs. Isabel Stabile

Professor Stabile is currently Director of the International School for Foundation Studies and Medical Foundation Programme, and also teaches in the Department of Anatomy, Faculty of Medicine and Surgery, University of Malta. During her tenure at Florida State University she was responsible for generating over \$10,000,000 in research funding which has led to numerous publications as well as international awards. In 2012, she re-designed the clinical curriculum in the Faculty of Medicine and Surgery and introduced new strategies to facilitate learning. The final product is student-centered, vertically and horizontally integrated and builds on the success of the biomedical sciences curriculum jointly developed three years previously. Her teaching and research experience have led to invitations to serve as referee for major clinical journals in her field. Dr. Stabile is the author of over 60 publications in the peer-reviewed literature, including eight books.

Peer Reviewer: Dr Robert Suban

Dr. Robert Suban is a full-time lecturer in the Department of Banking and Finance of the University of Malta. He holds a Bachelor in Business Administration, a Masters Degree, and a Ph.D. in Accounting & Finance from the Alliance Manchester Business School. He regularly attends and presents his research at various internationally peer-reviewed academic conferences in the area of finance. He has been involved in higher education for over twenty years as a lecturer in a number of different higher education institutions and he is now also involved in higher education administration. He has considerable experience as a practitioner having worked at the Central Bank of Malta, Jobsplus and a leading private travel organisation. Currently, he also holds a number of non-executive directorships in investment companies. He is also a Director of Malita Investments p.l.c., which is listed on the Malta Stock Exchange, and is the Chairman of its Investment Committee as well as a member of its Audit Committee.

Student Peer Reviewer: Mr Wilbert Tabone

Mr. Wilbert Tabone is a graduate in Creative Computing. Wilbert Tabone is a computing professional with a background in creative computing, human computer interaction and artificial intelligence. His expertise lie in the application of computational technologies for digital cultural heritage and the arts where Artificial Intelligence and the Internet of Things are revolutionising the way we analyse, connect and consume visual information. He currently works locally in applying this vision to the art community. Wilbert was involved as a student reviewer in various External Quality Assurance (EQA) audits including the first which were conducted by the NCFHE.