

# External Quality Assurance Audit Report



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

**EAPTI-GPTIM**

**Carried out between the 11<sup>th</sup>  
& 13<sup>th</sup> of November 2019.**

# Table of Contents

<b>Abbreviations List &amp; Definitions .....</b>	<b>3</b>
<b>Definitions.....</b>	<b>4</b>
<b>1. Executive Summary .....</b>	<b>5</b>
1.1 Section A: Background.....	5
1.1.1 The Peer Review Panel.....	5
1.2 Section B: Key Findings, Judgements and Recommendations .....	7
<b>2. About the External Quality Audit.....</b>	<b>14</b>
2.1 Introduction.....	14
2.2 Reviewers.....	14
2.3 Institutional Context.....	15
2.4 General Terms of Reference, Aims and Objectives of the EQA .....	15
2.5 Specific Terms of Reference and Research Questions.....	18
<b>3. Analysis and Findings of Panel .....</b>	<b>19</b>
3.1 Standard 1: Policy for Quality Assurance .....	19
3.2 Standard 2: Institutional Probity .....	35
3.3 Standard 3: Design and Approval of Programmes.....	36
3.4 Standard 4: Student-centred Learning, Teaching and Assessment .....	38
3.5 Standard 5: Student Admission, Progression, Recognition and Certification .....	53
3.6 Standard 6: Teaching Staff .....	56
3.7 Standard 7: Learning Resources and Student Support.....	60
3.8 Standard 8: Information Management.....	65
3.9 Standard 9: Public Information.....	67
3.10 Standard 10: On-going Monitoring and Periodic Review of Programmes.....	70
3.11 Standard 11: Cyclical External Quality Assurance .....	73
<b>4. Response by the Provider .....</b>	<b>77</b>
<b>Annex: Review Panel Bio Notes .....</b>	<b>81</b>

## **Abbreviations List & Definitions**

**EAGT:** European Association of Gestalt Psychotherapy (The EAGT has the status of European wide accrediting organisation (EWAO) within EAP – covers Gestalt modality).

**EAP:** European Association of Psychotherapy.

**EAPTI:** European Accredited Psychotherapy Training Institute.

**EAPTI-GPTIM:** European Accredited Psychotherapy Training Institute-Gestalt Psychotherapy Training Institute Malta. (EAPTI-GPTIM), as the lead EGN member designs and develops NCFHE accredited programmes

**EAPTI-GPTIM QAC:** European Accredited Psychotherapy Training Institute-Gestalt Psychotherapy Training Institute Malta. Quality Assurance Committee

**EATSCYP:** European Interdisciplinary Association for Therapeutic Services for Children & Young People

**ECP:** European Certificate of Psychotherapy.

**EGN:** EAPTI-GPTIM Network

**EGPN:** European Gestalt Psychotherapy Network. (Formed for formalising academic collaboration between EAPTI-GPTIM and its partner Gestalt institutes around Europe).

**EWAO:** European Wide Accrediting Organisation – recommends Institute for EAPTI status

**HoI:** Head of Institute

**IQA:** Internal Quality Assurance

**LN:** Legal Notice

**MAP:** Malta Association of Psychotherapists. (MAP has the status of National Awarding Organisation. MAP is responsible for registering graduates from GPTIM.

**MQF:** Malta Qualifications Framework

**NAO:** National Awarding Organisation recommended institution (by local NAO)

**NCFHE:** National Commission for Further and Higher Education

**TAC:** Training Accreditation Committee. (TAC is a committee of EAP and requires that each EAPTI is subject to a 7-yearly EAPTI accreditation process resulting in EAPT accreditation status.

**WCP:** World council of Psychotherapy

**QA:** Quality Assurance

**QAC:** Quality Assurance Committee.

**Definitions**

**Psychotherapy:** The comprehensive, deliberate, and planned treatment, or therapeutic intervention, given on the basis of general and special psychosocial, psychosomatic and behavioural disturbances, or states of suffering, training, by means of scientific psychotherapeutic methods, through an interaction between one or more persons being treated, and one or more psychotherapists, with the aim of relieving disturbing attitudes that lead to change, and to promote the maturation, development and health of the treated person (Psychotherapy Profession Act, 2018)

**Registered Psychotherapist:** A person who is in possession of a warrant to practice the profession of psychotherapy and is registered in the official register of warranted psychotherapists kept by the Board (Psychotherapy Profession Act, 2018)

## 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 judgments 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 Peer-review Panel:** Ing. Pierre Dalmas

**Peer-reviewer:** Prof. Sandra C Buttigieg

**Student peer-reviewer:** Ms Tiziana Gatt

**QA Managers (NCFHE):** Ms Fiona McCowan, Ms Viktoriia Maltseva

#### 1.1.2 Specific Terms of Reference and Main Lines of Inquiry

The Letter of Appointment issued by NCFHE to the individual Panel members was to review the compliance of the IQA of the licensee (EAPTI-GPTIM) with the NCFHE IQA standards. During the introductory Panel meeting, document review meeting, pre-scoping meeting and the scoping meeting at EAPTI-GPTIM, it became evident that the IQA of EAPTI-GPTIM transcends the operational and academic context of the licence conditions and scope of accreditation of EAPTI-GPTIM. This was due to the fact the IQA submitted by EAPTI-GPTIM to NCFHE comprehensively covered, in structure and content, the academic and operational aspects of the local licensee (EAPTI-GPTIM) and also the four satellite centres located in Croatia, Bosnia & Herzegovina, Serbia and North Macedonia, as part of the European Gestalt Network (EGN).

The Panel notes that the (standard) licence issued by NCFHE typically covers providers that either:

- (a) Licenced Provider develops and delivers locally its own accredited home-grown courses;
- (b) Licensed Provider collaborates with foreign providers for the local delivery of courses accredited abroad and recognised by NCFHE;
- (c) Licensed Provider is a franchise or satellite of an overseas provider;
- (d) Licensed Provider delivers abroad courses accredited locally by NCFHE.

It was however observed that EAPTI-GPTIM is part of a European network of Psychotherapy training institutes (refer to section 'Institutional Context' for further details).

The Panel was therefore required to conduct the peer-review cognisant of the fact that the standard NCFHE licensing conditions does not necessarily cover the '*modus operandi*' of the EAPTI-GPTIM training provision, in particular, foreign satellite training centres delivering EAPTI-GPTIM courses accredited by NCFHE (this context will as well as the set-up of a European Network will be explained in detail in this report).

Notwithstanding, after lengthy discussions with the NCFHE Audit Managers and due consideration, the Panel considered that, in lieu of the fact that a licence had been issued to EAPTI-GPTIM, the EQA audit as described in the 'EQA Provider Audit Manual of Procedures' (NCFHE, 2017), still needs to be fulfilled (by the appointed Panel).

The Panel concluded that although the NCFHE license issued to EAPTI-GPTIM does not take cognisance of the network set-up, the Panel was still (additionally) required to extend the scope and focus of the EQA Audit agenda to cover the network members. In this way, the Panel could ensure that EAPTI-GPTIM and the satellite network members are afforded the opportunity to demonstrate how the IQA of the network is aimed at the continuous improvement of quality in education provision.

The focus of the audit was now, therefore, to examine how EAPTI-GPTIM and the satellite network members manage their responsibilities to ensure the quality and standards of education that they offer, in particular:

- a) The fitness for purpose and effectiveness of the Internal Quality Assurance(IQA) processes as implemented by EAPTI-GPTIM and the other satellite network members;
- b) The compliance of EAPTI-GPTIM and the satellite network members with the established regulations and conditions or restrictions issued by NCFHE (SL 327.433, NQAF, EAPTI-GPTIM licence and conditions);
- c) The governance, accreditation status and QA oversight of the satellite network members.

In order to be able to fulfil the scope of the audit, the agenda for the main audit was set-up to include video-conferencing meetings with all the satellite centres and their respective stakeholders. The agenda was discussed and agreed during the Scoping Meeting with EAPTI-GPTIM by the Panel and the NCFHE Audit Managers.

The list below provides a record of the key meetings that the Panel held in person (or via video conferencing) with the various internal and external stakeholders of the Centres in Malta, Serbia, Macedonia, Croatia, Bosnia & Herzegovina.

**Day 1: 11th November 2019**

Meeting with Head of Institution and QA consultant

Meeting with the main coordinator of EAPTI-SEB (Studio za edukaciju Beograd, Srbija)

Meeting with Director of EAPTI-GIS (Gestalt Institute Skopje, Macedonia)

Meeting with Director of Psihointegrum, Gestalt Psychotherapy Training Institute Bosnia & Herzegovina

Meeting with Director of EAPTI-Psihika d.o.o. Croatia

Clarification meeting with Director of EAPTI-GPTIM and Facilitator

**Day 2: 12th November 2019**

Meeting with Examination Panel Members of EAPTI-GPTIM

Meeting with Lecturers, Mentors and Supervisors of EAPTI-GPTIM

Meeting with the members of Student Representatives of EAPTI-GPTIM

Meeting with Employers and External Stakeholders of EAPTI-GPTIM  
Skype Meeting with Lecturers, Mentors and Supervisors of EAPTI-SEB  
Meeting with students and alumni of EAPTI-SEB  
Meeting with Employers and External Stakeholders of EAPTI-SEB

### **Day 3: 13<sup>th</sup> November 2019**

Meeting with Lecturers, mentors and supervisors of GIS (EAPTI Gestalt Institute Skoplje – Macedonia)  
Meeting with Students + Alumni of EAPTI-GIS  
Meeting with Employers + External Stakeholders of EAPTI-GIS  
Meeting with EAPTI-GPTIM Quality Assurance Committee  
Meeting with Students and Alumni of EAPTI-GPTIM

It is also to be noted that during the Scoping Meeting, the Chair of the Panel informed the Provider that, in view of unprecedented nature of this EQA audit, the Panel reserves the right to decide at a subsequent stage, depending on the outcome of the proceedings of the audit, whether the video conferencing meetings need to be followed-up with on-site visits at one or more of the satellite centres by the Panel and NCFHE representatives. It is also noted that the HoI acceded to this request.

## **1.2 Section B: Key Findings, Judgements and Recommendations**

### **1.2.1 Standard 1 - Policy for Quality Assurance**

#### **Summary of Main Findings**

#### **Good Practice Identified**

- The Panel observes that there is an ethos that is carried forward by the same students (and then alumni), some of which become faculty members (under various roles). The Panel commends this ‘transfer’ of culture as it augurs well for the ongoing enrichment and sustainability of the Institute(s), and hence the student experience of new and ongoing cohorts.
- The EAPTI-GPTIM has continuously participated in significant discussions addressing training, professional and CPD standards established within the law. It also has a member on the official Board for the regulation of the Psychotherapy Profession in Malta.

#### **Judgement**

EAPTI-GPTIM surpasses the requirements of Standard 1.

## Recommendations

**Note: Optional recommendations refer solely to the academic and operational aspect of the EGN set-up. EAPTI-GPTIM is, therefore, free to adopt these recommendations in lieu of the fact that the scope of the EQA audit is restricted to the EAPTI-GPTIM licence and not the EGN context (Refer also to IQA 11).**

- R (Optional): The EAPTI-GPTIM is to ensure that a documented record is available to show that the Centres have contractually agreed to the conditions of the Statute.
- R (Optional): The Panel recommends the EGN to re-consider the 4-week period of notice of termination of EGN membership that is deemed to be too short for ensuring a coordinated termination of the programme delivery, and service provision of EAPTI-GPTIM locally accredited courses.
- R (Optional): The Panel recommends that the Statute is revised to include the responsibilities of EAPTI-GPTIM with respect to ensuring elements of, for example, business continuity, provision for access to student data etc. in the case of an EGN member withdrawing membership.
- R (Optional): The EAPTI-GPTIM is to forward to NCFHE records of the meeting of the respective EGN Boards and Committees as soon as these are formally set-up.
- R (Optional): The EAPTI-GPTIM is to initiate a process to rectify the licensing terms and conditions as regards to the programme offered at the satellite institutes, list premises and any training sites, periodic quality audits conducted for the purpose of confirming or revoking the licence awarded by NCFHE, records in Malta of students registered at satellite institutes in EAPTI-GPTIM accredited programmes.
- R: The Panel recommends that the Institute includes in its next revision of the Quality Manual the procedures and forms that are not currently within the scope of the Quality Manual but are however an integral part of the quality management system and hence the assurance of the quality of its ongoing programmes.
- R (Optional): The Panel recommends that the governance committee and panel organigram in the Quality Manuals of the satellite members needs to explain that the RAPL Committee and Examination Panel are under the remit and provision of EAPTI-GPTIM.
- R: The Panel recommends that the Institute consolidates the already existing documentation set into one high-level, overarching Quality Assurance Policy. The QA Policy document is to be published on the Institute's website.
- R: The Panel recommends that the Institute considers making available the documents comprising the quality management system online via one drop-down menu. This will facilitate access to prospective and current students.
- R: The Panel recommends that the Board of Institute considers appointing a subcommittee to manage the operational side of running the current programmes, in case the HoI is not in a position to continue leading the Institute, or in any other way it deems appropriate to ensure continuity of provision.

### **1.2.2 Standard 2 - Institutional Probity**

#### **Good Practice Identified**

N/A

#### **Judgement**

Gestalt Psychotherapy Training (Malta) Limited meets the requirements of Standard 2.

#### **Recommendations**

N/A

### **1.2.3 Standard 3 - Design and Approval of Programmes**

#### **Good Practice Identified**

- The Panel strongly commends the rigour, extensive detail and consistency of the individual programme specifications submitted by EAPTI-GPTIM, as approved by NCFHE.
- The EGN is resourced with an international faculty that brings with it a vast and learned spectrum of knowledge and experience to the design and development process.

#### **Judgement**

- EAPTI-GPTIM surpasses the requirements of Standard 3.

#### **Recommendations**

- R : EAPTI-GPTIM to retain documented evidence of the internal reports and minutes of the meetings of the design and development process when these become available in the future when designing and developing new programmes.

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

#### **Good Practice Identified**

- Teaching modes are documented in detail in the Programme Specification.

- The Head of Institute propagates and permeates a very positive psychological environment that empowers all the stakeholders to engage professionally and with high standards in the teaching, learning and support processes.

## Judgement

EAPTI-GPTIM meets the requirements of Standard 4.

## Recommendations

1. KR: The Panel recommends that the assessment criteria for a student to pass the assignment need to be documented and made available to the student before they attempt the various assignments. Similarly, for the live examination, the failing criteria need to be made known and communicated to the students in advance of the examination (to be implemented within three months with receipt of the report).
2. R: The Panel recommends that formative, documented assignment feedback is communicated to the Students (and not a pass/fail grade).
3. KR: The Panel recommends the implementation (by all Tutors) of the EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra> that specifies that 'all assessors/examiners shall complete a written evaluation of the trainee's work, which shall be made available to the trainee' (to be implemented within three months with receipt of report).
4. KR: The Panel recommends to the Institute to set-up policy and implements clear guidelines for the tutors on what constitutes good practice in terms of ensuring the separation of 'teaching and learning' from 'assessment' (to be implemented within three months with receipt of report).
5. R: The Panel recommends to the Institute to revisit and rectify the use of the terms 'Examination Panel' (Quality Manual, section 1.2.3) and the 'Examination Board' (Quality Manual, Appendix 6) that have the same function.
6. R: The Panel recommends that the Institute appoints an 'External Examiner' that is and is seen to be impartial to the Institute.
7. R: The Panel recommends that the Institute revisit the grading policy, possibly including the use of (number) marking in a way that the requirements of Quality Manual, Appendix 6, section 3.5 are met.
8. R: The Panel recommends that the Institute revisits and possibly redefines the number of 'referrals' possible between the Complaints and Appeals Board and the Ethics Committee in order to establish a more straight forward modus operandi.
9. R: The Panel recommends that the Institute determines whether both the 'Complaints Procedure' (Quality Manual, Appendix 13) and the 'Grievance Procedure' (only available online) are required, or not.

10. R: The Panel recommends that the Institute revisits the full set of procedures addressing complaints, grievance and appeals in order to (a) ensure that there is a coordinated and lean procedural approach, and (b) stakeholders have ease of access and reference to the complimenting procedures, possibly through a simplified (graphical) document map, or in any form deemed appropriate by the Institute.

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

#### **Good Practice Identified**

- The opportunity of one-to-one sessions between the HoI and the students before commencing a programme is commendable.

#### **Judgement**

EAPTI-GPTIM meets the requirements of Standard 5.

#### **Recommendations**

- KR: The panel recommends that the Institute updates the templates of the programme completion certificates of the Masters, Diploma and PGC programmes to include the minimum information as per licensing condition requirements (to be implemented within three months of the publication of the of report).

### 1.2.6 Standard 6 - Teaching Staff

#### **Good Practice Identified**

- Tutors and support staff demonstrate a characteristic spirit, culture and sense of community that is manifested in attitudes and aspirations that are conducive to the requirement of experiential and existential teaching, learning, assessment and support environment as inspired by the HoI.
- The Panel strongly commends the initiative taken by the HoI of facilitating through the Congress a unique synergy between the technical and professional aspects of Gestalt Psychotherapy and the QA aspects of the teaching, learning, assessment and related support processes. The Panel truly believes that this synergy is genuinely representative of the embedded quality culture of the EAPTIM-GPTIM and the EGN members.
- The document 'The requirements to become an Associate Teacher and Teacher of EAPTI-GPTIM' provides for a thorough selection and assessment of new academic teaching staff.

#### **Judgement**

EAPTI-GPTIM surpasses the requirements of Standard 6.

### Recommendations

- R: The Panel recommends the documentation of the feedback from the appraiser (HoI) to the newly recruited appraisee (tutor).

### 1.2.7 Standard 7 - Learning Resources and Student Support

#### Good Practice Identified

- EAPTI-GPTIM is run by exemplary, committed, motivated, engaged and professional academic and support tutors.
- The Panel commends the initiative taken by the EAPTI-GPTIM in providing the names and personal email contacts of (seven) student representatives on the EAPTI-GPTIM website <https://www.eapti-gptim.com/student-representatives-committee> (a number of these student representatives participated in the discussions with the NCFHE Panel). The Panel also recognises the mature, professional and altruistic disposition of the students who allow the Institute to publish their (student) names and private email on the website.

#### Judgment

EAPTI-GPTIM meets the requirements of Standard 7.

### Recommendations

- R: The Panel recommends that the feedback of the Students Representative Committee is documented.

### 1.2.8 Standard 8 - Information Management

#### Good Practice Identified

N/A

#### Judgement

EAPTI-GPTIM meets the requirements of Standard 8.

### Recommendation

- R: The Panel recommends that the Academy's documentation system is to include revision control to ensure the correct management of (printed) documented information.

### **1.2.9 Standard 9 - Public Information**

#### **Good Practice Identified**

- The Panel commends the transparency of the 'Student Training Document', thus facilitating the contractual understanding of both parties (Students and Institute).

#### **Judgement**

EAPTI-GPTIM meets the requirements of Standard 9.

#### **Recommendations**

N/A

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

#### **Good Practice Identified**

N/A

#### **Judgment**

EAPTI-GPTIM meets the requirements of Standard 10

#### **Recommendation**

- R: The Panel recommends that a policy for formal institutional self-evaluation that assesses the effectiveness of the Quality Management System is set-up.

### **1.2.11 Standard 11 - Cyclical External Quality Assurance**

#### **Judgement**

EAPTI-GPTIM meets the requirements of 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

<b>Evaluation subject</b>		
<b>Peer Panel Members</b>	<p><b>External Peers:</b></p> <ul style="list-style-type: none"> <li>• Ing Pierre Dalmas (Chair)</li> <li>• Prof Sandra C Buttigieg (Peer reviewer)</li> <li>• Ms Tiziana Gatt (Student peer Reviewer)</li> </ul> <p><b>QA Managers (NCFHE):</b></p> <ul style="list-style-type: none"> <li>• Ms Fiona McCowan</li> <li>• Ms Viktoriia Maltseva</li> </ul>	
<b>Timeline</b>	<b>Dates</b>	<b>Milestone</b>
	30 <sup>th</sup> May 2019	The Panel received induction and preparation
	22 <sup>nd</sup> July 2019	Desk Study
	9 <sup>th</sup> September 2019	The Panel met to determine the specific terms of reference, aims, objective and research question
	27 <sup>th</sup> September 2019	Preliminary provider meeting
	11 <sup>th</sup> , 12 <sup>th</sup> and 13 <sup>th</sup> November 2019	On-site audit visit

## 2.3 Institutional Context

The European Accredited Psychotherapy Training Institute-Gestalt Psychotherapy Training Institute Malta (EAPTI-GPTIM) is a Higher Education Institution whose programmes are based on the teachings of experiential, experimental and existential philosophies. The GPTIM, as it was initially called, was formally set-up during 1996 by Dr Lidija Pecotic, who is still its Director and Head of Institute (HoI). The HoI had opened and directed the first Gestalt school in Belgrade with students and lecturers from different parts of former-Yugoslavia and abroad, before the fratricidal wars of the Balkans in the 1990s. Through GPTIM, the HoI continued to support colleagues and students throughout the successive Balkan conflicts. This personal-professional network was not only a critical human and professional lifeline for the colleagues of the HoI, but one of the few effective ways how the psychological needs of hundreds of thousands of civilians traumatised by war could be addressed. Out of this work grew the first Gestalt Institutes of Serbia followed by Institutes in Macedonia, Bosnia & Herzegovina, Croatia and Montenegro, working closely with and under the oversight of GPTIM.

GPTIM was the first Gestalt institute in Europe to achieve accreditation (2005) by the European Association for Psychotherapy (EAP) and the European Association for Gestalt Psychotherapy (EAGT). The EAP is the umbrella for all psychotherapy modalities, European and international. It (EAP) accredits psychotherapy training Institutions the title of European Accredited Psychotherapy Training Institute (EAPTI). The EAPTI title is awarded to institutes in Europe that achieve the EAP and European Association of Gestalt Psychotherapy (EAGT) accreditation. The EAGT has the status of European Wide Accrediting Organisation (EWAO) within EAP and covers the Gestalt modality.

Subsequently, EAPTI-GPTIM actively supported the application and process for accreditation of the ex-Yugoslavia Gestalt institutes with which it was networked.

EAPTI-GPTIM is also a member of the European Interdisciplinary Association for Therapeutic Services for Children & Young People (EATSCYP <http://eiatscyp.org/malta/>) and of which the HoI is a co-founder.

EAPTI-GPTIM is member of the Malta Association for Psychotherapists (MAP) and commits to its standards and guidelines.

## 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.

- i. 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.
- ii. 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.
- iii. The Internal Quality Assurance (IQA) is fit for purpose.
- iv. 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**

The main lines of inquiry for this EQA were to establish the fitness for purpose and effectiveness of the internal quality assurance processes implemented by the provider, including the set-up and structure of the quality management system, documentation and the review of teaching, learning and assessment carried out by EAPTI-GPTIM Academy and the foreign satellite centres.

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:

- key recommendations (KR) which need to be implemented expediently by the institute to address weaknesses by the dates specified by the Panel;
- recommendations (R) 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

##### EAPTI-GPTIM Network (EGN) Statute and Quality Charter

The HoI explained to the Panel that the academic collaboration between EAPTI-GPTIM and its partner Gestalt Institutes around Europe has grown over the years to become a major provider and guarantor of high-quality professional traineeship and supervised practice of Gestalt Psychotherapy. As the need was being felt to constitute this networking formally, the Institute sought the support of a QA Consultant during 2018 to undertake the formalisation of the Network of Gestalt institutes under the guidance of EAPTI-GPTIM, into the EAPTI-GPTIM Network (EGN). The EGN is now a transnational partnership with an educational-professional function.

Apart from strong collaboration in the provision, the institutes in EGN collaborate to ensure that training and professional practice is maintained to EAGT and EAP standards. In the context of an ongoing collaborative dialogue with the EGN partners, EAPTI-GPTIM has the overall responsibility for ensuring that teaching and training standards are maintained and that the development, implementation and review of the Gestalt courses accredited by the NCFHE remain in line with NCFHE standards and with quality assurance matters.

##### EGN Statute

The above process led to the formation of the European Gestalt Psychotherapy Network (EGN) and the compilation of the EGN Statute & Quality Charter (issued May 2018). The EGN can, therefore, be described as a Malta-led network of Gestalt Psychotherapy Training Institutes operating in partnership with the EAPTI-GPTIM.

The EGN Statute includes the following main sections:

- Details of registered office;
- Aims and objectives;
- EGN Membership
- Use of NCFHE accredited courses
- Statutory bodies and officers
  - EGN Coordinating Board
- Committees of the EGN Coordinating Board
  - EGN QA Committee
  - EGN Professional Development Committee
  - EGN Publications and Archive Committee
  - EGN Lidija Pecotic Scholarship Foundation Committee
  - Independent Appeals Board
  - EGN Research Centre

- Annex 1: Historical background
- Annex 2: EQN Quality Charters

The HoI elaborated that each centre within the network is administratively autonomously and retains the income from the provision of NCFHE accredited courses so as to ensure the financial sustainability of each centre. EAPTI-GPTIM does not make a profit for the use of the NCFHE accredited courses by the other institutes in the Network. The only additional income comes from charging for the lecturing services of senior personnel for conducting training in each other's institutes.

Courses that are not accredited by NCFHE are not bound by the Statute and Regulations of the EGN framework. However, the EGN members are permitted to deliver other (own) courses developed at their respective Centre.

## **EGN Membership**

The Panel observes that the EGN statute states (Section III) that 'The EGN shall be formed of independent entities that shall have been accredited by the competent national authorities of the respective country to deliver Psychotherapy training courses or professional developments sessions.' The Panel endeavoured to establish the type and extent of the 'initial accreditation requirements' in place by the respective competent national authorities and also the type and extent of ongoing oversight by the competent national authorities in place at the satellite centres. The findings are reported under Standard 10.

The Panel notes that the EGN Statute provides for two other membership requirements, namely that the institute has already achieved accreditation by EAPTI and that applying institute is completely subservient to GPTIM for QA purposes. By virtue of accepting to be part of the network, the centres are committing to implement the requirements of the Statute, Charter, and the respective Institute's Quality Manual when delivering the NCFHE accredited programme.

Upon a request by the Panel, the HoI confirmed that there are no documented records to show that the Centres have contractually agreed to the conditions of the Statute.

The Panel observed that the EGN statute specifies a four (4) week notice for withdrawal of membership. The Panel considers this period too short for ensuring a coordinated termination of the programme delivery, and service provision of EAPTI-GPTIM locally accredited courses. It is also observed that the Statute does not describe the responsibilities of EAPTI-GPTIM with respect to ensuring elements of, for example, business continuity, provision for access to student data etc. in the case of an EGN member withdrawing membership.

## **Use of NCFHE accredited courses**

EGN member Institutes are committed to abiding by the Network Coordinating Board guidelines and oversight when delivering NCFHE accredited programmes. In doing so, they acknowledge that the Chairperson of the EGN has full intellectual copyright and legal ownership of course developed (by EAPTI-GPTIM) and accredited by the NCFHE for use by the EGN.

## **EGN Coordinating Board**

The Panel notes that the Statute provides for an EGN Coordinating Board (Clause 16) that fulfils the role of a governing board of the EGN. The EGN Coordinating Board is composed of the EAPTI-GPTIM HoI and the EGN founder, and one representative of all member Institutes.

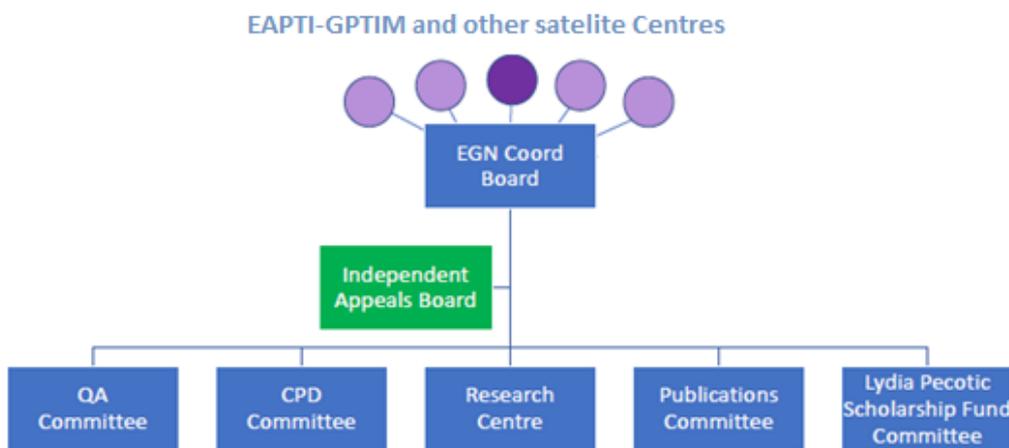
The Panel notes that the terms of reference of the EGN Coordinating Board (Clause 17) include providing policy direction, overseeing the implementation of the EGN Quality Charter, overview implementation of outcomes of accredited courses, review proposed changes to accredited courses, submit proposed changes to NCFHE for accreditation, collaborate with EAPTI-GPTIM in the design and development of new courses, ensure financial sustainability of the Network and establish criteria for membership within the Network, set-up or dissolve committees, consider and decide appeals and complaints in line with the parameters of the EGN Charter and act upon proposed amendments to the Statute.

The EGN Coordinating Board is required to meet at least twice a year.

The EGN Statute empowers the EGN Coordinating Board to set-up the following committees:

- EGN Quality Assurance Committee
- EGN Continuing Professional Development Committee
- EGN Publications and Archive Committee
- Lidija Pecotic Scholarship Fund Committee
- Independent Appeals Board
- EGN Research Centre Committee

The organigram below describes the relationship between the various Boards and Committees.



**Figure 1 : EGN Structure and Services**

The Panel observed that the Institute is in the process of ensuring the necessary formality in the setting up of the respective Boards and Committees.

### **EGN Quality Charter**

To ensure harmonious implementation of QA procedures for NCFHE-accredited courses, the EGN developed a Quality Charter on which the QA Manuals and supporting procedures are based. The EGN Quality Charter is annexed as Appendix 2 in the EGN Statute document. The QA requirements set-out in the Quality Charter are aligned, in structure and content, with the NCFHE standards.

The Quality Consultant explained that the purpose of this Quality Charter is to establish the minimum parameters for the QA system, manuals and procedures for EGN members with respect to the provision of NCFHE accredited programmes, and also to ensure compliance with NCFHE, EAP, and EAGT quality guidelines and regulations.

Members may wish to include other QA considerations that are relevant to their Institute, local or national context.

### **EAPTI-GPTIM Network Quality Assurance Committee (EGN QAC)**

The Panel notes that the Statute (Clause 20) explains that the EGN Coordinating Board shall appoint an EAPTI-GPTIM Quality Assurance Committee (EGN QAC).

The HoI explained that a number of QA functions are delegated to the respective Board of the Institutes of the EGN members. The EGN QAC, therefore, has a limited function that includes the overseeing of the implementation of the QA Policies and practices throughout the EGN in the context of the EGN Charter, interface with NCFHE for all issues including external quality assurance audits and submit regular reports to the EGN Coordinating Board highlighting quality issues or matters that need to be resolved by the members

The EQN QAC is chaired ex-official by the EAPTI-GPTIM HoI and two other members one of whom shall be an external QA expert who shall ensure that the work of the committee is in line with the NCFHE IQA and EQA parameters.

The Panel had a meeting with the local and satellite members of the Quality Assurance Committee of EAPTI-GPTIM. The HoI explained to the Panel that the EGN QAC includes the most experienced members of the GPTIM faculty team. The EGN QAC started to function formally after the Statute became effective.

The HoI also stated that, as yet, the QAC does not have a fixed agenda but address emerging issues, for example, feedback from students. The HoI explained to the Panel that the assurance of quality is happening intrinsically throughout the learning journey.

This continuum is also achieved by virtue of the fact that all the EGN members are bound by the Quality Charter and the IQA Manual template issued by the EGN QA Committee.

The QA Consultant explained that as the establishing organization within the Network, EAPTI-GPTIM has overall responsibility for ensuring, through this structure, that teaching, training and research standards are maintained., This is achieved in lieu of the fact that the Chair of the EGN Coordinating Board is ex-Ufficio Chair of the EGN QA Committee as well as the HoI of the EAPTI-GPTIM hence overseeing the quality standards across the EGN. EAPTI-GPTIM also has the final say on all substantive matters pertaining to the development, implementation and review of the courses accredited by NCFHE and provided by EGN members. Thus, for the purposes of maintaining standards and for interfacing on all QA matters, members of the Network accept that EAPTI-GPTIM remains the contact point for the NCFHE. The HoI went on to explain that member Institutes of EGN are obliged to achieve, ensure, and maintain the standards and quality of service of all those NCFHE-accredited courses that are administered and owned by EAPTI-GPTIM.

### **Document Hierarchy**

The structure is described in a set of documents, namely:

- The EGN Statute
- The EGN Quality Charter that regulates QA policies and procedures within EGN and its member institutes with respect to the provision of NCFHE-accredited courses, and
- The QA Manual of each of the EGN member institutes.

Throughout the review, the Panel endeavoured to identify, in practice, from the above hierarchy of quality system documents the type and extent of initiatives in place for overseeing and monitoring the educational standards of the teaching, learning, assessment, and student support of the local and satellite Institutes. The findings are reported in the various sections of this

report, namely under Standards 4, 6, 7, 8,9 and 10.

## EAPTI-GPTIM Governance Boards, Committees and Groups

The EAPTI-GPTIM QA Manual (section IQA 1) describes the composition, structure and functions of the boards and committees represented in the organigram included below.

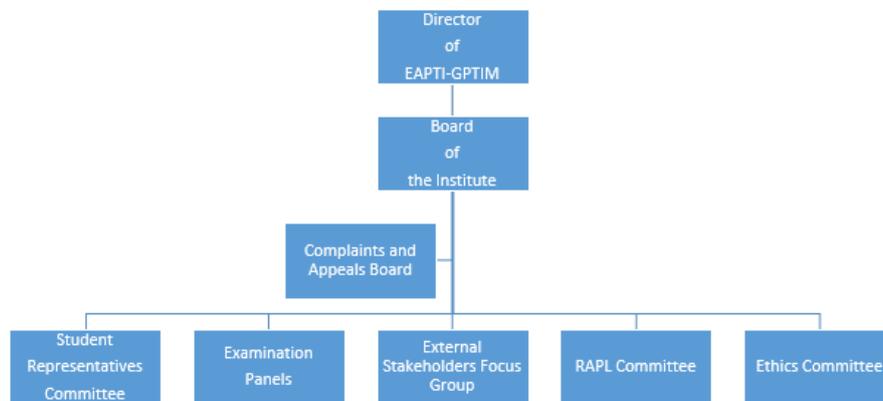


Fig 2: Composition, structure and functions of the EAPTI-GPTIM boards and committees

The list of Board, Committees and Groups is provided below together with reference to the corresponding section of the report:

- Board of the Institute (Also refer below)
- Complaints and Appeals Board (Also refer to Standard 5)
- Student Representatives Committee and RAPT Committee (Also refer to Standard 5)
- Examinations Board (Also refer to Standard 4)
- External Stakeholders Focus Group (Also refer to Standard 3 and 10)
- RAPT Committee (Also refer to Standard 5)
- Ethics Committee (Also refer to Standard 1, below)

### NCFHE Provider Licence of EAPTI-GPTIM and list of Accredited Programmes

The Panel was provided with a set of three NCFHE documents that describe the provider's rights and obligations and also a list of NCFHE-accredited programmes.

As described earlier on in the report under the section 'Terms of Reference', the EAPTI-GPTIM operates as part of a European network of external satellite centres.

Whereas the relationship between EAPTI-GPTIM and the satellite institutes forming part of the EGN is extensively described in the preamble of the EAPTI-GPTIM Quality Manual and also the EGN Statute, there is no reference in the NCFHE Licensing documents of the EGN network and its set-up.

The following section provides a comment of the various provider and programme licencing documents:

#### a) NCFHE List of Programmes (dated 25/4/18)

The 'NCFHE List of Programme' dated 25/4/18 specifies that the EAPTI-GPTIM is licensed as a higher education institution (Licence number 2014-FHI-020) for programmes classified up to MQF level 8. The HoI is registered as the legal representative of the EAPTI-GPTIM.

The list below provides the title of the accredited qualification (as listed in the NCFHE List of Programmes document) and the location where the programmes are delivered (as informed by the HoI, but not specified in the Licence):

- Diploma in Gestalt Psychotherapy (offered in Serbia, Macedonia, Bosnia and Hercegovina, and Croatia)
- Post Graduate Certificate in Gestalt Psychotherapy MQF 7 / ECTS 43 (offered in Malta)
- Post Graduate Certificate in Gestalt Psychotherapy in organisations MQF 7 / ECTS 30 (Offered in Malta)
- Post Graduate Diploma in Child and Adolescent Psychotherapy MQF 7 / ECTS 65 (Offered in Malta)
- Master in Gestalt Psychotherapy MQF 7 / 128 ECTS (offered in Malta).
- Professional Doctorate in Gestalt Psychotherapy, D.Psych. (GT) MQF 8 / ECTS 181 (Offered in Malta).

It transpires, from the discussions by the Panel with the HoI, that the upgrade programme from Diploma to Master in Gestalt Psychotherapy (MQF 7 / ECTS 44) is not included in the 'NCFHE List of Programmes' dated 25/4/2018. This programme is only offered in Malta (by EAPTI-GPTIM). The HoI explained that the required information had been forwarded to NCFHE who had in turn formally approved (by email) the programme.

The CEO of the NCFHE, Ms Edel Cassar, had replied through an email dated 19<sup>th</sup> August 2015 confirming agreement in principle for the delivery of the top-up modules to holders of the Diploma, exactly as accredited within the scope of the Masters Programme. The Institute was also bound to contribute to the development process of national RPL parameters. However, the Licensing agreement was subsequently not updated accordingly.

## **b) NCFHE General Conditions' document (document not dated)**

The Panel identified a number of obligatory requirements in the 'NCFHE General Conditions' document (document not dated) that the provider must inform the NCFHE of in case of changes to any of the following:

### Condition 1

- a) The programme it offers;
- b) Its main premises and any training sites;
- c) The licensee's legal representatives;
- d) The Head of Institution;
- e) The general selection criteria of the staff;
- f) The body corporate;
- g) Or any other changes which deviate from the original submission to the commission.

The 'NCFHE General Conditions' (document not dated) also require that:

- Condition 12 (part of): The quality of provision of the educational programmes and the organisation's internal quality assurance shall be the primary responsibility of the provider.
- Condition 13 (part of): The provider shall undergo periodic provider and programme quality audits conducted for the purpose of confirming or revoking the licence awarded by NCFHE.
- Condition 16: The provider shall clearly state its licence number and licence category in all media presence, marketing and advertising campaigns, published documentation and/or promotional material aimed at prospective students, parents and/or the public.
- Condition 20 (part of): The provider shall commit itself to maintain and retain an archive of student records in Malta ... At a minimum, for all providers, these archives must include admission records, students' details, proof of assessment, the record of each student's academic performance and in the case of taught programmes, records of students' attendance.
- Condition 23 (part of): The provider is legally obliged ... to operate from premises that are fully accessible to disabled users and wholly compliant with the latest health and safety regulations.

### **c) NCFHE Special Conditions' (9/10/17)**

The Panel also notes from the 'NCFHE Special Conditions' (9/10/17) that:

- Special Condition 1 (part of): All related educational/training activities will be held at a number of premises, namely the Cavalieri Art Hotel, Corinthia Hotel and the two private premises in Kappara and Fgura respectively.
- Special Condition 2 (part of): The legal representative is responsible for ensuring that all obligations attached to this licence are observed at all times.

The Panel also observed that the Licensing Agreements do not make any reference to the set-up and the relationship between the GPTIM and the EGN network.

The Panel informed the HoI that it is a requirement that the (provider) licences reflect the operational, academic and logistical set-up of the provider. However, the Panel notes that there are a number of requirements where this is not the case. This is mainly due to the fact that the license issued to EAPTI-GPTIM does not take cognisance of the network set-up that includes external satellite centres where the NCFHE accredited programmes are being delivered (refer to IQA 11 for further details).

The HoI informed the Panel that the Commission was formally notified from time to time of the developments.

The EAPTI-GPTIM QA Consultant made a point to the Panel members and the NCFHE representatives that future changes to the NCFHE National Quality Assurance Framework, Manual of Procedures and the Internal Quality Assurance standards need to be updated to reflect and include also the specific set-up of providers, such as that of EAPTI-GPTIM and the EGN.

The Panel recommended to the provider to make a formal submission to the Commission identifying the licensing anomalies and requesting a way forward.

## Strategy and Quality Objectives

The HoI informed the Panel that the Institute's strategy was to set-up the EGN network and develop the programmes currently accredited. This strategy has now been fulfilled. The HoI also stated that there are no plans to launch new programmes other than CPD courses and events.

The Institute does not intend to grow in student numbers in the next intakes.

The HoI also presented a number of quality objectives covering the next three-year period, in the areas of enhancement of the RAPL process, enhancement of the terms of reference of the Ethics Committee for the Doctorate Programme, review and update application form for accredited programmes, gather student feedback more systematically including formal analysis of data.

## Mission Statement

The Mission Statement available on the Institute's website (at the time of the EQA Audit) states as follows 'EAPTI-GPTIM provides an opportunity to engage in a powerful experiential life journey of self-development and growth. We support creative adjustment to get through life's challenges from moment to moment, strengthening one's resilience, towards meaningful relating and healthy well-being. We are part of the growing gestalt psychotherapy community and commit to collaborate with other professionals in the field, to together, creatively respond to the psycho-social needs of society and to the needs of vulnerable persons'.

## Institute Administration

The Institute is owned and run on a full-time basis by the Head of Institute. The Panel was informed that the HoI is supported by senior tutors (on a voluntary basis) in the running of the academic, research and operational aspects of the Institute and by a part-time QA Consultant on QA matters.

Reporting to the HoI, the QA Consultant fulfils the role of advisor to the HoI on the Institute's Quality Management System. The Consultant is primarily responsible for ensuring that the Quality Management System is fit for purpose through its monitoring, updating and reporting. The Panel affirms that the part-time QA Consultant is highly professional, experienced and proficient in the interpretation and implementation of the NCFHE IQA Standards. Throughout the audit proceedings, the Panel observed that both the HoI and the QA Consultant remained involved in discussion with the members of the Panel. The Panel considers that both representatives were both very knowledgeable and in control of the quality and academic aspect of the institution. The HoI also demonstrated a very comprehensive and consistently professional approach with respect to the academic and operational aspect of the Institute. The Panel, therefore, affirms that the HoI is knowledgeable and up to date on all the processes covered by all the (11) IQA standards. It was also evident to the Panel that whereas the Consultant contributed and supported the discussions with the Panel, the HoI was consistently the effective decision-maker. The remit of the Head of the Institute also includes the liaison with the NCFHE.

## Internal Quality Assurance Policy

The Panel notes that EAPTI-GPTIM is a founding member of the European Gestalt Network (EGN) and is thus party to the IQA policies and procedures of the EGN with respect to NCFHE-accredited courses. The HoI explained to the Panel that the EGN IQA procedures are also in line with the quality requirements of the EAGT and the EAP.

The QA Consultant explained to the Panel that the Institute is therefore bound by European and

International standards that ensure the quality assurance in the practice of the profession whereas the NCFHE IQA standards provide the Institute with the necessary focus on the standards that need to be achieved for education and training. However, as explained by the Consultant, there is considerable overlap between the two domains of standards.

The HoI explained that after the NCFHE accreditation of EAPTI-GPTIM during 2014, the institution began a process of formally documenting its internal quality assurance policy. The HoI also stated that over the years, this policy was revisited with the involvement of NCFHE with respect to the relationship of EAPTI-GPTIM with its partner institutions in the provision of its courses.

Based on the preceding, the Panel considers that the EAPTI-GPTIM policy for quality assurance that forms part of their strategic management is comprised of the following key documents:

- EGN Statute
- EGN Quality Charter
- Internal Quality Assurance Manual (2019)

The same set of documents apply for the other EGN numbers with the difference that the satellite Institutes have their own (local) IQA Manuals.

#### EAPTI-GPTIM Quality Management System (QMS)

Throughout the discussions with the HoI and QA Consultant, the Panel observed that the EAPTI-GPTIM is committed to ensuring a standardized approach to quality management through internal quality assurance practices that are well documented in the 'Internal Quality Assurance Manual' of the EAPTI-GPTIM (issued March 2019) as well as the supporting policies, procedures and forms.

The Panel observed that the IQA Manual provides general guidance and procedures for quality assurance within EAPTI-GPTIM that are informed by and consistent with the EGN Quality Charter.

The list of sections of the IQA Manual is identical in structure to the eleven NCFHE IQA standards. Each section describes how the institute has interpreted and implemented the requirements of the Standard.

The Quality Manual includes an organigram (management and staff structure), the policy statement, mission and vision of the Institute.

The EAPTI-GPTIM Quality Manual incorporates the following supporting policies and procedures:

- Code of Ethics and Professional Practice
- Research Ethics Standards and Guidelines
- Declaration of Interest for Examination Panel Members
- Template of Cooperation Agreements
- Policy for recognition and accreditation of prior learning
- Examination Panels
- Mitigation Policy
- Policy for Suspension of Studies
- Policy for Extension of Studies
- Policy for Recording and Archiving Data
- Procedures for Academic Misconduct
- Dissertations Guidelines for Students and Tutors/Mentors
- Complaints and Appeals Procedure

The IQA Standard 1 specifies that 'Educational institutions shall have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders shall develop and implement this policy through appropriate structures and

processes while involving external stakeholders’.

The Panel notes that the EAPTI-GPTIM has an extensive set of policies and procedures for quality, most of which are already available to the public under different dropdowns and links via the Institute website (refer to list of documents above and also further details in IQA 9).

However, the Panel recommends that the Institute needs to consolidate the already existing documentation set (as listed above and also under IQA 9) into one high-level, overarching document (Quality Policy) such that the QA Policy is more coherent and accessible to the general public, including prospective applicants. The QA Policy is to be published on the Institute’s website.

Note: The QA Manual was not uploaded on the website at the time of the EQA audit.

## Board of the Institute

The Panel notes from the EAPTI-GPTIM Quality Manual (Section 12.2.) that the Board of the Institute is composed of at least three (3) members including the HoI as ex officio Chairperson and at least two (2) members that are senior tutors. The Chairperson of the Board shall have the power to co-opt for a set period of time non-voting qualified and experienced persons to assist the Board on specific technical, academic or administrative issues.

The main function of the Board of the Institute shall be able to:

- Take all necessary decisions concerning the Boards and Committees set in force within the Gestalt Psychotherapy Training Institute, their composition, appointment, duties, functions, recommendations, outputs and outcomes and any other related matters thereof;
- Liaise with the EGN and its structures;
- Appoint academic staff;
- Assure that the Institution formulates and adheres to policies and standards related to quality assurance
- Consider any new programme of studies or amendments to programmes already accredited by the NCFHE, and liaise with the latter accordingly (also refer to Standard 3 and 10);
- Establish and set in force the Code of Ethics and Professional Practice and ensure that it is updated in line with amendments thereof in the national and international spheres, in particular the EAGT, EAP and MAP Ethical Code;
- Discuss and review students’ reviews, suggestions and feedback collected by the Institute Director, the programme coordinators or teachers at the end of every academic semester and consider ways of improving the provision of the Institute accordingly.

## Implementation of EGN and EAPTI-GPTIM QA Framework

The HoI explained that the Institute is implementing its QA framework on an ongoing basis. The Panel confirms that the preceding statement is truly indicative of the attitude and approach by the HoI, QA Consultant and key staff of the Institute. The Panel also recognizes the considerable effort put into the drafting of the EAPTI-GPTIM Quality Manual. The Manual, and its supporting appendices, is structured, comprehensive, clear and adequately cross-referenced, albeit still in its first revision (dated March 2019). The Panel considers that the Institute has the capability and resources to further enhance the Quality Manual. The Panel observes that key policies, procedures and Forms that the Panel had access to throughout the conduct of the review or during the desk study of the Institute website are not yet included in the narrative of the Quality Manual. Examples of these (available on the website) include:

- Dissertation layout guidelines;
- Organigram showing the link between Doctoral Study Council, Dissertation Approval committee;
- Committee for Dissertation Evaluation, Dissertation Defence Committee;
- Protocol and the Minutes of the Dissertation Defence.

The Panel, therefore, recommends that the Institute includes in its next revision of the Quality Manual the above (and other procedures and forms) that are not currently within the scope of the Quality Manual but are however an integral part of the quality management system and hence have an impact on the assurance of the quality of its ongoing programmes.

#### Quality Manual – Satellite Centres

The Panel had access to the Quality Manual of the satellite centres within the EQN. The QA Consultant explained to the Panel that the main section and appendices of the satellite manuals are identical to the EAPTI-GPTIM (Manual) except for the requirement of the (a) RAPL Committee and (b) Examination Panel.

According to the QA Consultant, this underlines the fact that the courses themselves belong to EAPTI-GPTIM and are being delivered by the EGN member institutes with QA oversight of EAPTI-GPTIM through the EGN structures, as indicated in the EQN QA Charter. The Panel was also informed that the satellite centres are encouraged and allowed to customize and enhance (add-on) to their own manual.

The QA Consultant explained that the responsibility of the Examination Panel and RAPL Committee is under the remit and provision of the EAPTI-GPTIM. The Panel noted that although the respective sections in the main text of the (satellite) Quality Manual are removed, the organogram could be misleading as it still indicates the presence of both the Committee and the Panel. Additionally, it is not explained in the (satellite) quality manual(s) that the remit and provision of the committee and Panel are under the remit of EAPTI-GPTIM.

#### Management Review

The HoI explained to the Panel that the management review function of the Institute is conducted via the 'Board of the Institute'. The Board is composed of the HoI (ex-Ufficio Chairperson) and a minimum of two (2) senior tutors. The Chairperson of the Board has the authority to co-opt for a set period of time non-qualified and experienced persons to assist the Board on specific technical, academic or administrative issues.

The HoI described the primary function of the Board to be as follows:

- Appoint all Boards and Committees within EAPTI-GPTIM;
- Liaise with the EGN and its structures;
- Appoint academic staff;
- Assure that the Institution formulates and adheres to policies and standards;
- Consider any new programme of studies or amendments to programmes already accredited by the NCFHE, and liaise with the latter accordingly;
- Establish and set in force the Code of Ethics and Professional Practice, and ensure that it is adhered to.
- Establish and set in force the Code of Research Ethics of the Institute, and ensure that it is adhered to. Update the Code in line with any relative amendments thereof in the national and international spheres, and their application in practice.
- Discuss and review students' reviews, suggestions and feedback collected by the Institute Director, the programme coordinators or teachers at the end of every academic semester and consider ways of improving the provision of the Institute accordingly.

The Panel had access to minutes of a number of meetings of the EAPTI-GPTIM Institute Board meetings. These minutes are deemed to be fit for purpose.

### Psychotherapy Act

The HoI explained that Psychotherapy began to be regulated under the Health Care Professions Act during 2005. This meant that Gestalt Psychotherapists could now register with the Council of Professions Complimentary to Medicine (CPCM) within the Ministry of Health (Refer also to Standard 9).

The HoI explained to the Panel that the recent enactment of the 'Psychotherapy Act' ensures regulation of the psychotherapy profession in Malta. The HoI also stated that the EAPTI-GPTIM has over the past years, continuously participated in significant discussions pertaining to addressing training, professional and CPD standards established within the law. EAPTI-GPTIM adheres to all that has now been formally outlined in the Act. The Panel was informed that the EAPTI-GPTIM was consulted by the local authorities in the drafting of the legislation of the Psychotherapy Profession Act. It now also has a member on the official Board for the regulation of the Psychotherapy Profession in Malta.

### Academic Integrity, Ethics and Research Activity

The HoI described how in the early years, Gestalt therapy was not focused on research but more on experiential methods. However, during the last decade, the need for research and publications has become more prominent. In fact, much more literature is available, and the lecturers are expected to keep up to date in their respective modalities. The Panel was informed that both the lecturers representing the Institute were, in fact, themselves actively involved in ongoing applied research.

The HoI explained that it was a requirement of EAP that institutes are engaged in research. Programmes include a module on research methodology whereby students are required to produce final work based on qualitative and quantitative research. The HoI explained that Gestalt is an inclusive, evidence-based experience. The research by the students feeds back into the programme as the academic papers are added to the programme. The HoI explained that the academic staff and students of the various Institutes make up a research network that is self-enriching. The Institute has also published journals to facilitate the sharing of case study research. Some of the research findings are presented during the biennial EGN congress.

The HoI explained to the Panel that EAPTI-GPTIM is committed to keeping academic integrity, freedom and honesty as its highest academic values. The Institute has in fact set-up an Ethics Committee to ensure effective observance of its Code and the related procedures. The Panel notes that the Ethics Committee is required to:

- Implement the Code of Ethics and Professional Practice and related procedures;
- Make the necessary recommendations and decisions as indicated therein;
- Refer cases to the Complaints and Appeals Board as indicated therein and in the Complaints and Appeals Procedure.

During its discussions with various internal and external stakeholders both in Malta and the satellite centres, the Panel could witness several instances that demonstrate that the environment within the local and satellite institutes is conducive to academic freedom and integrity, including the freedom to research, teach and learn, and provides opportunities for the student to express and defend individual beliefs.

In particular, the Panel observed:

- The availability of the EAPTI-GPTIM Code of Ethics, EAGT Code of Ethics and EAPT Ethical Principles (available online, also refer to Standard 9)

- Code of Ethics of Trainers and Trainees
- EAPTI-GPTIM Grievance Procedure
- Highly qualified, mature and experienced tutoring and support staff who have a passion and pride for their profession;
- The intensity of the research activity undertaken;
- The organisation of a professional Congress every two years, in different countries, where research and development of theory and practice in the field of Gestalt therapy and related fields are presented;
- Maturity, experience and (senior) positions held by the interviewees;
- Liaison with the placement holders and the placement formality (agreements, declarations, reports etc.);
- Broad-spectrum of employment positions, experience and qualifications held by the personnel interviewed by the Panel and also the EGN faculty team <https://www.eapti-gptim.com/faculty>, a number of the staff being in senior positions in tertiary education. There are several examples that can be cited. However, it is to be particularly noted that one of the persons interviewed by the Panel is extensively involved in supporting the Institute is the current President of the EAP and President of the MAP. The EGN also has a number of contributors <https://www.eapti-gptim.com/contributors> that enrich the holistic set-up of the EGN;
- All tutors on the Doctorate programme have a PhD, affiliated with universities;
- Publication of the Gestalt Today, Malta Journal (international interdisciplinary Journal in the Field of Psychotherapy);
- The academic collaboration between EAPTI-GPTIM and its partner Gestalt Institutes around Europe has grown over the years to become a major provider and guarantor of high-quality professional traineeship and supervised practice of Gestalt Psychotherapy;
- The broad experience <https://www.eapti-gptim.com/faculty>.

The Tutors and Students confirmed to the Panel that the online application Grammarly is used by the students and assessors to ensure originality and correct in-text citations, reference and bibliography of the work submitted by the students on the various programmes.

### IQA Self-Assessment Report (SAR)

This Self-Assessment Report (SAR) document was submitted by EAPTI-GPTIM to the National Commission for Further and Higher Education (NCFHE) as part of the pre-audit documentation in October 2019. The HoI explained to the Panel that data and recommendations for improvement were collected from the following sources when compiling the SAR:

- EAPTI-GPTIM Board
- EGN Partner Institutions
- Teachers in the Partner Institutions
- Students in the Partner Institutions
- Minutes of EAPTI-GPTIM Committees and the EGN Board
- Files, records, statistics, feedback forms of all the Institutions
- EAPTI-GPTIM Health and Safety Review
- Feedback through online website related to online information and resources
- External stakeholders and policymakers
- Ex-students who remain in touch with the Institutions through Supervision Groups

The Panel concludes that the SAR is fully compliant with the requirements as delineated in Annex

1 of the NCFHE Manual of Procedures, namely the need to (a) provide an overview of the institution, (b) identify strengths and weaknesses, (c) propose developments and improvements, (d) highlight examples of good practices.

For each of the IQA standards, the SAR includes the following sections:

- Currently in place
- Assessment of effectiveness
- Proposed development

## Succession Planning

The HoI explained to the Panel that the outcome of the EQA would help the Institute to identify any missing gaps that need to be addressed as part of the roll-out of its succession planning process. The HoI stated that the succession planning process takes cognizance of the fact that the continuity of the (local) Institute is ascertained by virtue of the fact that the more experienced tutors are already involved in the day-to-day running of the programmes and supporting operational aspects of the Institute. The HoI stated that this situation is most prevalent with the Doctorate graduates who tend to remain involved and support the Institute both operational and academically (post-graduation).

The Panel took favourable cognizance of the foregoing but also noted that Board of the Institutes (Quality Manual, section 1.2.1) also has within its remit the right to set up committees for specific sectors. The Panel hence recommends that the Board of Institute considers appointing a subcommittee to manage the operational side of running the current programmes, in case the HoI is not in a position to continue leading the Institute, or in any other way it deems appropriate to ensure continuity of provision.

It was very evident to the Panel during the scoping meeting and the main audit that the staff of the EAPTI-GPTIM and EGN members are highly professional, committed and passionate about their work at the Institute(s). This characteristic spirit is manifested in the attitudes and aspirations of the Management and Faculty. The Panel also observes that there is an ethos that is carried forward by the same students (and then alumni), some of which become faculty members (under various roles). The Panel commends this 'transfer' of culture as it augurs well for the ongoing enrichment and sustainability of the Institute(s), and hence the student experience of new and ongoing cohorts.

## Brief overview of EGN Satellite Centres

### **EAPTI-Studio za edukaciju Beograd, Serbia (EAPTI-SEB)**

EAPTI-SEB was founded in 2004 as a company for education and services which organizes the training in Gestalt psychotherapy. Today the school has five professionals involved in teaching and supervising in Diploma in Gestalt psychotherapy program (accredited by NCFHE). A number of Serbian students are registered with the Maltese centre on the professional Doctorate Programme. Psiho-Integrum cooperates with similar centres in Malta, Macedonia, Croatia, Serbia and Montenegro. Psiho-Integrum is accredited by the European Association for Psychotherapy (EAP) and the European Association for Gestalt Psychotherapy (EAGT). It is an accredited member of the European Gestalt Network (EGN).

The Panel conducted (video conferencing) interviews with the Centre Manager as well as a panel of academic staff and a panel of students. The Panel was informed that local legislation to recognize psychotherapy as an autonomous profession is not enacted. There is however a

national association for psychologists and a national association for psychotherapists.

Students from Serbia travel to other Balkan countries within the network to complete specific units not delivered in the Serbian centre. The graduation ceremony is held in Serbia. The language of teaching in the Serbian institute is Serbian, but some lectures are conducted in English. The Serbian academic tutors and supervisors are generally qualified clinical psychologists, Gestalt therapists etc. They all have Gestalt Masters Degree, and some of the tutors are reading for Professional Doctorate Degree in Psychotherapy.

Students are placed in organizations that support different categories of clients in the NGO and public sector hospitals as well as social work centres (e.g. couples therapy, school student therapy, etc.). An agreement is signed that establishes the mandate and boundaries.

### **EAPTI-Psihika Croatia (2017)**

EAPTI PSIHKA was founded in October 2007. Since then, Psihika has been organizing and performing training in EAPTI-GPTIM Diploma in Gestalt psychotherapy. The Panel was informed that EAPTI PSIHKA also cooperates with similar EGN centres in Serbia, Bosnia and Hercegovina, Macedonia and Montenegro. Psihika is a European Accredited Training Institute (EAPTI). EAPTI PSIHKA is a member association of European Association for Psychotherapy (EAP), the European Association for Gestalt Psychotherapy (EAGT), and the European Gestalt Network (EGN).

The Centre delivers the Diploma in Gestalt Psychotherapy (accredited by NCFHE).

The Panel had a meeting with the Institute Director who is responsible for the day-to-day administration of the Centre, organises teaching schedules, supervision sessions, meetings with tutors, student groups, handles communications, replies to questions cooperates with regulator bodies regarding the requirements of the Psychotherapy Act. The Director was a student of EAPTI-GPTIM (2008 intake).

The HoI explained that the experienced, visiting lecturers are usually assigned the delivery of the theoretical component.

### **Psihointegrum, Gestalt Psychotherapy Training Institute Bosnia & Herzegovina**

The Centre delivers the Diploma in Gestalt Psychotherapy (accredited by NCFHE). The Centre has been working with EAPTI-GPTIM and Belgrade for a number of years. The Director manages the Centre in an administrative role, is part of the teaching staff and works as a therapist. The teaching staff also provides support in the admission process through interviews and one-to-one meetings.

### **EAPTI CEP "Gestalt Institute" Ltd Skopje, Macedonia (EAPTI CEP)**

EAPTI CEP was established during 2006 when the first gestalt group was started and led by the EAPTI-GPTIM HoI. Through cooperation with the NGO sector, EAPTI CEP "Gestalt Institute" Ltd Skopje developed further, and in 2008, after first-generation therapists gained their Diploma, it gained accreditation from EAP and EAGT and was recognized as the EAPTI. Today, EAPTI CEP "Gestalt Institute" Ltd Skopje is in the process of continuous development, and it is actively involved in the almost all areas of the society from the health care sector, through social welfare sector to business and education.

The Centre delivers the Diploma in Gestalt Psychotherapy (accredited by NCFHE).

The Institute is a member of the psychotherapeutic association in Macedonia. It also has a licence from the local authorities to provide training services. The Centre is required to provide relevant information to the local authority, but an on-site assessment by the authorities is not required. The Panel was informed that local legislation to recognize psychotherapy as an autonomous profession is not enacted; however, a national association is a set-up.

The Panel had a discussion with the Director of the Centre, who graduated from GPTIM, is the founder of the Centre and holds the position of Faculty Dean at Skopje University. The Centre is registered as a company for educational and psychological services since 2006. The Director's role at the Centre includes administrative and technical support, programme coordination, liaison with the EGN, teaching and supervision. A total of five intakes have been registered at the Centre, with four intakes running and as well as a revision group.

The Director explained to the Panel that the student's motivation for joining the programme is mainly the Institute's EAPTI accreditation. However, the Panel found the students interviewed to be well informed about the link to Malta.

The students remarked that the biennial congresses are attended by academic staff, tutors and alumni and hence provide a very good learning opportunity, in particular through the workshops. The students explained to the Panel that the assignments include an abstract in English whilst the rest of the assignment is in Macedonian. Most Macedonians can understand but not speak English.

### Good Practice Identified

- The Panel observes that there is an ethos that is carried forward by the same students (and then alumni), some of which become faculty members (under various roles). The Panel commends this 'transfer' of culture as it augurs well for the ongoing enrichment and sustainability of the Institute(s), and hence the student experience of new and ongoing cohorts.
- The EAPTI-GPTIM has continuously participated in significant discussions addressing training, professional and CPD standards established within the law. It also has a member on the official Board for the regulation of the Psychotherapy Profession in Malta.

### Overall judgment for Standard

The EAPTI-GPTIM Academy surpasses the requirements of Standard 1.

### Recommendations for improvement

**Note: Recommendations refer solely to the academic and operational aspect of the EGN set-up. EAPTI-GPTIM is, therefore, free to adopt these recommendations in lieu of the fact that the scope of the EQA audit is restricted to the EAPTI-GPTIM licence and not the EGN context (Refer also to IQA 11).**

- R: The EAPTI-GPTIM is to ensure that a documented record is available to show that the Centres have contractually agreed to the conditions of the Statute.
- R: The Panel recommends the EGN to re-consider the 4-week period of notice of termination of EGN membership that is deemed to be too short for ensuring a coordinated termination of the programme delivery, and service provision of EAPTI-GPTIM locally accredited courses.

- R: The Panel recommends that the Statute is revised to include the responsibilities of EAPTI-GPTIM with respect to ensuring elements of, for example, business continuity, provision for access to student data etc. in the case of an EGN member withdrawing membership.
- R: The EAPTI-GPTIM is to forward to NCFHE records of the meeting of the respective EGN Boards and Committees as soon as these are formally set-up.
- R: The EAPTI-GPTIM is to initiate a process to rectify the licensing terms and conditions as regards to the programme offered at the satellite institutes, list premises and any training sites, periodic quality audits conducted for the purpose of confirming or revoking the licence awarded by NCFHE, records in Malta of students registered at satellite institutes in EAPTI-GPTIM accredited programmes.
- R: The Panel recommends that the Institute includes in its next revision of the Quality Manual the procedures and forms that are not currently within the scope of the Quality Manual but are however an integral part of the quality management system and hence the assurance of the quality of its ongoing programmes.
- R (Optional): The Panel recommends that the governance committee and panel organigram in the Quality Manuals of the satellite members needs to explain that the RAPL Committee and Examination Panel are under the remit and provision of EAPTI-GPTIM.
- R: The Panel recommends that the Institute consolidates the already existing documentation set into one high-level, overarching Quality Assurance Policy. The QA Policy document is to be published on the Institute's website.
- R: The Panel recommends that the Institute considers making available the documents comprising the quality management system online via one drop-down menu. This will facilitate access to prospective and current students.
- R: The Panel recommends that the Board of Institute considers appointing a subcommittee to manage the operational side of running the current programmes, in case the HoI is not in a position to continue leading the Institute, or in any other way it deems appropriate to ensure continuity of provision.

### 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

The Gestalt Psychotherapy Training Institute Malta (GPTIM) is the trade name of the company Gestalt Psychotherapy Training (Malta) Limited (licenced with the NCFHE as EAPTI-GPTIM – licence no. 2014-FHI-020) having company registration number C-24549, which forms part of a wider network of training institutes mostly based in the Balkans. It is also a member of the European Association for Psychotherapy (EAP) and the European Association for Gestalt Psychotherapy (EAGT).

The company is properly structured with a sole director, Dr Lidija Pecotic, who is also the shareholder of the same company. Ms. Pecotic is the sole employee of the company and handles the

education and administrative affairs of the company. The company is adhering to fiscal, FSS/NIC, employment and other regulatory obligations with the Malta Business Registry amongst others, in a proper and timely manner. The company is properly capitalized and has a sound equity and reserves base, which when taken together with cash and other assets, implies that the business has adequate cash reserves to deal reasonably with unpredicted circumstances and to continue in operation and implement its plans.

Furthermore, the training provider is clearly ensuring that the members of its body corporate, legal representative/s and staff occupying headings positions are fit for purpose, and this by carefully selecting personnel for the respective crucial regulatory and academic roles. It was noted that the company has clearly outlined the duties and responsibilities of the main roles within its structure, however, it does not have in place any written procedure relating to the engagement and selection for the headship positions as at present the company is owner-managed. It was also noted that the company, via its network, forms part of a Coordinating Board that applies to all entities within the network which covers various areas such as quality assurance, continuing professional development, publications and archiving, scholarship fund and a research centre. This is a very positive sign and is evidence of a sound structure and network.

From a financial perspective the company is still a small operation and is therefore inherently reliant on the continued support of its ultimate beneficial owner, that is its sole shareholder. However, the company regularly prepares financial budgets and thus sets targets against which to monitor actual performance. These budgets show a steady performance in terms of pre-tax profitability. Its size renders it flexible and able to withstand any short-term pressures or negative trends.

#### **Good Practice Identified**

N/A

#### **Overall judgement for Standard**

Meets Standard

#### **Recommendations for improvement**

N/A

### **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**

Course design philosophy

The HoI explained to the Panel that the Institute applies very rigorous principles and standards in

its design and development of programmes, in particular:

- Programme units are created in a way that includes a number of different delivery methods that can support active learning and student's motivation, based on curiosity and personal interests. Lectures, and other passive methods, have to be combined with methods that put students into active roles, like discussions, prepared debates, different kinds of critical analysis, homework in small groups, individual and team exercises, role-plays, research projects etc.
- The learning outcomes of the individual units guide the teaching-learning process. Since the Institute's programmes focus on psychotherapy, an approach that includes experiential learning during contact hours is crucial and has always been the core teaching method of the course.
- Delivery methods are described in every module, but tutors can implement other methods (not explicitly stated in the programme specification) if they support student-centred learning;
- Assessment methods need to cover writing, oral presenting and question answering in order to support students with different learning styles to express their acquired knowledge and skills in the best possible way.

### Design and development process

The HoI explained that the process for the design and development of new programmes starts off with the Board of the Institute. The Board identifies the need for a new programme through its regular communication with its staff, the Student Representatives Committee, feedback from students, and/or communication with the External Stakeholders' Focus Group (also refer to Standard 10). The Board nominates an *ad hoc* team of lecturers, in collaboration with the EGN structures where applicable, to design identified courses. The Board may also nominate external experts to support the work of this team. In its work, the team is guided by NCFHE parameters for programme design and development.

The Panel was informed that, throughout its work, the team gathers intermittent feedback from the Student Representatives Committee and the External Stakeholders Focus Group. Once it is ready with its draft proposals, these are submitted to the Board, who may request re-drafting as necessary. If this is a programme run or planned to run within EGN, the Board submits it to the EGN Coordinating Board for the purview of the EGN structures. Following this feedback, the Board liaises with the NCFHE on the accreditation process as per the EGN Statute and Quality Charter.

### External Stakeholders Focus Group

The HoI also explained to the Panel that the main function of this Focus Group (not yet set-up) will be to provide feedback to the Institute on how to improve course design and provision, and what new provision needed to be developed, to fit the needs of the sector

### Comments by Panel

The Panel notes that, whereas the design and development procedure is appropriately documented, the Panel could not verify the compliance to the process since the last programme that was designed and developed by EAPTI-GPTIM (Postgraduate Diploma in Child and Adolescent Psychotherapy) was accredited by NCFHE prior to the above process being adopted by EAPTI-GPTIM. Hence, the Panel could not assess the adequacy of the process records kept.

The Panel, therefore, recommends that EAPTI-GPTIM retains documented evidence of the internal

reports and minutes of the meetings of the design and development process when these become available in the future when designing and developing new programmes.

The Panel requested from NCFHE copies of the approved versions of the EAPTI-GPTIM accredited programmes. Having gone through all the programme specifications, the Panel strongly commends the rigour, extensive detail and consistency of the individual programme specifications submitted by EAPTI-GPTIM, as approved by NCFHE.

The quality of the programme specifications documents (end product) seen by the Panel constitutes substantial evidence of the good practices being applied at EAPTI-GPTIM in the design and development of accredited programmes.

### Good practice identified

- The Panel strongly commends the rigour, extensive detail and consistency of the individual programme specifications submitted by EAPTI-GPTIM, as approved by NCFHE.
- The EGN is resourced with an international faculty that brings with it to the design and development process a vast and learned spectrum of knowledge and experience.

### Overall judgment for Standard

- The EAPTI-GPTIM Academy surpasses the requirements of Standard 3.

### Recommendations for improvement

- R : EAPTI-GPTIM to retain documented evidence of the internal reports and minutes of the meetings of the design and development process when these become available in the future when designing and developing new programmes.

## 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

#### Teaching, Learning and Assessment Philosophy

The HoI explained to the members of the Panel that the Gestalt Psychotherapy is a specific humanistic modality of psychotherapy. The humanistic approach emphasizes the personal worth of the individual, the centrality of human values, and the creative, active nature of human beings. The HoI attested that it is from this stance that the Institute is interpreting the requirements of Standard 4 particularly, that a student-centred approach is engrained in the pedagogy and is the core of the experiential teaching approach.

The HoI also explained to the Panel that the rationale is that by providing experiential learning, the student has the first-hand experience of the process of therapy and of personal growth. In parallel,

the student, through supervised practice and professional development, learns to apply the knowledge, understanding and skills of becoming a Gestalt psychotherapist. Finally, through this combined process of practical experience and theory, the student is supported towards becoming equipped, rigorous and competent to assume the responsibility necessary to apply all that has been learnt to the context within which s/he will eventually work.

The teaching approach

The Panel had lengthy discussions with the various panels of students, alumni, tutors and Programme Coordinators in order to understand the teaching approach for the various taught units. The Panel held discussions with supervisors and placement mentors. One of the Tutors interviewed is a practising clinical psychologist who completed the Masters Programme with GPTIM and is reading for the Doctorate Programme (also with GPTIM).

Through these interviews, the Panel established that:

- Tutors inform students of the module content, expectations, teaching methods during the first session of the module;
- The students are engaged in the learning process;
- The students were satisfied with the extent, detail and clarity of the assessment tasks verbally provided by the tutors and were also well aware of the ongoing assessment process in place and how this determines the final pass/fail of the module;
- Feedback is given orally, and in some cases, documented. Tutor feedback is generally aimed at identifying strengths and areas for future development;

The Panel also established through the interviews and desk research that the teaching approach is primarily enquiry-based learning but also includes direct instructional and cooperative learning. Teaching is combined or followed by some form of active learning which will engage students to participate and involve themselves in the learning process.

In modules where there is no taught component, the Panel was informed that self-learning and hands-on hours are covered by mentoring or supervision in order to facilitate learning and resolve academic matters. The HoI explained that students are given the opportunity by their tutors to develop new knowledge that builds on their prior knowledge and scientific, theoretical and research ideas, take control of their learning and transfer their new knowledge to real-life contexts.

The Panel also established that the Tutors are encouraged to develop their personal teaching styles within boundaries set by pedagogical guidelines and procedures, provided by the Institute, and for the Tutors to practice reflectivity on their work and self-evaluation.

The Panel observed through the various discussions with the tutors, students and alumni from the various programmes the following pedagogical approach in the delivery of the curriculum:

- **The teaching of theoretical curriculum:** This is taught through lectures, presentations, discussions, analysis of different research proposals, homework in small groups, discussions of conducted homework, questions, dilemmas, alternative solutions etc.
- **The teaching of the theoretical curriculum (Doctorate Programme):** Students prepare a topic from a given viewpoint and participate in (a prepared) open debate about the topic. The student's debate will follow the lecture and the post-lecture discussion of the selected topic/s. The idea is to actively involve doctoral students into the debating context in order to encourage them to practise critical thinking, analysis, evaluation, comparison of different viewpoints etc.

- **Theoretical knowledge in qualitative and quantitative research methodology:** Teaching is delivered mainly through lectures, presentations and discussions with examples from conducted research and discussions in order to facilitate learning. After delivering the theoretical knowledge on one topic, the focus will then change from theory to practical knowledge and skills in qualitative and quantitative methodology. Students will be given some home-based work to be done individually or in small groups. Experiences, difficulties and questions that emerge through working on this homework will be discussed and clarified. Mentors will provide assistance (e.g. help with selecting literature, support with presenting the main findings, guidance about the structure of the article etc.)
- **The teaching of Supervision:** Teaching is delivered through self-study and hands-on hours. The module is not taught but learned experientially. The student will be part of a group of doctoral students who will engage in group supervision with a supervisor. Supervision sessions will be held regularly. Reflexivity and active participation will be encouraged in order to take the maximum benefit from the supervision groups and to improve both the theoretical and practical knowledge and skills in Gestalt psychotherapy and in research processes.
- **The teaching of practicum peer supervision (Doctoral Programme):** Teaching is delivered through self-study, hands-on hours, and mentorship. The aim of the practicum module is for a group of doctoral students to take responsibilities for organizing and maintaining a small, functional, peer supervision group. Students will have to meet and share knowledge about theory and practice of Gestalt psychotherapy and consult about their cases from personal practice and about their research processes. A mentor will attend the first two meetings to give introductory instructions and facilitate the initial period of forming the peer supervision group. After that, doctoral students will have to accept the responsibility for further organizing the peer supervision group and maintaining it. The mentor will remain available to answer all questions during the peer-group functioning.
- **The teaching of assessment and diagnostic techniques:** This is demonstrated to students during live demonstrations (therapy work) with volunteers in a group setting. A self-reflexive approach and group discussions will aid in processing each demonstration. Students will also have various opportunities to practice the process of assessment with colleagues through pairing up in the roles of client/therapist. In this way, they are given the opportunity to practise together with the steps of carrying out a diagnostic and assessment interview in order to acquire all the necessary information for effective interventions with clients. Such practice, including feedback from colleagues and teachers, will fine-tune therapeutic skills such as empathy, openness, flexibility, and the use of a dialogic non-intrusive approach.
- **Inter-disciplinary training:** The HoI explained that mental health is a multi-disciplinary approach that involves a number of stakeholders in the decision-making process. The tutors explained that the programme thus has an emphasis on professional ethics and interdisciplinary collaboration. One of the tutors emphasized that the curriculum makes a provision for the students to learn on collaboration, communication and relationship with other professionals. Hence, during their placements, the students are exposed to different scenarios that require the understanding of how to deal with the different needs of the clients. The students are prepared on how to recognize the different situations that demand that the psychotherapist reaches out to other professionals. This learning is facilitated even through the wide breadth of practical experience of the local and visiting tutors within the EGN who would have studied different psychotherapy approaches. A number of these tutors

have themselves published papers and books.

One of the tutors interviewed by the Panel suggested that a socio-political-economical module needs to be introduced to help the students identify local and international factors that can leave an influence on their clients.

## Mode of Assessment

It was very evident from the discussion of the Panel members with the Tutors that experiential learning is inherent and embedded in the teaching philosophy and aims at supporting the students to succeed.

The HoI explained to the Panel members that all exams in this programme are designed in a way that offers students different ways of demonstrating their knowledge. Wherever possible students will have the chance to express themselves both in a written and oral way, all assessment methods value creativity and reflectivity and assess both theoretical knowledge as well as its application in practical assignments. The general policy is that assessment should be organised in a way that offers support and encouragement for all learners and prevents the onset of anxiety.

The Panel observed from the discussions with the various stakeholders and also from the documentation made available to the Panel that a variety of assessment tools are used to ensure learning has taken place. In general, end-point assessment is used for taught units through submission of a written assignment.

The following describes a number of these assessment tools that the Panel identified from the various discussions with tutors, students and alumni from the various programmes and levels:

- **Personal therapy.** Students are expected to submit a written assignment highlighting meaningful and significant therapeutic interventions made by the therapist throughout the personal therapeutic journey, which influenced the student's insight, development and personal and professional growth. Aspects of the assignment will be presented through a 10-minute presentation, and two questions inspired by the assignment and presentation will be asked by the student audience present.

11. **Academic writing:** Written submission of the knowledge in methodology and rules of academic writing through the written submission of an in-depth case study.

12. **Live therapy session:** During the final examination, the student is required to conduct a 30-minute live Gestalt psychotherapy session with a volunteer 'client' in front of the rest of the cohort, therapists and tutors. The session is spontaneous. However, the student is given guidance by the tutor before the case study. The student, in the role of therapist, must demonstrate his/her ability and skills in applying Gestalt therapy theory and methodology, including initial diagnosis and effective intervention techniques. The 'clients' are volunteers from different intakes of the programme that bring real-life situations. The clients are not expected to change their personality during the sessions. The HoI emphasized that the clients are not given any instructions as this would 'contaminate' the examination session. The HoI explained that Gestalt therapy principles have to do with presence, contact, dialogue, spontaneity. The therapy cannot be prepared as diagnoseis depends on what is happening in the 'here and the now'. The examiners observe how the therapist behaves and how the client responds. The examiners can detect if the student being examined has communicated with the client. The HoI also explained to the Panel that an 'exam instruction

sheet' is not used as the students are prepared for the exam throughout the unit and programme

13. **Poster submission and presentation:** Submission of a poster (Doctorate Programme) on a chosen peer-reviewed article followed by a 10-minute oral presentation. Parameters that will be assessed are the ability to reduce the amount of information but not at the expense of clarity; representation and adequacy of the overall poster and oral presentation; references, tables, headings etc.
14. **Assessment of supervision:** The module is assessed through a written submission. The written submission will have to address the experiences and reflections of participating in a supervision group. (The student can fail if they do not attend a minimum number of hours in peer supervision group).
15. **Presentation of research report at the externally organised conference (Doctorate Programme):** Students who choose this assessment option will have to present proof that their abstract was accepted for a conference. The student will also have to enclose their presentation or short research report. Assessment will be based on the overall quality of their short research report or presentation (or both) and their abstract.
16. **Peer Supervision practicum:** This is assessed through the submission of a written report that addresses the experiences and reflections of participating in peer supervision. Each student will have to enclose proof of participating in at least 90% of peer supervisions. The proof is a paper stating the number of participating hours signed by all the colleagues/members of the group who participated in the peer supervision process.
17. **Quantitative teaching (Doctorate Programme):** This is assessed through the submission of a publishable article and submitting it to a peer-reviewed journal. Whether the article is published or not will not affect the assessment itself. Proof that the student worked on the article by him/herself will be provided by the mentor through a special form that has to be submitted together with a copy of the article and a proof of the article submission to a peer-reviewed journal.
18. **Dissertation (Doctorate Programme):** This is assessed through the doctoral thesis (minimum 50,000 words) and public defence of the thesis (thesis viva). The student will have 30-45 minutes to present his/her doctoral thesis research and key findings to the Thesis examination panel and other members of the public. The student will also have to answer questions asked by each member of the Thesis examination panel and by any members of the public.

#### Instructions to Students on work to be submitted

When asked by the Panel on whether the teaching process prepared them well for the learning and assessment, the students replied that they are guided during the session on the assessment criteria and receive ongoing feedback during the class therapy sessions. The students stated that the tutors prompt the students to participate. The students also explained that the Learning Outcomes and the list of reading material are available in the unit specifications.

The Panel was shown a document in the form of generic (used from year to year) assignment brief (not dated or revision controlled, also refer to Standard 8) that provides the students very detailed instructions on the inputs the student is expected to put into their work and the outputs that the

work will be assessed against. The document (4 pages) titled 'Clinical Competency - Guidelines for final case study' provides very generic (applies to various assignments) detailed instructions to the students on the expectations of the written submission, namely introduction, diagnosis, journey, conclusion, acknowledgements, index and referencing.

### Assessment criteria and Pass Mark

The NCFHE IQA Standard 4 requires that the provider ensures that 'the assessment criteria are made public to the students in advance'.

The Panel had access to the EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra>. The Code of Ethics specifies that the Institute 'shall publish the criteria and process of assessment for all its Courses, including its examination procedures'. It is also specified that EAPTI-GPTIM shall endeavour to keep the examination processes as clear as possible.

The Panel dedicated considerable time in its review to understand how this requirement is being implemented.

The Panel confirmed that the Programme Handbooks provide the student with the details of the assessment tool, the competences, and also the expected generic outcomes (criteria). The task is also described in the Programme Handbook. The students interviewed by the Panel confirmed that the tutors provide, during the course of the unit, explanations on the task, and expected outcomes.

The Panel observed that the task does not change from one cohort to another. This was confirmed by the HoI, who also explained that whereas the task is the same (from year to year), the experiential psychopathology that the cohort undergo provides a different context. The HoI also explained that sessions are delivered using the exploration of the subject area in an experiential manner. The students apply the theory in different contexts which bring out the salient learning points. Although the contexts may be different, the learning objective is common.

In order to further understand the robustness of the system, the Panel asked the Institute representative on the Panel to describe the 'failing points' when assessing a therapy session. The HoI explained that examples of 'fail' would be due to students not respecting therapist/client boundaries, late submission, unrelated submission or failure to attend an exam. The tutor explained to the Panel that their approach is to 'support the student and not to shame the student. Shame is about diminishing the person (you are not good, and the others are good)'. Hence, the tutors support the student in becoming the best version of themselves. The tutor also explained that they make sure that whoever is not ready or may jeopardise the system will not sit the examination. Hence the student will need more time to improve themselves to make it.

The Panel observes that both the respective Student Handbook and the Quality Manual (Appendix 5) provide the following key information for each of the modules of all the accredited programmes:

- Assessment components
- Mark distribution of each assessment component (weighting, in %)
- Minimum mark for 'Pass' for each of the assessment component (in %)
- Note that students need to achieve a minimum mark in each assessment component for the module.

The panel commends the detail and clarity of information communicated.

The Panel recommends that the assessment criteria for a student to pass the assignment need to be documented and made available to the student before they attempt the various assignment.

Similarly, for the live examination, the failing criteria need to be listed in advance of the examination.

#### Student Feedback to Panel Regarding Grading and Formative/Summative Assessment Feedback

During the course of the audit, the Panel asked for the views of a significant number of students (local and foreign centres) on their opinion regarding the suitability of summative pass/fail grade. In particular, the Panel asked the students to explain whether the pass/fail grading system helps the students to understand 'how well they passed or how badly they failed'. One of the students, a University alumnus, commented that initially she did not look favourably at the pass/fail grading; the awarding of a 'pass/fail' did not reflect the additional effort put into the assignment by the student. However, in time, the student came to realize that this mode of scoring mitigates the (unnecessary) competitive element that is not conducive to the learning environment that is necessary with this type of team-based, experiential learning process. The student also explained that whereas home-based assignments are compiled individually, it is a practice within the Institute that the students (are expected) to share the graded assignments (after the class presentation) through email/google docs.

The Panel observed from the discussion with the students that they (students) have learned to cooperate on the assignments within the group and support each other throughout the learning experience. They stated that the inherent advantage with the system is that they (students) learn from each other since the educational environment makes it conducive to give more value to co-operation, even though submissions are individual to the student.

The Panel notes that there is a culture in the Institute that 'failure is not an option'. One of the students explained to the Panel that the students go through 'experiential growth' and that they are supported throughout. The student also stated that 'you can only fail if you want to fail'. One of the students started to the Panel that 'their focus is on achieving the maximum. 'We grow and learn through experience and ongoing feedback. We are given clear guidance for writing and references, we are happy with the pass/fail. This is more qualitative assessment than quantitative; we think experientially more than with numbers'.

The students from Macedonia explained to the Panel that they receive verbal feedback throughout and written feedback on home-based assignments that provides direction on where they did well or where they need to improve. The students also explained that the pass/fail grading system, when combined with verbal feedback, provides the student with guidance on how to improve.

The Panel, however, solicited the Institute for implementation (by all Tutors) of the EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' (paragraph 7.2) <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra> that specifies that 'all assessors/examiners shall complete a written evaluation of the trainee's work, which shall be made available to the trainee'. The Panel justified this request by also citing the Latin proverb, *verba volant scripta manent*, that is 'spoken words fly away, written words remain'.

The Panel also elicited the importance of documented feedback for defending the Institute's decisions in academic challenges (appeals) by students, grievances, Examination Panel decisions, complaints etc.

The Panel explained that documented feedback (record of meeting) is also necessary for recording supervision sessions with Doctorate and masters students after every meeting. The feedback can also be used to record progress achieved and also work that needs to be carried out by the student on what has to be done prior to the next meeting. This will avoid a situation where students may complain that appropriate supervision was not made available.

The Panel was informed by the Programme Coordinator that the students are encouraged to submit,

before the deadline of the take-home assignment, a draft of the assignment for feedback by the tutor. The Students interviewed by the Panel confirmed that the tutors make themselves available to provide this preliminary feedback.

Whereas the Panel recognises this 'additional' support as an important component of the teaching and learning process, the Panel strongly recommends to the Institute to set-up policy and implement clear guidelines for the tutors on what constitutes good practice in terms of ensuring the separation of 'teaching and learning' from 'assessment'. The Panel understands that, while the learners are working on an assessment, the tutor can continue to give general feedback and support; however, this must be limited to development of knowledge, understanding and skills. Feedback must be specifically limited to guidance, for example, guidance on how to approach the knowledge and skills requirements, confirmation of which criteria the assessor is targeting and clarification of what the assignment brief requires. The guidelines need to ensure that once the student begins work for the assessment, the tutor must not provide specific assessment feedback on the evidence produced by the learner or confirm achievement of specific assessment criteria until the final feedback stage, thus ensuring the separation of 'teaching and learning' from 'assessment'.

### Summative and Formative Assessment Feedback

The EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra> specifies that 'all assessors/examiners shall complete a written evaluation of the trainee's work, which shall be made available to the trainee'.

The Panel established that participation and delivery by the student are assessed by main and support lecturer who alternate in the delivery of the unit, each tutor having around four sessions (each). The pass/fail is moderated between the two tutors.

The HoI explained that the assessment decision is communicated in the form of ongoing formative feedback to help the student 'grow' throughout the delivery of the individual units. In fact, an official result is not communicated to the student through document/result slip. The HoI also explained that the experiential and ongoing feedback is intended to ensure the academic and professional 'transformation' includes sufficient iterations and opportunities of feedback to ensure that the students complete the units of study successfully.

The Panel was presented with different scenarios that range from a pass/fail, summative verbal confirmation to taking of notes by tutors during the therapy practice sessions to claims of students receiving written formative feedback. From the Panel discussion with the tutors (Malta and external centres), it transpires that some tutors take student notes of the engagement and interaction during the practical sessions that are (student notes) subsequently referred to for the grading of the student performance. Samples of hand-written student notes were seen by the Panel. The tutors interviewed on the Panel prepares personal notes (samples were seen by the Panel) stated that the notes are considered when grading (pass/fail) the student. The Panel confirmed that it is not a practice that these personal notes are shared with the central administration of the respective Institutes.

The Panel was presented with a template of an assessment feedback form (Masters Programme). However, the Panel observed throughout the discussions with students, tutors and staff, both at Malta and in external centres, an inconsistent approach towards the provision of written, formative feedback through this Form.

The Panel invited the HoI (and the institute academic representatives on the Panel) to take more cognisance of the fact that (some) students may consider written, formative feedback as a more efficient method for post-assignment reflection. The Panel hence recommends that formative, documented assignment feedback is communicated to the Students (and not a pass/fail grade).

The Panel also invited the Institute representatives to give consideration to the fact that, apart from its academic value, the dissemination of documented interim and final feedback to the students will also facilitate the (enhanced) internal verification of the assignment decisions and also provide the opportunity for students to have recourse to the necessary records in case they decided to lodge a formal appeal or complaint. This, in turn, will also facilitate and ensure that an Appeals Board will have access to objective evidence when reviewing the merits of a student appeal or grievance.

The Panel encouraged the Institute to explore other ways of ensuring that the students have access to recorded formative feedback, possibly in the form of session capture (video) or virtual chat room to allow feedback and questions after the session.

#### Internal Verification

The Panel noted that the instructions do not change from cohort to cohort. The Panel also observed that the assessment of students is discussed and moderated between the lead and support tutor.

#### Examination Panel

The EAPTI-GPTIM Quality Manual (section 1.2.3) makes reference to the 'Examination Panel' that is set-up from time to time as required for the respective programmes. The 'Examination Panel' is included in the EAPTI-GPTIM organogram provided under Standard 1 and is appointed by the Board of the Institute.

The Panel is composed of:

- Academic member of the Board of the Institute and
- At least one other serving lecturer from within the institution.

The Quality Manual also provides the terms of reference for the 'Examination Panel'. The main functions of the 'Examination Panel' are to:

- Recommend procedures of assessment and examinations and to ensure that these are duly administered;
- Determine the results of assessments and examinations;
- Advise and recommend on the progression of students to further and upper levels of studies to the Board;
- Submit to the Board of the Institute advice on any matters pertaining to examinations including recommendations on decisions to be made by the Examinations Board on any cases of borderline results, and exceptional circumstances of individual students in respect of examinations, such as in cases of illness during examination time and other particular circumstances.
- Decide upon and issue final awards.

The Quality Manual (Appendix 6) also refers to the setting up of the 'Examination Board'; this Board is however not included in the EAPTI-GPTIM organogram provided under Standard 1,

Appendix 6 describes the composition of the 'Examination Board', namely:

- Academic member of the Board of the Institute (Chair), usually the Programme Coordinator,
- Internal examiner;
- External examiner, appointed by the Board of the Institute;
- Module leader
- Teaching staff.

The NCFHE Panel observed that the 'Examination Panel' (Quality Manual, section 1.2.3) and the 'Examination Board' had overlapping functions. Towards the end of the audit, this matter was brought up to the Institute representatives who confirmed that the correct nomenclature is 'Examination Panel'. The Panel recommended to the Institute to revisit and rectify this anomaly, for clarity and correct due process.

The NCFHE Panel met with a number of local and foreign members who sit on the 'Examination Panel (Board)'. The NCFHE Panel was also introduced to one of the EGN Tutor who also fulfils the role of the 'External Examiner' on the Examination Panel (Board), who is also a visiting tutor within the EGN. The Panel observed that while the Quality Manual (Examination Board, Appendix 6) does not define the term 'External Examiner', the EGN tutor as an External Examiner is not considered to be 'external' to the Institute, and hence cannot conduct a holistic peer review of the Institute during the Examination Panel (Board) sessions. The Panel also stated that notwithstanding the credentials, qualifications, experience and integrity of the current 'External Examiner', whom the Panel had extensive discussions with, the Institute needs to ensure that the appointed 'External Examiner' is and is seen to be impartial to the Institute. Whereas the HoI explained to the Panel that the Institute defines 'external' as a person who is not appointed as a tutor, mentor or supervisor on the course, the HoI immediately acknowledged that the Institute, through the EGN Coordinating Board, will look into the matter and take the appropriate decisions.

The Panel observed that the Quality Manual (Appendix 6, section 3.5) requires that the module representative provides the 'related marks per component and the pass/fail results' to the Examination Panel (Board). The NCFHE observed to the representatives of the Examination Panel (board) present during the interview that the (Panel) cannot be satisfied that this is taking place since the EGN members (including EAPTI-GPTIM) implement a pass/fail grading system and not a percentage-based recording of results (See also Standard 8).

It is, therefore, recommended that the Institute revisit the grading policy, possibly including the use of (number) marking in a way that the above requirement is justifiably met.

## **Placements**

### **Placement Agreement**

The HoI explained to the Panel that the Trainee Psychotherapist is expected to undergo a number of placements, also referred to as a clinical practicum, at a hosting providers in a clinical setting. In the Masters Programme, trainees progress from Core Placement 1 to Core Placement 2 where they fully apply their therapy knowledge while in the role of 'trainee therapists' by doing hands-on therapy with real clients thus gaining practical experience in a real clinical setting. In this module, the emphasis is primarily on Gestalt methodology and techniques and their application in real live therapy sessions.

The Panel observed through the peer review meetings that the Institute had identified and cooperates with institutions, agencies, governmental and non-governmental organisations that provide such placement services.

The Panel noted that when a hosting institution is identified by EAPTI-GPTIM, the Institute undertakes an agreement of service and assurance of quality. The HoI presented to the Panel the document 'EAPTI-GPTIM Placement Agreement'. This document sets out the roles, responsibilities and conditions of the (a) Institute, (b) Host and (c) Student.

The agreement specifies the need for:

- Trainees are required to undergo (personal) supervision with the EAPTI-GPTIM accredited Supervisors when providing therapy to clients;
- The host liaison person, together with the trainee and the allocated EAPTI-GPTIM module Coordinator to identify a professional within the clinical setting, who will be the student's Mentor throughout the placement.

The agreement also specifies the role of the Mentor.

The HoI explained that the purpose of the agreements is to ensure that:

- the hosting institution and the hosting mentor expert are fit and proper for the purposes of the required training;
- the functions and responsibilities of the trainee student, the hosting expert, and the mentor of the trainee student are clearly identified, and
- full confidentiality of the students in placement, their clients, and any information thus acquired about the students, hosting institution and/or third parties is respected.

### Role of mentor

The Panel conducted interviews with a number of representatives from the local (and foreign) hosting providers as well as the students who had already attended placements. Throughout these discussions, it was recognized that the mentor is responsible for introducing the students to the role of the mental health professional. The job of the mentor is not to directly teach the student but to guide the student through the learning process and to share his/her own experience and good practice through observation, discussion, critique and reflection. The students explained that they practice carrying out initial clinical assessments with clients at the discretion of the mentor and the service provider. The Panel also noted that hosting providers were extensively familiar with the requirements of the placement as described in the module specifications. In particular, these include the need (as described in the module specification that was accessible to the Panel) that all aspects of the job have to be covered including clinical interviews, differential diagnosis, creating an intervention plan, communication with clients in general, keeping the necessary documentation, communication with other mental health professionals etc.

The HoI presented the Panel with a document that provides placement instructions to the host mentor. The Mentor fills-in a 'Mentor's Evaluation Report' for each trainee. The report provides feedback on whether the knowledge, skills and understanding have been achieved by the Trainee. The Panel observed that the report includes 'tick-boxes' and space for comments. One of the Mentors interviewed by the Panel explained that the Mentor is also required to report on where the placement may not have covered all areas fully and hence need to be addressed at a later stage. The report is forwarded at the end of the practicum by the Mentor to the Module Coordinator. This report is used by the Module Coordinator to then carry out a further assessment to give feedback to the student in order to support their professional growth and development.

### Role of Supervisor

The HoI explained that the role of the Institute supervisor is to monitor the progress being registered during the placements in terms of gained competence from the first placement, observation/orientation mode by the student, to the second, intervention mode by the student. The Supervisor is reachable via their (mobile) telephone by both student and employer in cases where a (crisis) intervention is required.

### Code of Ethics of Trainee Psychotherapists

The Panel also had access to the document that describes the role, responsibility and code of conduct of the GPTIM Trainee Psychotherapist while on placement. The HoI explained that all Trainees of EAPTI-GPTIM are required to sign an agreement to honour the Code of Ethics of the EAPTI-GPTIM and of the Malta Association for Psychotherapy (MAP) and to act in accordance with the Professional Practice Guidelines. The agreement is also signed by the HoI for the Institute.

### Logbook and Reflective Diary

The students interviewed by the Panel confirmed that they are required to maintain a 'Logbook and Reflective Diary'. The aim of this logbook is to log the placement hours. The student is expected to record the date, time, type of activities carried out and the relevant signatures confirming that such hours have been carried out according to the initial agreement. The guidelines also provide a sample that may be used for this logging process. The logbook is accompanied by a reflective diary. The HoI explained that the aim of this diary is to present the most important aspects of the field placement. The Panel had access to the guidelines document that is provided to the student. The guidelines document provides extensive details of the knowledge, skills and competences that need to be demonstrated through the logbook.

### Feedback from Employers

The Panel met with representatives of the employers that host EAPTI-GPTIM students on placement and also employ EAPTI-GPTIM Graduates. One of the employers confirmed that they have regular contact with the EAPTI-GPTIM Module Coordinator (sometimes monthly) on various matters, namely placement offers, administration of placements and providing course feedback.

One of the employers explained that students are matched with clients such that there is minimal risk of harm during the session with the trainee. The employers explained to the Panel that they guide the students before they meet the client, but then have to trust in the 'process'. The employer representative also explained to the Panel that the students would typically have some experience but will need support from their Supervisor and Mentor. The employer stated that marginal errors should not harm the client. Ultimately, the employer is ultimately responsible for the client and will step in, if necessary. The Panel was also informed that the client has an option to refuse to be seen by a student and that the client signs a contract with the student.

There was consensus amongst the employers that that EAPTI-GPTIM students are normally better prepared than students from academic study streams of psychology and counselling programmes. The employers explained that this relates to the fact that the Gestalt programme is delivered in a vocational setting, as compared to the academic approach. One of the employers also confirmed that they ask clients to provide feedback on the student one-to-one therapy sessions; the results give a very high satisfaction rate (>90%).

The Panel received very positive feedback from the Skopje employers regarding the placement programme. Most impressive (for the Panel) was the terminology used by one of the employers wherein the employer was referred to as the 'beneficiary'. The representative from the Red Cross NGO stated that the provision of psychological counselling improves the image of the Red Cross; hence, an additional layer of care for the citizens. The representative stated that, through the Gestalt students, the NGO disseminates Red Cross values and promotes social responsibility. Students are thus promoting the NGO's services. The employer explained to the Panel that some of the students also continue to volunteer with the Red Cross when they become therapists. The representative explained that 'we all grow in a socially responsible system, employers, placement students and training centre'.

Another employer representative (from Skopje) explained to the Panel that the resident elderly benefit from placements of students since the students tend to be very patient with the elderly.. The representative explained that after the contact session, the residents are calm. Some remember

them and hug them on their subsequent visits and build relationships with the students. The EAPTI-GPTIM HoI explained to the Panel that the benefit for the residents is the 'here and now'. In general, the students benefit because they have practised under supervision. The patients benefit from the Students.

One of the employers explained to the Panel that the students that are on placement are assessed on an ongoing basis through constant communication between the mentor of the organization and the student. During placements, the students have 3 meetings (at the beginning, middle and end).

### **Student representative**

The Panel interviewed a number of student representatives of the local and satellite Institutes. The student representatives were registered on a wide spectrum of ongoing programmes. They were employed in sectors related to their respective areas of study, namely mental health care, education and voluntary sector, domestic violence support. A number of these were student representatives for their cohorts.

The student representative stated that issues are resolved informally with their Tutors. However, the students also stated that the HoI was accessible and very approachable. The student representative explained that they have formal meetings with the HoI at the end of the semester, during which they discuss general points that arose during the cohort.

One of the suggestions by the students interviewed was that the admission criteria should be narrowed as the cohort size is critical and could hinder the activities in the workshops, especially in the case of visiting tutors. In some cases, up to 60 students are present during some workshops that are attended by students from different years.

Another comment by the local student representatives was regarding the high cost of the (optional) lunch at the hotel venue.

### **Student feedback questionnaire**

EAPTI-GPTIM conducts a student/participant satisfaction quiz. The quiz (survey) is conducted via a Tablet that is handed round to all students at the end of the semester and workshops. The HoI explained that the students' feedback also includes requests for additional topics. In some cases, workshops are conducted with participants to address the requested subject area. The HoI stated that the results are discussed informally with the Programme Coordinators and Tutors (Refer also to Standard 8).

### **Cohort size**

The Panel discussed the feedback from the students regarding the cohort size and whether the Institute would consider introducing the number clause. The HoI explained that there are instances where cohorts are split into 2 groups. The institute is not aiming to increase the size of the intakes in view of the specificity of the learning process

### **Complaints and Appeals Board**

The HoI explained to the panel that the formal complaints procedure includes a three-tier process.

The HoI explained that minor complaints usually are part of the feedback received from students throughout their programs. These complaints are addressed either individually by the student or student representative or through discussion with the Tutor of HoI, by email. The HoI attested that, in general, such minor complaints have always been resolved at that moment or within a few days following discussions.

The HoI explained that failing the above, a second, formal tier of processing of complaints is the Institute Complaints and Appeals Board. The Panel notes the Quality Manual, section 1.2.5 specifies that the Board of the Institute shall select the members of the Complaints and Appeals Board on a case by case basis.

Section 1.2.5 explains that the Complaints and Appeals Board shall regulate itself in line with the 'Complaints and Appeals Procedure' (Quality Manual, Appendix 13).

Appendix 13, para 1.1 specifies that complaints shall normally be dealt with by the Ethics Committee. It is also stated that the Ethics Committee may decide that a matter may be more appropriately dealt with by a senior member of another training organisation. Furthermore, in case of a conflict of interest by the Chair of the Ethics Committee, the complaint shall be referred to the Complaints and Appeals Board.

The Panel considers that whereas it cannot exclude that complaints or appeals can present complex and challenging situations with respect to conflicts of interest, ethical complications etc., it considers the contingencies in place unnecessarily complex. This could also result in discouraging complainants from launching or pursuing the complaint. The complexity is in lieu of the number of 'referrals' possible, namely from of the Complaint and Appeal Board to the Ethics Committee to possibly a senior member of another training organisation and back to the Complaints and Appeals Board, in the case of a conflict of interest by the Chair of the Ethics Committee.

The Panel, therefore, recommends that the Institute revisits and possibly redefines the number of 'referrals' possible and establish a more straight forward *modus operandi*.

Furthermore, the Panel also notes possible redundancy between the 'Complaints and Appeals Procedure' (Quality Manual, Appendix 13) and the online EAPTI-GPTIM 'Grievance Procedure' <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra>. The Panel notes that there is considerable overlap, and possibly redundancy, between the two procedures as evidenced in the following two key sections:

- Persons that have recourse to complaints and appeals and grievances;
- Grounds for making a complaint ('Complaints procedure', Section 3.2 and 3.3) and grounds for making a grievance ('Grievance Procedure' Section 3.2 and 3.3) are the same in both procedures.

The Panel recommends that the Institute determines whether both the 'Complaints Procedure' (Quality Manual, Appendix 13) and the 'Grievance Procedure' (only available online) are both required, or not.

The Panel also notes that the EAPTI-GPTIM 'Complaints and Appeals Procedure' is available only online. It transpires that this procedure is intended (solely) as a means of examining a complaint against a trainee therapist (defined in the procedure as a student on an EAPTI-GPTIM programme at an advanced level). The Panel concludes that the 'Complaints and Appeals Procedure' that is available only online and the 'Complaints and Appeals Procedure' that is available only in Appendix 13 of the Quality Manual have different scopes. The Panel, therefore recommends that the documents are assigned unique titles in order to ensure clarity of purpose.

The Panel also notes that there is also recourse to the EGN Independent Appeals Board (EGN Statute, Article 24).

The Panel also recommends that the Institute revisits the full set of procedures addressing complaints, grievance and appeals in order to (a) ensure that there is a coordinated and lean procedural approach, and (b) stakeholders have ease of access and reference to the complimenting procedures, possibly through a simplified (graphical) document map, or in any form deemed appropriate by the Institute.

The Panel was not provided with any records of appeals or complaints received, processed and upheld or refused. The Panel, therefore, could not, through documented evidence provided (emails, decisions etc.,) reach any conclusion or opinion regarding the effectiveness and consistency of the processes in place for the formal resolution of appeals or complaint cases relating to lack of academic integrity, discrimination, intolerance etc.

During the interviews with the Panel, the students noted that they never had the need to make an official written appeal or complaint since they preferred to communicate any issues verbally with the HoI.

The Panel established that the students interviewed were familiar with the complaints procedure but never resorted to it. The students stated that the ongoing communication and feedback by the tutor makes it possible for the students to achieve the level expected.

The peer review team commends the effort made by the HoI to maintain direct communication with the students. The Panel did not find evidence to contradict the benefits of such an individualised problem-solving approach. Nevertheless, the Panel feels that the requirements of the standard, and hence the interests of the students, would be better served if records of appeals (possibly in the form of emails received from students and their corresponding replies) are retained, in particular records on nature of the appeal or complaint, dates and decisions taken.

### **Good practice identified**

- Teaching modes are documented in detail in the Programme Specification.
- The Head of Institute propagates and permeates a very positive psychological environment that empowers all the stakeholders to engage professionally and with high standards in the teaching, learning and support processes.

### **Overall judgment for Standard**

The EAPTI-GPTIM Academy meets the requirements of Standard 4.

### **Recommendations for improvement**

19. KR: The Panel recommends that the assessment criteria for a student to pass the assignment need to be documented and made available to the student before they attempt the various assignment. Similarly, for the live examination, the failing criteria need to be made known and communicated to the students in advance of the examination (to be implemented within three months with receipt of the report).
20. R: The Panel recommends that formative, documented assignment feedback is communicated to the Students (and not a pass/fail grade).
21. KR: The Panel recommends the implementation (by all Tutors) of the EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' <https://www.eapti-gptim.com/code-of-ethics-and-professional-pra> that specifies that 'all assessors/examiners shall complete a written evaluation of the trainee's work, which shall be made available to the trainee' (To be

implemented within three months with receipt of report).

22. KR: The Panel recommends to the Institute to set-up policy and implements clear guidelines for the tutors on what constitutes good practice in terms of ensuring the separation of 'teaching and learning' from 'assessment' (To be implemented within three months with receipt of report).
23. R: The Panel recommends to the Institute to revisit and rectify the use of the terms 'Examination Panel' (Quality Manual, section 1.2.3) and the 'Examination Board' (Quality Manual, Appendix 6) that have the same function.
24. R: The Panel recommends that the Institute appoints an 'External Examiner' that is and is seen to be impartial to the Institute.
25. R: The Panel recommends that the Institute revisit the grading policy, possibly including the use of (number) marking in a way that the requirements of Quality Manual, Appendix 6, section 3.5 are met.
26. R: The Panel recommends that the Institute revisits and possibly redefines the number of 'referrals' possible between the Complaints and Appeals Board and the Ethics Committee in order to establish a more straight forward modus operandi.
27. R: The Panel recommends that the Institute determines whether both the 'Complaints Procedure' (Quality Manual, Appendix 13) and the 'Grievance Procedure' (only available online) are required, or not.
28. R: The Panel recommends that the Institute revisits the full set of procedures addressing complaints, grievance and appeals in order to (a) ensure that there is a coordinated and lean procedural approach, and (b) stakeholders have ease of access and reference to the complimenting procedures, possibly through a simplified (graphical) document map, or in any form deemed appropriate by the Institute.

### 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

##### Pre-admission Enquiries on Programmes and Induction Meeting

The Panel considers that the Institute website includes sufficient information for prospective students to enrol in the course. Official contacts are available on the Institute's official website. The Panel notes from the various interviews with students and alumni that the Institute's key contact at the admission stage is the HoI and the senior tutors. The students interviewed also confirmed that the HoI was available to conduct one-to-one meetings with them prior to registration.

The Students interviewed also confirmed that an induction meeting is held with the registered applicants at the EAPTI-GPTIM premises during which the HoI provides relevant information and queries are answered. During this induction meeting, the Institute key staff are introduced to the students.

The Panel was informed by the students interviewed that once prospective students register for a programme, they receive a hardcopy of the relevant Student Handbook. The Student Handbook includes all relevant information about the institution, studying, programmes, finances, entry

requirements, different procedures, values, ethics etc. (Also refer to Standard 7).

### Registration of Students

All EGN Institutes are responsible for compiling and retaining registration records of their respective students. Hence, EAPTI-GPTIM is not in receipt of records of students at the satellite centres.

### Recognition and Accreditation of Prior Learning (RAPL)

The HoI explained to the Panel that the Institute recognizes the value of learning wherever it occurs, either to meet programme entry requirements or to achieve credit towards an award. However, recognition and accreditation of prior learning will only be possible where learning, appropriate to the outcomes of the relevant entry requirements, module or award level, can be assured to be (academically) valid and taught by qualified tutors at the level that EAPTI-GPTIM requires for the specific programme.

A Recognition of Acquired Previous Learning (RAPL) committee is in place to discuss individual requests. The HoI also explained that the Institute charges a fee for the administration of RAPL claims, which charge will be clearly stated.

The Panel notes that the Institute has a detailed Policy of Recognition and Accreditation of Prior Learning in place (Quality Manual, Appendix 5).

### Cancellation Policy

The Panel notes that the cancellation policy is clearly explained on the Institute website (refer also to Standard 9). The policy also includes a declaration of acceptance that needs to be filled in by the prospective applicants. The cancellation policy applies for all workshops, seminars and training courses.

### Attendance

Student attendance records are kept for each session. The Panel was presented with filled-in attendance sheet records. The students are expected to have 80% minimum attendance in order to be eligible for the final exam. Attendance at the local and foreign workshop and seminars compensate for missed sessions.

### Progression and Resit Policy

The HoI informed the Panel that Students need to complete all work submissions prior to attempting the end of programme examination (Masters and Doctorate programme).

In cases where the attendance is low, students are allowed to join subsequent year cohorts;

The Panel was informed that during the last final examination session of the Masters Programme, three (3) out of seventeen (17) students failed the final examination. There are cases where students are stopped their studies or asked to defer their sit to have more time to prepare well.

## Extenuating Circumstances and Mitigation Policy

The HoI explained to the Panel that special circumstances are taken into consideration when deciding about students' progression. They include documented illness, accidents, close bereavement, closely related compassionate events etc. that have affected the student's performance in assessment/examination or which caused him/her to be absent from an assessment/examination. Other requests shall be considered on a case-by-case basis. The Institute's Mitigation Policy is accessible via the Quality Manual, Appendix 7 and also on the Institute website (Refer also to Standard 7 and 9). Students are required to make a written request to the Chair of the Board of the Institute, citing the request and reason thereof, and provide the necessary evidence.

The HoI also explained that students whose request is denied by the Board might appeal this decision to the Complaints and Appeals Board.

## Certification and eligibility for Psychotherapy Warrant and Associates

The Panel was informed that Students graduating from the Master in Gestalt Psychotherapy would have the following opportunities:

- Register with the official Board of the Psychotherapy Profession in order to be officially recognised as an autonomous warranted Psychotherapist;
- Register for European certification with the European Association for Psychotherapists (EAP);
- Receive the title 'European Certificate of Psychotherapy (ECP)'. The ECP is a European wide standard for psychotherapy education and training established by EAP to create a comprehensive European wide standard for psychotherapy education and training. The ECP is awarded to a person (and not the Institute) upon application to psychotherapists whose psychotherapy education conforms to the ECP standard. Graduates can apply for the ECP through the MAP (EAP National Awarding Organization (NAO)).

## Qualification Certificates

The EAPTI-GPTIM issues graduates with Certificates (Refer also to Standard 9). The licencing conditions set the following conditions on the Provider, namely that

- Certificates shall carry the NCFHE logo and the following statements in all the Certificates;
- The awarding body is to clearly state name and licence number in all advertising material and certificates.

The Panel, however, noted that samples of the Masters, Diploma and PGC programme completion certificates (issued by EAPTI-GPTIM and as seen by the Panel during the review) did not include the minimum information as per licensing condition requirements. The discrepancies notes were as indicate below:

- Masters and Professional Doctorate Certificate: Number of ECTS not included.
- Diploma in Gestalt Psychotherapy: NCFHE logo missing
- Post Graduate Certificate in Gestalt Psychotherapy: NCFHE logo missing.

Note: It was confirmed by the HoI that the foreign EGN members do not include a reference to the name and license number of EAPTI-GPTIM on the certificate issued by the Institute to their Graduates on the EAPTI-GPTIM accredited courses.

- The opportunity of one-to-one sessions between the HoI and the students before commencing a programme is commendable.

### Overall judgment for Standard

The EAPTI-GPTIM Academy meets the requirements of Standard 5.

### Recommendations for improvement

- KR: The panel recommends that the Institute updates the templates of the programme completion Certificates of the Masters, Diploma and PGC programmes are to include the minimum information as per licensing condition requirements (To be implemented within three months of the publication of the report).

### 3.6 Standard 6: Teaching Staff

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

### Main findings

#### Roles of Academic and Supporting Personnel

The Panel observes that the realisation of quality teaching, learning, assessment process of the EAPTI-GPTIM accredited programmes requires the participation and interaction of a number of professional and qualified academic and support staff. The various roles identified by the members of the Panel throughout the duration of the audit and are listed hereunder:

- a) Tutor: Contributes to the delivery and/or assessment of a particular unit. Tutors can also function as mentors;
- b) Leading (Associate) Tutors Primary responsibility is the design, delivery and assessment of a particular unit. Leading tutors can also function as mentors;
- c) Programme Coordinator: Has overall academic and administrative responsibility for a particular programme. Programme Coordinators can also function as mentors.
- d) Mentor: The mentor must guide the student through his/her studies by giving advice and the necessary information on the student's request;
- e) Placement mentor: Provides monitoring of the student who is attending work placement and reports back to the tutor. They send a report midway and at the end of the placement.
- f) Supervisor: Processing of experiences with the student during the placement. The supervision does not only provide guidance in relation to the clients but also with respect to the students' emotions. Gestalt tutors also attend personal supervision.
- g) Coordinator of the clinical practice under the mentorship
- h) Supervisor of peer experience groups
- i) Mentor in the mental health field
- j) Specialists for Doctorate Programme (e.g. Supervisors)

Note: more often than not, leading tutors also fulfil the role of Programme Coordinators.

## Entry Requirements

The Panel notes that the entry requirements (qualifications and experience) of the academic and support staff (listed above) are described in the Quality Manual and Section 8 of the respective programme module specifications under 'Minimum formal qualifications and experience required to deliver this module/unit'.

The Institute also applies a general rule whereby staff (except those engaged on units that have no connections to psychotherapy) need to have a Psychotherapeutic license and minimum of 6-8 years of practical experience in psychotherapy.

All teachers need to be individually registered members with the EAGT and registered or warranted according to their respective local requirements.

The Panel considers that the Institute fulfils NCFHE guidelines with respect to the level of qualifications for the level of programme being taught.

## Recruitment

The HoI explained to the Panel that the Gestalt Therapy Community in Malta is capable of developing tutors, and supervisors from within. Some became associate teachers in the school.

The HoI also explained that in the case of a vacancy arising within the Institute, the open call is first issued internally for part-time staff to all ongoing groups of registered Gestalt therapists who sustain ongoing CPD groups with GPTIM. If a suitable person is not found from the internal call, EAPTI-GPTIM issues an opening over the Institute's official website.

The HoI stated that in both internal and external calls, classification of applied candidates is made by the Board of the Institute based on formal qualifications, professional experience, and publications. A short-list is thereby generated. The Board then constitutes itself as a Selection Board and shall interview the short-listed candidates.

The Panel members were also informed by the HoI that in cases of extraordinary achievement and international renown in the required field, a tutor is head-hunted and employed directly by the Head of Institute.

The Panel was also provided the document 'The requirements to become an Associate Teacher and Teacher of EAPTI-GPTIM'. This document provides the requirements and procedures for professionals in the field of Gestalt Psychotherapy to become an Associate Teacher or Teacher of EAPTI-GPTIM including the need to undergo a formal examination.

The document includes the following key sections:

- General requirement before entering the training for a Teacher;
- Personal Characteristics;
- Training requirement for teachers;
- Teacher obligations;
- Final Examination;
- Processing of documents.

The Panel was also provided with a copy of the 'Service Agreement of School Teacher at EAPTI-GPTIM' that is signed by the Director EAPTI-GPTIM and the recruited member of staff. The Contract is considered by the Panel to be very detailed and comprehensive.

## Tutor induction and mentoring by HoI

Throughout the discussion with the tutors, it was observed that in general, tutors were very well versed with student-centred learning guiding principles. The Panel also observed from the interviews with the various tutors and support staff a characteristic spirit of a culture, a sense of community manifested in attitudes and aspirations of the academic and support staff that were conducive to the requirement of experiential and existential teaching, learning, assessment and support environment as inspired by the HoI.

The tutors also commented to the Panel that they have a very good open and direct working relationship with the HoI and academy staff.

## Teaching Observation

The Quality Manual (IQA 6) describes the following three opportunities that are available for observation of teaching aimed at the development and growth of the tutoring staff, namely:

- a) Programme coordinators attend their colleagues' classes at least once a year. Feedback is given in dialogue after the observation.
- b) Teachers also have an obligation to attend supervision 4 (four) time per year where the learning-teaching process is discussed, as well as the implementation of the programme
- c) Every academic year the students' evaluation of teachers' work and unit implementation is discussed; Points for improvement and development are defined.

However, records of the above were not yet available.

The Panel was informed that the HoI conducts walk-in appraisals of newly recruited Tutors, and on ad hoc basis thereafter. The appraisals are followed up by verbal feedback from the appraiser to the Tutor being appraised. The HoI explained that it is not customary for records to be kept of the outcome of the appraisal process.

The Panel acknowledges the benefit of the 'walk-in' appraisals. Nevertheless, the Panel recommends the documentation of the feedback from the appraiser to the appraisee. This will also facilitate the follow-up of the appraiser on points for improvement by the appraisee, thus resulting in a continuous improvement cycle.

## Continuous professional development

The HoI explained to the panel that all tutors engaged by the EGN need to be individually registered members with the EAGT and registered or warranted according to their respective local requirements. This means that Continuous Professional Development (CPD) is a regulated requirement required to maintain the membership and registration/warranting, thus ensuring the ongoing highest standards in the profession and as EGN Tutors.

Additionally, the Tutors' are required to ensure their own supervision hours necessary for maintaining their official warrants/registration/memberships. The Panel was informed that the CPD hours include time spent on supervision, personal therapy, attendance of professional conferences, and publication in peer-reviewed articles etc.

The Institute, however, organizes a host of CPD initiatives including focus groups, training, seminars, biennial Congress (see below) and others that qualify as CPD for its academic and support staff and students. Academic and support staff are invited by the Institute to attend free of charge. The staff interviewed by the Panel also commented that these various CPD sessions are well attended and provide the attendees with the opportunity to socialize and network professionally.

The HoI stated that the Congress is one of the EGN's main facilitators of CPD and also a research platform for the Doctoral candidates of the EAPTI-GPTIM and the EGN members.

### Facilitation of CPD through Congress

The HoI explained that the EGN organises a biennial interdisciplinary, international congress that provides its academic and support staff, students, alumni the opportunity to deliver presentations, update themselves, submit papers, display posters and network with psychotherapists and other professionals.

The Third International Interdisciplinary Gestalt Congress "On Becoming a Psychotherapist- Exploring the Authenticity, Creativity, Competence and Responsibility of the Profession was held over 3 days during September 2019 in Skopje, Macedonia. The Congress was organized by Gestalt Institute Skopje and EAPTI- GPTIM network.

The HoI explained that the Congress focused on different ways of developing professional skills and standards, through lectures of 18 keynote speakers, 36 oral presentations, 33 poster presentations, and 23 workshops.

The HoI also informed the Panel that the EAPTI-GPTIM QA Consultant and member of the Quality Assurance Committee of EAPTI-GPTIM was invited by EAPTI-GPTIM as a guest speaker on the theme "The impact of Networked Quality Assurance on Psychotherapy Training".

The HoI also confirmed that the congress is also considered as CPD hours for warrant holders as well as a platform for Doctorate students to present their academic research related to their qualitative and quantitative research methodology module.

The Panel strongly commends the initiative taken by the HoI of facilitating through the Congress a unique synergy between the technical and professional aspects of Gestalt Psychotherapy and the QA aspects of the teaching, learning, assessment and related support processes. The Panel truly believes that this synergy is genuinely representative of the embedded quality culture of the EAPTI-GPTIM and the EGN members.

### Good practice identified

- Tutors and support staff demonstrate a characteristic spirit, culture and sense of community that is manifested in attitudes and aspirations that are conducive to the requirement of experiential and existential teaching, learning, assessment and support environment as inspired by the HoI.
- The Panel strongly commends the initiative taken by the HoI of facilitating through the Congress a unique synergy between the technical and professional aspects of Gestalt Psychotherapy and the QA aspects of the teaching, learning, assessment and related support processes. The Panel truly believes that this synergy is genuinely representative of the embedded quality culture of the EAPTIM-GPTIM and the EGN members.
- The document 'The requirements to become an Associate Teacher and Teacher of EAPTI-GPTIM' provides for a thorough selection and assessment of new academic teaching staff.

### Overall judgment for Standard

The EAPTI-GPTIM Academy surpasses the requirements of Standard 6.

### Recommendations for improvement

- R: The Panel recommends the documentation of the feedback from the appraiser (HoI) to the newly recruited appraisee (tutor).

### 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

##### Internal communication

The Students informed the Panel that the Academy staff has an open-door policy that facilitates and encourages internal communication on problems, concerns or anxieties they might have.

The Tutors also informed the Panel that they do encourage students to communicate with them (tutors) through email. This was corroborated by the Students who informed the Panel that the response time was satisfactory.

##### Learning Resources

The Panel notes that the Institute makes available the following learning resources for its students:

- e-library of over 500 papers and books referenced in the Doctorate and Master Programmes and available online, curated by the academic staff of the Institute
- Access to the British Gestalt Journal, the European Association of Psychotherapists (EAP) Journal;
- Publication of its peer-reviewed journal 'Gestalt Today Malta' and free online access;
- A small graduate-level library that includes key texts, past students' case studies and theses, and as well as copies of the peer-reviewed journal 'Gestalt Review' produced by the partner Gestalt Institute in Belgrade or any other Gestalt Journals published by other EGN Institutes;

Students are informed about resources that are at their disposal by teachers and in the Student Handbooks.

##### Facilities

The Panel visited the premises at Kappara during the scoping visit. The Panel was informed that the premises at Kappara is used for weekend retreat sessions where participants are encouraged to stay overnight. These sessions are intended to foster the collegiality and networking of trainees. The Institute also has other premises at Fgura that is used for smaller groups. Teaching spaces are equipped with all necessary additional equipment (A/C, projectors, loudspeaker systems, Internet etc.). Accessibility to learning spaces for students with disability is available at Kappara.

The main review was conducted at the hotel that is also outsourced by the Institute to host CPD and larger group training sessions.

## Tutor / Mentor Support

The HoI explained that the student is assigned to a mentor at the start of the programme. It is the mentor's duty to guide the student through his/her studies by giving advice and the necessary information on the student's request.

The HoI explained that the main responsibility of the mentor is to guide the student throughout the programmes with respect to informed decisions, Institute's procedures, access to special support, extenuating circumstances and programme progression.

It transpires from the discussions of the Panel with the Students that the Student-Mentor set-up is well received and functions appropriately. The Students confirmed that they are supported throughout the programme.

The Students also commented favourably on the access during their studies (and beyond) to the network of Institute Tutors who are considered to be industry practitioners, support staff and employers.

## Special Needs

The HoI explained to the Panel that Students who have special needs for learning and/or assessment are encouraged from the outset to inform the Institute of their needs in terms of the Mitigation Policy (Quality Manual, Appendix 7 and Student Handbook).

The Panel also discussed with the tutors the practical aspects of the implementation of the special support. The Tutors explained to the Panel that the special needs of the students are communicated via the Programme Coordinators. The tutors support the students in adapting the teaching, learning and assessment methods according.

The HoI explained that Psychotherapy training and education is conceptualized to be at the same time, an educational and supportive process. Personal psychotherapy is part of most programmes on the Institute. If students have difficulties in studying they can consult with their mentor and ask for support including temporary suspension of studies or extension of studies; In such cases, when possible, students can discuss and agree on the way to make up for missed materials, assignments, experience, supervision etc.

## Student Training Contract (Masters and Doctorate)

The HoI presented to the Panel a copy of the document 'Student Training Contract' that applies to Masters and Doctorate trainees (also refer to Standard 9). The contract describes the contractual arrangement between the trainee and the Institute, awareness of regulations and policies, record keeping, compliance with code of ethics, payment terms of the course fee, and GDPR obligations.

## Scholarship foundation

In collaboration with EGN, the Lidija Pecotic Scholarship Fund offers scholarships for those in financial need to partly or wholly cover tuition at the Institute, in particular in some of the Balkan countries.

The Statute provides for the setting up by the EGN Coordinating Board of an EGN Lidija Pecotic Scholarship Fund Committee (Refer also to Standard 1).

The Panel had access to the results of the pre-audit student questionnaire, which is administered by the Provider on behalf of NCFHE (Note: The Provider does not have access to the results of the questionnaire). The Panel observes that a total of eighty-five (85) respondents participated in the questionnaire of which twenty-three (27%) were from Malta and the balance of the students was from the centres of Serbia, Macedonia, Montenegro, Croatia, Bosnia and Herzegovina.

Fifty-seven (57) of the students (69%) were following the Diploma in Gestalt Psychotherapy, three (3) students (4%) were following the Doctorate in Gestalt Psychotherapy, and twenty-two (22) students (27%) were following the Masters in Gestalt Psychotherapy, one only one(1) student following the PGC in Gestalt Psychotherapy.

The Panel analysed the scores and also the comments entered by the respondents and how these relate to the findings of the Panel during the review.

The absolute majority of the comments were highly favourable of the teaching and learning process at EQPTI-GPTIM. One of the respondents acknowledged the personal journey that the programme had taken her through. The student stated that 'This education has helped me to return to myself, to learn a lot about me and about other people, society and psychology. I am grateful for that and feel confident in their guidance during my studies'. Another student commented that 'teaching is on a very high level, and the practice that we get is extraordinary'. Another student commented that 'the subjective and personal development is enormously beneficial'. One student commented 'I am completely satisfied with my studies. After finishing this degree, I am planning to apply for another programme with the same institute. Staff is well trained and professional. I am eager to learn more from them. I feel motivated and satisfied'.

The Panel also observed other comments suggesting 'More structure is needed, more agile approach'. Another comment referred to the need for students to have an opportunity to meet individual therapists before choosing which person to take therapy with'. Another student commented upon the need for 'more practice and different lecturers' and the need to cap the intake per cohort.

### Scheduling

The Panel had access to very detailed programme schedules of the various programmes. In some cases, the schedules cover up to the full duration of the programme (4 years) and provide the dates, venue (both local and abroad), unit title and speakers of the various units up to the second or third year of the programme.

### Personal Therapy

The students interviewed informed the Panel that they (trainer therapists) need to undergo personal therapy (at their cost). The therapist is chosen by the student in cooperation with the module coordinators from a list of qualified Gestalt psychotherapists provided by EAGTI-GPTIM. The Panel was informed that the aim of this personal therapy is for the trainee therapist to experience at first hand the full process of Gestalt psychotherapy and to develop as a person. The trainee therapist is required to keep a record of the date and time of sessions and will write a reflective diary.

## Student Representatives Committee

While student representatives were always appointed ever since the origins of EAPTI-GPTIM, the HoI explained that the Student Representative Committee was formally set up following NCFHE accreditation.

The HoI explained to the Panel that the student representatives are expected to represent their colleagues in respect of commonly shared issues within their class and shall be expected to act in the interest of all.

The students interviewed by the Panel confirmed that the students' feedback and queries are brought up by the Student Representative Committee in the meeting with the tutors. In their opinion, the feedback is always taken into consideration by the Institute.

The Panel notes that the QA Manual (Section 1.2.6) specifies that the Student Representative's Committee shall be requested by the Board of the Institute to give feedback on the best ways to gather student feedback, to comment on any feedback received, and to give feedback on how to improve the provision and workings of the Institute. The Panel, however, observes that records of this feedback were not available at the time of the Review

The Institute submitted the names of the student representatives as part of the pre-audit documentation. The Panel also commends the initiative taken by the EAPTI-GPTIM in providing the names and personal email contacts of (seven) student representatives on the EAPTI-GPTIM website <https://www.eapti-gptim.com/student-representatives-committee> (a number of these student representatives participated in the discussions with the NCFHE Panel). The Panel also recognises the mature, professional and altruistic disposition of the students who allowed the Institute to publish their (student) names and private email.

### Dissemination of Information to Students

The Panel notes through its desk study and discussions with Institute management and students that students have various sources of information that support their learning experience at the EAPTI-GPTIM.

The main categories of information that are available for dissemination are as indicated below:

- Student Handbook

This document is provided as a hard copy to all new students. It contains information about the specific academic programme.

The Panel went through the EAPTI-GPTIM Student Handbook Programme Guidelines for the Masters in Gestalt Psychotherapy (2014). The document sampled includes the following key sections:

1. Overview
2. Entry requirements
3. Programme objectives
4. List of 14 taught units, 2 units of Core Placement (1 and 2) and 1 Unit final exam (case study)
5. Profile of each module that includes:
  - a. Title of Module
  - b. Learning Outcomes (knowledge, skills and competences)

- c. Hours of the total learning
- d. Total number of ECTS
- e. Mode of delivery
- f. Mode of assessment
- g. Reading list (Core text and recommended reading)

- Website (<https://www.eapti-gptim.com/application-forms>)

This link includes the policies, procedures and forms that are required by the student through the course (Also refer to IQA 9).

The Panel considers that the Students are provided either in hard copy (via Handbook) or online all of the policies, procedures, regulations and forms that are essential for good student experience.

#### Student comments

The Panel had several interviews with students from various programmes and intakes registered at all the centres as well as alumni from within the EGN.

The Panel observed throughout (all the interviews) a high level of maturity and objectivity from both the local and foreign registered students interviewed. The Panel regularly asked the students to provide feedback to the Panel. The following provides an overview of the comments and observations received from the students interviewed:

- Strength of the experiential nature of the learning process.
- The supportive atmosphere that encourages the students to flourish;
- The clarity of the programme structure;
- The Hol is open to change, always improving the learning experience and takes on board suggestions for improving the learning experience;
- Tutors and support personnel are experienced and qualified;
- Students who had previous learning journeys at local, foreign universities or online degree programmes consider that the learning experience at EAPTI-GPTIM is superior;
- Structure of the programme is reviewed for improvement from time to time;
- Handbook and website are a great help;
- Considerable support throughout such that it is highly unlikely to fail. 'Students will only fail if they want to fail because they are provided with everything';
- On a Sunday they prefer not to have a break and finish earlier in order to be home for lunch;
- They have feedback sheets at the end of the sessions. They pass around a tablet and put in their feedback.
- They travel to a congress from their own expense at a discounted rate.
- The learning experience is enriched through the visiting lecturers;
- Personal therapy at their own course 30-60 Euros per hour – compulsory and expensive;
- They also pay extra for supervision per hour;
- Recently have been given an online library (e-books) for free
- The students are satisfied with the number of available books/data available for them;
- Assessment criteria are in student's Handbook with all the necessary information included;
- Students stated that they divided into groups, and all the issues and queries are discussed during regular meetings;
- The students said that in case of appeal or complaint, they would communicate to their tutor or the Hol.

- Working in small groups. They get to know each other well; they share and discuss their assignment. For the presentation, they discuss and support each other, and they agree not to present the same topic.
- Students usually send assignments via email for initial feedback from the Tutor and present a hard copy later.
- Not satisfied with the number of students at lectures and workshops; they prefer to have smaller groups.
- Students are satisfied overall with the programmes;
- Students stated that failing is not an option; tutors support them a lot;
- The students mentioned that they fill up session sheets after a lecture and a survey on the tablet.
- Students mentioned that now they have access to a free online library on Google Drive for sharing information.
- Students are usually surprised when they find an apartment as their training Centre but eventually understand that the layout is conducive to experiential learning.

### Good practice identified

- EAPTI-GPTIM is run by exemplary, committed, motivated, engaged and professional academic and support tutors.
- The Panel commends the initiative taken by the EAPTI-GPTIM in providing the names and personal email contacts of (seven) student representatives on the EAPTI-GPTIM website <https://www.eapti-gptim.com/student-representatives-committee> (a number of these student representatives participated in the discussions with the NCFHE Panel). The Panel also recognises the mature, professional and altruistic disposition of the students who allow the Institute to publish their (student) names and private email on the website.

### Overall judgment for Standard

The EAPTI-GPTIM meets the requirements of Standard 7.

### Recommendations for improvement

- R: The Panel recommends that the feedback of the Students Representative Committee is documented.

### 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

#### Data Collection

During the scoping visit held at the Kappara premises, the Panel was shown the filing system used at the Institute. Organised files are kept per programme intake and per student.

Throughout its discussions, it was evident to the Panel that the Institute had access to the following data:

- Personal data of the students including contact information, demographic data; medical and academic misconduct data where applicable;
- Enrolment data including students' entry applications and related documentation, and participation rates of vulnerable groups;
- Academic data including, results, attendance, retention and success rates, students' satisfaction with their programmes, students' assessments, student placement agreements, declarations, consents, academic requests, clinical placements reports, yearly and final transcripts, and graduation documentation;
- Financial data related to student payments and pending fees;
- Website analytics for monitoring use of Institute website and to enhance the online experience.

The HoI remarked that information is retained in soft copy on the office computer and in some cases in hard copy. The electronic data is backed up on an external drive at their Kappara.

#### Data retention

The academy has a detailed data archival policy (Quality Manual, Appendix 10, Section C) that specifies the retention period of the various forms of data.

The HoI confirmed that aggregated demographic and academic data (participation, retention and success rates), as well as e-copies of official transcripts and degree certificates, are retained by the Institute for 50 years. The HoI explained that the Institute records and archives its data according to the requirements of the Policy for Recording and Archiving Data Policy (Quality Manual, Appendix 10).

#### Data Analysis of Student Satisfaction questionnaire

The Institute administers e-questionnaires at the end of each academic year on such issues as the quality of teaching, assessment, venue and resources. The HoI provided the Panel with a statistical analysis report of the student satisfaction questionnaire feedback covering the period 27/1/19 up to 26/5/19 with a total of 1,103 respondents.

The questions relate to satisfaction with regards to the lecture, venue, clarity and usefulness of learning content and the likeliness of participants' recommendation to others. The results are expressed in raw data and percentages over a scale indicating whether the participant is extremely likely, likely, neither likely nor unlikely, extremely unlikely and does not know.

The Panel commends the rigour of the exercise but also comments that the data set should cover less cohorts in order not to (possibly) conflate interpretation of the results..

The HoI also provided to the Panel samples of reports, including analysis of student feedback for two individual tutors.

#### Tracer studies

The Institute has plans to issue an invitation to the particular alumni cohort to fill in a short questionnaire related to their career pathways and future CPD needs. The HoI informed the Panel that the Institute is planning to launch its first tracer study after the NCFHE review.

## Document Management

The panel notes that on various occasions between the desk-based analysis and the on-site audit, it was not always possible for the Panel to ascertain that the printed version document in hand was, in fact, the current, approved revision. In general, the documents (both online and printed versions) were not uniquely referenced, date stamped and revision control. A case in point is the Forms used by the Institute. The Panel, therefore, recommends that the Academy's documentation system is to include revision control to ensure the correct management of (printed) documented information. In this way, both students and staff always have access to the latest, approved versions of documents.

## Data Protection

The HoI explained to the Panel that EAPTI-GPTIM protects the privacy of its students' education records in compliance with GDPR requirements and in particular Subsidiary Legislation 586.07 'Processing of Personal Data (Education Sector) Regulations', in terms of Legal Notice 19 of 2015, as amended by Act XXVII of 2016. Access to student data is provided strictly within the parameters of the Act.

### Good Practice identified

- Nil

### Overall judgment for Standard

The EAPTI-GPTIM meets the requirements of Standard 8.

### Recommendations for improvement

- R: The Panel recommends that the Academy's documentation system is to include revision control to ensure the correct management of (printed) documented information.

## 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

#### EAPTI-GPTIM Public Information

The necessary information regarding the Institute and its accredited courses is made available to prospective and current students, academic and support staff and the public at larger through the Academy's website via the various links on the Institute website. The HoI explained to the Panel that the website had undergone a major overhaul prior to the (audit) review and that the revamped website includes a student log-in area which was still under content development

The EAPTI-GPTIM website <https://www.eapti-gptim.com/> provides the following general

information under various pages and links.

- History of Institute
- Aim of the Institute
- List of Faculty members with profile and CV
- List of Institute past and present Contributors with profile and CV
- Student Representative Committee including names and personal emails of student members of the Committee
- Explanation of the EGN Network
- Target group and detailed entry requirements for the respective programmes
- Course fees by academic year for the PGC and Masters Programme and information regarding 'Get Qualified Scheme'. A course fee for the other accredited programmes accredited by EAPTI-GPTIM is not available online. However, prospective applicants are directed to the Institute email address and contact numbers.
- Application Forms and Student Contract Form
- Cancellation Policy
- Extending the Course Duration Form
- Mitigation Policy
- Policy for Suspension of Studies
- Sample of EAPTI-GPTIM (end of) Course certificates
- Schedule of CPD and training events
- EAPTI-GPTIM Code of Ethics and Professional Practice
- EAGT Code of Ethics
- EAPT Ethical Principles
- Code of Ethics of Trainers and Trainees
- EAPTI-GPTIM Grievance (and Appeals) Procedure
- EAPTI-GPTIM Complaints and Appeals Procedure
- Complaints Form for Complaints
- Code of Ethics for Supervisors
- Research Ethics Standards and Guidelines
- The Gestalt Today Malta Journals (issues November 2016, January 2018 and August 2019)
- Gallery (Graduations, events, seminars etc.)
- Links to EGN members and associations
- CPD Forms (Supervision)
- Links to warranted Psychotherapists
- Information re past Conferences

The website also includes a dedicated page for each of the accredited programmes. The list below provides the typical content for the Doctoral programme:

- General course information and rationale (including MQF Level and course duration)
- Course Outline / List of Modules
- General pedagogical procedure
- Assessment
- Number of ECTS
- Link to Application Form
- List of speakers on the programme
- Regulations on Doctoral Studies
- Various templates of key Forms required by the Doctoral candidates
- Dissertation layout guidelines
- Organigram showing the link between Doctoral Study Council, Dissertation Approval committee, Committee for Dissertation Evaluation, Dissertation Defence Committee

- Protocol and the Minutes of the Dissertation Defence
- Schedule of Studies
- Application for Exams

The Panel considers that the information available to the public via the Institute's website is very comprehensive and in-line with the requirements of NCFHE regulations.

However, the Panel recommends that a consolidated EAPTI-GPTIM QA Policy is compiled and made available to the public via the EAPTI-GPTIM website (Refer also to the recommendation in IQA 1)

The Panel also notes that the EAPTI-GPTIM has an extensive set of policies and procedures for quality, most of which are available to the public under different pages via the Institute website. Hence, the Panel recommends that the Institute considers making available these documents online via one drop-down menu or equivalent. This will facilitate access to prospective and current students (Refer also to the recommendation in IQA 1)

#### Student Training Contract (Masters and Doctorate)

The HoI presented to the Panel a copy of the document 'Student Training Contract' that applies to Masters and Doctorate trainees. The contract describes the contractual arrangement between the trainee and the Institute, awareness of regulations and policies, record keeping, compliance with code of ethics, payment terms of the course fee, and GDPR obligations. The Panel commends the transparency of the document, thus facilitating the contractual understanding of both parties (Students and Institute). [https://b505e098-0862-41d9-a0b8-4950023f614.filesusr.com/ugd/3e745d\\_a52aaa52a8414dfeaa34f1b47ed06ba5.pdf](https://b505e098-0862-41d9-a0b8-4950023f614.filesusr.com/ugd/3e745d_a52aaa52a8414dfeaa34f1b47ed06ba5.pdf)

#### Post-Qualification Graduate Entitlement

The Panel also notes that the EAPTI-GPTIM website clearly explains in the respective programme section the respective student warrant and registration entitlements in lieu of the programme qualification. The student is well informed that the programme is harmonized with all the standards prescribed by the European Association for Psychotherapy and the European Association for Gestalt Therapy. All national requirements for becoming a psychotherapist are met and are in line with the 2018 Psychotherapy Profession Act (Malta). After finishing this programme, the student will be in a position to apply for a warrant in order to begin to practice Gestalt psychotherapy competently and professionally' <https://www.eapti-gptim.com/master-in-gestalt-psychotherapy>

#### Good practice identified

- The Panel commends the transparency of the 'Student Training Document', thus facilitating the contractual understanding of both parties (Students and Institute).

#### Overall judgment for Standard

The EAPTI-GPTIM Academy meets the requirements of Standard 9.

#### Recommendations for improvement

Nil

### 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

##### Cyclical Review of Programmes

The Institute is required to undergo accreditation for all its already accredited programmes in five-year cycles as specified by Subsidiary Legislation 327.433 and the National Quality Assurance Framework for Further and Higher Education.

The HoI explained that the process for the cyclical review of an existing programme starts off with the Board of the Institute. The Board nominates an *ad hoc* team of lecturers, led by the Programme Coordinator, in collaboration with the EGN structures where applicable, to review identified courses. Throughout its work, the team gathers feedback from the Student Representatives Committee and the External Stakeholders Focus Group. Once it is ready with its draft proposals, these are submitted to the Board of the Institute, who may request re-drafting as necessary. If this is a programme run or planned to run within EGN, the Board submits it to the EGN Coordinating Board. Following this feedback, the Board liaises with the NCFHE on the re-accreditation process as per the EGN Statute and Quality Charter.

The Panel could deduce from the accreditation records of the course provision of EAPTI-GPTIM locally accredited programmes is within the five years stipulated by the Legal Notice. However, the Panel recommends that Masters programme accredited during 2014 is now (at time of audit) due for cyclical review and submission to NCFHE for programme re-accreditation.

##### Feedback from employers and tutors that informs the cyclical review process

The Panel observed from the discussions that the employers are very engaged and informed with the Institute as regards the programme structure and content, in particular the placement units. The Panel was informed by one of the employers of the changes to the placement unit scheduling that were taken on board by the Institute to accommodate trainees that lack work experience and initiative. In these cases, in order to mitigate for this situation, the 1<sup>st</sup> placement duration was extended to allow for more client observation by the students.

One of the employers also commented regarding the need to review the entry requirements to the programme.

The employer also gave feedback to the Institute as regards the use of the learning outcomes as the framework for providing student placement feedback as opposed to filling in the feedback questionnaire.

One of the Tutors suggested that a new social/political module be introduced that looks at the treatment of patients in the context of the changing social and political environment. The Tutor also suggested that the Institute and its tutors need to make a sustained effort to keep in touch with the ever-changing socio-economic-political, spiritual, gender fluidity and family unit structures. The Tutor believes that the Institute has a lot to offer to its students, alumni, tutors, and hence to society at large, in terms of the relationship between organism and environment both through its formal

teaching and also through its satellite centres, CPD sessions, student research, congresses and its international networks and associations.

### External Stakeholders Focus Group

Throughout the discussions, the Panel noted that meetings are held with external stakeholders in a spontaneous way and in response to the socio-political needs, the psycho-social field, and placement contexts. The HoI explained that these meetings are crucial for EAPTI-GPTIM to remain in tune with shifts in society, emerging needs in the work-field, and students' and services' needs in relation to placements.

The HoI explained that, through the drafting process of the IQA policy, it was recognized that there is a need to set up an External Stakeholders Focus Group that would meet at least once yearly in order to formally provide feedback and discuss how to improve course design and provision to fit the needs of the sector. The HoI confirmed that, while the Focus Group has not yet met, Board discussions are underway to establish who will be part of this group and in terms of starting the initial processes.

### Internal Institutional Review

Whereas it was very evident to the Panel members that the HoI and QA Consultant, in particular, have a very good overall understanding of the operational and academic processes, evidence in the form of a policy for formal institutional self-evaluation and evidence of such self-evaluation that assesses the effectiveness of the Quality Management System was not available. The Panel is cognisant of the fact that the Institute's formal Quality Management System is still new and developing. However, the IQA standard requires that the provider implements a process of internal review and self-evaluation both at the Programme and institutional level. The review and self-evaluation process needs to involve systematic feedback from key staff, students, alumni, employers and other stakeholders. The inputs of this process need to be based on factual data and evidence. The outputs of this internal monitoring and review process will inform management decisions, thus identifying strengths as well as areas for improvement. The resulting corrective, verification and prevention actions need to be monitored to ensure that the effectiveness of their implementation will result in an enhancement of the Student Experience.

### External Accreditations and Oversight

The Institute has undertaken a number of external accreditations each requiring its respective oversight. These accreditations (and associations) are described below:

- EAPTI / EAGT Accreditation

EAPTI-GPTIM has been accredited as the European Accredited Psychotherapy Training Institute (EAPTI) by the Training Accrediting Committee (TAC) of the European Association for Psychotherapy during 2005.

The benefits of EAP accreditation include:

- Status of 'European Accredited Psychotherapy Training Institute' and add the title 'EAPTI' to the name of the Institute; hence EAPTI-GPTIM;
- Graduates of the Institute can apply for the ECP title;
- Inclusion of Institute on the EAP's website as a 'European Accredited Psychotherapy Training Institute (EAPTI);
- Inclusion of the Institute's programme and activities on the EAP website;

- Broadcast of information of the Institute on the World Council of Psychotherapy;
- Cyclical re-accreditation.

The first part of the joint-accreditation (EAPTI / EAGT) process requires that the Institution is required to fill in a self-assessment report template. The report covers information related to:

- Details of changes to the training programme (Standard 10)
- Management and teaching resources (Standard 6)
- Financial probity (Standard 2)
- Ongoing legal issues (Standard 2)

This is eventually followed-up by a one-day on-site day assessment that is conducted by two experts from the same Gestalt modality of the applying Institute. The process of accreditation as EAPTI included a thorough scrutinizing process of the EAPTI-GPTIM training program, teaching staff, procedures of students, admission, evaluation and certification, ethical conduct, financial functioning and review of the facilities of the institute. The process of accreditation also confirms that the Institute conducts training for the profession of psychotherapist in the Gestalt modality at the high level of the European psychotherapy training standards. The Institutes also needs to demonstrate that it is involved in national/international research. Accreditation can be subject to conditions that need to be addressed through a corrective action plan. Follow-up on the corrective action plan is conducted via video conferencing

The EAPTI accreditation of the Institute by EAP is also approved by the European Association for Gestalt Psychotherapy (EAGT). EAGT is in charge of the quality of the training within the Gestalt modality of psychotherapy in Europe and which has the status of European Wide Accrediting Organization (EWAO) within EAP.

Re-accreditation for EAP occurs every five (5) years and every seven (7) years for the EAGT.

- EAPTI-GPTIM is also a member of the European Interdisciplinary Association for Therapeutic Services for Children & Young People (EATSCYP <http://eiatscyp.org/malta/>) and of which the EAPTI-GPTIM HoI is the co-founder. The HoI has participated and contributed to the establishment of standards in relation to Program development and training standards.
- EAPTI-GPTIM is also a member of the Malta Association for Psychotherapists (MAP) and commits to its standards and guidelines.
- In addition, the recent enactment of the *Psychotherapy Act* ensures regulation of the psychotherapy profession in Malta. EAPTI-GPTIM has over the past years, continuously participated in significant discussions addressing training, professional and CPD standards established within the law. EAPTI-GPTIM adheres to all that has now been formally outlined in the Act. It also has a member on the official Board for the regulation of the Psychotherapy Profession in Malta set up by the *Ministry* for the family, children's rights and social solidarity.
- All tutors need to be individually registered members with the EAGT and registered or warranted according to their respective local requirements. This means that CPD is a requirement in order to maintain membership and registration/warranting, ensuring the highest standards in the profession and as teachers (Also refer to Standard 6).

## Good practice identified

- N/A

## Overall judgment for Standard

The EAPTI-GPTIM Academy meets the requirements of Standard 10

## Recommendations for improvement

- R: The Panel recommends that a policy for formal institutional self-evaluation that assesses the effectiveness of the Quality Management System is set-up.

## 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

### Preamble

The Letter of Appointment issued by NCFHE to the individual Panel members was to review the compliance of the IQA of the licensee (EAPTI-GPTIM) with the NCFHE IQA standards. During the introductory Panel meeting, document review meeting, pre-scoping meeting and the scoping meeting at EAPTI-GPTIM, it became evident that the IQA of EAPTI-GPTIM transcends the operational and academic context of the licence conditions and scope of accreditation of EAPTI-GPTIM. This was due to the fact the IQA submitted by EAPTI-GPTIM to NCFHE comprehensively covered in structure and content the academic and operational aspects of the local licensee (EAPTI-GPTIM) and also the four satellite centres located in Croatia, Bosnia & Herzegovina, Serbia and North Macedonia, as part of the European Gestalt Network (EGN).

Prior to the Main Audit), the Panel sought guidance from the NCFHE QA Committee requesting clarifications on whether the Panel was expected to extend its terms of reference to include the EGN, possibly also including site visits at one or more of the satellite centres. The Audit Manager informed the Panel that the QA Committee had entrusted the Chair of the Panel the full autonomy and authority to determine the most appropriate approach for the conduct of the review.

The Panel concluded that although the NCFHE licence issued to EAPTI-GPTIM does not take cognisance of the network set-up, the Panel was still (additionally) required to extend the scope and focus of the EQA Audit agenda to cover the network members. In this way, the Panel could ensure that EAPTI-GPTIM and the satellite network members are afforded the opportunity to demonstrate how the IQA of the network is aimed at the continuous improvement of quality in education provision. Fully cognisant of the fact that the licence conditions were not representative of the IQA set-up, the Panel still accepted to conduct the EQA audit

## **Key factors influencing the final outcome of the EQA audit**

There were three key factors that influenced the outcome of this audit:

1. During the course of the desk studies by the Panel, scoping visit and main audit, the Panel could not confirm that all the satellite centres had the status of an accredited training institute by their respective local accrediting bodies to deliver further and higher education. The only evidence provided by all the centres comprised of an endorsement by their local, national association of Psychotherapy and also accreditation by the European Association of Psychotherapists.
2. The satellite centres do not have oversight (audits) of their quality assurance system with respect to their Quality Manual by either EAPTI-GPTIM or an accrediting body or a 3<sup>rd</sup> party other than that of the EAP. The Panel did have access to the EAP initial onsite and ongoing (postal) accreditation review checklists. However, these reviews only addressed a small number of the requirements of the NCFHE IQA standard (also refer to Standard 10).
3. The Panel could not guarantee the necessary rigour in conducting the review of the satellite centres during the 3-day audit through videoconferencing, notwithstanding the comprehensive agenda set-out and the excellent logistical support facilitated by the HoI of EAPTI-GPTIM and the extremely co-operative staff of the satellite centres.

## **Possible Scenarios for completing the EQA audit**

In view of the above key findings, after consulting with the Panel and the NCFHE Audit Managers, the Chair had a side-meeting in the late afternoon of day 2 of 3 of the EQA audit with the HoI, QA Consultant and one of the NCFHE Audit Managers to discuss the status of the proceedings of the audit. The Chair explained to the HoI and QA Consultant that, whereas the EAPTI-GPTIM is considered to be on track with meeting the requirements of all the IQA Standards (based on the evidence seen during the internal Panel meetings, scoping visit and first two out of three days of the audit), the Panel was not in a position to arrive at a positive conclusion that confirms that the satellite centres are also compliant to the requirements of the IQA standard.

## **Possible Scenarios**

The NCFHE Audit Managers had confirmed the possibility of suspending the EQA audit in order to seek policy and guidelines from the NCFHE office. However, in the situation and also in view of the significant logistical challenges that were overcome by the Provider in coordinating a multi-site audit agenda, the Chair in agreement with the Panel and NCFHE members decided to complete the audit ensuring fairness and transparency in all scenarios considered and that any decision that was taken would be subject to subsequent approval by NCFHE QA Committee.

As a possible way forward, the Chair of the Panel suggested later on at the end of day 2 to the HoI of EAPTI-GPTIM, the following scenario:

Whereas the HoI accepts to:

- a) Withdraw from the remit of the terms of reference of the EQA audit the provision of accredited courses by the satellite centres, and
- b) The satellite centres refrain in the future from including the NCFHE licence number and logo from the certificates issued by the satellite centres for the EAPTI-GPTIM accredited courses (albeit this was confirmed not to have been the case so far),

The Panel would agree to:

- a) Complete Day 3 of the audit, and conclude the audit;
- b) Submit to NCFHE a report that
  - i. Includes in the EQA report the full findings of the Panel related to EAPTI-GPTIM and also the four satellite centres;
  - ii. Identifies recommendations in the EQA report made by the Panel that relate to the satellite centres as 'optional';
  - iii. Pronounce judgments in the EQA report that will be based on the Panel findings relating only to the remit of EAPTI-GPTIM (and not the satellite members of the EGN).

The Panel was very positive on the added value of the EGN and considered that it would be a disservice to the extensive work and effort put into the IQA by EAPTI-GPTIM (and the EGN) and also discouraging to the management of the satellite centres.

The Chair explained that in this way, the full narrative in the EQA report would make it possible for EAPTI-GPTIM in the future to negotiate with NCFHE a possible extension to the terms of an extended or new EQA audit (possibly also with a new Panel) that could also include the consideration of the provision by the satellite centres as part of the EAPTI-GPTIM NCFHE licence. The Panel explained that it does not have the authority or competence to commit to the above possibility (namely of extending the licence conditions).

Possible scenarios of minimum conditions that need to be met for the consideration of the (foreign) satellite training centres to be included (in future) under the terms of reference of the EQA audit will be submitted by the chair of the panel to the NCFHE for further consideration.

### **Conclusion**

After an open and rigorous discussion between the HoI, QA Consultant and the Panel, the HoI confirmed that the EQA audit could proceed with the conditions as agreed (refer above). The HoI confirmed that the satellite centres would effectively refrain from including the EAPTI-GPTIM NCFHE licence number and NCFHE logo on the certificates of students that graduate on EAPTI-GPTIM accredited programmes delivered at the satellite centres.

However, EAPTI-GPTIM will still allow the centres to deliver the locally accredited courses since the courses remain the intellectual property of EAPTI-GPTIM.

### **Acknowledgement**

The Panel acknowledges the consistently professional support of the HoI and QA consultant throughout the full proceedings of the scoping visit and main audit. The full engagement and passionate feedback by the other academic and support staff, students, alumni and also the employers are commendable.

### **Good practice identified**

Nil

### **Overall judgment for Standard**

EAPTI-GPTIM Academy has fulfilled this standard by virtue of hosting the EQA referred to in this

report. This is the first EQA of the EAPTI-GPTIM.

EAPTI-GPTIM meets the requirements of Standard 11.

## **Recommendations for improvement**

## 4. Response by the Provider

### 1. Preamble

The NCFHE External Quality Audit (EQA) has been a fruitful experience for EAPTI-GPTIM. It informed the Institute's own self-reflective process, and its pre-EQA self-evaluation enabled the Institute to revise, formalize and fine-tune many of its practices and procedures.

The Institute is particularly pleased that the EQA found that all the National QA Standards were met, and that for three Standards : 1, 3 and 6, expectations were exceeded. This will strengthen the Institute's resolve to continue improve the quality of its provision, both in Malta and through the European Gestalt Psychotherapy Network.

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

<b>Standard 4</b>	
1. KR: The Panel recommends that the assessment criteria for a student to pass the assignment need to be documented and made available to the student before they attempt the various assignment. Similarly, for the live examination, the failing criteria need to be made known and communicated to the students in advance of the examination (To be implemented within three months with receipt of the report).	1. This recommendation will be implemented as from academic year 2020-21.
2. R: The Panel recommends that formative, documented assignment feedback is communicated to the Students (and not a pass/fail grade).	2. All assignments are given written feedback, apart from the pass/fail grade. This will be clarified in the Student Manual.
3. KR: The Panel recommends the implementation (by all Tutors) of the EAPTI-GPTIM 'Code of Ethics for Trainers and Trainees' <a href="https://www.eapti-gptim.com/code-of-">https://www.eapti-gptim.com/code-of-</a>	3. This recommendation will be implemented as from academic year 2020-21.

<p><u>ethics-and-professional-pra</u> that specifies that 'all assessors/examiners shall complete a written evaluation of the trainee's work, which shall be made available to the trainee' (To be implemented within three months with receipt of report).</p> <p>4. KR: The Panel recommends to the Institute to set-up policy and implements clear guidelines for the tutors on what constitutes good practice in terms of ensuring the separation of 'teaching and learning' from 'assessment' (To be implemented within three months with receipt of report).</p> <p>5. R: The Panel recommends to the Institute to revisit and rectify the use of the terms 'Examination Panel' (Quality Manual, section 1.2.3) and the 'Examination Board' (Quality Manual, Appendix 6) that have the same function.</p> <p>6. R: The Panel recommends that the Institute appoints an 'External Examiner' that is and is seen to be impartial to the Institute.</p> <p>7. R: The Panel recommends that the Institute revisit the grading policy, possibly including the use of (number) marking in a way that the requirements of Quality Manual, Appendix 6, section 3.5 are met.</p> <p>8. R: The Panel recommends that the Institute revisits and possibly redefines the number of 'referrals' possible</p>	<p>4. This recommendation will be implemented as from academic year 2020-21.</p> <p>5. These will be revised and operational as from academic year 2020-21.</p> <p>6. An external examiner who is truly independent from the Institute is a requirement for the final examination. This will be clarified in the Quality Manual.</p> <p>7. The Institute has explained in detail to NCFHE why it has opted for the assessment and grading system that it uses. This system ensures that a Pass is given only once the required high standards in specific components, both written and practical, have been achieved according to set numerical parameters.</p> <p>8. This system following international good practice in the field. However the Institute will review to clarify as</p>
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<p>between the Complaints and Appeals Board and the Ethics Committee in order to establish a more straight forward modus operandi.</p> <p>9. R: The Panel recommends that the Institute determines whether both the 'Complaints Procedure' (Quality Manual, Appendix 13) and the 'Grievance Procedure' (only available online) are required, or not.</p> <p>10. R: The Panel recommends that the Institute revisits the full set of procedures addressing complaints, grievance and appeals in order to (a) ensure that there is a coordinated and lean procedural approach, and (b) stakeholders have ease of access and reference to the complimenting procedures, possibly through a simplified (graphical) document map, or in any form deemed appropriate by the Institute.</p>	<p>necessary.</p> <p>9. The Institute will review these and have them ready in 2021.</p> <p>10. The Institute will review these and have them ready in 2021.</p>
<b>Standard 5</b>	
<p>11. KR: The panel recommends that the Institute updates the templates of the programme completion Certificates of the Masters, Diploma and PGC programmes are to include the minimum information as per licensing condition requirements (To be implemented within three months of the publication of the of report).</p>	<p>11. This recommendation will be implemented as from academic year 2020-21.</p>
<b>Standard 7</b>	
<p>12. R: The Panel recommends that the feedback of the Students Representative Committee is documented.</p>	<p>12. This recommendation will be implemented as from academic year 2020-21.</p>
<b>Standard 8</b>	
<p>13. R: The Panel recommends that the Academy's documentation system is to include revision control to ensure the correct management of (printed) documented information.</p>	<p>13. The Institute will review these and have them ready in 2022.</p>

<b>Standard 10</b>	
14. R: The Panel recommends that a policy for formal institutional self-evaluation that assesses the effectiveness of the Quality Management System is set-up.	14. The Institute will have this policy in place in 2022.

**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”.**

**4. Response to comments and proposals made by the Peer Review Panel in connection with Standards for which the Peer Review Panel decided “Does not meet Standard”.**

## Annex: Review Panel Bio Notes

In the setting up of the review Panel for EAPTI-GPTIM, 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 the Peer Review Panel. The bio notes are correct as at the time of when the QA audit was carried out **on the 11,12 and 13<sup>th</sup> November 2019**.

### Head of Review Panel/External Peer:

Ing. Pierre Dalmas

Since July 2014, Ing. Pierre Dalmas holds the position of Director, Quality Assurance at the Malta College of Arts Science and Technology. His primary responsibility is to facilitate the enhancement of the academic and administrative processes of the College as well as to ensure the compliance of the Quality Management System with National and European standards, guidelines and legislative requirements.

He holds a Masters Degree in Business Administration (Grenoble Graduate School of Business, France) and a Bachelor (Honours) Degree in Mechanical Engineering (University of Malta). His previous management positions within the diverse manufacturing and services industry sectors have helped Pierre in relating the needs of the industry with the expected outcomes of vocational and professional education and training. Pierre is also a certified trainer and has delivered training locally and abroad in industry, academic and vocational institutions.

Pierre is one of the MCAST representatives on the ReferNet team, an EQAVET National Reference Point (since 2015) and a European Vocational Training Association (EVTA) expert panel member. He regularly attends, both at a national and European level, meetings and conferences related to VET and quality assurance.

### Peer Reviewer:

Professor Sandra C. Buttigieg

Professor Sandra C. Buttigieg MD, PhD (Aston,UK), FFPH (UK), MSc, MBA, MMCDF is Head of Department of Health Services Management, Faculty of Health Sciences, University of Malta (UOM). She is Consultant in Public Health Medicine at Mater Dei Hospital, Malta, in charge of the Clinical Performance Unit, and a member of the Patient Safety and Quality Improvement Team. She is also Honorary Senior Research Fellow at the University of Birmingham, UK. She was Director of the Institute of Health Care, UOM from 2000-2010. She was invited several times by SKVC – Centre for Quality Assessment in Higher Education, Lithuania, both as Team Leader and External Reviewer in audits of higher education courses. She also participated in internal audit of UOM, as part of the Quality Assurance Senate subcommittee. She has authored

and co-authored numerous academic and research articles and is currently on several Editorial Boards of high ranking peer-reviewed journals.

### **Student Peer Reviewer:**

Ms Tiziana Gatt

Tiziana Gatt is a University of Malta student reading for the Master of Arts in Health, Medicine and Society. She graduated with a Diploma in Management Studies and furthered her academic knowledge through a B.Sc.(Hons) in Sport and Active Lifestyles, and an Award Certificate in Teaching Adults.