



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

# External Quality Assurance Audit Report

## **Learn Key Training Institute**

Carried out between the 30<sup>th</sup> of  
September & 1<sup>st</sup> of October 2020

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## Abbreviations List

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

# Executive Summary

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## Institutional background

Learnkey Training Institute started its operations since 1995 to provide training courses/programmes primarily in Management, Business and Accounting. In 2001 the Institute was accredited by City & Guilds UK to deliver a range of diploma courses. Within the same year the Institute was also accredited by the British Computer Society to perform ECDL courses and testing. Throughout the years the Institute added ILM, VTCT and LCCI to its portfolio.

Since 2015 the Institute has been accredited by the ACCA (Association of Chartered Certified Accountants) to deliver the Accounting and Finance Diploma Fundamentals (F) courses and is currently one of the local established ACCA Gold Centres. In December 2015 Learnkey Training Institute was licensed by NCFHE as Higher Education Institution holding licence number 2005-TC-007. The Institute is licensed to deliver home-grown courses classified from MQF Level 3 to 5.

Currently the Institute runs different home-grown courses replacing the recent City & Guilds training programme. The courses offered by Learnkey target job seekers as well as employees willing to further their professional development. The vision of the Institute is summed up in the statement below:

Offer learners theoretical and practical knowledge mirroring a real-world context. This will enable learner to meet current industry needs. We work with different partners as a learning community.

Learnkey Training Institute has recently changed ownership and under the new Directorship the Institute is currently developing new strategic planning. The Dean of Academic Affairs within the Institute is mainly responsible for all student and course matters. The services of an external QA consultant have been recently adjoined to the Institute for matters related to QA auditing – the consultant role was mainly related and in preparation to the NCFHE audit.

Since October 2019 the Institute has also been approved to deliver OTHM qualifications (OTHM Centre number: DC1808272), however, currently no OTHM qualifications are running yet.

Due to current COVID-19 context the Institute has rapidly changed the teaching from face-to-face to online mode.

## Overview of the audit process

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 reaching conclusions on Standards 1 and 3 – 11. As outlined in the External Quality Audit Manual of Procedures, the NCFHE sought external expertise to evaluate and reach a conclusion on Standard 2. Through this report, the panel also highlighted areas of good practice which, in its view, make a positive contribution to academic standards and quality of education that are worthy of being emulated and disseminated more widely.

The panel met for induction and preparation on 14th January 2020 and again on 24th March 2020 to determine the specific terms of reference, aims, objective and research question of the QA process. A preliminary online meeting was held with the provider on 2nd September 2020 and the audit visit was conducted on 30<sup>th</sup> September and 1st October 2020.

## Summary of the conclusions given by the Peer Review Panel

On the basis of the findings documented in the report, the panel has concluded that Learn Key meets Standards 2, 5, 7, 8, 9 and 11, requires improvement for Standards 1, 3, 4, 6, and 10. The recommendations listed for each Standard are proposed to improve the positive practice already attained while addressing the challenges encountered within the institution.

The panel made 7 mandatory recommendations, all of which need to be implemented within 6 weeks of the publication of the report. They also made 9 key recommendations and 8 recommendations.

## About the External Quality Audit

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### 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 regards to the programmes of study that they offer and the achievements and capabilities of their 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 the 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.

## The Peer Review Panel

The Peer Review Panel was composed of:

**Chair of Review Panel:**

Ms Desiree Scicluna Bugeja

**Peer Reviewer:**

Mr Peter Calleya

**Student Peer Reviewer:**

Ms Tiziana Gatt

**QA Managers (NCFHE):**

Ms Fiona McCowan and Mr Jurgen Damato

## Specific Terms of Reference

The main lines of inquiry for this EQA were to establish the fitness of purpose and effectiveness of the internal quality assurance processes established and implemented by the Institute. This includes the set-up and structure of the quality management system, documentation and review of teaching, learning and assessment carried out by the Institute and the foreign awarding bodies.

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:

- Mandatory recommendations (MR) which are crucial to meet a standard and must be implemented by the date indicated by the panel.
- Key recommendations (KR) are important to improve a standard and which should be implemented expediently by the institute within the timeframe indicated by the panel to address weaknesses.
- Recommendations (R) for improvement which are merely suggestions based on the panel analysis and observations.

## Institutional Context

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Learnkey Training Institute is one of the local pioneer training institutions specializing in *Accountancy, Management Studies, Secretarial, IT and Business* courses/programmes that facilitate continuous professional development training for employees seeking to advance in their careers and for persons seeking to enter a business/management career path.

Since its foundation the Institute has worked with Foreign Awarding Bodies and Training Providers namely City & Guilds UK, British Computer Society (to perform ECDL courses), ILM, VTCT, LCCI and ACCA to organise courses/programmes of study within the local sector. The Institute is also a centre of testing holding the exams relevant to the courses run by these foreign awarding bodies. Currently the Institute is in collaboration with OTHM Qualifications – an Ofqual regulated Awarding Organisation. The Institute is an approved Centre for OTHM till the end of 2021. The OTHM courses will start running once sufficient numbers of course participants will enrol in the specific courses.

Since being licensed by NCFHE, the Institute has also developed a number of home-grown courses modelled on the City & Guilds qualifications. The latter courses have been accredited by NCFHE. The Institute is licensed to provide qualifications from level 2 to level 7. The Institute is currently gauging the needs and priorities of the local labour market to evolve the home-grown courses in the right direction potentially also venturing into *Tourism & Hospitality* and *Social Care* disciplines. The local course applicants can benefit from the *Get Qualified Scheme* and recover 70% of the course fees through tax refunds.

The Institute is currently developing the web/ virtual learning approach and seeking to strengthen the online platform by 2021. This recent development addresses the present COVID-19 pandemic context and it also aims to attract foreign external individuals to the courses/programmes of study offered, thus expanding within the international market. The local course applicants are still targeted by the Institute. The newly appointed Business Manager is currently exploring a *cold calling* marketing approach – this entails liaising with local companies to attract their employees to the range of courses offered within the Institute. The new Institute owner together with the management team within the Institute is planning the extension and renovation of the current premises to facilitate hosting of more courses and/or course participants per programme. The Institute's strategic planning also considers prospective expansion to new premises. The business plan is still under discussion and not yet finalised.

## Analysis and Findings of Panel

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### 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**

The Institute has been licensed to operate as a Higher Education Institution by NCFHE since December 2015. The Institute currently operates its academic quality and standards procedures on a bilateral system namely: the quality assurance procedures required by the Association of Chartered Certified Accountants (ACCA) for all ACCA Fundamentals courses and the quality assurance standards as outlined in the National Quality Assurance Framework for Further and Higher Education (NQAF).

The Institute compiled a self-assessment report (SAR) based on the eleven standards set by NQAF, through the support of a recently engaged QA external consultant. The report indicates that the necessary QA documentation has been recently developed. Statements of the QA Policy, Equal Opportunities Policy and Refund & Cancellations Policy are available on the website. However, the complete QA Policy is not.

The panel notes that the engagement of internal (particularly lecturers and students) and external (such as employers relating to Accounting firms and Qualifications Houses) stakeholders in the process of QA implementation and strategic planning is generally lacking or negligible.

The panel notes that the organigram/organisational structure chart presented in the documentation stipulates no specific personnel for all matters related to QA. The recent engagement of an external QA consultant (since March 2020) on a service contract basis to facilitate the compilation of SAR and other related documentation, is considered as valid. However, the panel notes that such an engagement is not ongoing and thus the QA implementation and planning process lacks continuity and consistency. In fact the panel is concerned that the QA procedures (development, implementation and monitoring are being conducted through a sporadic approach with limited regular input from management personnel within the Institute.

The EQA by ACCA engages the Institute in a monitoring visit at least once every three years (or more frequent if necessary), an annual renewal exercise through which provider puts forward evidence of outlined necessary actions and a result service that includes uploading of students' details and results. Furthermore, all students sitting for the ACCA exams take part in a survey about Learning Provider (i.e. the Institute). The last EQA Monitoring Visit by ACCA was conducted in 2018 (19<sup>th</sup> October 2018). The report indicates satisfactory adherence to performance targets for Gold Centre approval as part of the Approved Learning Partner Programme. The report highlights a list of follow-up actions that the Institute had to satisfy and provide evidence of actions and provide evidence of actions by 31<sup>st</sup> January 2019. An ACCA representative confirmed to the panel that all necessary actions were administered effectively and timely as requested in the

report dated 23<sup>rd</sup> October 2018. The next Monitoring Visit by ACCA is scheduled for 2021. ACCA conducts a result service for local ACCA students and the results attained by local course participants are compared to global results. However, since the number of ACCA course participants within the Institute is low, comparison is difficult. When comparison was feasible the pass rate was at par to the global ACCA pass rate.

The ACCA representative explained to the panel that all platinum ACCA centres have the opportunity to forward feedback regarding ACCA exams and courses. Not all the received feedback lead to change however changes are held when appropriate. The compiled feedback from platinum centres is available for discussion with participation of all ACCA centres. In this manner centres can contribute by forwarding comments and proposals through participation in a webinar. From the ACCA interviewee the panel is informed that the Institute did not participate in such webinars engaging all centres. Furthermore, the Institute failed to take opportunity to hold meetings or communicate with the ACCA representative.

### **Good Practice Identified**

1. Engagement of an external QA consultant to strengthen QA processes especially related to NCFHE audit.

### **Recommendations for improvement**

1. Better engagement of both internal and external stakeholders in QA processes and strategic planning.
2. Recruitment and engagement of an internal QA officer to ensure regular ongoing development, implementation, monitoring and review of QA processes.
3. MR: Publishing of complete QA policy on official website within 6 weeks of report publication.

### **Conclusion**

Requires improvement to meet Standard.

## 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

Learn Key Limited is a company incorporated in Malta under registration number C 24652, which was previously owned by a Maltese shareholder and in 2019 it was taken over by a new shareholder, Mr. M. Hussein.

The company's current sole director is highly qualified and experienced in the fields of finance and accounting, especially via his role as owner of the International School of English in Dublin Ireland – [www.iseireland.ie](http://www.iseireland.ie). Mr. Hussein's profile renders him fit for purpose for his role within Learn Key Limited. The company presented the share transfer documentation to MBR to reflect the take over, submitted its annual return for 2019 however has not as yet submitted the latest audited financial statements as at 31 May 2019, to the Malta Business Registry despite the fact that more than a year has passed from the date of these financial statements.

Upon the takeover the new shareholder injected own funds to improve and rectify the short-term liquidity issues faced by Learn Key Limited and settled practically all outstanding in respect of direct taxation and FSS/NIC and also bank borrowings.

The company was performing in the black up to May 2019 and had positive net equity however it had considerable borrowings and dues to the Commissioner for Revenue, which have been now settled by the new shareholder. Given the takeover of the company by Mr. Hussein more importance was accorded by the financial evaluator to the Financial Projections for 2020 to 2022 presented by the new shareholder, which indicate towards a plan to grow the company substantially in terms of turnover and build up considerable reserves in the near future. As a result of the above findings one can state that the business as a whole 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 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 specific written procedure relating to the engagement and selection for headship positions.

From a financial perspective the company's balance sheet reflected a considerable enhancement in its equity base after carrying out a revaluation of the property owned by the company, which added €323k in value to the net equity base of the company, which exceeded €385k at year-end 31 May 2019. Given its overall small size the company tends to be flexible in its approach and hence able to act quickly and decisively in the case of any short-term pressures or negative trends.

### Good Practice Identified

The company has prepared a three-year financial forecast which can be used to identify performance variances over time and thus render the management able to take actions to rectify matters as soon as possible.

### **Recommendations for improvement**

1. It is recommended that the company prepares a written procedure on how to fill any vacancies in the future for headship positions.

### **Conclusion**

Meets Standard

## Standard 3: Design and Approval of Programmes

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

### **Main findings**

The Institute offers both home-grown courses and other courses in partnership with foreign awarding bodies. The latter mainly consist of modules of the ACCA qualification where the Institute has attained Gold status as an approved learning partner. Course design, content development and approval of such foreign accredited programmes are mainly conducted by the awarding body abroad and the Institute does not have any direct input.

The Institute is not a self-accrediting entity and for its own internally developed programmes follows the programme accreditation procedures of the NCFHE.

The home-grown courses currently offered by the Institute are pegged at MQF levels 3, 4 and 5 and were originally developed by City & Guilds, an educational organisation and awarding body in the UK, that was then discontinued. The design and content of the home-grown qualifications are based on the City & Guilds syllabus. The Dean of Academic Affairs and other Institute personnel together with the lecturers provided their input to write the learning outcomes and competencies and adapted the qualifications for the local market. Learning outcomes of each course are available on the website and also forwarded to course participants upon enrolment. Workload is defined in terms of ECVET/ECTS, where every 25 hours make up 1 credit. All modules have their assessment clearly indicated and course participants are informed of the exam dates in advance. All home-grown programmes were submitted to and accredited by the NCFHE.

The Dean of Academic Affairs is responsible for allocating lecturers to particular modules/programmes and ensuring teaching is aligned to the syllabus content. There is no recording of formative feedback and ongoing monitoring. The latter is conducted on an ad hoc basis.

The panel notes that no formal procedure for the course-design process and approval is in place and this has no student and/or other stakeholder involvement. The panel notes that following accreditation, the content of certain courses has never been reviewed and may be outdated. The panel is also aware that the Institute is currently exploring the possibility of venturing into new disciplines related to Tourism and Hospitality and Social Care. In the event that the Institute develops home-grown courses in these fields, the engagement of internal and external stakeholders is pivotal. The Institute is currently phasing out certain home-grown courses and replacing them with OHTM (UK awarding body) qualifications. The panel recommends that any future planning of home-grown courses or modules will ensure internal and external stakeholder involvement.

The panel notes that the Institute is not responsible for the learning outcomes, assessment criteria, content or assessment method set by the foreign awarding body qualifications. Both lecturers and

students confirmed the online resources provided by the foreign awarding body are sufficient and easily accessible to facilitate effective content delivery. The prospectus indicates that the programmes are designed to enable smooth student progression, however, this may at times be compromised since certain modules are not offered by the Institute.

From discussions with the foreign awarding body, the panel notes that the Institute has channels of communication available to interact, forward feedback and contribute to the development/changes of the programmes. The panel notes that the Institute needs to take a more active role through the channels available.

### **Good practice identified**

1. The currently taught foreign awarding body courses abide to the international standards, ensuring an independent review process for course content and assessment, thus instilling public confidence in their autonomy.

### **Recommendations for improvement**

1. In the event that the Institute seeks to devise new home-grown courses, a formal process for their design, development and approval must be put in place. This should also include both internal and external stakeholder involvement.
2. For courses by foreign providers the Institute should make better use of the available channels of communication to forward relevant feedback and contribute to the development of the programmes within the local context.

### **Conclusion**

Requires improvement to meet Standard.

## 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**

The Institute provides a range of courses primarily ACCA Fundamentals and home-grown courses. Due to the current pandemic context online lessons replaced the face-to-face class sessions in a timely manner – the panel notes that the transition to the virtual learning context was smooth. The live online lessons are also recorded and shared by uploading these on a specific online platform namely *Teachable*. The panel notes that this practice was highly appreciated by course participants. Indeed, feedback from interviewees clearly indicates that such a practice involving availability of recorded lessons facilitated the course participants' learning and understanding. The panel notes that none of the accredited courses currently offered by the Institute include accredited work-based/placement learning component.

The course lecturers for all courses provide lecture notes including tailor made notes for the local variant modules. ACCA course participants have also access to the ACCA global website through a personalised registration number login. The Kaplan textbook is also provided to all ACCA course participants. For future OTHM qualifications, online resources will also be available.

A mock test composed of previous ACCA exam questions is administered with course participants prior to the final ACCA exam. Such mock tests are scored by the lecturers and the scored script is forwarded to course participants with the mark attained and some general comments such as *Well done*. In the case of home-grown courses, a test composed of previous City & Guilds exam questions is also conducted prior to the final course exam. The scored test papers are returned to the students with a mark and limited feedback often in the form of a general comment.

From the interviews conducted by the panel and a detailed review of exam papers for home grown courses it is evident that exam questions/papers are re-used/recycled over a period of years. This practice weakens the validity of the summative assessment. A review of sets of exam papers related to the home-grown courses reveals a number of faults with the paper setting/questions namely inadequate distribution of marks (at times over inflated), lack of consistency in mark allocation for similar tasks, mark allocation on exam sheet not consistently visible. The panel notes that no formal/official marking schemes were available for the exam papers reviewed. The panel also notes that no internal and/or external verification of summative assignments/exams is in place. Furthermore, no moderation of scored scripts takes place. The development and sharing of assessment criteria prior to assessment is limited in practice. The panel notes that once the final exam papers of the home-grown courses are scored by lecturer, the grades are emailed to course participants in a timely manner.

The panel is informed that in exceptional circumstances, course participants unable to continue their studies are provided the option to extend their studies by one year. Furthermore, course participants with a learning difficulty are provided with extra time during their final exam.

From the interviews conducted it is highly evident that lecturers at the Institute adapt their teaching methods to facilitate learning and understanding by all course participants. Lecturers

seek to engage course participants through questioning and effective use of a range of teaching and learning resources. This practice was also extended to the online/virtual mode of teaching. The panel notes that the course participants and alumni interviewed often cited the personal one-to-one individual attention typical of this Institute. Indeed, the small class numbers facilitate this approach too. The open-door policy approach is highly appreciated by both current and past course participants. This approach enhances communication between course participants and management and thus any identified difficulties are solved promptly. The premises at the Institute offer sufficient classrooms/space for comfortable face-to-face sessions for small groups however the rooms need renovation. The premises are also equipped with a computer lab and a lounge area. The panel is aware that currently the Institute is in the phase of applying for the necessary permits for a building extension through the construction of additional floors. The panel is informed that the premises' renovation process will take place once the construction is complete.

The panel notes that the Institute maintains and retains adequate records of the assessment process and grading. Furthermore, a formal application for potential students' complaints and appeals is in place, however such procedures are rarely used since the difficulties arising are solved promptly through other channels.

### **Good practice identified**

1. Smooth and efficient transition to online teaching and learning during pandemic timeframe to ensure consistency and continuity across all courses/programmes of study.
2. Prompt availability of recorded lessons via easily accessible online platform to facilitate learning and understanding.

### **Recommendations for improvement**

1. MR: Provision of internal and external verification for all summative tasks within 6 weeks of report publication.
2. MR: Provision of moderation of scored summative assessment tasks within 6 weeks of report publication.
3. MR: Compilation of marking schemes relevant to summative assessment tasks to ensure reliability in the scoring process within 6 weeks of report publication.
4. KR: Provision of constructive written feedback to students to support ongoing learning and understanding within 6 weeks of report publication.
5. KR: Development of clear assessment criteria to be shared with students prior to assessment tasks within 6 weeks of report publication.

### **Conclusion**

Requires improvement to meet standard.

## 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**

The admissions process within the Institute is implemented in a consistent and transparent manner. Potential course participants can access information about the courses offered through multiple sources namely, the official website of the Institute, the Facebook page and the Instagram account. Any queries from interested applicants are received and addressed by the Dean of Academic Affairs on a personal level either via email or through face-to-face encounters. Such meetings are intended to understand the applicant's needs, objectives and career prospects as well as to gauge previous experiences and/or qualifications.

In the case of potential course participants lacking the entry requirements for a specific course, the Dean of Academic Affairs in liaison with a tutor lecturing in the field meet the applicant in person to discuss his/her aptitude, prior learning/qualifications and suitability for study. The panel notes that the Institute lacks adequate well defined and published mechanisms for the recognition of prior learning/qualifications. Such meetings facilitate potential applicants' course choice and further studies. Once the applicant starts the course a brief induction session takes place during the first lecture. All information related to the course programme, study unit details, payment schedule, student feedback questionnaire and the complaints/appeals process are explained in depth during this first induction session. Furthermore, the Institute has a *Student Handbook* which includes all details and guidance related to pursuing studies at the Institute, that is made available to the course participants.

The Institute has developed an efficient database management system that keeps adequate records of all details related to the enrolled students. The system also keeps track and manages all information regarding course participant progression. Any accredited qualifications put forward by course applicants are recognised as prior learning. Each course participant is informed of his/her progress by the lecturer in an ongoing verbal manner. The verbal feedback of the lecturer relates to the tasks assigned in class and at home. The panel notes that the role of written feedback is pivotal to enhance achievement and learning and thus recommends that written feedback is in place.

The certificates and transcripts issued by the Institute are aligned to NCFHE requirements and standards. However, the Panel recommends minor changes such that information related to the study units is also visible on the certificate.

### **Good practice identified**

1. The Institute has invested in a control management system (CMS) that facilitates smooth and efficient recording of student progression.
2. The personal tailor-made academic guidance and advice prior to course admission

facilitates course participant academic success and course retention.

### **Recommendations for improvement**

1. KR: The Institute needs to breakdown the ECTS for each respective study unit within the course, as on the final course transcript issued within 6 weeks of report publication.
2. KR: The Institute needs to develop and publish the set of regulations/guidelines related to recognition of prior learning/qualifications, within 6 weeks of report publication.

### **Conclusion**

Meets Standard.

## Standard 6: Teaching Staff

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

### **Main findings**

The Institute does not employ full-time lecturers. The recruitment of part-time lecturers is conducted through a call for applications where CVs are submitted and potential candidates are shortlisted. The Dean of Academic Affairs then conducts a formal interview and selects the lecturers based on their qualifications and experience. There is no evidence of a standard set of selection criteria for the recruitment process.

The foreign awarding bodies such as ACCA are not involved in the selection of lecturers directly, however, such awarding bodies ensure the Institute engages qualified personnel.

All lecturers engaged within the Institute have a qualification of at least one level higher than the level/course they teach. The panel notes that all lecturers within the Institute are professional educators or professionals in their own field (e.g. Accountants). Their professional status is taken as evidence of their competence in the course content. No formal official monitoring or observation of lecturers is undertaken by the Institute. The panel notes that a systematic lecturer appraisal process is lacking within the Institute. Such an appraisal system needs to establish basic appraisal criteria and include documented feedback of the appraisee by the appraiser. This approach facilitates follow-up by an appraiser on any highlighted points for improvement by the appraisee, thus leading to a holistic lecturer improvement cycle.

When lecturers commence a course, the Dean of Academic Affairs provides them with the learning outcomes to ensure adequate content coverage. Upon completion, the lecturer submits a report on all students which includes results of the mock test.

A number of lecturers have been teaching within the Institute for a number of years. The Institute takes pride in knowing all course participants individually and ensuring they are satisfied with all aspects of the course. Any complaints related to the teaching style/mode are looked into by the Dean of Academic Affairs and discussed promptly with the lecturer/s concerned. Any feedback related to the teaching/learning process is primarily gained through students' questionnaires which includes questions about the lecturer's delivery/teaching style. These questionnaires are handed to students mid-course and towards the end of a course. However, students can also provide feedback about the course any time during the course duration through informal discussions with Dean of Academic Affairs. The Dean of Academic Affairs is responsible for assessing all student feedback and if any issues are raised these are taken up directly with the lecturer. This process is often conducted informally however the panel notes that documented evidence of the process is necessary.

Lecturers complete a self-assessment report after the delivery of a course/programme of studies. However, following a review of the sample reports, the panel notes that such reports are mainly descriptive rather than analytical in nature. Furthermore, these reports are not formally discussed at a management level – thus no action plans for improvement are drawn from the reports.

Lecturers have the necessary equipment and facilities to deliver classroom lectures. Currently lecturers are providing live lessons and then also using the *Teachable* platform to upload the recording of the live lessons. In this manner course participants can easily download documents and course material. The panel notes that lecturers are being compensated extra for shifting to online lecturing. The Dean of Academic Affairs supports lecturers with all their requirements, however, this is mainly from a logistical and administrative perspective and not a pedagogical one.

All lecturers are committed and dedicated to their work. Their approachability, amenability, availability and willingness to facilitate learning was confirmed by the course participants, alumni and the Institute management personnel.

The Institute should seek ways to support the lecturers individually and collectively to further develop in their role by carrying out a professional review and evaluation to better understand their needs, facilitating interaction and discussion amongst themselves and with the administrative staff. The panel notes that no formal meetings for lecturers are held.

Lecturers are responsible for their own continuous professional development (CPD) and the Institute does not contribute to this. The lecturers who are warranted professionals, undertake a minimum amount of CPD hours to maintain their warrant. The lecturers who are professional educators undertake CPD related to the subjects taught within their main teaching (full time) role. The Institute keeps track of the CPD records of the lecturers through periodical updated CVs. Some lecturers attended seminars organised by ACCA related to their subjects, however, the panel suggests that the Institute offers CPD opportunities to lecturers regarding course content and to provide training for upskilling of pedagogical competences.

### **Good practice identified**

Not applicable.

### **Recommendations for improvement**

1. MR: The Institute should develop a structured recruitment process, with established selection criteria to ensure consistency and objectivity in selection of lecturers within 6 weeks of report publication.
2. MR: The Institute needs to establish a formal, regular recorded system of professional lecturer appraisal within 6 weeks of report publication.
3. The Institute should support and provide its lecturers with opportunities in continuous professional development (CPD) relating to course content and upskilling re pedagogical competences.

### **Conclusion**

Requires improvement to meet Standard.

## 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**

The panel notes that the Institute seeks to ensure adequate resource allocation to course participants. Indeed, the ACCA course participants are provided access to the ACCA online resources, the Kaplan books as well as access to the BRP online platform. Currently all ACCA course participants also have access to the recorded lessons following the live online sessions. The panel observes that currently no formal specific budget allocation for resources is in place. However, any requests by lecturers for extra resources are put forward to Dean of Academic Affairs and then such requests are discussed at a management level. A small physical library (mainly focusing on Accounting textbooks) is available within the Institute premises. The panel notes that the Institute has access to a virtual library. Currently only lecturers have access to the online library, however the panel notes that the Institute plans to extend access to course participants too. All rooms within the Institute are equipped with Wi-Fi.

The Institute premises are equipped with a computer lab (for easy practice in SAGE and other related courses) and a lounge/study area. Since the vast majority of course participants are mature adults (probably already in employment), the face-to-face lessons are mostly held in the evening to facilitate attendance and participation – such lessons are currently held live online at hours suitable for the attendees. All live sessions are recorded and placed on *Teachable* platform for easy and ongoing access by course participants. The panel notes that the Institute is aware that it needs to invest in better infrastructure – indeed the Institute has strategic plans to expand the premises and improve the IT framework.

The panel notes that all course participants have easy access to fellow course participants and their lecturers and Dean of Academic Affairs through email and a *WhatsApp* group chat. Any course participants encountering difficulty during the course of studies can contact the tutor/s and/or the Dean of Academic Affairs. Such matters are prioritised and settled promptly. The Institute supports struggling students through tutorials – such extra sessions do not incur extra cost. Furthermore, course participants who fail to complete the course due to personal circumstances can avail themselves of the deferral option. This implies that such course participants can resume their studies during the following year at no extra charge/cost.

Any course participants with a learning difficulty and/or disability are accommodated by providing the necessary logistic and/or academic arrangements to assist the person. Moreover, in such cases extra time is provided during summative assessments.

### **Good practice identified**

1. Extended learning arrangements offered to struggling course participants, through tutorials at no extra charge.
2. Use of *WhatsApp* group chat engaging both course participants and lecturers for prompt

student support and guidance.

### **Recommendations for improvement**

1. KR: Enhance physical and/or virtual library with resources related to home grown courses within 8 weeks of report publication.

### **Conclusion**

Meets Standard.

## 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**

The Institute has a structured framework in place for its information management. This ensures that all records and administration related to the programmes of studies and other activities are effectively maintained.

The main internal database is the CMS system. After a potential course participant views the prospectus and applies online, via email, or in person, a meeting is set up to discuss and offer guidance to ensure the suitability of the selected course. The Dean of Academic Affairs will review the applicant's documents of previous qualifications to facilitate this process.

Once the student registers for a course, a profile is created on the internal database where the course participant is assigned an ID. All admission records, personal details, payments schedule, details of course followed with proof of assessment and grades, are all retained within this database. Records of the course participants will also include personality profiles and details of any vulnerable groups if applicable.

The panel notes that the storage of all course participants' data in one place is beneficial. The database is mainly accessed and analysed by the Dean of Academic Affairs and Marketing Officer. Records of course participation, retention and success rates are closely monitored and the ACCA also monitors for attendance, dropout rate, course completion and student feedback for its programmes of study.

After a course participant has completed the course, all records are deleted in accordance with GDPR requirements.

The Institute also makes use of the *Trello* platform for internal administration. This enables effective monitoring of scheduled tasks and other activities with clear lines of responsibility and due dates.

Having these systems and platforms in place is commendable from an information management perspective and fits in well with the Institute's future plans and strategy.

The Dean of Academic Affairs is responsible for conducting the students' questionnaire which gauges students' course satisfaction. Informal sessions with lecturers are also held to discuss all aspects of the course. However, there is no evidence that the feedback is being disseminated for information purposes or discussed at top management level for further action planning.

The Institute does not carry out any traceability studies. Some course participants call the Institute administrative personnel to discuss employment prospects or advise if they received a promotion. However, this is not done in a formal structured manner. It is up to the course participants to decide whether to keep the Institute informed about their employment status after course

completion. After a course participant has completed the course, Learn Key retains only the details which are agreed by the student in a signed contract.

As the Institute has some course participants enquiring about employment opportunities and has contact with companies on the lookout for potential employees, the panel recommends the development of a systematic tracking system related to employment and career progression for all successful course participants.

### **Good Practice identified**

1. Effective use of an internal management system for the functional monitoring and control of assigned responsibilities, administrative tasks and other activities.
2. Effective implementation of the *Trello* platform to facilitate smooth internal administrative task coordination.

### **Recommendations for improvement**

1. The Institute should develop a tracking system related to the employment and career progression of course participants who have completed their studies.

### **Conclusion**

Meets Standard

## Standard 9: Public Information

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

### **Main findings**

The necessary information regarding the Institute's accredited courses is made available mainly through the official Institute portal and social media channels. The website includes information about the range of courses and other relevant information including the Price Lists, the Student services, the Appeals Procedures and all information necessary for local or foreign students (including accommodation, VISA information and pre/post arrival services for the latter type). The panel considers that the info available on the website related to current ACCA, new OTHM and running home grown courses is compliant with the statutory information requisites stipulated by NCFHE however lacks:

- a. Information regarding the learning credits ECTS and
- b. The pass rate/mark.

The panel notes that the pass rate and the assessment procedures are available on the module templates once a course participant is enrolled in the course. However, the standard specifically mentions the inclusion of this information for prospective applicants prior to application.

The Dean of Academic Affairs together with the Sales and Marketing Manager are jointly responsible for the update of public information available on all channels. The panel is informed that the website is currently being revamped to facilitate use by prospective course applicants.

### **Good practice identified**

1. Transparent updated information to both local and foreign potential course applicants.

### **Recommendations for improvement**

1. MR: Updating all current and future course information to include ECTS within 6 weeks of report publication.

### **Conclusion**

Meets Standard.

## 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**

The panel was informed that programme review particularly of the home-grown courses is regular and ongoing however no records of related meetings/decisions/action plans are available. The process is informal. The review of which home-grown courses will be developed depends on the current demands.

Furthermore, the panel notes that the two main tools of ensuring the views of students and lecturers in the process of periodic review of programmes is through the students' questionnaire and the lecturers' self-assessment reports. The panel observes that the questionnaires compiled by the course participants need thorough analysis by the Institute's management. As highlighted within the SAR the analysis and discussion of such feedback needs to be amplified. The self-assessment reporting by lecturers is a valid opportunity of course review, however the panel notes that the reports presented tend to be descriptive rather than analytical in nature. Lecturers need to focus their self-reflection on improvement and further development of the courses and programmes. External involvement in the process of monitoring and review is highly limited and almost negligible. The Institute needs to discuss ways to start involving stakeholders relevant to the courses offered, within the monitoring review process. The panel notes that the review and self-evaluation process within the Institute needs to involve systematic feedback from all involved i.e. management, students, alumni, potential employers and other stakeholders. The inputs of this process need to be based on factual evidence such that the outputs of such a process are authentic and embrace both strengths and challenges. Such a process needs to be on-going and regular to lead to effective change when necessary, thus enhancing course participants' learning experience.

The Annual Update Report compiled by the Institute as an Approved Learning Partner (ALP) forms part of the continuous monitoring requested by ACCA. Furthermore, the report compiled by the ACCA representative following the monitoring visit ensures continuation of set performance targets for centre Gold approval as part of the Approved Learning Partner programme. The panel notes that the actions for improvement requested following the monitoring visit were all satisfied by the Institute in a timely manner. Indeed, the actions requested from the report dated 23<sup>rd</sup> October 2018 were finalised by the set deadline i.e. 31<sup>st</sup> January 2019.

### **Good practice identified**

Not applicable.

### **Recommendations for improvement**

1. KR: Adequate and in-depth analysis of student feedback provided through questionnaires,

- to be held regularly by the Institute's management within 6 weeks of report publication.
2. Provision of review of home-grown courses aligned to current demand.
  3. KR: Lecturers' self-assessment reports to shift from a mere descriptive mode to a more analytical perspective within 6 weeks of report publication.
  4. KR: Embedding of regular monitoring and review of all academic courses/programmes both the home-grown and the foreign awarded within 6 weeks of report publication.

## **Conclusion**

Requires improvement to meet Standard.

## Standard 11: Cyclical External Quality Assurance

*Entities should undergo an external quality assurance audit by, or with the approval of, the NCFHE on a cyclical basis, according to the NCFHE guidelines, once every five years.*

### **Main findings**

The Institute has fulfilled this standard through the hosting of EQA referred to in this report. This is the first EQA cycle of the Institute. The personnel within the Institute were highly receptive and attuned to the discussion. Throughout the audit the panel observed the willingness and commitment of the Institute personnel to follow the challenges outlined and formulate the necessary action plans and changes to address them. For future audits the panel recommends better and more enhanced engagement of the Institute's personnel in the compilation of the SAR.

### **Recommendations for improvement**

1. KR: The Institute needs to actively engage personnel from the Administration and Management in the compilation of Self Assessment Reports prior to future audits.

### **Conclusion**

Meets Standard.

## Response by the Provider

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### Preamble

From its formation in 1995, Learnkey Training Institute has been constantly pursuing the delivery of quality service through its inclination towards affecting change and improvement. Such operational mindset has allowed the company to develop as a pioneer Maltese Training Institute and is accredited by renowned international independent organisations. The Institute highly values the role that these quality assurance processes have in its internal quality controls and on its efforts to maximise upon the development of its resources and professional growth of its members.

All members at Learnkey were kept abreast of the developments of this External Quality Audit through a number of exercises held throughout the process. This ensured accuracy in the collation of information, being responsive to quality assurance queries and coordinated efforts towards the implementation of the recommendations submitted. As evident from the Response of the Provider, Learnkey proved to be proactive and not only addressed and taken on board the recommendations set up by the board, but went to the extra mile in a number of measures that, through consultation, are designed towards the delivery of the holistic learning experience.

## Response to Key recommendations and Recommendations made by the Peer Review Panel

Action plan		
Recommendations	Actions to be taken to address the recommendations	Date for completion
Standard 1:		
Better engagement of both internal and external stakeholders in QA processes and strategic planning.	The Institute will formalise the already existing channels through which it engages with students, alumni, tutors and correspondent foreign bodies of the university, specifically in relation to the quality management system. It shall be noted that the Institute follows the current agenda through its subscription with competent foreign bodies, including ACCA and OTHM dissemination systems and share such information internally accordingly.	<p>Communications will be channeled through a new platform called Moodle - new learning management platform (<a href="https://youtu.be/oJ3qwBaQsOk">https://youtu.be/oJ3qwBaQsOk</a>), scheduled to be operational by mid-June.</p> <p>Please refer to Doc J - Learnkey handbook online which is available for students. Foreign bodies include OTHM, ACCA, City &amp; Guilds.</p> <p>How does Learn Key plan to engage internal stakeholders in QA processes and strategic planning?</p> <p>Students are being requested to submit their feedback and opinion through the questionnaire.</p> <p>Learnkey also signed an agreement with a recruitment agency to be cognisant of the HR demand of the labour market. A webinar was already held in May to orient students with jobs &amp; career opportunities.</p>

Recruitment and engagement of an internal QA officer to ensure regular ongoing development, implementation, monitoring and review of QA processes.	The Institute is committed to consolidate its efforts and be more proactive in the improvement of the quality cycle of its courses. It sets to allocate more resources, namely the engagement of a new Internal Quality Assurance Officer who will assist in the academic and quality management fields. CV of the new recruit is attached as Doc A. Such approach is aimed at assuring the compilation of IQA reports and the follow-up processes required. Regular monitoring of such documents will also improve information availability for future external quality assurance exercises. This document sets to incorporate the general policies and the means through which the Institute's educational programmes and awards meet NCFHE standards	Done
Standard 2:		
It is recommended that the company prepares a written procedure on how to fill any vacancies in the future for headship positions.	Please see attached Document, titled <i>Doc B Learn Key Institute - Headship Positions Recruitment Process – 2021</i> .	Please refer to Doc B Learn Key Institute - Headship Positions Recruitment Process - Additional Amendment
Standard 3:		
In the event that the Institute seeks to devise new home-grown courses, a formal process for their design, development and approval must be put in place. This should also include both internal and external stakeholder involvement.	In the eventuality that the Institute introduces new homegrown courses, the relevant stakeholders will be engaged during the whole pedagogical process.	Done
For courses by foreign providers the Institute should make better use of the available channels of communication to forward relevant feedback and contribute to the development of the programmes within the local context.	The Institute will consolidate the policy set out to communicate with the foreign bodies by documenting such processes.	As per St.1.

Standard 4:		
<p>KR: Provision of constructive written feedback to students to support ongoing learning and understanding within 6 weeks of report publication.</p> <p>KR: Development of clear assessment criteria to be shared with students prior to assessment tasks within 6 weeks of report publication.</p>	<p>A maintenance report listing the plan of works for renovation of the current premises is being attached Document C.</p> <p>The Board may wish to note that following recommendations shared during the Audit dated October 2020, a double marking system was introduced for assessment of homegrown courses. This was performed on a random sampling methodology to improve the internal verification of such assessment. Additionally, this is also supported by the procedure already set in place of generating alternative questions to different exam sittings. These initiatives were taken albeit the foreseeable winding down of the homegrown courses offered by the Institute in the upcoming months.</p>	<p>Action has been taken. As a sidenote, Learnkey is not foreseeing to offer homegrown courses any longer for the time being.</p>
Standard 5:		
<p>KR: The Institute needs to breakdown the ECTS for each respective study unit within the course, as on the final course transcript issued within 6 weeks of report publication.</p>	<p>Certificate template has been reviewed as per attached document titled, Doc D final certificate sample lv5.</p> <p>The Institute is introducing short induction courses for students who enrol for a course with us. These are to be tailor-made to the selected course and will orient the participant with the system structure.</p>	<p>Done</p> <p>System will be fully operational for the next uptake scheduled in September 2021</p>
<p>KR: The Institute needs to develop and publish the set of regulations/guidelines related to recognition prior learning/qualifications within 6 weeks of report publication.</p>	<p>Guidelines on the recognition of prior learning may be accessed on the website (refer to Doc E LEARNKEY RPL policy and application), together with the application form that the potential student needs to compile. Interested parties can be assisted to collate a portfolio of their learning experiences, that can be verified and validated. Considering that the foreign accredited courses have their RPL systems independently, RPL has a narrow scope for homegrown courses delivered by the Institute as they are classified at MQF Level 3.</p>	<p>RPL for homegrown courses are not needed as they are being phased out.</p> <p>With regards to the OTHM we usually ask student to fill in application form available from <a href="https://learnkey.com.mt/downloads">https://learnkey.com.mt/downloads</a> and start the process. Also attached please find the OTHM RPL – Doc H - Recognition of Prior Learning Policy v3.0</p>

<p>Standard 6</p> <p>The Institute should support and provide its lecturers with opportunities in continuous professional development (CPD) relating to course content and upskilling re pedagogical competences.</p>	<p>The Institute encourages its teachers to participate in a minimum of one CPD Course on annual basis. Although a system is in place for such tuition, tutors at the Institute are currently engaged on part-time basis and have been attending CPD courses as part of their full-time duties. Such participation is verified through the annual submission of the CVs of tutors.</p> <p>ACCA tutors are encouraged to participate in courses provided by the foreign body itself. A list of these courses may be retrieved from the below address:  <a href="https://www.accaglobal.com/hk/en/member/cpd-landing/cpd-online.html?tpc=members-topic:accountingcpd&amp;locale=&amp;currentPage=1&amp;itemPerPage=12&amp;isLiveCopy=true&amp;executeSecondQuery=false&amp;liveCopyName=hk&amp;secoe=1&amp;">https://www.accaglobal.com/hk/en/member/cpd-landing/cpd-online.html?tpc=members-topic:accountingcpd&amp;locale=&amp;currentPage=1&amp;itemPerPage=12&amp;isLiveCopy=true&amp;executeSecondQuery=false&amp;liveCopyName=hk&amp;secoe=1&amp;</a></p> <p>As for other courses, tutors are required to follow CPD training sessions from City &amp; Guilds Group:  <a href="https://www.cityandguilds.com/what-we-offer/centres/cpd-training">https://www.cityandguilds.com/what-we-offer/centres/cpd-training</a></p>	
<p>Standard 7:</p>		
<p>KR: Enhance physical and/or virtual library with resources related to home grown courses within 8 weeks of report publication.</p>	<p>A range of books were added to the library found at the Institute which related to the largest target group of students currently enrolled with the Institute. These mostly relate to business, accounting and management fields.</p>	<p>Done</p>
<p>Standard 8:</p>		
<p>The Institute should develop a tracking system related to the employment and career progression of course participants who have completed their studies.</p>	<p>A section has been incorporated in the CMS database under the tab 'employment' that lists down information related to students' career progression. Alumni will be encouraged to furnish the Institute with such professional insights.</p>	<p>Learnkey will be keeping in touch with alumni by email even following completion of studies. This is to be held for a period of one year to keep track of the network's career development. The Institute shares current job opportunities with the present students and alumni alike.</p>

Standard 10:		
KR: Adequate and in-depth analysis of student feedback provided through questionnaires, to be held regularly by the Institute's management within 6 weeks of report publication.	The Institute is committed to continue building upon the QA Manual which lists down all stakeholders and clearly defines their remits accordingly. Student queries (submitted in/formally) and respective action taken in response will be documented. The cyclical process of programme evaluation will be given a more systematic dimension. A clearer connection of the considerations taken from the feedback on learning opportunities and programme design and its development shall also be established.	Done
Provision of review of home-grown courses aligned to current demand.	A clearer trail of the review process of home-grown courses will be retained	Homegrown courses will be phased out by June 2021.
KR: Lecturers' self-assessment reports to shift from a mere descriptive mode to a more analytical perspective within 6 weeks of report publication.	Self-review of the performance of lecturers will be more focused upon generating analytical insights into room for improvement by incorporating objectives related to train-the-trainer.	Done
KR: Embedding of regular monitoring and review of all academic courses/programmes both the home-grown and the foreign awarded within 6 weeks of report publication.	The mid and end of module student Questionnaire (submitted online) is currently being considered as part of the student's view on current programmes.	Done
Standard 11:		
KR: The Institute needs to actively engage personnel from the Administration and Management in the compilation of Self Assessment Reports prior to future audits.	The Institute welcomes this recommendation and it will be ensured that its personnel is actively participating in the compilation of self-assessment exercises, including the Self Assessment Reports which may be required for future audit cycles.	

Response to Mandatory recommendations made by the Peer Review Panel

Mandatory recommendations	Actions to be taken to address the recommendation	Date for completion
Standard 1		
MR: Publishing of complete QA policy on official website within 6 weeks of report publication.	An updated version of the Quality Assurance Handbook is available on the website and is accessible to students and tutors.	Done
Standard 4		
<p>MR: Provision of internal and external verification for all summative tasks within 6 weeks of report publication.</p> <p>MR: Provision of moderation of scored summative assessment tasks within 6 weeks of report publication.</p> <p>MR: Compilation of marking schemes relevant to summative assessment tasks to ensure reliability in the scoring process within 6 weeks of report publication</p>	<p>The Board may wish to note that following recommendations shared during the Audit dated October 2020, a double marking system was introduced for assessment of homegrown courses. This was performed on a random sampling methodology to improve the internal verification of such assessment. Additionally, this is also supported by the procedure already set in place of generating alternative questions to different exam sittings. These initiatives were taken albeit the foreseeable winding down of the homegrown courses offered by the Institute in the upcoming months.</p> <p>For homegrown courses, students are presented with a set of feedback comments on receipt of their grading scheme.</p>	Action has been taken. As a side note, Learnkey is not foreseeing to offer homegrown courses any longer for the time being.
Standard 6		
MR: The Institute should develop a structured recruitment process, with established selection criteria to ensure consistency and objectivity in selection of lecturers within 6 weeks of report publication.	As part of the Institute's drive to be transparent and promote equal opportunities, the upkeeping of a more organised system for formal documentation of staff together with recruitment methods and job descriptions fall under the functions of the Human Resource, Finance & Facilities Manager. The Institute has successfully been ensuring adherence to the guidelines regarding qualification levels of tutors (Communications to Further and Higher Education Institutions, dated 15th October 2014 'Qualification Level for Tutors').	Doc G Learn Key Institute - Tutors Recruitment Process2021 - Additional Amendment

<p>MR: The Institute needs to establish a formal, regular recorded system of professional lecturer appraisal within 6 weeks of report publication.</p>	<p>Tutor appraisal has been mostly based upon the evaluation information gathered from students. Feedback on tutor performance vis-à-vis such input will be connected in a clearer manner reference to Doc F &amp; Doc G</p>	<p>Reference to Doc I Learn Key Institute – Tutor Appraisal Process - 2021</p>
<p>Standard 9</p>		
<p>MR: Updating all current and future course information to include ECTS within 6 weeks of report publication.</p>	<p>Course information listed on the website now includes ECTS and assessment criteria.</p>	<p>Done</p> <p><a href="https://www.learnkey.com/mt/course/mqf-level-5-uk-level-4-diploma-health-and-social-care-management">https://www.learnkey.com/mt/course/mqf-level-5-uk-level-4-diploma-health-and-social-care-management</a></p> <p>Click on handbook button</p>

### Annex 1: Review Panel Bio Notes

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

The following bio notes present the profiles of the members of Peer Review Panel. The bio notes are correct as at the time of when the QA audit was carried out on 30<sup>th</sup> September and 1<sup>st</sup> October 2020.

#### **Chair of Review Panel:**

Ms Desiree Scicluna Bugeja currently holds the position of Assistant Director within the Directorate for Learning & Assessment Programmes (MEDE). She is responsible for STEM subjects and coordinates a team of seventeen curriculum leaders in the field of STEM education. Together with a highly committed team, Ms Scicluna Bugeja ensures quality STEM education across primary and secondary sectors. She is the national coordinator of a number of European projects including Scientix, Teach-UP, SYSTEMIC and CDG4E. Ms Scicluna Bugeja has a keen interest in educational assessment and evaluation and has often lectured undergraduate and qualified educators re quality and standards in educational practices. Further to the initial degree in teacher education, Ms Scicluna Bugeja attained a postgraduate diploma in Youth Studies, and a Masters in Educational Evaluation & Assessment.

#### **Peer Reviewer:**

Mr Peter Calleya has been a financial services professional for over 30 years and is currently Head of Governance for Commercial Banking for HSBC Bank Malta. Previous roles included Head of Strategic Planning for HSBC Malta and Senior International Marketing Manager for HSBC Europe. He is also a Visiting Senior Lecturer at the University of Malta where since 2007 he has lectured various courses from Diploma and Bachelors to Masters level and also served as an examiner, paper-setter and reviewer.

Since 2003 he has been elected for consecutive terms to the Board of Directors of the Institute of Financial Services (ifs Malta) and since 2011 has served as Vice President. He has also been recently re-elected for his fourth consecutive three-year term to serve on the Board of Directors and Executive Committee of the Brussels-based European Banking and Financial Services Training

Association (EBTN) for 2020-2022. He holds an MBA (Bangor), MA Marketing (Melit.) and BA (Hons) Business.

**Student Peer Reviewer:**

Ms Tiziana Gatt is a University of Malta student reading for a Master of Arts in Health, Medicine and Society. She holds a B.Sc.(Hons) in Sport and Active Lifestyles, a Diploma in Management Studies and an Award Certificate in Teaching Adults. She has a vast range of experience in the volunteering and education sector and also in the hospitality and tourism industry. Ms Gatt has been auditing various institutions offering accredited courses in relation to quality assurance for the past 4 years.

## Annex 2: Agenda of the on-site visit.

**Date:** 30<sup>th</sup> September & 1<sup>st</sup> October 2020

**Venue:** 83 Mannarino Road, Birkirkara

### Day 1

08.30 – 09.00	Panel arrives at Learnkey
09.00 – 11.00	Meeting with Director and Facilitator <i>Mr Mahamood Hussein, Ms Shirley Thomas</i>
11.00 – 11.15	Panel discussion
11.15 – 12.45	Meeting with administrative staff
12.45– 13.15	Working Lunch
13.15 – 14.15	Meeting with Students
14.15 – 14.30	Panel discussion
14.30 – 15.00	Meeting with Alumni
15.00 – 15.15	Panel discussion
15:15 - 16:15	Tour of teaching platform (Teachable)/database (CMS)/management programme (Trello)
16.15 – 16:30	Panel discussion
16.30 – 17.30	Meeting with Teaching staff
17.30 – 17.45	Panel discussion/Finalisation of Day 1

### Day 2

08.30 – 09.00	Panel arrive at Learnkey
09.00 – 10.30	Meeting with External QA Officer
10.30 – 11:00	Meeting with representative of ACCA (via Skype)
11:00 - 11:15	Panel discussion
10.15 – 12.15	Meeting with Director and Facilitator <i>Mr Mahamood Hussein, Ms Shirley Thomas</i>
12.15 – 16.00	Working Lunch and Discussion on QA Report
16.00 – 16.30	Presentation of Initial Findings <i>Mr Mahamood Hussein, Ms Shirley Thomas</i>