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Short bio:

Sandro Spiteri has thought and trained in the primary, secondary and tertiary sectors since 1989. From 2001 to 2008 as Senior Executive within the Foundation for Education Services he set up the first national family literacy and parent leadership programmes, and has worked and published with UNESCO on these issues. From 2009 to 2013 Sandro was Director for Quality Assurance and later Director for Curriculum Management and eLearning, for compulsory education. In these roles he set up the national external school review system for compulsory education, and the first national literacy strategy. Since 2013 he is Head of Quality Assurance at the National Commission for Further and Higher Education and has set up the national quality assurance system for the sector and authored the National Quality Assurance Framework for Further and Higher Education. Sandro is currently reading for an Ed.D. on quality assurance at the UCL Institute of Education, London.

Proposal

Title: Using ESG 2015 to develop a national quality culture for further and higher education in a post-colonial micro-state: Malta

Abstract:

In July 2015 Malta inaugurated its National QA Framework for Further and Higher Education to foster a comprehensive quality culture in the sector. This is the first QA framework within the European Higher Education Area (EHEA) that covers further, higher and adult formal educational provision. The Framework is based on the 2015 version of ESG, enriched with EQAVET elements. This synthesis was possible because of Malta's characteristics as a post-colonial micro-state.

As part of this process a number of tools and procedures were developed, institutions were upskilled in both internal and external QA, prospective peer and student evaluators were trained, and the first three pilot external quality audits have been carried out. The support of ENQA and the ESU were instrumental in this.

This paper will discuss how Malta's characteristics informed the development of Malta's QA Framework, and how the Framework itself was developed and implemented.



Text of paper:

Need for the QA Framework

On the 1st of July 2015 the National Commission for Further and Higher Education (NCFHE), Malta's quality assurance agency for the sector, launched the National Quality Assurance Framework for Further and Higher Education. The Framework is the first of its kind in the EHEA to encompass further, higher and formal adult learning. It is one of the key deliverables of the NCFHE-led project called 'Making Quality Visible' that was partly funded through the European Social Fund and ran from 2013 to 2015.

The aim of this project was to develop the necessary quality assurance structures so that Malta would be compliant with its international commitments and targets. These include the Bologna and Copenhagen Processes, the 2007 Action Plan of the European Commission on adult learning, and the EU Education and Training 2020 targets. Furthermore, the Framework for the Education Strategy for Malta 2014-2024 (MEDE 2014) includes the quality assurance of education programmes as one of the strategic pillars for policy development.

The need for a quality assurance framework for further and higher education was first established in the Further and Higher Education Strategy 2020 for Malta (NCHE 2009) by the fore-runner of the NCFHE. This Strategy included the promotion of excellence in further and higher education and in research by creating a quality culture across the sector.

Of course, the concept of a quality culture in higher education is not a new one. The European University Association led two important projects to promote a quality culture in higher education in 2002 and 2012 (European University Association 2002, 2012). The ESG from its first version in 2005 was clearly premised upon the development of a quality culture that placed the primary locus of improvement within the provider. The 2014 'Report on Progress in Quality Assurance in Higher Education' by the European Commission highlighted the importance of a quality culture in higher education and referred to the need for "a genuine culture of continuous quality improvement" (European Commission 2014, p.4).

The need for an overarching framework encompassing further and higher education has also already been identified at European level. The EQF Recommendation of 2008 (European Union 2008) outlined eight common principles for quality assurance in both further and higher education. The latest proposal has come from the Structural Reforms Working Group of the Bologna Follow-up Group in the context of the EHEA (Structural Reforms Working Group 2014).

In Malta it was the 2006 Education (Amendments) Act (Government of Malta 2006) that introduced quality culture throughout Malta's educational sectors, not just for further and higher education. The quality culture heralded by the 2006 Act had a coherent ideology across all sectors: the onus of ensuring quality in teaching and learning was on the providers through their internal developmental processes; the external oversight through inspections and audits was justified inasmuch as it supported these internal processes.

This particular relationship between internal and external quality assurance can be seen in all the relevant references with respect to the further and higher education institutions and structures set up or reconstituted by the 2006 Education Act. Indeed, Legal Notice 296 of 2012 'Further and Higher Education (Licensing, Accreditation and Quality Assurance) Regulations' (Government of Malta 2012), that implemented the relevant sections of the 2006 Act, stated



clearly that: “Providers shall have the primary responsibility for the quality of their provision and its quality assurance” (Government of Malta 2012 Regulation 36(1)).

One could easily come to the conclusion that this coherent discourse on quality culture for educational provision in Malta was simply the result of policy transfer from the international policy guidelines and related tools that have been mentioned. However this would ignore that many EHEA countries have not gone down the quality culture route that Malta has undertaken, due to their own particular histories. It would also not explain why no other EHEA country has so far attempted to develop a quality culture that encompassed both further and higher provision.

Before its independence in 1964 from the British Empire Malta had more than a century and a half of educational policy transfer (Sultana 2001) from the former “mother country” (Zammit Mangion 1992 p.52). Therefore I believe it is significant that Malta’s overarching formal discourse on quality assurance as enshrined in the 2006 Education Act is so strikingly different from the ‘choice, transparency and accountability’ discourse of the marketisation of education (Molesworth, Scullion and Nixon 2011; Shattock 2012; Williams 2013) that transformed educational provision and quality assurance in England from the 1980s to today and that is, indeed, a dominant paradigm internationally (Ball 2012; Rolfe 2013; Shah and Nair 2013).

Thus, the inception of the awareness for the need for this particular kind of overarching quality culture in Maltese educational provision cannot be taken for granted. It was informed by two key facets of Malta’s socio-cultural and political identity: its size and its colonial heritage.

Challenges to constructing a Maltese QA Framework

Malta is a micro-state archipelago in the middle of the Mediterranean with over 420,000 inhabitants and a population density is 1,309 per square kilometre, one of the highest in the world. This physically constricting environment engenders: “the absolute conditions within which the Maltese mind has to operate” (Friggieri, 1995, p.110). Amongst these are: **Isolation** and **Smallness**. We Maltese are **Isolated**, both literally and metaphorically, from mainland Europe and Africa. We are **Small**, forever being measured and measuring ourselves against much bigger, more powerful and influential nations. We have a 2000-year-old history of colonization, of the cumulative “invention by the global of the local as native” (Baldacchino, 1997, p.60) by some of the greatest empires in history, with its inevitable effect on national identity.

Baldacchino (op. cit.) has a similar take on the mind-bendingly constricting elements of an island micro-state, two of which are **Intimacy** and **Monopoly**. Baldacchino’s **Intimacy** is a corollary to Friggieri’s (op. cit.) **Smallness**. In **Intimacy** the healthy separation between public/professional and private is blurred and one’s private space shrinks, also because of the effect of monopoly discussed further on. This atmosphere breeds dissimulation, a guardedness that one can never be completely divested of without the fear of negative consequences. Sutton (2007) refers to the dangers, but also the potential positive effects, of what he called “exaggerated personalism” and “concerted social harmony” (Sutton 2007 p.203, 204).

Monopoly, which is equivalent to Sutton’s (2007) “government pervasiveness” (Sutton 2007 p. 203), refers to the increasing pervasiveness of the state apparatus in everyday life, and therefore the shift in the balance of power that effects all spheres of life: “Small state government is characteristically weighty and omnipresent and, as a result, omnipotent.” (Baldacchino, op. cit., p. 69). This is further exacerbated by Malta’s colonial heritage of paternalistic governance in and panoptic control through state educational provision (McCulloch 2009) which persisted even after Malta’s independence in 1964 (Zammit Mangion 1992, Sultana op. cit.).



Malta's further and higher education sector has had its share of Monopolistic micro-state pervasiveness. In the 1970's and 80's the University of Malta went through several upheavals which saw a number of 'non-utilitarian' faculties suppressed, student enrolment subject to work placement for 50% of the course, and state intervention in the selection of the university's top personnel. The national vocational college was transformed into a second university, which two years later was amalgamated with the original university leaving Malta without a comprehensive vocational college for 20 years.

Although from 1987 onwards the situation improved significantly, the institutional memory is still there and it coloured the perception of further state intervention through any form of external quality assurance. The new state inspection remit in further and higher provision in the 2006 Education Act brought about misgivings about the potential for renewed state intervention in further and higher provision through any form of quality oversight.

In sum, any attempt to introduce external quality assurance in further and higher education in Malta faced a three-fold challenge:

- State educational oversight seen as a vestige and marker of colonial legacy and interpreted as state panoptical control;
- A history of heavy-handed state experimental intervention in further and higher education as result of Monopoly;
- The lack of anonymity and psychological 'distance' between a prospective external reviewer and reviewed institution due to the Intimacy of Malta's social networking.

Justification for a unified national QA framework

These challenges were addressed through a three-pronged strategy: a) capitalising on the positive aspects of Malta's size and close-knit social networks; b) the setting up of Net-QAPE, and c) a scoping exercise with providing institutions.

Malta's 'absolute condition' of Smallness is not only a limitation but can also be an advantage, as Sutton (op. cit.) indicated. The fact that we have one Ministry of Education covering all educational provision gave added impetus for one unified QA Framework and for the close working collaboration between stakeholders on the ground. Also, the National Qualifications Framework in place since 2009 gives parity of esteem to vocational and tertiary provision, and to the ECTS and ECVET learning credit systems. Finally, the NCFHE itself uses the same licensing and accreditation mechanisms for all entities and forms of provision. We capitalised on these common elements in making the case for a unified QA Framework.

Net-QAPE, the Network for Quality Assurance Professionals in Further and Higher Education, brought together over 40 QA officers from all the major state and private providers and many smaller ones, which together cover more than 95% of students in the sector. It provided a regular and frequent forum to discuss all aspects of the QA Framework. This ensured the ownership of all providers in the process, and dispelled fears that the QA Framework was yet another manifestation of state Monopoly, such that the final framework was unanimously approved. Net-QAPE membership also gave access to unique training opportunities on QA matters, thus empowering the QA personnel and upskilling the entities to improve their provision.

The third part of the strategy was a scoping exercise with all service providers, so as to explore the complexity of provision and the practice of providers in terms of quality assurance. This scoping exercise took the form of one-to-one interviews by the undersigned from January to March 2014. 75 % of license holders at the time, including all the major state and private providers, were interviewed.



The scoping exercise indicated that there was a wide variety of service users that ranged from full-time 'local' and international residential students to part-time students attending evening short courses. These were being served by a whole gamut of providers that ranged from self-accrediting institutional providers such as the University of Malta, to specialised micro-providers of locally accredited vocational and professional courses.

The scoping exercise also highlighted a pervasive culture of quality assurance good practice already in place. In some cases the relevant structures and procedures were informal, but they were nonetheless underpinned by the intent of ensuring a valid educational experience for students. In these cases the scoping exercise served to bring to consciousness the QA value of these good practices. These could be matched with the seven Standards of ESG 2009, and the scoping exercise determined that any external quality assurance procedure that recognised these practices already in place and helped providers identify what could be further improved would be appreciated by them.

The feedback received indicated that the internal and external quality assurance measures to be proposed in the Framework had to be flexible enough to cater for all these variances, whilst ensuring that they were primarily developmental in scope. They needed to ensure that state external quality assurance procedures did not divest entities of their ownership and primary responsibility to ensure quality themselves. These measures needed to be at par with accepted international standards to ensure the integrity and credibility of the Framework, whilst not being so cumbersome and inflexible, especially for micro operations, as to overwhelm them and be an actual disincentive to the development and sustainability of a quality culture.

But was such a comprehensive QA Framework conceptually possible? To explore this question, we compared the ESG 2009 with EQAVET as adapted for the Maltese context (NCFHE 2013). We concluded that at a conceptual level all the Factors and Principles and 65% of the Indicators of the Maltese adaptation of EQAVET were reflected in the ESG. The conceptual differences were that the ESG are more explicit in their process orientation, in the relationship between internal and external quality assurance functions, and in placing the primary responsibility of quality assurance on the provider. On the other hand the EQAVET model is more explicitly oriented towards employability and employment, with a clearer reference to employers' involvement. The Shewhart/Deming Quality Cycle is an explicit component of the EQAVET model, whereas it is subsumed within the ESG. Kelly (2010) also compared the ESG 2009 and EQAVET and came to similar conclusions.

With respect to the adult learning sector, a report for the European Commission (European Commission 2013) concluded that the EQAVET and ESG quality reference frameworks are applicable to the sector, whilst acknowledging that the adult learning sector is less uniform in terms of objectives, organisation, target groups, and societal results (especially for the nonformal part of adult learning). Most cases studied in the report were based on the same philosophy as the quality cycle, and similar descriptors were in place.

During the scoping exercise mentioned earlier all further and formal adult education providers agreed that the ethos and scope of the ESG could function as the basis for a national quality assurance framework that catered not only for higher but also for further and lifelong educational provision, for both state and private sectors. At the same time, providers expressed the need for a QA framework that was both process and outcome oriented, and had a greater sensitivity to stakeholder (including employer) involvement and employability issues than the ESG 2009.

Thus, the scoping exercise indicated that both state and private sector further, higher and formal adult education providers were ready to take on board a common but flexible national framework for both internal and external quality assurance that was primarily developmental

and acknowledged the main locus for quality assurance within the entities themselves. We therefore concluded that such a framework that was situated within the ESG and enriched by EQAVET perspectives was an achievable target for Malta and would be fit for purpose given Malta's particular history and reality.

Developing a national QA Framework

The Framework is underpinned by six Principles:

1. It is based on the ESG and enriched by the EQAVET perspective.
2. It contributes to a National Culture of Quality, by supporting providers to develop and improve their internal quality management systems which are regulated, monitored and supported by external quality audits. Figure 1 below represents the concentric nature of the national culture of quality. At its core is the internal quality assurance (IQA) process conducted by the provider. This may be augmented by external review that is sought by the provider. The third cycle in the quality culture is the external quality audit (EQA) conducted by the NCFHE, as explained below. Finally, the NCFHE will itself be peer reviewed by other quality assurance agencies within the context of the due diligence process of the European Quality Assurance Register. To achieve this aim the NCFHE applied for and was granted affiliate membership in ENQA, with the aim of applying for full membership.

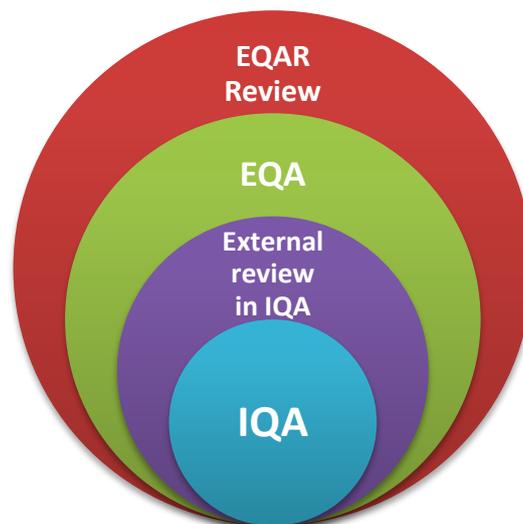


Figure 1: Malta's National Quality Culture

3. It is sufficiently flexible so that the IQA mechanism of entities can be fit for purpose.
4. The EQA mechanisms of the Framework are a tool for both development and accountability. The EQA ensures that the internal quality management system of the provider is, amongst other things, fit for purpose according to the provider's courses and service users, and implemented with effectiveness, comprehensiveness and sustainability.
5. The Quality Cycle is at the heart of the Framework.
6. The integrity and independence of the EQA process is guaranteed.

The Framework includes the first and second part of the ESG. The first part, that relates to the IQA of providers, includes the ten ESG Standards in which the relevant guidelines have also been incorporated and adapted to the Maltese context and to VET provision, plus an



eleventh one that relates to the financial and institutional probity of the provider since this is a Maltese legal requirement. The Framework, as well as all the other related deliverables are available at: <http://www.ncfhe.org.mt/content/home-quality-assurance-making-quality-visible-concluding-conference/147292160/> .

The Framework passed through several cycles of feedback, including by representatives of ENQA, CEDEFOP and a number of QA agencies that are ENQA members. It was finalised in October 2014, and updated by taking into consideration the proposed changes in ESG 2015. Of course the Framework still had to be tested through the piloting of a number of EQAs. This was carried out in April and May 2015, with the three biggest state providers: the University of Malta, MCAST the national vocational college, and the Institute for Tourism Studies. The full reports of these EQAs will be published in November 2015, in line with ESG 2015.

ENQA was instrumental in providing access to its member QA agencies who helped develop the EQA manual of procedures and undertook the EQAs themselves or nominated experienced peers to do so. Having international peers in the EQA panels of these institutional providers also addressed the concern with the 'absolute conditions' of Isolation, Intimacy and Monopoly discussed previously.

Training seminars were also held for prospective Maltese peer evaluators and student evaluators. The training for the latter was provided by the European Students' Union, and indeed six of these student evaluators were selected to participate in the first three pilot EQAs with excellent results.

The evaluation of the fitness for purpose of the QA Framework, the EQA tools and the training provided to Net-QAPE members has been entrusted to an independent company that is currently undertaking a range of quantitative and qualitative data-gathering exercises. It is envisaged that the first cycle of EQAs by the NCFHE will start in the last quarter of 2015. Time will tell if the intended teleology of Malta's National Quality Assurance Framework for Further and Higher Education will be fulfilled, leading to enhanced provision and outcomes in the sector.

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