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Developing a National Quality Culture for Further and Higher Education in a Micro-State: The Case of Malta

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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. It is also significant because it presents an alternative to the neo-liberal New Public Management paradigm of QA in higher education that is dominant internationally. Indeed, the Framework is based on the 2015 version of the European Standards and Guidelines (ESG) which focus on quality enhancement rather than accountability, enriched with elements from the EU system of QA for vocational education (EQAVET). The rhetorical positioning of the Framework as well as its overarching nature were possible because of Malta's characteristics as a former colony and as a micro-state. This paper discusses how Malta's characteristics informed the development of Malta's QA Framework, and how the Framework itself was developed and implemented.

Key words Quality Assurance, further and higher education, Malta, small states

The 21st century is witnessing the intensification of quality assurance (QA) in higher education around the world. This is mainly being driven by neo-liberal New Public Management theory that in the UK emerged out of the Thatcherism and in America out of the Reaganism of the 1980s (Holmes, 1993; Giauque, 2003; Rinne, 2008; de Vries, 2010). The six constitutive elements of New Public Management (NPM) may be considered to be decentralisation, privatisation, orientation of the results of the market mechanism towards the public sector, private sector management practices, and introduction of participation (Jidwin and Mail, 2015). NPM underpins the

'choice, transparency and accountability' discourse of the marketization of higher education (HE) that has become a dominant paradigm internationally (Bridges et al., 2007; King et al., 2011; Ball, 2012; Rolfe, 2013; Shah and Nair, 2013).

The NPM influence on QA in HE has left its toll. Harvey and Williams (2010) have surveyed 15 years of research and concluded that HE QA practices that focussed on accountability were not effective in encouraging improvement, with an essential aspect of that failure being the dissolution of trust. QA industrial models, and Total Quality Management in particular, were regarded as of little use in HE settings. Other reviews by Houston and Paewai (2013) and Sursock (2011) have come to similar conclusions.

Ball (2004) has characterised the denaturing effect of NPM on HE as an increase of performativity and fabrication of educational 'delivery' to fulfil performance indicators and present a 'successful' Potemkin façade. This warped the internal QA processes of educational institutions and vitiated the external QA processes: "the particular disciplines of competition encourage schools and universities to fabricate themselves – to manage and manipulate their performances in particular ways" (Ball, 2004, p.149). Morley (2004) has gone further, arguing that in a neo-liberal state quality becomes a "policy technology" (p.1), where panic is "manufactured" (p.8) to justify the imposition of the "myth of measurement" (p.26) and fulfil political/ideological imperatives.

The ubiquitousness of the NPM paradigm, however, has not gone unchallenged. At European level the Bologna Process that kicked off in 2000 led to the development of the European Standards and Guidelines (ESG) which were first issued in 2005 and revised in 2009 and 2015. The ESG regulate the external QA and accreditation of HE within the European Higher Education Area (EHEA), of which Malta is a founder member. They are counter-cultural with respect to the NPM paradigm since they are premised on the autonomy of universities, and their primary ownership of the QA process is based on quality enhancement rather than accountability.

Between 2002 and 2013 the European University Association led two important EU-funded projects to investigate and promote such a quality culture in higher education (European University Association 2006, 2013). 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 2014a, p.4).

Malta has not followed the NPM trend: the 2006 Education (Amendments) Act (Government of Malta 2006) 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. This culture has survived the change of government in 2013 and is a core component in the educational strategy of the present administration (MEDE, 2014). 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, which led to the setting up of the National Commission for Further and Higher Education (NCFHE) in 2012 (Government of Malta 2012a). Legal Notice 296 of 2012 (Government of Malta 2012c), that implemented the relevant sections of the 2006 Act with respect to further and higher education, stated clearly that: "Providers shall have the primary responsibility for the quality of their provision and its quality assurance" (Ibid. Regulation 36(1)).

This led directly to the development of Malta's National QA Framework in 2015 that covers further, higher and formal adult education. This Framework was one of the key deliverables of the NCFHE-led project called 'Making Quality Visible' that was partly funded through the European Social Fund. The aim of this project was to develop the necessary quality assurance structures so that Malta would be compliant with its international commitments with respect to the Bologna Process (Observatory Magna Carta Universitatum, 2016), the Copenhagen Process for vocational provision (Europa.eu, 2011), adult education (European Commission, 2006; 2007) and the Education and Training 2020 targets within the EU (Council of the European Union, 2009). In the Maltese context, 'further education' refers to provision up to the equivalent of Level 4 in Malta's National Qualifications Framework (NCFHE, 2015d) that mirrors the European Qualifications Framework (Europa.eu, 2016). 'Higher education' refers to provision from Levels 5 to 8. Vocational/professional education provision can be either 'further' or 'higher' depending on the qualification Level. The Framework is the first of its kind in the EHEA to encompass further, higher and formal adult learning.

Thus, Malta presents an interesting case study of the development of a national HE QA framework not only because it has bucked the NPM trend, but because of its overarching nature. This should not be taken for granted. Throughout its 164-year colonial history as part of the British Empire and even for the following two decades, Malta was subject to a more or less uncritical process of educational policy transfer (see for example Sultana,

2001). Therefore, I believe it is significant that Malta's discourse on quality assurance, as enshrined in the 2006 Education Act, is so strikingly different from the NPM discourse of the marketisation of education that transformed educational provision and quality assurance in England from the 1980s to today (Molesworth et al., 2011; Shattock, 2012; Williams 2013) which, as mentioned earlier, is the dominant QA discourse internationally.

The nature of this quality culture in Maltese educational provision was informed by two key facets of Malta's socio-cultural and political identity: its size and its colonial heritage.

Malta fits within the most stringent definitions of state 'smallness' (Sultana, 2006; Bray, 2011), of not more than one million inhabitants. This physically constricting environment engenders: "the absolute conditions within which the Maltese mind has to operate" (Friggieri, 1996, p.110), what Briguglio (2014) calls the inherent context of small island states. Amongst these Friggieri (1996) identifies Isolation and Smallness. Baldacchino (1997) also identified a number limitations of an island micro-state, two of which are Intimacy and Monopoly. Baldacchino's *Intimacy* is a corollary to Friggieri's *Smallness*. We Maltese are Isolated, both literally and metaphorically, from mainland Europe and Africa. Our rocky shores form the outer ramparts to our bastions that ring the island, from pre-historic walls to the High Renaissance behemoths that enclose the Grand Harbour.

We are Small, forever being measured and measuring ourselves against much bigger, more powerful and influential nations. Malta has been in a continuous state of being-as-colony for almost all its recorded history of over two millennia, as the cumulative "invention by the global of the local as native" (ibid. p.60) by some of the greatest empires in history, with its inevitable effect on national identity. In Intimacy the healthy separation between public/professional and private is blurred and one's private space shrinks, leading to "multiplex relationships" (Bray, op. cit. p.47). Monopoly refers to "government pervasiveness" (Sutton, 2007 p. 203), the ubiquitousness of the state apparatus in everyday interactions, 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).

Intimacy and Monopoly in a small island community build an inverse social panopticon (Spiteri 2016) constituted by multiple intermeshing levels of networking within which the inhabitants feel that they are 'already known' and have no real anonymity. This environment breeds dissimulation, a guardedness that one can never be completely divested of without the fear of negative consequences. Sutton has referred to the dangers of what he calls

"exaggerated personalism" (op. cit. p.203). Mayo et al. (2008) have discussed the limitations Intimacy poses to adult education provision in small states.

Malta's further and higher education sector has had its share of Intimate and Monopolistic micro-state pervasiveness, both during Malta's colonial period and after Independence in 1964. The University of Malta, the only state university, traces its origins to the founding of the Collegium Melitense in 1592 by the Jesuits, and was established in 1769 (Vella, 1969). It underwent several periods of contracting and expanding autonomy and government control (Zammit Mangion, 1992; Mifsud Bonnici, 2013). During the British colonial period from 1800 to the Second World War the two key tools that the Colonial government used in its struggle for control of the University were a) the internal inspection mechanisms of the University as mandated in the successive statutes and entrusted to government placemen, principally the Rector, and b) the external educational audit function of the various governmental Commissions and Committees throughout this period. The Rector was explicitly charged with carrying out class inspections as often as possible. The 1838 and 1871 Statutes of the University included precise instructions on how the Rector was to carry out such inspections:

> in such visits he will sit on the right of the Professor or Preceptor, and will take note, although in silence and without interrupting the course of the lesson, all that could be subject to his consideration (Government of Malta 1871 art.15 p.7).

One can only speculate on the tortuous intra-University dynamics that necessitated the need for the Rector not so much to inspect lectures, but to do so in silence and even stipulating where he was allowed to stay!

However, even after the end of British colonialism with Malta's Independence in 1964, the overbearing state Monopolism continued. The latest example was in the 1970s and '80s which saw the suppression of a number of 'non-utilitarian' faculties and of the research function of the University; the introduction of education and management degrees amongst others; the abolition of students' fees, and student enrolment subject to the availability of work placement for 50% of the course, leading to even stronger state patronage (Mayo 2012). MCAST, the national vocational college that had been opened in 1970, was transformed into a second university which two years later in 1981 was amalgamated with the original University, leaving Malta without a comprehensive vocational college for the next 20 years (Zammit Mangion op. cit.). On the one hand, these reforms resulted in a gradual increase in student numbers, including the percentage of female students (Mayo op. cit.), and the modernisation of the University through the expansion of courses. On the other hand, however, the reductionist utilitarian approach and heavy-handed reforms meant that the resultant upheaval cause great resentment.

The tide turned with the Education Act of 1988 (Government of Malta 1988), which amongst other things refounded the University with administrative and academic autonomy, although it retained its national, state-funded status. MCAST was set up again in 2001 (Galea, 2013). However the reforms of the 1970s and '80s still rankle; the institutional memory of the University has coloured the perception of further state intervention through any form of external quality assurance. 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.

These challenges were addressed through a four-pronged strategy as part of the EU-funded project 'Making Quality Visible' (Ncfhe.gov.mt, 2016): a) capitalising on the positive aspects of Malta's size and close-knit social networks; b) the setting up of Net-QAPE; c) a scoping exercise with providing institutions, and d) desk-based comparative research on QA systems. In this section of the paper 'we' refers to the stakeholders in the Project.

Malta's 'absolute condition' of Smallness is not only a limitation but can also be an advantage. Lowenthal has referred to Managed Intimacy: "Small-state inhabitants learn to get along, like it or not, with folk they will know in myriad contexts over their whole lives. To enable the social mechanism to function without due stress, they minimise or mitigate overt conflict." (Lowenthal, 1987 p.39). Bray has also observed that: "The multiplex characteristics and need for managed intimacy in small states may be forces for conservatism, but they may also provide social cohesion and links that promote innovation." (Bray op. cit. p.56). Sultana (2010, p.140) has put it pithily: "Small *can* be beautiful."

The fact that Malta has 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 (Government of Malta 2012b) 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 that 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.

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 (NCFHE 2015g).

But was such a comprehensive QA Framework conceptually possible? First of all, the need for an overarching framework encompassing further and higher education had first been identified at European level. The first conference on 'Quality Assurance in Vocational Education and Training and in Higher Education' organized jointly by the EU Commission and CEDEFOP was held in Graz, Austria, in May 2006 (Cedefop.europa.eu, 2006), following the Parliament and Council recommendation on further European cooperation in quality assurance in higher education in February 2006 (European Union, 2006). The EQF Recommendation of 2008 (European Union, 2008) outlined eight common principles for quality assurance in both further and higher education. In December 2013 the European Commission held a consultation exercise on a proposed European Area of Skills and Qualifications that included moves towards a convergence between vocational and higher education QA systems (European Commission, 2013b). The latest proposal for a unified QA framework 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 the need for an overarching framework was first established in a report exploring the feasibility of a QA framework for further and higher education (NCHE, 2007) by the National Commission for Higher Education (NCHE) that was the forerunner of the NCFHE. Following a national consultation process, this led to the Further and Higher Education Strategy 2020 for Malta (NCHE, 2009), which identified the promotion of excellence in further and higher education and in research as one of its priorities, by creating a quality culture across the sector. The formation of the NCFHE was a direct consequence of this Strategy (Government of Malta 2012a).

However, by the time the NCFHE started work on the F&HE QA Framework for Malta in December 2014, the idea of an overarching QA framework at European level had not left the drawing-board, and at the time of writing are perhaps even further away from realization at EU level. This was mainly due to objections from stakeholders (European Commission, 2014a; 2014b) and a change of focus by the new 2014 Commission, which separated higher from vocational education in the commissioner portfolios (Europa.eu, 2014), tying the latter to employment.

We therefore needed to explore whether an overarching framework was fit for purpose for Malta's context. To do so we conducted desk research which compared the ESG 2009 with EQAVET, the EU QA system for vocational provision, 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 version of EQAVET were reflected in the ESG. Both systems allow for both institutional-level and programme-level quality assurance. The conceptual differences are that the ESG are more explicit in their process orientation, in the relationship between internal and external quality assurance functions, and in placing the primary responsibility of quality assurance on the provider. The EQAVET model is more explicitly oriented towards employability and employment, with a clearer reference to employers' involvement. The Shewhart/Deming Quality Cycle is an explicit component of the EQAVET model, whereas it is subsumed within the ESG and certainly does not act in contradiction to it.

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

- The development and ownership of the QA system
- Self-assessment or internal evaluation
- External assessment or evaluation
- Review and enhancement.

Neither the ESG nor EQAVET prescribe how quality assurance should be implemented. Both set out a framework reference for providers within their respective sub-sectors that highlight what should be done but not how it should be done. However, there are significant differences in the detail between ESG and EQAVET. In general ESG is more explicit and sets out specific standards and accompanying guidelines for internal and external quality assurance of higher education institutions and of the agencies.

Finally, two important initiatives by the European Commission looked at the quality assurance requirements for adult education. In 2009, the Commission initiated a three-year Thematic Network of 14 national agencies for lifelong learning, in order to increase the impact of innovative projects in VET and adult education. The Network was entitled QALLL which stands for "Quality Assurance in LifeLong Learning with a Focus on Vocational Education and Training and Adult Education" (European Thematic Network QALLL, 2012). The project aimed to improve the quality and efficiency of education

and training by highlighting good practice and developing recommendations. One of its ten key recommendations was the adoption of the EQAVET quality cycle to ensure constant improvement in the provision of adult education.

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

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 (NCFHE 2015g).

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.
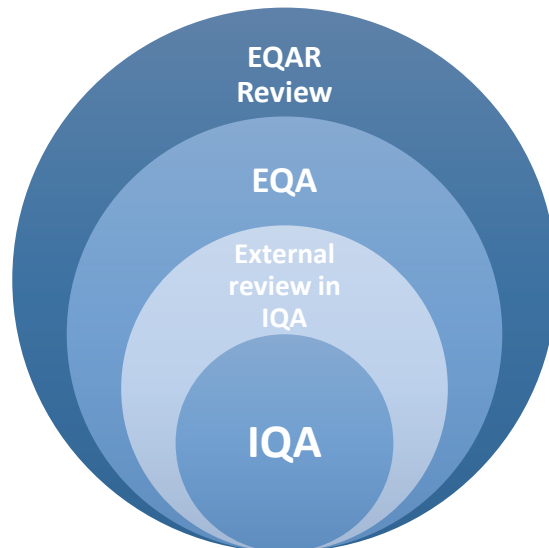
Figure 1: Malta's National Quality Culture

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 Part 1, 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. Much of the text of the Guidelines has been incorporated into the Standards, allowing for flexibility according to the different contexts of the range of educational institutions in Malta. ESG 5 was amended to take into consideration the reality of occasional part-time staff which often are the only or the majority of staff in micro educational institutions. ESG 7 was amended to require information on vulnerable groups, as well as on participation, retention and employment rates. ESG 9 now makes explicit reference to the Quality Cycle, and to the inclusion of employers as

stakeholders in the periodic programme reviews for employment-related courses.

With respect to Part 2 of the ESG, ESG 1 was amended to specify that EQAs need to check that the IQA systems are fit for purpose, are in fact functioning and effective, and are sustainable. ESG 7 was amended to refer to a two-step appeals process, one within the NCFHE itself and one at the courts of law in line with Maltese legislation.

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 in parallel training seminars were 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 that took place in April and May 2015, with excellent results.

Before the official launch in July 2015 the Framework was fine-tuned to take into consideration the proposed changes in ESG 2015 and the experiences of the first pilot external audits. ENQA, the European Association for Quality Assurance in Higher Education, 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.

The First three pilot audits were carried out with the three biggest state providers: the University of Malta, MCAST the national vocational college, and the Institute for Tourism Studies (ITS). The full reports of these EQAs were published in early 2016, in line with ESG 2015. These pilot EQAs were carried out on the basis of Standard Operating Procedures (EQA SoP) (NCFHE, 2015d) that were also developed through the ESF project. The EQA SoP endeavours to promote the development of a quality culture whilst ensuring the rigour of an independent international-standard HE EQA. Thus, the EQA outcomes are not an overall judgement or judgements; rather, a judgement is made on a four-point scale (ibid. p.50), for each Standard. Another important innovation is that the EQA report include the official reaction of the hosting entity, indicating the way forward following the EQA recommendations. In this way the entity is seen as participating in the EQA process, not simply submitting passively to it.

The piloting of the IQA and EQA processes was generally considered positively by the EQA evaluators themselves (NCFHE, 2015e,f,h) and the stakeholders of the institutions involved (Grant Thornton, 2015).

Once the EQA reports were in the public sphere, the very different ways the three participants reacted is instructive of the consequences of the small-island parameters of Intimacy and Monopoly discussed earlier. Whilst the MCAST received a clean sweep of 'meets Standard' judgements, the University generally fared less well; although it received one 'exceeds Standard' judgement, it also received five 'needs to improve' judgements. The EQA report for ITS was by far the most negative: it indicated seven 'does not meet Standard' judgements.

Along with the EQA Reports, the NCFHE issued an explanatory note in which it emphasized that the judgements for any one institution were: "*sui generis* and cannot be compared with those conducted on any other educational institution. All entities are measured against established criteria, rather than against each other" (NCFHE, 2016 p.1). The NCFHE was: "extremely conscious that it is breaking new ground in Malta, where a culture of accountability and sensitivity to constructive criticism has still to take root" (ibid.). The explanatory note also underlined that although the three EQAs were pilots (in that the hosting institutions received significant support in preparation for their EQAs and the judgements of the final reports kept in mind that these were the first EQAs in Malta), they were "fully-fledged external quality assurance audit(s)" (ibid.).

While the original proposal was to foreground the EQA reports on the NCFHE website, as is common practice with other national QA agencies, the NCFHE opted for: no media announcement of the reports; a preliminary explanatory meeting with the media; and placing the documents on its website without any indication of this on the website landing page itself. At the time of writing they are tucked under a section that would be accessible only to QA *cognoscenti*, for all intents and purposes invisible to the general public.

Whilst MCAST immediately issued a public declaration of satisfaction with the result (Malta Independent 2016), both the University and the ITS have to date issued no public statement. In their reaction to the audit, as part of the EQA report, the University, a partcipant in the preparatory and implementation phases of the project, criticized aspects of the preparation for the EQA and the way it was conducted (NCFHE 2015c Chapter 4). The ITS also disagreed with the EQA outcomes in its written response. However, the audit did have a profound effect on ITS. It led to a review of its operations and programmes, and significant investment in new premises (Malta Independent 2016).

Some important lessons were learnt during the piloting of the EQAs (Spiteri, 2015; Grant Thornton, 2015): with respect to the IQA processes, more work

was needed to bring to consciousness good practices, and to change the mentality of institutions from mere providers of educational services to educational entities with an intrinsic quality culture. With respect to the reporting of the IQA processes that was a requirement prior to the EQAs, institutions needed to do more to ensure that such reporting was not just descriptive but truly self-reflective, identifying needs and proposing concrete and sustainable action plans.

With respect to the judgments of the EQAs, there was a need to standardize their interpretations, whilst at the same time reiterating that judgments could not be compared across different categories of entities. In the medium- to long-term the Standards and the EQA SoP needed to be adapted for programme-level EQAs. The pilot EQA also showed that the eleventh Standard, that the entity would undergo an EQA, was self-evident and did not require a judgement, so in future the EQA will deliver ten judgements for the first ten IQA Standards of the Framework.

There is still a lot of development work that needs to be done to adapt the expectations of the Framework Standards to the different types of providers – for example, for representatives of foreign providers. The internationalization of further and higher education provision in Malta, both through the intake diversification of Maltese institutions, as well as through the accreditation of an increasing number of higher education institutions and universities by the NCFHE, is also likely to bring important changes to the QA scenario in Malta.

Acknowledgements

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