Quality Assurance Audit Report

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

St Martin's Institute of Higher Education

Carried out between the 15th and the 17th of March 2016

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Abbreviations List

BYOD	Bring Your Own Device
CPD	Continuing Professional Development
ECTS	European Credit Transfer System
HEI	Higher Education Institution
IQA	Internal Quality Assurance
MQF	Malta Qualifications Framework
NCFHE	National Commission for Further and Higher Education
PGCHE	Postgraduate Certificate in Higher Education
QA	Quality Assurance
SAAB	St. Martin's Admissions and Advisory Board
SAR	Self-Assessment Report
SMI	St. Martin's Institute of Higher Education
UoL	University of London International Programmes (division)
VLE	Virtual Learning Environment

1. Executive Summary

1.1 Section A: Background

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

1.1.1 The Peer Review Panel

The Peer Review Panel was composed of:
- Mr Anthony F. Camilleri, Chair of the Peer Review Panel
- Ms Anne Marie Vincenti, Peer Reviewer
- Ms Jessica Falzon, Student Reviewer
- Ms Tiziana Gatt, Student Reviewer

1.1.2 Specific Terms of Reference and Main Lines of Inquiry

In interpreting its mandate, the review team determined that all activities performed by the University of London (henceforth UoL) as part of its relationship with St Martin's Institute of Higher Education (henceforth SMI) would be considered within the scope of the review, as if they were performed by structures within the institute itself.

Furthermore, the review team decided that, as part of an enhancement-led approach, it would issue recommendations linked to all parts of the operations of the institute. The report therefore distinguishes between *key recommendations* which we feel need to be implemented expediently by the institute to address weaknesses, and *opportunities for improvement* which are merely suggestions based on our analysis and observations.

1.2 Section B: Key Findings, Judgements and Recommendations

1.2.1 Standard 1 - Policy for Quality Assurance

Good Practice Identified

GP1.1 The institution has quality procedures in place covering most of its operations.

Judgment

SMI requires improvements to meet Standard 1

Recommendations

R1.1 key recommendation: The HEI should establish a quality assurance policy which mandates the operation of (already existing) quality management procedures. The policy should be adopted as an official act of the highest governing body of the institution, and include provisions to ensure that any revisions are also adopted in the same manner. The policy should be published on the institution's website in its entirety.

RI1.2: The institution should establish processes and procedures to periodically collect and consider the requirements of external stakeholders and feed them into quality assurance processes. Such structures could range from regular surveys of stakeholders to a consultative committee. The institution should be able to demonstrate documentation of the results process.

RI1.3 The institution should use the NCFHE audit as an opportunity to embark upon an in-depth strategic review of operations. A future SAR should not only contain a description of the institution, but an actual assessment of its performance, presenting its strengths, weaknesses and planned improvements across each standard, with the data from this having come from consultations throughout the institution.

1.2.2 Standard 2 - Institutional Probity

Good Practice Identified

G.P2.1 The management of the institution has invested its past profits in owning its buildings which act as security to finance troughs in the business life cycle.

Judgment

SMI Meets Standard 2

Recommendations

R2.1   It is recommended that SMI considers developing clear selection criteria for headship positions

1.2.3 Standard 3 - Design and Approval of Programmes

Good Practice Identified

GP3.1   The institution supplements UoL curricula with internally developed content for purposes of updating the content, addressing lacunae in coverage and to adapt it to local needs.

Judgment

SMI meets Standard 3**.**

RI3.1 SMI should explore avenues by which it could ensure that all learning acquired by its students is appropriately certified and recognised. Measures towards this could include ensuring that the diploma supplement adequately describes all content actually taught at the institute, or offering ECTS for learning done over and above the UoL requirements.

RI3.2 The Panel recommends more extensive involvement of Maltese stakeholders in programme design and provision. Measures towards this could include:
- more extensive utilisation of visiting lecturers from the Maltese business community;
- creation of internally developed credits to supplement UoL content (vide RI3.1);
- more extensive use of local examples / cases by which in teaching UoL content.

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

Good Practice Identified

GP4.1 SMI prides itself on its personal and individualised approach. Students enjoy close interaction with all members of staff at all levels and see themselves as peers in the learning process. There is a conscious and concerted effort on the part of all lecturers to provide students with relevant and timely feedback.

GP4.2 The school organizes a periodic student consultation day, where each student may sit down with staff members, and discuss his or her individual performance in a structured manner, outside of the constraints of an examination.

GP4.3 The institution's use of its VLE clearly enhances the learning experience, and furthermore is at a reasonably advanced level of sophistication considering the limitations of the institution in terms of size.

GP4.4 The institution organizes an annual careers day, which takes a 'speed dating' format with employers. The opportunity gives students invaluable job-interview practice, leads to some of them receiving offers and is also appreciated by employers as a unique opportunity to find qualified hires. This forms part of an overall culture at the institute of strongly encouraging students to enter the workforce, even during studies.

Judgment

SMI surpasses Standard 4

Recommendations

RI4.1 The institution should significantly increase its commitment to student exchange, in particular by examining opportunities for shorter student exchanges offered by student associations, or within the UoL ecosystem.

RI4.2 With the help of SMI, the student union should collaborate with other local or European student unions for the purposes of capacity building.

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

Good Practice Identified

GP5.1   A head of department holds a pre-admission interview directly with all prospective students. Following application, they are interviewed by a board of relevant faculty to determine their appropriateness for the course and their needs.

GP5.2   All teaching staff periodically fill an evaluation form on the status and progress of every student. This information is used as the basis of (a) the review of progress given at the student/parent consultation days, and (b) to identify students requiring extra assistance.

GP5.3   A personal development programme tutors all students in basic academic skills such as essay-writing, referencing, use of technology for research, etc.

Judgment

SMI meets Standard 5

Recommendations

GP5.1: **key recommendation**: SMI should update its diploma supplement to include overall learning outcomes. Preferably, the supplement should also include a brief description of each credit and its specific learning outcomes in the same document

1.2.6 Standard 6 - Teaching Staff

Good Practice Identified

GP6.1   The institution has strong links to the world of work, mainly through contacts of its various members of staff. Furthermore, staff at the institution are embarking upon (limited) research projects with members from other HEIs/universities within Malta - setting the groundwork for a nascent national Higher Education community (as opposed to one solely contained within the University of Malta).

GP6.2   The institution actively encourages its staff members to upgrade their qualifications. In fact, over 70% of staff have upgraded their qualifications since being employed.

GP6.3 The institution has developed its own Postgraduate Certificate of Higher Education (PGCHE) for its teaching staff. Practically all members of staff have either acquired or are in the process of acquiring the PGCHE.

Judgment

SMI requires improvements to meet Standard 6

I6.1 **key recommendation**: Establish minimum requirements in terms of qualifications and competences for:
- teaching staff teaching University of London material;
- teaching staff teaching internally developed courses;
- staff designing programmes.

Such minimum requirements should distinguish as appropriate the qualifications needed to teach or design programmes at different levels of the MQF.

RI6.2 **key recommendation**: Aside from the recommendation made in RI6.1, the HEI should establish a minimum level of qualifications and competence to be held by a department as a whole, and clearly indicate the qualifications and competence which should be held by a head of department, taking into consideration the MQF level of the programmes the HEI is licensed to offer.

RI6.3 **key recommendation**: the institution should establish a senior leadership body, made up at minimum of a designated senior academic from each department. The senior academic should be able to demonstrate an adequate combination of research, teaching and/or professional experience appropriate for the role.

RI6.4 SMI should formally establish some basic research targets at department level or at the level of individual members of staff.

RI6.5 SMI should compile its various research activities into a cohesive research programme. SMI should publicly report on the achievement of said programme, and dedicate a section of its website to this. This could also include an online repository of publications by students and staff of the institution.

RI6.6 The panel suggests that the institution establishes a student-service charter, which would establish minimum standards for teaching staff to respond to students, but which would also serve to protect staff by establishing what kind of requests would be considered unreasonable.

1.2.7 Standard 7 - Learning Resources and Student Support

GP7.1 An estimated 30% of the infrastructure of the institution is given over to social spaces including library, students study spaces, games room and kitchenette. Students have access to essentially all resources in the building when it is open.

GP7.2. The institution operates a Creativity Lab with the aim of giving students access to equipment they would not otherwise have access to. These resources are used in a variety of projects, including with external stakeholders such as Google and Heritage Malta.

Judgment

SMI meets Standard 7

Recommendations

RI7.1   The Panel suggests the institution establishes a working-group including the student union and teachers to address the low utilisation of social spaces, and possibly also consider engaging external consultants as appropriate for support.

RI7.2   The Panel recommends that SMI adopts an ergonomics policy and applies it for all further infrastructural purchases.

RI7.3   Introduce arrangements to support BYOD, such as arranging with a local hardware provider to lease software/machines to students as needed (in particular in cases where students' computers need repair or replacement), including student equipment in the school's insurance policy or arranging for volume discounts for equipment and software.

RI7.4   The panel recommends that the school investigate the possibility of national inter-library loans.

1.2.8 Standard 8 - Information Management

Good Practice Identified

No particular good practices identified.

Judgment

SMI meets Standard 8

Recommendations

RI8.1   The panel recommends that the institution adopts a clear data-protection policy which specifies who has access to which student data under which conditions. It should also include guidelines on secure storage and encryption of the same data.

RI8.2   **key recommendation**: At present there are no policies on versioning, updating or replacement of any administrative documents of the institution. The panel recommends that the institution institutes and adopts a clear policy on document traceability

1.2.9 Standard 9 - Public Information

Good Practice Identified

No particular good practices identified.

SMI requires improvement to meet Standard 9.

RI9.1   **key recommendation** SMI should include on its website the following basic information including:
- learning outcomes as well as teaching, learning and assessment procedures for each credit/course offered as part of the institution's programmes;
- information about the faculty teaching and managing the institution;
- an explanation of SMI's role as a UoL teaching college, and the division of procedures, including admissions between UoL and SMI;
- tuition fees.

RI9.2   Furthermore, the website should include information about pass rates for each course, the day-to-day activities at SMI (a news section), the campus and resources available to students, as well as career paths enabled by the various courses.

RI9.3   The institution should identify a clear responsibility for public information, and establish processes to ensure the publication and updating of such information.

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

GP3.1 also applies under this standard

SMI meets Standard 10

RI10.1 SMI should ensure that all programmes undergo a formal redesign (or a check whether they need a redesign) at appropriate intervals - in particular, computing courses need to be reviewed at minimum every 3 years to remain relevant.

RI10.2 The panel encourages SMI to continue to expand its offer of internally developed qualifications to enable (a) a faster response to technological change, and (b) to cater more directly to the particularities of the Maltese IT context.

RI10.3 A more elaborated template for the annual monitoring reports should be created, so that

these consistently reflect not just student grades, but the results of the evaluation questionnaire, as well as feedback from students, employers and any relevant risks / developments in the field. Such annual reports should also compare performance with previous iteration of the course

1.2.11 Standard 11 - Cyclical External Quality Assurance

Judgment

SMI surpasses Standard 11

2. About the QA Audit

2.1 Introduction

The quality audit is a tool for both development and accountability. The QA audit shall ensure that the internal quality management system of the provider is:

- fit for purpose according to the provider's courses and service users;
- compliant with standards and regulations and contributing to the development of a national quality culture;
- contributing to the fulfilment of the broad goals of Malta's Education Strategy 2014-24;
- implemented with effectiveness, comprehensiveness and sustainability.

2.2 Reviewers

Evaluation subject	SMI	
Peer Panel Members	**External Peers:** Mr. Anthony F. Camilleri Ms. Anne Marie Vincenti **Student Peer Reviewers:** Ms. Jessica Falzon Ms. Tiziana Gatt **QA Audit Managers – NCFHE representatives:** Ms. Angelique Grech & Ms Lorraine Vassallo	
Timeline	**Dates**	**Milestone**
	24th October 2016	Panel received induction and preparation
	21st December 2016	Panel met to determine the specific terms of reference, aims, objective and research question of the QA process.
	20th January 2017	Preliminary Provider meeting
	15th - 17th March 2017	On-site audit visit

2.3 Institutional Context

SMI was founded in 1985, by the current Principal, Mr Charles Theuma, as a private tuition centre offering the ordinary level qualification in computer science. In 1995 the Institute applied to become a teaching centre for the UoL offering the University of London BSc (Hons) Computing.

Permission was obtained 2000. In the interim period the Institute was a teaching organisation for the University of Oxford, Delegacy of Examinations offering the Diploma in Computing & Information Systems. In 2009, SMI was awarded the Affiliate Centre status by the University of London. Currently, the Institute offers seven (7) Diplomas, eleven (11) Bachelor of Science (B.Sc) programmes and one (1) Master of Science (M.Sc) Degree Programmes conferred by University of London International Programmes.

SMI is a higher education institution, licensed by the National Commission for Further & Higher Education (license number 196). In December 2012, the NCFHE licensed SMI as a Higher Education Institution with awarding powers at MQF levels 5 to 7. SMI's Mission Statement states as follows:

"The mission of the Institute is to seek to be a regional icon in quality education excelling in teaching and research in multi-disciplinary fields.

The Institute's vision is to continuously strive to be regarded as a prestigious seat of learning by its peers, which puts the advancement of the student's achievement through intellectual, moral and social education as its primary objective, unlocking the student's potential to develop academically and psychologically."

In 2013 the first internally developed programmes: the Diploma in Entrepreneurship and the Postgraduate Certificate in Higher Education, were accredited by the NCFHE, the latter being a programme which was developed to train this institute's own academic staff. SMI currently offers a portfolio of five (5) internally developed diplomas, three of which have been accepted as automatic accreditation of prior learning thus enabling successful students to progress directly into the second year of the respective B.Sc. degree within the UoL.

The Institute currently has two departments, the Computing department and the Business Entrepreneurship and Finance department. The Computing department includes: the computing, the creative computing, digital games and the information systems groups. The Business Entrepreneurship and Finance department has a much wider perspective and is earmarked to generate spin-offs in future, namely: the Department of Finance which will group accounting, banking, economics and finance and the Department of Business which will encompass the international business, entrepreneurship, marketing, human resources and management organisational theory. The Institute currently has 196 students: 126 studying full-time and 70 studying part-time.

2.4 General Terms of Reference, Aims and Objectives of the QA Audit

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 Vocation Education and Training (EQAVET) perspective.

ii. The Framework contributes to a National Culture of Quality through:
- increased agency, satisfaction and number of service users;
- enhancement of the 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 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 contributing to the development of a national quality culture;
- contributing to the fulfillment of the broad goals of Malta's Education Strategy 2014-2024;
- 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 Higher education programmes and the quality of the learning experience of students. It presents an opportunity for providers to demonstrate that they adhere to the expectations of stakeholders with regard to the programmes of study that they offer and the achievements and capabilities of students. It also provides a focus for identifying good practice and for the implementation of institutional approaches to the continuous improvement in the quality of educational provision.

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

The QA audit examines how providers manage their own responsibilities for the quality and Standards of the programmes they offer. In particular, the following issues are addressed:
- The fitness for purpose and effectiveness of internal quality assurance processes, including an examination of the systems and procedures that have been implemented and the documentation that supports them.
- The compliance with the obligations of licence holders with established regulations and any conditions or restrictions imposed by NCFHE.
- The governance and financial sustainability of providers, including assurances about the legal status of the provider, the appropriateness of corporate structures and the competence of staff with senior management responsibilities.

The QA audit benchmarks the QA system and procedures within an institution against eleven (11) Standards:
1. Policy for quality assurance: entities shall have a policy for quality assurance that is made public and forms part of their strategic management.
2. Institutional and financial probity: entities shall ensure that they have appropriate measures and procedures in place to ensure institutional and financial probity.
3. Design and approval of programmes: self-accrediting providers shall have appropriate processes for the design and approval of their programmes of study.
4. Student-centred learning, teaching and assessment: entities shall ensure that programmes are delivered in a way that encourages students to take an active role in the learning process.
5. Student admission, progression, recognition and certification: entities shall consistently apply pre-defined and published regulations covering all phases of the student 'life-cycle'.

6. Teaching staff: entities shall assure the competence and effectiveness of their teaching staff.
7. Learning resources and student support: entities shall have appropriate funding for their learning and teaching activities and sufficient learning resources to fully support the students' learning experiences.
8. Information management: entities shall ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.
9. Public information: entities shall publish information about their activities which is clear, accurate, objective, up-to-date and readily accessible.
10. On-going monitoring and periodic review of programmes: entities shall implement the 'Quality Cycle' by monitoring and periodically reviewing their programmes to ensure their continuing fitness for purpose.
11. Cyclical external quality assurance: entities should undergo external quality assurance, approved by NCFHE, at least once every five years.

Peer-review panels essentially ask providers the following question about their arrangements for quality management:
'What systems and procedures are in place and what evidence is there that they are working effectively?'

The approach to quality assurance can be encapsulated in a number of key questions which providers should ask themselves about their management of quality.
- What are we trying to do?
- Why are we trying to do it?
- How are we trying to do it?
- Why are we doing it that way?
- Is this the best way of doing it?
- How do we know it works?
- Could it be done better?

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

The approach of QA audits 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 practice.

2.5 Specific Terms of Reference and Research Questions

In interpreting its mandate, the review team determined that all activities performed by the UoL as part of its relationship with the institute would be considered within the scope of the review, as if they were performed by structures within the institute itself.

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

distinguishes between *key recommendations* which we feel need to be implemented expediently by the institute to address weaknesses, and *opportunities for improvement* which are merely suggestions based on our analysis and observations.

The review team also considered the state of the institution up to the time of writing of this report. Thus, weaknesses which were addressed to our satisfaction between the site-visit and the finalisation of this report (in particular with regards to information to be made public), have not been included as we consider them resolved as of the day of reporting.

3. Analysis and Findings of Panel

3.1 Standard 1: Policy for Quality Assurance

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

Main findings

SMI has processes and procedures in place for the assurance of the quality and standards of their programmes and education provision and a clear commitment to the enhancement of quality in its work. Quality assurance is in place for essentially all its processes including its strategy and financial results, of student satisfaction, of the content of programmes and of student performance, with the possible exception of marketing activities. In each of these areas, we could identify evidence of action corrective/improvement actions being taken as a result of quality management. The status of these quality management processes and procedures might be best described as semi-formal, in that they clearly occur and evidence has been provided for them through documentation, however they are not necessarily regulated by an explicit policy. Thus, SMI does not have an officially endorsed and public document comprising all these processes and procedures into a single policy on quality assurance.

Quality assurance at SMI is the shared responsibility of the St. Martin's Admissions and Advisory Board (SAAB), the departments and the UoL.

The UoL has ownership of its programmes with respect to the curricula and associated quality procedures relating to programme design and review, as well as processes of student admission and certification, assessment and appeals. It also ensures the quality and standards of the provision of its programmes by undertaking Institutional Periodic Review audits of its affiliate centres. Two such audits have so far been carried out at SMI, in 2010 and 2015 respectively. In both instances this resulted in a confirmation of SMI's status as an affiliate centre. Officials such as lecturers, programme directors and examiners visit SMI several times during the academic year to support its activities.

The SAAB is the Institute's main executive management body and comprises of the principal as chair, the registrar as executive secretary, the heads of each department and the general manager. Its remit includes the setting up and oversight of procedures for admissions, assessment and appeals relating to its own (internally developed) courses. SAAB also vets and approves proposed new courses and programme proposals, including proposals to modify existing provision, before these are presented to the registrar for submission to the NCFHE.

The Institute's departments carry out an annual monitoring exercise concerning the effectiveness of curriculum and assessment, as well as the teaching methods and pedagogy for the programmes. They also hold departmental meetings once a month which are minuted. Through meetings with management and lecturers the panel confirmed that these meetings function as a space of effective communication, reflection and decision-making. One of the strongest indications of the operation and effectiveness of these quality processes and of the Institute's commitment to quality generally can be seen in the introduction of additional courses and extra-curricular activities to supplement UoL programmes.

Academic staff are bound to abide by a Code of Ethics which was developed by the academics themselves in 2009 as a self-regulatory code. This code outlines SMI's mission, vision and objectives and gives procedures relating to ensuring academic integrity, procedures in relation to teaching, and procedures relating to lecturer's interaction with students and parents respectively. Throughout the visit, the panel was able to verify that the code is mainstreamed throughout all levels of the institution. The panel was impressed by the pastoral character of the Institute.

Student feedback is an integral part of SMI's quality assurance system. The main source of feedback comes through informal channels from the lecturers' close contact with the student. During the site visit, the panel ascertained that, not only are students continuously encouraged to provide feedback but that the students feel very comfortable doing so. There is also a formal feedback system where students are asked to complete an online questionnaire anonymously on every course via the online intranet system three times throughout the academic year. This questionnaire is completed by the majority of students as it must be completed to access the intranet, however it is not compulsory should a student choose not to use the intranet. The feedback is reviewed by lecturers and respective Heads of Department who immediately flag important concerns. Feedback with respect to the school's environment are tackled directly by the principal and the general manager.

With regards to external stakeholder involvement, SMI also endeavours to maintain a relationship with its alumni and prospective employers. From the audit visit, it was ascertained that a formal system for involving employers in quality assurance does not exist, with the main source of feedback from employers being staff members' personal contacts and their involvement in the industry generally, as well as informal feedback gained at the Careers Day event. Alumni feedback is mainly garnered from a tracer study carried out by SMI.

SMI has procedures for ensuring against intolerance or discrimination against the students or staff as set out in its policy on 'Gender Equality and Diversity'. With regard to procedures for ensuring academic fraud, students are encouraged to use the TurnItIn system made available by the UoL.

The self-assessment documents produced for the NCFHE were prepared by a small team of five persons from senior management, and were reviewed multiple times, in response to queries from the reviewers during the school scoping visit, as well as in response to internal drivers. However, nobody at SMI, aside from the report authors, seemed to be aware of the SAR, or involved in its preparation. Furthermore, while the level of preparation that went into compiling the report is impressive, it mainly reads as a list of procedures and achievements of the institution, rather than an in-depth analysis of strengths, weaknesses and future plans of the institution.
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Good Practice Identified

GP1.1 The institution performs a review of essentially all its processes including its strategy and financial results, of student satisfaction, of the content of programmes and of student performance, with the possible exception of marketing activities.

Overall judgment for Standard

SMI requires improvements to meet Standard 1

Recommendations for improvement

RI1.1: **key recommendation**: While the HEI has operating quality procedures, these are

somewhat haphazard and are not collected into a single policy on quality assurance. The HEI should establish a quality assurance policy which mandates the operation of (already existing) quality management procedures. The policy should be officially adopted as an official act of the highest governing body of the institution, and including provisions to ensure that any revisions are also adopted in the same manner. The policy should be published on the institution's website in its entirety.

RI 1.2 The institution should establish processes and procedures to periodically collect and consider the requirements of external stakeholders and feed them into quality assurance processes. Such structures could range from regular surveys of stakeholders to a consultative committee. The institution should be able to demonstrate documentation of the results process.

RI1.3 The institution should use the NCFHE audit as an opportunity to embark upon an in-depth strategic review of operations. A future SAR should not only contain a description of the institution, but an actual assessment of its performance, presenting its strengths, weaknesses and planned improvements across each standard, with the data from this having come from consultations throughout the institution.

3.2 Standard 2: Institutional Probity

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

Main Findings

SMI is registered as a limited liability company within the Registrar of Partnerships at the Malta Financial Services Authority. It is a holding company with three subsidiary limited companies namely: St. Martin's Institute of IT Limited, Softsense Training Limited, Yellow Bus Games Limited. The limited liability companies which make up SMI are audited on an annual basis by independent auditors.

SMI has a number of mechanism and procedures on finances and accounts. The Institute has 2 licenses: the Shireburn accounting software and the Shireburn Payroll system. The Shireburn Accounting system is managed by an accounts clerk within the Registrar's office, under the supervision of the General Manager and the Financial Controller. The Shireburn Payroll system is managed solely by the Financial Controller due to ensure confidentiality since it includes the salaries for all members of staff. This software suite is licensed and an annual maintenance fee is paid. SMI has enhanced this system through a tailored cashier's module which keeps a clear audit of all tuition fees being paid through the front desk cashier. On outward payments the institute maintains that no single individual at SMI has authorization to pay out monies belonging to the institution without at least the intervention of another member of staff. This limits the incidence of theft or misappropriation of funds. All outward payments must be against a valid and authorised invoice recorded on the Shireburn accounting software for services rendered. On inward payments, policies state that all payments received by SMI for services rendered an invoice are issued through the Shireburn accounting system. Receipts are issued for all payments received. The institute also has a policy on transfer payments, these are authorized either by the General Manager or the Principal, and these are reconciled by the Financial Controller through the provision of receipts.

SMI develops an annual budget prior to the start of the academic year; this is presented for approval to the Board of Directors with a review of the budget to the board after a period of six

months.

Through the self-assessment report, SMI highlighted that it never feels it possesses the sufficient resources to deliver its academic programmes. Human resources expropriates 80% of the income of the institute whilst the rest is absorbed to meet the day to day expenses of the Institute. The management of the institution has invested its past profits in owning its buildings which act as security to finance troughs in the business life cycle. The number of students currently reading for a diploma or degree at SMI is 196 (126 full-time and 70 part-time students). In the self-assessment report and during the audit visit it was highlighted that this number is below capacity in fact, SMI may teach up to 600 students.

In the self-assessment report, SMI has provided evidence that it is insured against all risks, third party liability, employers' liability and loss of electronic equipment. The leadership of the organisation is also covered by a life insurance.

The financial statement presented by the institute show that the company's level of activities decreased over the previous year. However, the company's operating expenses also decreased and hence the results at year end improved significantly. The audited accounts also state that the company's activities expose it to a variety of financial risks such as market risks, credit risk, liquidity risk and interest rate risk. The company's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential effects on the Company's performance. Furthermore, the company's interest rates arise from long term borrowing. Borrowing issued at variable rates expose the company to cash flow interest rate risk. In general, the company's exposure to risk associated with the effects of fluctuations in the prevailing levels of market interest rates on its financing position and cash flows are not deemed to be substantial by the directors in view of the nature of the assets and liabilities.

The financial statements also show that financial assets which potentially subject the company to concentrations of credit risk consist principally of cash at bank and debtors. The company's cash is placed with quality financial institutions. Debtors are presented net of an allowance for doubted debts. Credit risk with respect to debtors is limited as amounts are mainly due from subsidiary and associated undertakings. The balance sheet within these accounts suggests that the going concern assumption used in the preparation of the financial statements is dependent on further sources of funds. Related parties of the company have given assurances that they will continue to support financially the operation of the company that ensures its continuance as a going concern.

Comprehensive records of the financial transactions are being kept by the company and its accounts are audited annually by an independent certified auditor. The financial statements comply with the Companies Act, 1995 enacted in Malta and are in accordance with General Accounting Principles for Smaller Entities (GAPSE) Regulations, 2009. Annual budget plans and regular reviews by the board of the annual budget are carried out. The directors are confident that the level of activity will increase and hence trading results will register an improvement in subsequent years. Appropriate measures and procedures are in place to ensure institutional and financial probity.

No specific procedure is in place to ensure that members of the body corporate, the legal representative/s and staff occupying headship positions are fit for purpose. The institute claims that such positions are only filled by mature persons who have proved themselves to be more than capable and appropriate to occupy such positions. In the self-assessment report the institute states that currently the Chairperson of the Board of Directors is one of the Chairmen of the Industrial Tribunal. The rest of the Board is composed of four other directors, three of whom are the shareholders. Two are lecturers at SMI while the other is a former lecturer at the Institute and presently an Associate Academic on Technology and Entrepreneurship Education in the Faculty of Education at the University of Malta. The remaining director is a retired auditor and business

consultant.

Persons occupying the posts of Head of Department and/or Head of Group have been lecturing at SMI for a number of years and are only selected to occupy such positions after a thorough interview. It is recommended that SMI should consider developing clear selection criteria for headship positions. The board members and staff occupying headship positions are deemed fit for purpose.

Good Practice Identified

G.P 2.1 The management of the institution has invested its past profits in owning its buildings which act as security to finance troughs in the business life cycle.

Overall judgment for Standard

SMI meets Standard 2

Recommendations for improvement

RI 2.1 It is recommended that SMI considers developing clear selection criteria for headship positions

3.3 Standard 3: Design and Approval of Programmes

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

Main findings

SMI is not a self-accrediting entity and, as such, in the case of its own internally developed programmes, follows the programme accreditation procedures of the NCFHE. In the case of the UoL International Programmes it submits these to the NCFHE for recognition and levelling to the Malta Qualifications Framework.

SMI has developed its own internal procedures for the design and approval of its own internally developed programmes and courses. The panel was able to ascertain that this procedure involves considerable consultation, collaboration and vetting before submission to the NCFHE. In the design of new programmes, proposers consult with their head of department, with academic colleagues within their own institution and external experts from other institutions (mostly from the UoL lead colleges). With respect to the computing courses and diplomas, the panel saw clear evidence of consultation with stakeholders from the world of work and feedback from industry informing programme design. Informal meetings are held periodically between key employers and SMI, at the discretion of both parties. Topics for such meetings may include employers' expectations from students, future developments in the industry and local industry needs. Such meetings led to the establishment of a Careers Day which is an event organised by the institute once a year.

Students do not currently sit on the SAAB board or any Departmental meetings. SMI's regulations

give students no say in the design and review of programmes, including those which are internally developed. Nonetheless a strong student-centred perspective can be detected in the fact that most of the programmes and courses that have been developed by SMI have been specifically designed to enable smooth student progression and to provide an alternative access route to those students who do not possess necessary qualifications for entry into tertiary education. SMI's internally developed (Level 5) Diplomas are intended to serve as a bridge between Malta's compulsory general education and a more targeted tertiary education, providing students with a supportive route to an undergraduate BSc degree. These Diplomas were developed in close consultation with academic staff from the UoL lead colleges since SMI aimed to attain automatic Accreditation of Prior Learning (APL) for these Diplomas which would enable students who have successfully completed them to progress directly into Level 2 (Advanced Level) of the respective degree with UoL. To date, 3 of the 5 internally developed Diplomas have been accepted for APL.

Although SMI has no influence on the design and approval of UoL International Programmes whatsoever, it has created units, short courses and supports extra-curricular activities specifically with the intention to supplement and improve on what it considers to be deficiencies in the standard UoL curricula to help students develop skills and competences needed in the world of work. Examples of these are the Introduction to Programming course; the vocational units: Database Practice, Web Development, Server Side Scripting, Software Testing, Systems Programming, Introduction to User Interface, Introduction to Artificial Intelligence and Concept Art; the basic Introduction to Programming course; the research methodology course which prepares students for their dissertation; and activities such as the Game Development Challenge and the Junior Achievement Young Enterprise Start-Up Competition. While this is indeed commendable, students following UoL programmes do not receive formal recognition and credit for this learning, since none of this extra learning feature in their (UoL) transcript.

Good practice identified

GP3.1 The UoL provides a comprehensive curriculum for each course offered under its auspices and examinations are also set by the University in accordance with those same curricula. As such, SMI has no formal need for programme design except in the case of its internally designed courses. This said, we have found multiple examples of SMI developing additional lessons and even entire modules (particularly in computing) over and above the UoL requirements, for purposes of updating the content, addressing lacunae in coverage or to adapt it to local needs.

Overall judgment for Standard

SMI meets Standard 3

Recommendations for improvement

RI3.1 While complementing the UoL courses with internally developed content is commendable, none of this extra learning is taken into account by the UoL examinations, since their curriculum is globally standardised. This leads to a situation where students may acquire several ECTS-equivalents of learning which are effectively not recognised, assessed or certified in any way. We therefore recommend that SMI explores avenues by which it could ensure that all learning acquired by its students is appropriately certified and recognised. Measures towards this could include ensuring that the diploma supplement adequately describes all content actually taught at the institute, or offering ECTS for learning done over and above the UoL requirements.

RI3.2 The orientation of the institute towards UoL qualifications means that Maltese stakeholders do not take direct part in the design of its programmes and qualifications. While this

is compensated for by content which is added on an ad-hoc basis by lecturers within the institute, we recommend more extensive involvement of Maltese stakeholders in programme design and provision. Measures towards this could include:

- more extensive utilisation of visiting lecturers from the Maltese business community;
- creation of internally developed credits to supplement UoL content (vide RI3.1);
- more extensive use of local examples / cases by which in teaching UoL content.

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

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

Main findings

The Institute offers the opportunity for students to read for their programmes on a full-time or part-time basis; students are also allowed to transfer their studies between full and part-time study providing they meet the entry requirements. The institute allows students a maximum time limit of 8 years in which to finish their studies, from the start of their diploma programme to finishing their degree. It is also possible for the students to either undertake to study less than four units or their equivalent every year due to family issues or due to learning difficulties, without any penalties on their attainment. If students are temporarily unable to continue their studies, SMI gives them the possibility to postpone their studies for a year or more due to personal reasons.

Student also may opt to transfer their studies to any University of London College or resume their studies with another registered or affiliate institution overseas – including via distance learning.

As already highlighted, the Institute prides itself in its student-centred approach. This is evident in its academic staff's efforts to identify and address gaps or shortcomings in students' learning, in a clear emphasis in teaching for employability, and, especially in the Institute's strong individualised support system, whereby students are followed and guided by members of staff on an individual basis from pre-admissions to graduation. Students met during this visit greatly emphasized their close interaction with members of staff at all levels and the feeling of mutual respect within the learner-teacher relationship. This is especially appreciated by vulnerable students, whose specific needs are fully catered to. Additionally, by offering a flexible range of admissions options, including pre-qualification courses, SMI offers a pathway into Higher Education for students who might not otherwise have the opportunity.

Staff and students met with during the audit visit provided evidence for the use of variety of student-centred learning strategies and pedagogical methods. Notably, the Institute is currently developing an infrastructure for the creation of videos to supplement teaching given in class. Students show high satisfaction with the quality of teaching, and especially with the way the lecturers 'flash out' and contextualize the curriculum content provided by the University of London.

The Institute's close guidance and support is gauged to gradually wean off students to become autonomous learners by the end of the programme. The setting up of a 'Personal Development Programme', a compulsory unit for fresher's and first year repeaters which teaches study skills needed at higher education level, and a 'student consultation day' held every November, where students have the opportunity to sit down with their respective lecturers and receive structured

feedback in a formal setting, all contribute to this end. Extra-curricular activities and events such as a Career's day, a Game Development challenge, a Junior Achievement Young Enterprise Business Plan Competition and a Stock Market Simulation Exercise are also intended to foster a sense of autonomy in the students.

The panel however found it strange that the Institute also holds a 'Parents/Student consultation day'. A 'Parents Day' in a higher education setting is not normally considered as conducive to the formation of students as responsible adults. That said, the panel found that in practice most parents do not attend and that students whose parents did attend found it positive. We find that a procedure for engaging the persons within a student's wider support structure to assist them during their studies is highly commendable in specific circumstances. However, the SMI should consider restructuring it so that it is not seen to resemble the usual secondary school 'parents day'.

The assessment of the UoL programmes and associated quality assurance processes is regulated by the University of London. Assessment methods for individual programmes are often linked to how on-campus programmes at the lead colleges are assessed.

Students are informed of the criteria and methods of assessment for each course well in advance as these are published in the Programme Specification and Programme Regulations booklet. The University of London has developed a comprehensive set of regulations and procedures for ensuring the consistency, fairness and appropriates of their assessment which include strict regulations covering the protocol of examinations, the appointment of examiners and the appointment of external examiners. They also have procedures covering mitigating circumstances that may affect academic performance and procedures for complaints and appeals. Students however reported that were put off from using the complaints and appeals procedure as they found it excessively complicated.

Students have access to generic examiner's reports but they do not receive the examiner's feedback on their individual assignments and exam scripts, something that was highlighted as a limitation both by the students and by the Institute in its SAR. To address this, SMI has made efforts to ensure that the formative assessment it carries out and the feedback given to students aligns with the expectations and standards of the University of London. Over the years the Institute has worked with the lead colleges to make sure that feedback it provides highlights the areas the UoL examiners would look for in the final examinations. In January 2014 the Institute organised a two-day live-in workshop for lecturers delivered by academics from the Teaching and Learning Resource Centre of the London School of Economics and Political Science Lead College. The purpose of this workshop was to help lecturers better understand the examiners' expectations and improve on ways to assist their students reach these expectations.

Lecturers also perform an annual benchmarking exercise on the grades achieved by students following the release of the UoL results in August. Every academic compares the UoL grades achieved by the students with those obtained in the SMI internal examinations as well as with the grades obtained during UoL sittings held in the previous years and offers an analysis. This exercise helps lecturers evaluate the effectiveness of their teaching and learning strategies. A report comparing students' performance with expected performance and looking for variances and their possible causes is compiled by the respective heads of department and is discussed with the department. The panel was impressed both with the lecturers' efforts at providing students with relevant and timely feedback and with their care in analyzing and using student performance to inform their teaching and learning strategies.

SMI holds two formative examinations during the academic year in preparation for the UoL summative examinations held in May. The exam scripts are prepared by the lecturers well in advance and passed on to an internal verifier who confirms that the examination paper meets the

required standards to justly prepare a student for the UoL examination. Once the scripts are marked, a sample of scripts are passed on to verifiers who again confirm that the marking is fair, respects the pre-established marking scheme. Examiners are then asked to prepare an examiner's report wherein they highlight the class performance, success and shortcomings and recommend fine-tuning or changes to the teaching strategy in order to address the identified shortcomings. Students receive their marked script and a completed feedback form from the lecturer once the results have been published which happens about two weeks following completion of the examination period.

With regards to the examination of its own internally developed programmes, the same procedure as that of the SMI's formative examinations mentioned above is followed with regard to setting and marking, with the exception that the Business, Entrepreneurship & Finance department also has a double blind marking system for the final internally developed Diploma examinations, and, for all departments the verifier who checks a sample of the exam scripts is external to the institute.

The panel noted with approval that SMI programmes are designed with the explicit intention of continuous assessment (rather than based on an end of year assessment final examination). The student's final grade depends on a combination of assignments as well as three summative examinations throughout the academic year

Official examination dates are set in the academic calendar by the registrar before the start of the academic year. These are uploaded on the intranet system and circulated by email to all students. The timetable for the respective examination sessions is published on the intranet system one month before commencement of the examinations. Marking criteria and procedures for mitigating circumstances, complaints and appeals for internally developed programmes can be found in the programme specifications and regulations booklet which is also uploaded on Moodle.

In 2006 SMI set up a Student Council composed of five elected representatives. Currently, there are two representatives from the computing department and three from the business department. At the moment, the Council's main responsibility is the organization of social activities for students and managing student spaces within the Institute. The council currently does not really have an 'academic' arm to deal with student complaints or to contribute to academic consultations within the Institute. Students are reasonably aware of the council and its activities.

SMI currently does not operate or actively promote any form of international student exchange.

Good practice identified

GP4.1 SMI prides itself on its personal and individualised approach. Students enjoy close interaction with all members of staff at all levels and see themselves as peers in the learning process. There is a conscious and concerted effort on the part of all lecturers to provide students with relevant and timely feedback.

GP4.2 The school organizes a periodic student consultation day, where each student has the opportunity to sit down with staff members, and discuss his or her individual performance in a structured manner. Providing a forum for students to receive summative feedback outside of the constraints of an examination is highly commendable.

GP4.3 The institution is developing an infrastructure for a virtual learning environment (VLE), mainly involving the uploading of materials and creation of videos to supplement the teaching given in class. We find that use of the VLE is clearly enhancing the learning experience, and furthermore that it is at a reasonably advanced level of sophistication considering the size of the

institution.

GP4.4 The institution organizes an annual careers day, which takes a 'speed dating' format with a number of employers. This event is very well organized, and students are coached in advance in how they should prepare themselves for this event, especially for their interview with employers. This opportunity gives students invaluable job-interview practice, leads to some of them receiving offers and is also appreciated by employers as a unique opportunity to find qualified hires. This forms part of an overall culture at the institute of strongly encouraging compensating students to enter the workforce, even during studies.

Overall judgment for Standard

SMI surpasses Standard 4

Recommendations for improvement

RI4.1   Students at SMI generally do not avail themselves of student exchange opportunities. We recommend that the institution significantly increase its commitment to student exchange. Methods to do this could include:
- Informing students of smaller exchange opportunities such as summer-camps offered by universities around Europe.
- Creating links with student societies in Malta (such as AEGEE, AIESEC, TDM 2000) which exist to promote student exchange.
- Exploring opportunities for exchange between institutions in the University of London ecosystem.
- Continue preparations to participate in the Erasmus+ programme.

RI4.2   The student union is motivated but it is young and inexperienced as an organization. We recommend that, with the help of the school, it collaborates with other local or European student unions for the purposes of capacity building.

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

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

Main findings

The eligibility criteria and requirements for each course can be found on SMI's website. Those pertaining to the internally designed programmes are found in the 'admission' section for each department. For UoL programmes, the website redirects to the relevant webpage on the UoL website. The whole of the admissions process for the UoL programmes is regulated and managed solely by the UoL and can be found on the UoL website. SMI acts as an intermediary between the UoL and the prospective student applying for the respective UoL programme mostly by guiding the prospective student as regards to their suitability for the programme, and on how to go about applying for it, but it is the prospective student themselves who applies online to the UoL, and it is the decision of the UoL whether to accept the applicant or not. The UoL communicates the result

directly to the applicant.

The information on how to apply with SMI and, where applicable, concurrently for a UoL programme, is given to the prospective student in an initial meeting held with the respective head of department. All prospective applicants who contact the Institute are directed towards setting up this meeting as the first port of call. The purpose of this meeting is for the head of department to try to understand what the prospective applicants wants to achieve and to guide them accordingly, as well as to explain what SMI is, its relationship with the UoL, and provide full details of the desired programme and the options available. Fees, terms of payment, arrangements, and any schemes the student can benefit from are also explained. The head of department also shows the prospective applicant a sample certificate and gives them a pack containing the application forms, information regarding SMI and its programmes, information on the UoL colleges, a copy of the SMI code of ethics etc.

From the interview the panel could see that SMI places great importance on this one-to-one meeting, and in its effectiveness at not only getting students onto the right track but at establishing a personal relationship with students right from the start. After this initial meeting, the admission procedure involves applicants submitting the SMI application form, along with verified copies of academic certificates, copy of the ID card or passport and two passport sized photos and paying the respective one-time non-refundable application fee to the Registrar's Office. An account is then opened on the intranet system whereby each applicant is provided with a unique SMI identification number. If the applicant is applying for entry into a UoL programme, after the application form together with the respective documents is vetted and approved by the Registrar, they are stamped and signed and are forwarded to the applicant by e-mail together with clear guidelines for how to complete the online registration with the UoL. If the applicant is applying for entry into SMI's own programmes, after the application form and respective documents are vetted and approved by the Registrar, applicants are sent a questionnaire which they must also complete. The purpose of this questionnaire is for students to assess their potential for the programme and to help the faculty committee get to know the student better. Once the questionnaire is completed a short interview is scheduled with the admissions panel, made up of faculty members from the respective department. The head of department does not sit on this panel. The members of this panel will then decide whether the student may be accepted on the programme. The registrar's office will then issue the respective letter confirming that the student has been accepted to read for the respective course programme, subject to successfully completing the English language placement test.

The Institute organises a fresher's event at the start of every academic year for new students. This event is organised by all academic staff and the registrar's office. During this event, students are introduced to the SMI ethos, the buildings, the administration system and to the different online platforms which they need to access during their course of studies. The UoL online registration process is explained in detail, as is the use of the online library system.

The already mentioned personal development programme, set up by SMI in 2013/14, and which consists of six one hour weekly workshops in basic academic skills such as essay-writing, referencing, use of technology for research, etc. delivered during the first semester to fresher's and first year repeaters greatly helps prepare students for higher education studies. As does the provision of English language support classes offered to students who do not yet possess the appropriate level of English language mastery required at tertiary level study using the English language.

The panel found especially commendable the existence of a very effective student mentoring programme. Each student at SMI is assigned a lecturer as his or her mentor and this mentor becomes the student's main contact of reference throughout their studies. The mentor meets the student regularly (at least once a month) and also continually monitors the academic progress of

the student in all subjects to identify and flag up any problems or difficulties which the student may be facing, with the student and the head of department. Lecturers at the Institute complete feedback forms on student's assignments throughout the year. Additionally, each staff member periodically completes an evaluation form for each and every student which covers all relevant issues including behaviour, attendance and academic attainment. These results are compiled and used to identify students in need of extra assistance or who require an intervention to improve their motivation. Some student records are stored on the Intranet and are accessible to all lecturers, mentors and administrative staff. As has been mentioned under 3.4, the results of all formative and mock examinations are carried out and analysed feedback given to the student.

Attendance is also closely monitored. Lecturers record the attendance at the beginning of each lesson and recorded on the intranet system. Attendance reports are issued during the first week of every month by the registrar's office and any warnings regarding unsatisfactory attendance are noted in a report. Furthermore, the absenteeism percentage for the previous month is recorded in an excel sheet, which is forwarded to the respective heads of department. The heads of department monitor this information closely and will approach any students who are struggling with attendance.

A Europass/UNESCO diploma supplement and a certificate of completion is issued to each student who successfully completes the SMI course programme. The panel saw a sample of each. Although the content of the SMI diploma supplement has been approved by the NCFHE, it does not yet comply with the requirement introduced this year that all diploma supplements include a description of the learning outcomes of the programmes. It also does not include specific information or learning outcomes about each of the individual modules. The UoL issues its own diploma supplement and degree certificate to students who successfully complete the MQF level 6 degree programmes.

Good practice identified

GP5.1   A head of department holds a pre-admission interview directly with all prospective students. Following application, they are interviewed by a board of relevant faculty to determine their appropriateness for the course and their needs. This information is used to tailor the approach to each student.

GP5.2   Student progression is tracked closely. All teaching staff in both departments periodically fill an evaluation form on the status and progress of every student. This information is collected and used as the basis of (a) the review of progress given at the student/parent consultation days, and (b) to identify students requiring extra assistance.

GP5.3   A personal development programme tutors all students in basic academic skills such as essay-writing, referencing, use of technology for research, etc.

Overall judgment for Standard

SMI meets Standard 5

Recommendations for improvement

GP5.1: **key recommendation**: SMI should update its diploma supplement to include overall learning outcomes. Preferably, the supplement should also include a brief description of each credit and its specific learning outcomes in the same document**.**

3.6 Standard 6: Teaching Staff

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

Main findings

The Institution's HR policy is to identify bright individuals with the knowledge and the vocation to teach, even though these individuals typically do not have an academic postgraduate qualification. These members of staff are then encouraged to pursue their postgraduate studies as well as strengthening the natural pedagogical skills through a Postgraduate Certificate in Higher Education (PGCHE).

The recruitment process involves a public call for applications, followed by a screening of applications to weed out those that do not meet the criteria of the call. All remaining candidates hold a one-on-one interview with the head of department, who shortlists 6 candidates. These candidates are then interviewed by a panel headed by the head of department. The panel evaluates "candidates on the basis of personality (20%), attitude towards teaching (20%), other factors (10%) and knowledge of the subject focus of the academic (50%)". Notably though, this last criterion is defined as "the ability of the candidate to communicate difficult matter with ease to students of all ages". Notably, true expertise in the subject is barely weighted at all - candidates who can show exceptional depth and spread of knowledge are only awarded an extra 5%.

While the recruitment process is not published in detail, the panel found it to be reasonably transparent, nor did it find evidence of it being applied inconsistently.

The Institute treats the development of academic staff as a process which spans a period of five years, during which the academic is hand held and closely monitored during the first academic year, and expected to read for the PGCHE programme (a two year programme) during year two to five (depending on the provision by the Institute). In these first five years individuals are expected to show interest in their own career, illustrate initiatives in preparation for the delivery of lectures, build a portfolio of teaching aids, set up and establish an up to date VLE presence, and build healthy relationships with peers at SMI and also with the student cohort in their care.

The Institute has the following academic structure:
- Junior Lecturer: a trainee with a first class or second upper honours bachelor degree.
- Assistant Lecturer: an established lecturer with a first class or second class upper bachelor degree and five years of service at SMI as Junior Lecturer.
- Lecturer: an established lecturer with a master degree and three years of service at SMI as an Assistant Lecturer.
- Senior Lecturer: an established lecturer with a doctorate degree and six years of service as a lecturer.

It is normal for SMI to recruit staff at either junior or assistant lecturer grade, depending on the curriculum vitae and the appraisal during the recruitment process. It is a policy of the institute not to recruit academic staff at senior lecturer grade, even if a candidate has a doctorate qualification and may have sound credentials because the Institute feels that every academic requires a number of years to settle in at a predominantly teaching institution (as compared to a research based seat of learning) and thus needs at least five years to gain the necessary skills and competences as a teacher. The institution has no guidelines as to the balance of staff holding these

titles in a department. While the principal signs off on all hires, the heads of department seem to have relative autonomy in staff decisions.

The institution clearly prioritises teaching competence over research excellence in its staff, with the result that most staff are not involved in research activities at all. Furthermore, as a faculty, participation in international conferences is quite low. Most staff at SMI are full time, which while an advantage from the perspective of stability and low turnover, also limits the amount of 'professional practice' engaged in by staff. Notwithstanding, several staff members do engage in innovative research projects, many in collaboration with staff outside the institution, and have been involved in a number of publications. The research that does happen is clearly led by the head of department or in collaboration with them. The institution also does not have a dedicated budget for conferences or other staff-development activities, although these are funded from time to time on an ad-hoc basis.

SMI adopts a 360 degrees method of appraisal. Appraisals are held on a yearly basis. Members of staff fill in a qualitative and quantitative evaluation form, feedback from students is gathered in an on-going manner and through a student feedback system, peers observe a lecture and write a report, Heads also observe a lecture per academic member of staff and fill in a similar quantitative form to the academic member of staff. All the information gathered concerning the individual academic member of staff is discussed in the yearly appraisal meeting.

In terms of teaching methods, the institution is quite advanced in terms of use of its VLE. The primary mode of instruction remains the lecture.

Good practice identified

GP6.1   The Institution has strong links to the world of work, mainly through contacts of its various members of staff. Furthermore, certain staff at the institution are embarking upon (limited) research projects with members from other HEIs/universities within Malta – setting the groundwork for a nascent national Higher Education community (as opposed to one solely contained within the University of Malta).

GP6.2   The institution actively encourages its staff members to upgrade their qualifications. In fact, over 70% of staff has upgraded their qualifications since being employed. As part of this, practically all members of the teaching staff have acquired or are in the process of acquiring a PGCHE, as a direct result of strong encouragement by the institution.

Overall judgment for Standard

SMI requires improvements to meet Standard 6

Recommendations for improvement

RI6.1**key recommendation**: Establish minimum requirements in terms of qualifications and competences for:
- teaching staff teaching UoL material;
- teaching staff teaching internally developed courses;
- staff designing programmes.

Such minimum requirements should distinguish as appropriate the qualifications needed to teach or design programmes at different levels of the MQF.

RI6.2 **key recommendation**: The HEI should establish a minimum level of qualifications and competence to be held by a department as a whole, and clearly indicate the qualifications and competence which should be held by a head of department, taking into consideration the MQF level of the programmes the HEI is licensed to offer.

RI6.3 **key recommendation**: the institution should establish a senior leadership body, made up at minimum of a designated senior academic from each department. The senior academic should be able to demonstrate an adequate combination of research, teaching and/or professional experience appropriate for the role.

RI6.4 While some members of staff do engage in (academic and professional) research appropriate to their level, this seems to be mainly on their own initiative. The Panel recommends that the HEI formally establish some basic research targets at department level or at the level of individual members of staff.

RI6.5 The Panel recommends that the institution compiles its various research activities into a cohesive research programme. SMI should publicly report on the achievement of said programme, and dedicate a section of its website to this. This could also include an online repository of publications by students and staff of the institution.

RI6.6 The panel is somewhat concerned that the level of personal support given to students at all hours of the day may have negative impact on work-life balance for members of staff. We suggest the institution establishes a student-service charter, which would establish minimum standards for teaching staff to respond to students, but which would also serve to protect staff by establishing what kind of requests would be considered unreasonable.

3.7 Standard 7: Learning Resources and Student Support

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

Main findings

The institute has its own physical library equipped with textbooks, further reading books, academic publications guidebooks, past papers and dissertations from students who have completed their degree programme with SMI. Before the beginning of each term all academics are allowed to recommend their textbooks to be included in the library stock which, keeping in mind the cost of such recommended resources, would be included soon after the recommendation is made.

SMI does not pre-allocate a specific annual budget for staff work-resources, including funding for continuing development, conference fees or material needed for teaching/learning. This said, resources are allocated to these activities on an ad-hoc basis in line with institutional priorities, i.e. prioritising SMI as a teaching institution. While, as already mentioned the overall research activity, and hence overall funding for research is low, with respect to teaching activities, and continuous personal development, we find the resource allocations to be fully adequate. Thus, for example, interviews established that an average of €800 - €1000 per year is used to supplement

the physical library.

Students registered with UoL have access to the online library of the UoL. The resources provided by this online library support even Level 7 students, and provides sufficient material to fully support all courses taught at the school.

The institution is spread out over two buildings and ten floors. Of these, one floor is given over to the library and study-area, while two more are given over to student common-areas. In addition, two floors house offices for administrative staff and a staff-room. Academic staff do not have individual offices or desks on campus. One computer-lab is equipped with computers for the availability of the students. Students also have access to rudimentary (but fully sufficient) audio-production, virtual-reality, and video labs. The rest of the institution is given over to teaching space, as well as utilities (such as reception area etc.). All classrooms are equipped with projectors, whiteboards and in some-cases interactive whiteboards, as well as relatively modern seating – although, the comfort of such seating was a frequent topic of complaint during our interviews.

IT infrastructure includes SMI's intranet and Moodle system, the UoL Virtual Learning Environment (VLE) and Google Apps. While the intranet is used as a form of communication between the students and administration, the Moodle VLE, provides communication between the students and the academics in relation to academic content and resources and setup of interactive activities, class-work and assignments. Google apps on the other hand is used to provide the students with an indefinite access to standard facilities such as e-mailing, calendaring and student electronic storage space for everywhere on the cloud. The UoL VLE contains all the academic content produced by the relevant lead college including subject guides, assignments etc. It also provides access to an online library, forums and plagiarism checking software..

The institution emphasises its efforts to assist students with learning limitations to overcome their difficulties and achieve an appropriate qualification. It does this by ascertaining that it modifies its pedagogy to meet the needs of students with learning difficulties, as well as providing special conditions for examining the students according to guidelines as set by a board of specialists. Appropriate arrangements are also made with regards to wheelchair-bound students where lectures would be set to take place in easily accessible classes.

The building of the Institute is accessible even on the weekend which allows students access to resources provided such as the Creative lab, which may be used both for studies-related and more personal matters.

Lecturers are also encouraged and expected by the Institute to start preparing for the academic year by the end of September. This was confirmed in an interview with the lecturers who exhibited the material prepared over the summer which includes the filming of a video giving an introduction to the topics to be covered and which would be made available for the students to view prior to the start of the term.

Good practice identified

GP7.1 An estimated 30% of the infrastructure of the institution is given over to social spaces including library, students study spaces, games room and kitchenette. Students have access to essentially all resources in the building when it is open.

GP7.2. The institution operates a Creativity Lab with the aim of giving students access to equipment they would not otherwise have access to, for the purpose of providing for innovative

project-participation. Considering the size of the institution, these resources are put to excellent use in a variety of projects, including with the involvement of external stakeholders such as Google and Heritage Malta.

Overall judgment for Standard

SMI meets Standard 7

Recommendations for improvement

RI7.1   Despite a significant investment in social spaces for staff and students, it seems that both groups still prefer to leave the institution's premises during their free time. We suggest the institution to establish a working-group including the student union and teachers to address this issue, and possibly also consider engaging external consultants as appropriate for support.

RI7.2   Complaints about the appropriateness of various seating arrangements were a common feature of our interviews in the institution. We recommend that SMI adopts an ergonomics policy and applies it for all further infrastructural purchases.

RI7.3   While the school seems to have found a reasonable balance between providing equipment itself and BYOD, we feel that students would benefit from more explicit policies for strengthening BYOD. These might include arranging with a local hardware provider to lease software/machines to students as needed (in particular in cases where students computers need repair or replacement), including student equipment in the school's insurance policy or arranging for volume discounts for equipment and software.

RI7.4   Since certain relevant learning materials, in particular, Maltese case studies, are only available from Maltese libraries, we recommend the school investigates the possibility of national inter-library loans.

3.8 Standard 8: Information Management

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

Main findings

As soon as an individual submits an SMI application form, along with the relevant documentation, and one-time application fee, an account is opened on the SMI intranet system and the applicant is provided with a unique SMI identification number. The Intranet System is where all student information is stored. After an applicant is formally accepted and registers as a student at SMI, they have their records on the SMI Intranet, through which they are able to update their public data, check their attendance status and financial records. During the audit visit the panel was told that the student records may be accessed by the Registrar's Office and the IT personnel.

Course participation in terms of attendance is noted on SMI's intranet and, as already been noted under 3.5, is analysed and used to monitor student progression. Student data in terms of retention is stored per course under the following sub headings: graduated, resigned, dropout, and current student. Whether the student pursues his/her studies at SMI following a diploma is also monitored. The amount of local and international students is noted as well. SMI formally benchmarks the results of its students following UoL programmes with the overall global cohort

of that same programme.

The Institute strives to gather feedback on a regular basis by formally organising student feedback surveys which are carried out three times during the academic year – in November, February and June. Each study unit is individually evaluated by every student, and so as gather the maximum feedback possible, the completion of such survey is obligatory should students wish to access the intranet system, where timetables and other administrative issues are posted. This leads to a near-full completion rate.

The institution has organized tracer studies of the employment of its graduates. The majority of students are already in employment or in the possession of offers before graduating from the course, due to the high emphasis put on this by the school as a whole. Furthermore, due to the already described personal approach and small size of SMI, most lecturers can identify the places of employment of former students on demand.

SMI does not operate bespoke student-records software. Management of student records as well as institutional records is done using a mixture of custom-databases, spreadsheets, documents saved on network drives and paper-files. While the current system seems to cater adequately for the needs of the institution, it does not provide for robust document traceability, security or access control. In particular, it proved difficult to ascertain who has the right to edit certain strategic/management/administrative documents, which bodies make changes, and which were the official current versions. In fact, at different occasions during the review, we observed documents being corrected when they were found not to be the latest version, or persons disagreeing on who precisely had access to which student data.

Good practice identified

No particular good practices identified.

Overall judgment for Standard

SMI meets Standard 8

Recommendations for improvement

RI8.1   The panel recommends that the institution adopts a clear data-protection policy which specifies who has access to which student data under which conditions. It should also include guidelines on secure storage and encryption of the same data.

RI8.2   **key recommendation**: at present, there are no policies on versioning, updating or replacement of any administrative documents of the institution. The panel recommends that the institution adopts a clear policy on document traceability.

3.9 Standard 9: Public Information

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

Main findings

The SMI website was fully revamped on 3rd April 2017. Until that point, the website contained significant amount of out of date information and expired links, due to the departure of the person responsible for its content. At present, it is not clear who is responsible for the overall concept, design or content of the website.

The new website contains detailed information on the admissions section as part of every programme chosen from its home page. This section includes the necessary information which a potential SMI student would need to make sure he is eligible for application, including the required age, qualifications as well as some limited information admissions. Links are also provided to sources of financial support, but we were unable to locate any mention of the tuition fees anywhere on the website.

The website provides a prospectus for each department, which lists the programmes available from the department, together with the list of credits they encompass, as well as generic learning outcomes for the programme. No specific information whatsoever about credits/courses offered by SMI is published. Furthermore, no information about the members of the faculty, the structure of the institute or its quality assurance policy could be found.

With respect to UoL programmes, the institute simply links to the page on the UoL website for the respective programmes – offering no information whatsoever about the specific role SMI plays as a teaching institute.

General information on pass rates, the institution's activities and further learning
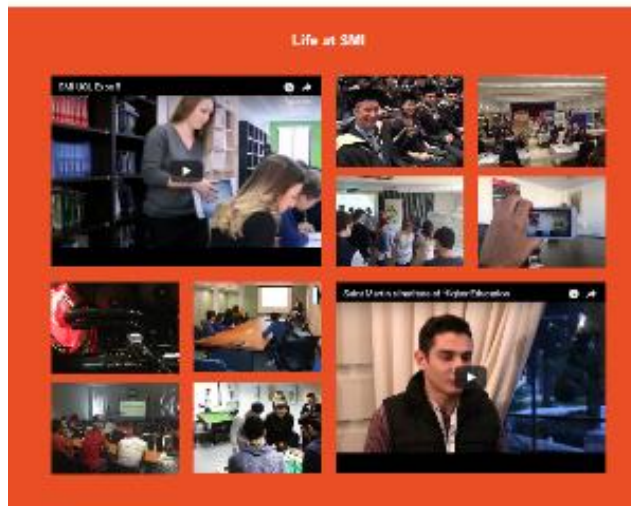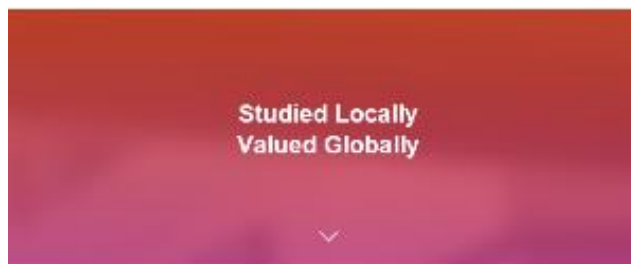
opportunities are also missing.

The Panel's impression is that while the older website was out of date, the new website has been launched incomplete – as the range of information available on it is significantly less than before. As such, as at the date of writing, the panel found that the information available is not sufficient for prospective applicants to make an informed choice on the institution, or even to discern basic information about its functions. This said, the personalised admissions interview, mentioned earlier, would somewhat compensate for this lacuna – however even this is not mentioned anywhere on the website.

Good practice identified

No particular good practices identified.

Overall judgment for Standard

SMI requires improvement to meet Standard 9.

Recommendations for improvement

RI9.1   **[key recommendation]** SMI should complete its website with basic information including:
- learning outcomes as well as teaching, learning and assessment procedures for each credit/course offered as part of the institution's programmes;
- information about the faculty teaching and managing the institution;
- an explanation of SMI's role as a UoL teaching college, and the division of procedures, including admissions between UoL and SMI;
- tuition fees.

RI9.2   Furthermore, the website should include information about pass rates for each course, the day-to-day activities at SMI (a news section), the campus and resources available to students, as well as career paths enabled by the various courses.

RI9.3   The institution should identify a clear responsibility for public information, and establish processes to ensure the publication and updating of such information.

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

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

Main findings

During the visit the panel could see that there is clear on-going monitoring and review of programmes happening at SMI. The panel was presented with several examples which showed that the impetus for the development of SMI own courses and programmes came from a review of the UoL programmes in light of practice in the sector and the local context. The panel also saw

examples of short courses and vocational units developed specifically to address gaps in students' knowledge and to make for smooth learning progression (see 3.4).

The Institute's departments are obliged to produce an annual monitoring report about all their respective programmes. This report is sent to the Principal, Registrar as Secretary to the SAAB and to the Board Secretary. The reports consist of an overview of the grade curve of students for the last three years, as well as a 'comments' field. The comments field sometimes contains an analysis of the feedback received on the course, but its use seems to be purely at the discretion of the lecturer filling it in, with several of them showing no comments whatsoever. Apart from this, several tools such as the annual report on the UoL results, the examiners' reports, the academic staff self-appraisal document and the student feedback questionnaires all are used as means to ascertain the effectiveness of curriculum and assessment, as well as the teaching methods and pedagogy for the programmes. Furthermore, as was already mentioned, the panel confirmed that the monthly departmental meetings are a space of effective communication and reflection.

The curricula of the University of London International Programmes are reviewed over a four to six-year period. The Periodic Programme Review of each programme is the shared responsibility between the University of London International Academy and the respective Lead College.

Good practice identified

GP3.1 also applies under this standard

Overall judgment for Standard

SMI meets Standard 10.

Recommendations for improvement

RI10.1 Ensure all programmes undergo a formal redesign (or a check on whether they need a redesign) at appropriate intervals – in particular, computing courses need to be reviewed at minimum every 3 years to remain relevant.

RI10.2 The Panel encourages SMI to continue to expand its offer of internally developed qualifications to enable (a) a faster response to technological change, and (b) to more directly cater to the particularities of the Maltese IT context.

RI10.3 A more elaborated template for the annual monitoring reports should be created, so that these consistently reflect not just student grades, but the results of the evaluation questionnaire, as well as feedback from students, employers and any relevant risks / developments in the field. Such annual reports should also compare performance with previous iteration of the course.

3.11 Standard 11: Cyclical External Quality Assurance

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

Main findings

SMI fulfilled this standard by virtue of hosting the external quality audit referred to in this report. In addition, the institution undergoes periodic external review by the University of London against its Teaching Institutions Recognition Framework. SMI also actively participates in quality enhancement activities organised by the NCFHE including training courses, conferences, round-table meetings as well as individual consultations.

Overall judgment for Standard

SMI surpasses Standard 11.

4. Response by the Provider

1. Preamble

Saint Martin's Institute of Higher Education is a Higher education institution that is in a transitional phase from purely a teaching institution for a foreign University – the University of London, to an awarding body in its own right. The Institute's ambitions are towards a subsequent status of a Research and Teaching University, yet it is embedded in the Institution's values, that any progress aimed for and achieved by the educational institution must be measured through clear, globally accepted benchmarks.

The nearly two decades of apprenticeship of the University of London has served Saint Martin's Institute to appreciate the necessity of;

1. **Selecting the right type of individuals to research and lecture** the syllabi in their entirety as presented by the University of London. As an examining body, the University of London has set extremely high standards that never waver. The examination papers are unseen by the lecturers at Saint Martin's Institute and the students' scripts are assessed and marked by the examination boards of the University of London. Students are not only expected to answer questions set through theoretical regurgitation, but must build specific arguments to prove that theories being presented to concretise their answer to the question. In a wide portfolio of subjects, students are also expected to be able to prove such theories, through mathematical and computational methods. Students need to be able to think deeply and widely when answering questions – and under the stressful situation of a timed invigilated examination. Therefore, the Institute had an even more strenuous role of preparing and mentoring students to sit for public examinations. This role of a teaching institution for a highly regarded University taught Saint Martin's Institute of Higher Education the importance of student centred pedagogy in preparing students for their final examinations. It also identified the necessity of quality assurance when preparing and marking formative assignments and internal mock examinations that needed to mimic as closely as possible both in format as well as marking standards of the examining boards of the University of London. These needs have formed the selection criteria of the Institute for its academic staff, who must show deep and wide knowledge in the subject matter they would have applied for, aptitude in communicating their knowledge to an audience and last but not least a vocation towards the profession of teaching.

2. **The importance of safeguarding the organisation's reputation**. Education is surely one of the most intangible of services that one can imagine. It is also a service that produces results after a substantial time-lag, at times, years. The causality of education in society is many times measured in decades, and the Institute appreciated the importance of consistent standards through the leadership of the University of London. As an examination system, the University of London has been in existence for 159 years and the system has spawned a number of now famous Universities in their own right, both in the United Kingdom and also in the Commonwealth. Whilst the Institute received its awarding powers in 2012, it desisted from rushing to develop and offer its own qualifications, but rather chose to embark on a programme of gradual development with clear measurable benchmarks to ascertain that its own reputation as an awarding body is gained through meritocracy and achievements. The Institute's first home grown qualification, the NCFHE Accredited at MQF Level, 5 Diploma in Entrepreneurship, was benchmarked in 2013 to the first year of the business administration degrees offered by the Royal Holloway, University of London. This qualification was the Institute's test, with students qualifying from the Saint Martin's home grown diploma being accepted into the second year of the degree of the University of London. Proof of standard is clear by the

annual high achievements of the students when sitting for the University of London examination in their second and third year, attaining a majority of second upper and lower honours classification. The transition was successful with both the Institute and the University of London agreeing on an MQF Level 5 Diploma in Finance and Diploma in Management & Leadership, approved by the London School of Economics and Political Science of the University of London as equivalent to the first year of the degrees in Economics, Management, Finance and Social Sciences. This strategy of building key and core competences in order to gain trust in amongst employers and students (and their parents) is in recognition that founding an educational institution must unequivocally be based on rigour in educating students, and clearly defined measurement criteria for employers to trust the Institute when recruiting graduates as employees.

The following are our responses to the key requirements as presented by the Audit Panel who reviewed our operations during the External Quality Assurance.

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

Recommendation 2.1
'It is recommended that SMI considers developing clear selection criteria for headship positions'

Academic Leadership
In 2010, a set of procedures were drafted and approved by SAAB with regards to the selection criteria for headship positions. These include the positions of the Vice Principal – Academic Affairs, Head of Department and Head of Group as per attached memorandum named *'Term and selection procedures for academic management positions'.*

These procedures have been followed judiciously since 2012. Before 2008, the Institute was led by the Principal – who is also the founder of the organisation – and the Vice Principal (Academic Affairs), Dr. Ronald Aquilina who had the headship of the academic staff. From 2008, the number of full time academics employed at the Institute started to increase, the need was felt to establish the two departments and heads were selected in the respective roles. The first head of department for Business Entrepreneurship & Finance was Dr Alex Rizzo, who served a term whilst Mr Jonathan Barbara was selected to head the Computing & Information Systems department (as it was known at that time). Both heads served until 2012 when the current selections procedures as set were put into effect. The current head of department, Ms Alessandra Theuma heading the Department of Business Entrepreneurship & Finance, was recruited after a selection process between three candidates. Mr Dylan Seychell, head of the Department of Computing, was recruited after a selection process between two candidates. Both individuals are now in their second term. Mr Dylan Seychell will be replaced by Mr Silvio McGurk in September 2017 following a selection process which took place as per memorandum issued last September 2016. The selection process for a new head of department for Business Entrepreneurship & Finance will commence shortly since the incumbent enters the last year of her second term this academic year.

This system guarantees that departments are never under the leadership of a single individual for an indeterminate term, with the possibility of the department falling into a rut. Job descriptions for each role are attached as reference to this document, and during the selection interviewing process, candidates are required to present a three year plan of action for their respective department and success criteria that will be referred to during the headship period.

Registrar

The Registrar is a post that is filled through application and it is a permanent post. The post is mostly of an administrative role, and requires continuity and longevity. This post has developed substantially since 2013, when Saint Martin's received its awarding powers. The Institute recognizes the need to revisit and develop a detailed job description for the Registrar. The key position of the Registrar within the Institute has a primary role in the upkeep of quality assurance rigour together with student and programme curator role that is congruent with the Registrar of an academic institution.

Although the Registrar's role has not been constituted in the same way as other headship positions, the incumbent has managed internal quality assurance cycles since 2012, and been very much in charge of the Institutional Periodic Review carried out by the University of London audit team in 2015, and the current External Quality Assurance by the NCFHE in 2017. The next step is to clarify the role through a written document and get this approved as part of the constitution of the Institute.

General Manager

The General Manager is a post that is filled through application, and is a permanent post. The role of the General Manager is to oversee the ongoing operations of the institute in a timely and effective manner. The General Manager is responsible for overseeing the finances, human resources, marketing, precincts, information technology, housekeeping and general administration.

Principal

The Principal is the representative of the organisation as required by the Higher Education Act of the Republic of Malta and is also the named individual on the NCFHE licence as head of an academic institution with awarding powers. Since the Institute is constituted as a limited liability company, the Principal is also the Managing Director of the company.

The Principal, according to the current role, must have the ability to oversee the day-to-day business requirements of the organisation, whilst at the same time balance this with the academic needs as a seat of higher education.

As yet, the Institute has not constituted a process where the Principal is replaced after serving a pre-determined time span – although this is contemplated for the future. The organisation has been an awarding body for four years, and before that a teaching institution for thirteen years. The organisation is still in its nurturing stages as an academic seat, and the management team and the board of directors will investigate procedures to establish the selection process for the role of Principal according to pre-determined criteria. The past decade has meant the exposure of a number of members of staff to management practices, many of whom have remained as full time academic staff in the ranks. This will augur well should the Institute invite such members to apply to take the helm of the Institute as Principal.

Conclusion

The Institute's board of directors are aware of the obligation to ensure sound governance and have succession plans whilst keeping in mind the current resources of the organisation. This recommendation will be taken into consideration and the necessary policies put in place by the next QA audit cycle included as part of the Governance Policy Document on the Institute's Web-Site.

Recommendation 3.1
'SMI should explore avenues by which it could ensure that all learning acquired by its students is appropriately certified and recognised. Measures towards this could include ensuring that the diploma supplement adequately describes all content actually taught at the institute, or offering ECTS for learning done over and above the UoL requirements'.

The Institute has already taken this recommendation on board and is of this year promoting the concept of parallel degrees, where students will be awarded **two separate** diploma supplements. Saint Martin's Institute of Higher Education home-grown programmes, that follow the learning outcomes developed by the Institute's academic departments, are taught and examined over the Autumn and Winter semester and will gain successful students the opportunity to receive awards by the Institute, whilst students will sit for their final University of London examinations after preparation and mentoring by the Institute's academics during the Spring semester sitting for their exams in May. Thus, graduates will have all the learning acquired as students at the Institute via the Saint Martin's diploma supplement, whilst the University of London issues its own diploma supplement when it confers its degree on the graduate.

Recommendation 3.2
'The Panel recommends more extensive involvement of Maltese stakeholders in programme design and provision. Measures towards this could include:
a.   more extensive utilisation of visiting lecturers from the Maltese business community;
b.   creation of internally developed credits to supplement UoL content (vide RI3.1);
c.   more extensive use of local examples / cases by which in teaching UoL content.'

The Institute accepts the panel's recommendation as a medium term development. The Higher education act was enacted in 2012 and the Institute received its awarding powers in 2013. The Maltese market is, still to this day, wary of home-grown programmes not emanating from State Institutions and Saint Martin's Institute of Higher Education's reputation was closely integrated with the University of London as the conferring body.

Saint Martin's initiated its home-grown programme development through its Diploma in Entrepreneurship at MQF Level 5. This qualification has clear content similarities to the foundation year of the business administration degrees offered by the University of London which allowed Accredited Prior Learning status to students who successfully complete the SMI Diploma in Entrepreneurship but also accepted the replacement of 25-30% of the curriculum by home-grown learning outcomes that has customised the qualification towards the local business community needs, whilst keeping its loyalty towards the aims of the foundation year of the University of London degrees.

With regards to measure (a) the Institute **does** invite visiting lecturers from the Maltese business community and in fact has established a Saint Martin's YouTube channel https://www.youtube.com/user/smiitmalta where we have interviewed a number of industry leaders and these sessions are available online. In addition to this we also have a Sound Cloud station https://soundcloud.com/fikliemiehor that includes a number of interviews (in Maltese) with constituted bodies and entrepreneurs discussing major business oriented subjects. Each academic, apart from the fact of having been a practitioner in industry before joining the Institute, is free to invite any individual who may have expertise and who will extend the knowledge horizons to the student body. Students are also invited to study visits in industry, where they **must** attend a lecture by a member of the visited firm. Is the Institute doing enough of this propagation of knowledge through industry links? The Institute will continue to strive to foment a general interest towards learning and knowledge by all means possible, including the recommendation of the panel.

We have already answered (b) through the actions we are undertaking as answered for 3.1 whilst in the case of point (c) we wish to reiterate that academics are freely referring to examples emanating from the Maltese business community, whenever this is possible and practical. Unfortunately, information pertaining to Maltese companies is very scarce, except for those that are publically listed and it is not easy to compile realistic statistical data that may assist in the development of arguments and theories as available for international markets. The Institute also has an international cohort of students, with close to 40% of its students not being Maltese and we aim to inculcate a European wide vision towards business and computing. We wish to assure the panel that academics are continually making solid reference to local firms and brands in addition to the internationally renowned multi-national corporations. The academics at the Institute seek to provide a balanced outlook to the field of study they teach.

Conclusion

In conclusion, the Institute desisted from being too forward in the development of its own awards in the first years from its receipt of awarding powers – purely through its persistent need to protect its reputation that has been painstakingly built over the three decades since its foundation. The Maltese public is still wary of non-State institutions, and the worst case scenario is that the Institute will suffer fall-out from misguided haste.

This first External Quality Assurance by the National Commission for Further and Higher Education has further legitimised the Institute as a valid and important member of the Higher education community on the Island, providing a sterling service to its students and alumni. It is maybe the opportune time to use these glowing reviews by the independent panel to introduce the Institute's own programmes more strongly to a hopefully receptive market.

Recommendation 5.1

'SMI should update its diploma supplement to include overall learning outcomes. Preferably, the supplement should also include a brief description of each credit and its specific learning outcomes in the same document.'

The diploma supplement as presented to graduates by Saint Martin's Institute of Higher Education met the specific scrutiny of the National Commission for Further and Higher Education as per communication dated in 2014-5. We understand that this key recommendation is a new exigency in effect from 2017, and the Institute's Registrar has already taken note of this requirement. All diploma supplements awarded in 2017 will include the new requirements.

Conclusion

This key recommendation will be fully complied with in this cycle of MQF level 5 Diploma awards.

Recommendation 7.1

'The Panel suggests the institution establishes a working-group including the student union and teachers to address the low utilisation of social spaces, and possibly also consider engaging external consultants as appropriate for support.'

This suggestion will be taken on board and acted upon with the best possible intentions. The geographic size of the Maltese Islands means that many students continue to participate in their home communities, enjoying sports clubs and entertaining themselves with different groups of friends close to their domicile. This is a dynamic that has been very noticeable among the Saint Martin's student body.

Recommendation 7.2

'The Panel recommends that SMI adopts an ergonomics policy and applies it for all further infrastructural purchases.'

We will keep this in mind in any future infrastructural developments of the Institute.

Recommendation 7.3

'Introduce arrangements to support BYOD, such as arranging with a local hardware provider to lease software/machines to students as needed (in particular in cases where students' computers need repair or replacement), including student equipment in the school's insurance policy or arranging for volume discounts for equipment and software.'

The recommendation to introduce arrangements to support **buy your own devices** has been on our minds for a number of academic years. However, our efforts have been thwarted by the high price expectations of local hardware importers when compared to the same or better models available over the internet. Additionally the fact that students registered in private Higher education institutions receive their grant some months later than students who are attending State institutions and are thus placed at a disadvantage. We will continue to monitor the situation and investigate the possibility of arrangements with suppliers.

Recommendation 7.4

'The panel recommends that the school investigate the possibility of national inter-library loans.'

During the years spanning 2000 to 2007, Saint Martin's Institute of Higher Education paid access fees on behalf of each of its students to visit and borrow from the University of Malta library. However, feedback from students suggested that modern titles, especially in ICT, were not readily available. At this juncture we stopped paying the fee and channelled these monies into our own library provision. Soon after, the University of London opened its **Athens** on-line library to all its international student cohort and academics at teaching institutions, providing invaluable resources necessary for the academic development of the community at the Institute. We believe that this provision offers sound supportive resources for students.

In the past there was also talk of transforming the library system in Malta into an interlinked system that would bring together the public library system, as well as the many private and public libraries dotting the Islands. We have been, and remain keen to participate in such a set-up.

Conclusion

The recommendations as provided are acceptable and the Institute will strive to achieve the recommendations.

Recommendation 8.1

'The panel recommends that the institution adopts a clear data-protection policy which specifies who has access to which student data under which conditions. It should also include guidelines on secure storage and encryption of the same data.'

SMI does have a policy with respect to data protection, however, as pointed out by the panel this is not documented and this is something which we will be working on.

All documentation related to SMI students falls under the responsibility of the Registrar. The students files are kept in the Administration department and access to these files is only given to the Registrar and administrative staff working under her supervision. Any requests made by academics to view a student file, need to go through the respective Head of Department and once approved the Head of Department will inform the Registrar. Academics requesting access to student files are only allowed to do so in the Administration office under the supervision of the Registrar.

The student files are colour coded especially in the case of students who require specific arrangements throughout the duration of their studies with us. Any medical certificates / documentation is sealed in an envelope marked as CONFIDENTIAL and signed by the Registrar and the Principal. In these cases, the necessary information is passed on to the respective Head of Department at the beginning of the academic year so that the necessary arrangements are made by the faculty.

Every academic year, continuing students are asked to complete a registration form for the respective year and every year students over the age of 18 years old are required to give SMI consent to divulge any information related to their academic performance. Data protection is treated seriously at SMI and whenever a third party requests information regarding our student/s, the first thing that is checked is whether we have the consent to provide the relevant information. It is to be appreciated that in our case, the parents / legal guardians are the ones normally paying the tuition fees and hence have a certain expectation that we can provide the information upon request, which is not necessarily the case. Thus in such cases, we normally request written confirmation from the respective student that we are allowed to divulge the information. The same procedure applies in the case of our consultation days where the academics are provided with a list of those students who did not give us the consent to discuss any details.

Discussions have already commenced with respect to an improved and robust system to ensure the controlled access and safe-keeping of student records within the ambit of data protection legislation.

Recommendation 8.2

'At present there are no policies on versioning, updating or replacement of any administrative documents of the institution. The panel recommends that the institution institutes and adopts a clear policy on document traceability.'

The recommendation will be taken forward by the Registrar who will agree with the Principal a timeline for implementation.

Conclusion

The Institute is bound by the Data Protection Act of 2001 enacted by the Government of Malta, and protects data pertaining to each student according to law. Every effort will be made (a project has been initiated already) to build an adequate CRM and ERP system to deal with such recommendations. The Institute finds itself in a transitionary state, where to date, the Institute and graduates rely totally on the University of London since the ultimate award emanates from this organisation. Admittedly, we have our first individual students who have read solely our homegrown qualifications and therefore we will ascertain that the recommendations brought forward by the panel will be initiated and adhered to.

Recommendation 10.1

'SMI should ensure that all programmes undergo a formal redesign (or a check whether they need a redesign) at appropriate intervals - in particular, computing courses need to be reviewed at minimum every 3 years to remain relevant.'

The Institute is in transition from being totally reliant on the University of London programmes to an awarding body. Saint Martin's Institute has held a license to operate as a teaching institution for the University of London since its first introduction of the Bachelor of Science programmes in the year 2000. But this license was conditional of the continued relationship as a teaching institution to the conferring body. Since 2013, Saint Martin's Institute of Higher Education was enabled to develop its own home-grown programmes, and can now extend itself beyond the constraints of an international syllabus. It must be said that the University of London provides very respectful learning outcomes that have an important international flavour based upon sound research from a University supported by many precious resources. The University of London, owing to its international nature, may take more time to upgrade certain syllabi since it needs to take into consideration any constraints on resources at similar teaching institutions around the world. Having said that, and as indicated in recommendation 10.2, students registered at Saint Martin's Institute of Higher Education are exposed to the very latest technologies and taught leading edge knowledge and competences to make them very much sought after by employers in Malta, and in some cases overseas.

Recommendation 10.2

'The panel encourages SMI to continue to expand its offer of internally developed qualifications to enable (a) a faster response to technological change, and (b) to cater more directly to the particularities of the Maltese IT context.'

Saint Martin's Institute is very much aware of the benefits from its affiliation with the world renowned University of London – not simply the brand itself, but the knowledge and academic research available through the network of colleges and universities that constitute the University of London. We feel that the bar set by the University of London examination boards have helped us form our expectations based on very high international standards. Our apprenticeship to such a prestigious seat of learning is very much appreciated and Saint Martin's Institute of Higher Education is more oriented towards offering diversity of field of study combinations rather than duplication. The Institute is set to offer parallel qualifications where these are possible, but will offer students the options to mix majors as they may wish for their career prospects and that may not necessarily be offered as a programme by the University of London. This will be catered for through a wider home-grown MQF Level 6 portfolio that is being developed, and that will probably be deemed to have a futuristic flavour.

Recommendation 10.3

'A more elaborated template for the annual monitoring reports should be created, so that these consistently reflect not just student grades, but the results of the evaluation questionnaire, as well as feedback from students, employers and any relevant risks / developments in the field. Such annual reports should also compare performance with previous iteration of the course.'

This recommendation will be adopted as of this academic year.

Conclusion

The recommendations provided by the panel are all received well, with both 10.1 and 10.2 being actually work in progress in both departments. As the Institute starts to find its feet with the

local student community and the teaching profession, Saint Martin's Institute of Higher Education will feel more at liberty to continue to develop further innovative programmes at MQF Level 6. Until the last academic year, the focus of the Institution has been towards developing a portfolio at MQF Level 5 that lead to University of London degrees. This year we are developing degrees that may be achieved in parallel and this will continue to establish the institute as a valid Higher education institution of the highest quality for Maltese and international students.

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

Recommendation 1.1 (key recommendation)

While the HEI has operating quality procedures, these are somewhat haphazard and are not collected into a single policy on quality assurance. The HEI should establish a quality assurance policy which mandates the operation of (already existing) quality management procedures. The policy should be officially adopted as an official act of the highest governing body of the institution, and including provisions to ensure that any revisions are also adopted in the same manner. The policy should be published on the institution's website in its entirety.

Whilst recognising that disparate quality assurance policies have periodically been developed for specific processes and these enjoy the mandate of the hierarchies of the Institution, no effort has been made to collate these into a single policy on quality assurance encompassing the full cycle of the organisation. Therefore the Institute will take this key recommendation on board, and will ascertain to develop a single quality assurance procedure currently in operation to be documented and published on the Institute's website.

Recommendation 1.2

The institution should establish processes and procedures to periodically collect and consider the requirements of external stakeholders and feed them into quality assurance processes. Such structures could range from regular surveys of stakeholders to a consultative committee. The institution should be able to demonstrate documentation of the results process.

The management team will establish the processes necessary to build in such stakeholders in the quality assurance processes in a more formalised manner than is current practice. This recommendation will be an integral part of the transition of the Institute from a teaching institution to a research based awarding Higher education institution.

Recommendation 1.3

The Institution should use the NCFHE audit as an opportunity to embark upon an in-depth strategic review of operations. A future SAR should not only contain a description of the institution, but an actual assessment of its performance, presenting its strengths, weaknesses and planned improvements across each standard, with the data from this having come from consultations throughout the institution.

The Institute will take this recommendation on board, including the carrying out such analysis annually on a formal basis during the post-mortem analysis of each academic year. The process will include as many stakeholders as is possible to attain a clearer picture of the strengths of the institution and identify the weaknesses that may be challenged for the following year. May we

point out that this exercise is already carried out albeit in an informal manner by the respective departments at the end of each academic year. In addition to this, SMI conducts an analysis of the examination results achieved by our students attempting University of London examinations. This analysis includes recommendations by the respective lecturer for the following academic year.

Conclusions

Saint Martin's Institute appreciates the spirit in which these recommendations are being put forward, and is satisfied that the panel have clearly indicated that quality assurance procedures are already in place and mandatory. It is also natural that a correlation exists between Standard 1 that deals with a policy for quality assurance and Standard 11 that deals with cyclic external quality assurance with the latter indicative that the institute surpasses this standard, which in itself reinforces that quality assurance practices at the Institute that have been adhered to without compromise. Thus the main point remaining is the compilation of the diverse quality assurance policies and publication of the said document.

Recommendation 6.1 (key recommendation)

Establish minimum requirements in terms of qualifications and competences for:
a.   teaching staff teaching University of London material;
b.   teaching staff teaching internally developed courses;
c.   staff designing programmes.
Such minimum requirements should distinguish as appropriate the qualifications needed to teach or design programmes at different levels of the MQF.

This key recommendation is already in effect at Saint Martin's Institute of Higher Education. Again, it is imperative that the reader understands that the Institute is in a transitionary process – one of a teaching institution where syllabi and study material are provided exclusively by the University of London, to an institution with awarding powers and developing its own qualifications. The vast majority of academic staff are qualified at a postgraduate level with a minimum of MQF Level 7, and the Institute is currently providing MQF Level 5 and MQF Level 6 programmes – with the former exclusively awarded by Saint Martin's Institute whilst the latter conferred by the University of London. Thus for points a. and b. the Institute exclusively recruits fresh full-time academic staff with a requirement of an MQF Level 7 qualification. The Institute makes no distinction between the recruitment of staff required to teach the UOL programmes of its own internally developed programmes. Even with the UOL programmes, the policy of the Institute is that the material needs to be researched and expanded to enhance the learning experience for the students. The designing of programmes is driven by the respective Head of Department in conjunction with the academics whose specialisation is concerned and who have already proven their academic worth at the Institute. Junior members of staff may be asked to participate in the course process development as part of their own growth.

Recommendation 6.2 (key recommendation)

Aside from the recommendation made in RI6.1, the HEI should establish a minimum level of qualifications and competence to be held by a department as a whole, and clearly indicate the qualifications and competence which should be held by a head of department, taking into consideration the MQF Level of the programmes the HEI is licensed to offer.

Whilst appreciating this key recommendation, it is felt there are a number of anomalies that inhibit possible execution. Firstly we believe that it is the MQF Level of the **programmes** that Saint Martin's Institute is designing, accrediting and teaching that needs to be taken into consideration rather than the Licence. The licence according to law is that the Institute may confer degrees(?) at MQF Level 5 to Level 8, but that does not mean that the Institute will necessarily embark on qualifications at all these levels.   The second point is that the recommendation seems to constrain upon the institution upon making the qualification level as the **primary** criterion by which to gauge adequacy for headship. We feel that the ideal HOD candidate is one who can show evidence of academic leadership and who has, and can share a vision, for the department in question. If the qualification metric had to be the only established measure for headship adequacy, the nature of rotation for heads of department would be lost, because once the highest qualified member of academic staff takes on the post, then it would practically mean this is for life – or as long as the individual wishes tenure. Having said this, normal practice is for the Head of Department to hold a minimum of a Level 7 qualification, whilst it is also usually *preferred if the H*OD also has around three years of teaching experience at higher level and is in the process of furthering his/her academic standing. The Institute will also discuss whether it wishes to have a new HOD voted in by faculty members after the interview person has selected the appropriate candidate.

It must be said that the Institute has had no less than **four** academic faculty members who have read for their doctorates through the support of the Institute, only to be head hunted as soon as they graduated and joined other institutions. Saint Martin's Institute also had in its employment another two members of part-time lecturing staff who taught exclusively at Saint Martin's Institute, who moved as full time academics at other Institutions. During the period of this external quality assurance exercise we have three members of academia reading their doctorate – no one can put in any guarantees that any or all will move to greener pastures.

It is felt that if the Institute had to set up such requirements for headship as, for example, having a doctorate degree to qualify, the Institute will probably be for ever chained to individuals who will have a stranglehold on the Institution – even if their performance is not up to scratch.

Recommendation 6.3 (key recommendation)

The institution should establish a senior leadership body, made up at minimum of a designated senior academic from each department. The senior academic should be able to demonstrate an adequate combination of research, teaching and/or professional experience appropriate for the role.

Whilst we appreciate the recommendation being put forward we would like to have a clearer idea of the role intended for this senior academic. Should the recommendation have the idea of a subject convener in mind, then the institute is not large enough to warrant that role, although this will be discussed and considered when the institute grows further and expands its internally developed offering. At the moment the Head of Department is the person who fits the profile being suggested and who leads the academic development of the department. When he/she wishes to make any changes, these are designed in conjunction with the lecturers concerned, and the proposal is presented to the Saint Martin's Admissions and Advisory Board (SAAB) for approval before implementation. We also need to be realistic and factor in the resource restrictions, in terms of staff, which the HEI faces. This is a small institute and having too many dispersed structures will stretch the institute thinly.

Recommendation 6.4 (key recommendation)

SMI should formally establish some basic research targets at department level or at the level of individual members of staff.

The Institute is in agreement with the panel, and the Institute has such basic research targets at both departmental and individual level being formulated. It must be noted that the Institute has thirteen academic papers published under its name in the past **five** years, and this equates to close to a paper for each two members of academic staff in employment.

Recommendation 6.5

SMI should compile its various research activities into a cohesive research programme. SMI should publicly report on the achievement of said programme, and dedicate a section of its website to this. This could also include an online repository of publications by students and staff of the institution.

Recommendation welcomed and to be actioned.

Recommendation 6.6

The panel suggests that the institution establishes a student-service charter, which would establish minimum standards for teaching staff to respond to students, but which would also serve to protect staff by establishing what kind of requests would be considered unreasonable.

The academics at the institute are guided by the SMI 'Code of Ethics' of 2009, developed by academic staff employed at that time, and that has been found to be fit for purpose during a number of reviews that have been undertaken . This code is based upon six main principles;

1. Total Commitment
2. Discipline
3. Role Modelling
4. Honesty
5. Professionalism
6. Respect

Each of these principles highlights clear guidelines on what is expected from the academic members of staff in their encounters with the students – be they during a lecture, tutorial, one-to-one mentoring session, or over the virtual learning environment, or any other communication means. The concept of what and what is not reasonable is purely in the control of the academic, who must put the student's and Institute's interests in their right perspective. In practical terms, a lecturer's commitment is evidence by his timely response to his students. It is standard practice to reply to email requests from students within 48 working hours whilst the turn-around for marked exams and / assignments is a maximum of three weeks. The Institute appreciates that there is no written policy about this and will take measures to rectify.

Conclusion

This is the standard where we feel most divergent from the panel's recommendations. The institute is but a sapling. It does not have the peace of mind of a benevolent Government and had to make do with the best it can attain within its commercial limitations. The Institute has never shirked from its **primary** objective in teaching and mentoring the students in our trust as best as is humanly possible. And with over 40% of our graduates sitting for the University of London examinations, attaining a first class honours with another 40% plus attaining a second upper, we cannot ever be accused that the Institute has not focused all its available resources to attract like-minded academics who find teaching and mentoring others as a naturally altruistic fulfilling career. During exit interviews carried out with individuals who resign from their employment, it has been a recurring pattern that such individuals believe that an academic life consists only of partaking a conversation of already accumulated knowledge to a group of very attentive and motivated students! The fact that academics need to be continually learning themselves to keep abreast of the field of study, the complications of their students own lives that seem to meddle in the academic experience, and the continuous battle against the ever increasing material values of instant gratification (and study does **not** give instant results) tend to wear down even some of the strongest characters.

Saint Martin's Institute of Higher Education is proud of its attainment reflected in the achievements of its students thus far, and whilst all the recommendations provided by the panel are being seriously considered, the Institute feels that its cautionary strategy that has served it well for the past seventeen years will see it through the required developments in the near future.

Recommendation 9.1 (key recommendation)

SMI should complete its website with basic information including:
a. *learning outcomes as well as teaching, learning and assessment procedures for each credit/course offered as part of the institution's programmes;*
b. *information about the faculty teaching and managing the institution;*
c. *an explanation of SMI's role as a UoL teaching college, and the division of procedures, including admissions between UoL and SMI;*
d. *tuition fees.*

The institute embarked on a best practice approach of a mobile-first driven web presence. The latest international developments indicate that entities should improve their holistic web presence rather than simply developing a single website that acts as a source of information. Having said that, SMI invests in its main website on its official URL www.stmartins.edu together with a number of third party platforms for various purposes as outlined before. The main website acts as the main actor in SMI's web presence while also providing the required linkage with the other platforms namely:

•   Facebook (https://www.facebook.com/StMartinsInstituteMalta) This platform act as the main social platform for the provision of institutional news, activities, events and public engagement.
•   Issuu (https://issuu.com/stmartinsedu) is used as a document publishing platform that allows SMI to publish documents while making use of this third party platform for the best viewing experience from the user's' perspective. This is used mainly to disseminate prospectuses and other documents online.
•   Flickr (https://www.flickr.com/photos/stmartinsinstitutemalta) is used as the institute's online photographic repository.
•   Twitter (https://twitter.com/stmartinsedu) While this platform is still gaining pace in Malta, SMI started its web presence on it in the past years.
•   Instagram (http://instagram.com/stmartinsedu) This photo-sharing application is popular with younger generations and SMI opened its profile on this platform to interact with younger audiences. The profile is still being enriched since by the platform's design, it is challenging for an organisation such as ours to be continuously active on it.

Recommendation 9.2

Furthermore, the website should include information about pass rates for each course, the day-to-day activities at SMI (a news section), the campus and resources available to students, as well as career paths enabled by the various courses.

SMI employs its social media pages to communicate its activities with the general public while directing people to the main website as required.

Recommendation 9.3

The institution should identify a clear responsibility for public information, and establish processes to ensure the publication and updating of such information.

The Institute accepts this recommendation and will be setting up the structures for compliance.

Conclusions

These recommendations have clarified what constitutes necessary public information. The Institute already complies with substantial sections of the recommended public information, included in its prospectuses. Yet the Institute has now clear guidelines of the information that is required to be publically available.

It must be noted though, that as a private commercial entity, in a country that has as yet to formulate code of ethics for further and higher education institutions, including advertising and promotion code of practice, certain information may be deemed to be of a sensitive nature.

Annex: Review Panel Bio Notes

In the setting up of the review panel for **St. Martin's Institute of Higher Education**, 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 **15th - 17th March 2017**.

Head of Review Panel/External Peer: Mr. Anthony F. Camilleri

Anthony F. Camilleri is an expert in quality assurance of education and digital education. He currently acts as secretary of ISO PC 288/WG1 which is drafting ISO 21001: Educational Organization Management Systems. In addition, he performs reviews for national quality assurance bodies in Higher Education around Europe, trains reviewers to conduct such reviews as well as provides consultancy on quality management systems for digital education.

External Peer: Ms Anne Marie Vincenti

Anne Marie Vincenti graduated with a BA (Hons) in Philosophy (with First Class Honours) from the University of Malta in 2008 and subsequently MSc (with Distinction) in the Philosophy and History of Science from King's College London and (jointly) the London School of Economics and Political Science (LSE) in 2010. She has taught at various levels in higher education; currently she lectures 'Philosophy of Science' and 'Baroque Science' part-time at the University of Malta. Anne Marie has extensive experience in quality assurance in education and has also worked as an officer with the NCFHE and previously within the Academic Programmes and Quality Resources Unit (APQRU) of the University of Malta.

Student Peer: Ms. Tiziana Gatt & Ms. Jessica Falzon

Tiziana Gatt is a University of Malta student reading for the B.Sc.(Hons) in Sport and Active Lifestyles, and concurrently she is reading for the National Diploma in Teaching Adults, a course which was offered by the Directorate for Lifelong Learning. She graduated with a Diploma in Management Studies in 2012.

Jessica Falzon is a University of Malta student reading for the LL.D.
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NCFHE Staff Member: Ms Angelique Grech & Ms Lorraine Vassallo

Ms Grech is the senior officer in charge of the management of External Quality Assurance audits within the Quality Assurance at NCFHE and she is also the Malta Qualifications Framework Coordinator. She has been working with the NCFHE for the past four (4) years. Before joining the Quality Assurance Unit, she was the officer in charge of the licensing of educational institutions. She also held the post as an Officer within the Malta Qualifications Recognition Information Centre (MQRIC), where she has gained expertise on different education systems and on the evaluation of qualifications, in the context of accredited providers and programmes within various countries.

Ms Lorraine Vassallo is a Quality Assurance officer at the NCFHE. Her work currently focuses on Internal Quality Assurance, mainly the evaluation of IQA documents, and External Quality Assurance. Her early work at the NCFHE focused on the licensing of further and higher education institutions and programme accreditation. Prior to taking up her position as officer at the NCFHE, Ms Vassallo taught English language as a foreign language in ELT schools. She also gained extensive knowledge and experience in EU funding at the Planning and Priorities Coordination Division. Ms Vassallo holds a Bachelor of Arts Degree in Italian and a Master's Degree in Literary Tradition and Popular Culture.