



ESAT

EDUCATIONAL
SERVICES
AND TESTING

ESaT

Internal Quality Assurance
Manual

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Policy for Quality Assurance

This Internal Quality Assurance Document shall be made public and available for viewing, or download, on the ESaT website (www.esatqualifications.com)

1. Organisation Structure

The current organisational structure can be seen in the Organisation Organigram. It involves three main boards: the Board of Directors, the Qualifications Committee and the Management.

- a) The Board of Directors is responsible for setting standards, ensuring compliance with the Regulatory Conditions in the context of strategic aims and the development of ESaT.
- b) The Management is responsible for delivering the products and services of ESaT within the constraints of the Regulatory Conditions and the overall direction of the Board of Directors.
- c) The Qualifications Committee is responsible for the development of new qualifications, the investigation of Malpractice, and Appeals made by candidates or centres.

Board of Directors

The Board of Directors must ensure:

- the commercial viability of ESaT.
- guidance and establishing direction for the organization (by establishing the vision, mission and goals of the organization).
- that there is appropriate expertise in the areas of operation as an Awarding Organisation, e.g. through involvement in the appointment of senior staff.
- sound day-to-day management and administration and sound fiscal policy as well as ensure compliance with the Regulatory Conditions.
- a robust governance system for the business to guide its own actions and the actions of the management.
- adequate protection of the organization's assets and member's investment (this includes the company's plant, equipment and facilities, including the human capital).
- that the accounts auditing process (including the hiring of the auditor) is monitored and kept under control.
- that an approved 3-year budget plan is in place.

The Board of Directors (see below) is made up of people with relevant skills, knowledge and education/industry experience to represent the interests of all stakeholders and to ensure that there is a sound management of resources.

The Board of Directors

- Jason Fenech (Director/ Shareholder/Responsible Officer)
- Silvia Bagarotti (Company Secretary)

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The Board of Directors will meet physically at least once a year to:

- approve the annual financial statements and approve the auditor's report,
- confirm board members,
- receive a report from the Managing Director,
- receive a report from the Responsible Officer and consider:
 - any proposed changes or actions necessary to ensure compliance with the Regulatory Arrangements,
 - issues arising from quality assurance such as serious complaints about standards, and
 - any disciplinary action required.
- receive the Academic Director report, and consider any proposed changes.

Typically, however, the board meets three to four times a year; in between these meetings, it is kept informed of any developments by means of video conferences or electronic mail. Meetings are held whenever deemed necessary throughout the year.

The Responsible Officer is the person responsible for putting into action the decisions made by the Board of Directors through the senior staff and administration staff.

The Head of Institute is directly accountable to the Board of Directors for ensuring that there are sufficient resources to sustain qualifications.

Qualifications Committee

The Qualifications Committee is responsible for:

- a.
 - the analysis of data and feedback from all stakeholders.
 - the development of course and test material, based on:
 - the data and feedback received from stakeholders, and
 - the direction established by the Board of Directors for the organization.
 - ensuring that the courses and assessments are fit for purpose.
 - the objectivity and fairness of the course and assessment process and procedures.
- b.
 - ensuring compliance with MFHEA conditions of accreditation and licensing
 - evaluating cases of Conflict of Interest
- c.
 - investigating alleged cases of malpractice.
 - imposing penalties.
 - withholding results if the circumstances are such that the award of an accurate mark is not possible.
- d.
 - evaluating appeals against the outcome of applications for special arrangements.
 - evaluating appeals against the outcome of applications for special considerations.
 - evaluating appeals against decisions of the Qualifications Committee.

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The Qualifications Committee (see below) is made up of people with relevant skills, knowledge and education/industry experience to represent the interests of all stakeholders and to ensure:

- the course and assessment process is sound.
- that ESaT complies with all conditions of accreditation and licensing.
- that any case of malpractice is thoroughly assessed and fairly and objectively dealt with. The Committee must ensure that trust in ESaT courses and assessment is maintained.
- that all appeals are thoroughly assessed and fairly and objectively dealt with.

The Qualifications Committee

- Kevin Putt (Academic Director)
- Nick D'Alessandro (IT Expert)
- Jason Fenech (Responsible Officer)
- Silvia Bagarotti (Company Secretary)

The Qualifications Committee will meet as and when necessary, to:

- a.
 - discuss the stakeholder feedback,
 - confirm committee members,
 - receive a report from the Responsible Officer and consider:
 - any proposed changes or actions necessary to ensure compliance with the Regulatory Arrangements,
 - issues arising from quality assurance such as serious complaints about standards.
 - receive the Head Examiner's and Director of Studies report and consider any proposed changes.
- b.
 - discuss cases of Conflict of Interest,
 - impose conditions to mitigate cases of Conflict of Interest,
 - assess the compliance of ESaT with regards the conditions of accreditation and licensing of the MFHEA and other regulating institutions,
 - prepare a Compliance Report.
- c.
 - analyse alleged cases of malpractice,
 - discuss penalties to be imposed in case of confirmed malpractice.
- d.
 - discuss appeals against the outcome of applications for special arrangements,
 - discuss appeals against the outcome of applications for special considerations,
 - evaluate appeals against decisions of the Qualifications Committee.

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Management (see Organisation Organigram)

The Management is responsible for:

- the administration of ESaT, serving the day-to-day functions, sampling work for moderation and providing general support for the Institutions and Centres.
- company legal issues, payment of taxes and employment legislation.
- delivering the products and services developed by ESaT within the constraints of the Regulatory Conditions and the overall direction of the Board of Directors and the Qualifications Committee.
- the collection of data and feedback from all stakeholders. This information will provide both the Qualifications Committee as well as the Board of Directors with all the necessary data to decide the direction for the organization.
- ensuring sound day-to-day management and administration.
- ensuring compliance with the Regulatory Conditions.
- following the governance system designed specifically to guide the actions of the management and the organization.
- protecting the organization's assets and members' investment (this includes the company's plant, equipment and facilities, including the human capital).

The Management (see below) is made up of people with relevant skills, knowledge and education/industry experience to represent the interests of all stakeholders and to ensure the effective day-to-day running of the organization.

The Management (see various Job Descriptors)

- Managing Director/Responsible Officer: oversees the whole operation and offer guidance to the Board of Directors. In his/her role as Responsible Officer, the MD is also responsible for communicating changes and any issues to validating bodies and the public.
- Academic Director: responsible for the creation of new courses, exam suites, teacher and candidate resources.
- Centre Directors: responsible for the running of offsite ESaT qualifications.
- Director of Finance: must ensure that the company is run efficiently and that the operations are feasible.
- Director of Administration: responsible for the correct completion and storage of forms, as well as Human Resources.

The Management meets regularly to:

- discuss the day-to-day running of the organization.
- discuss employee requirements, performance.
- receive reports/ feedback from the Managing Director.
- receive reports from the Responsible Officer and discuss feasibility of proposed changes or actions necessary to ensure compliance with the Regulatory Arrangements and issues arising from quality assurance, such as serious complaints about standards and any disciplinary action required.
- receive the Academic Director report and discuss any proposed changes.

Meetings will be held whenever deemed necessary (remote or face-to-face) throughout the year. Moderation and standards meetings are held on a regular basis and involve the specific members of staff relevant to the particular tasks, usually the Academic Director, Senior Item Writer and Qualifications Managers.

Key decisions about management are made by the Managing Director, in consultation with senior management staff and, if necessary, the Board of Directors. The Managing Director is in regular contact with the members of the Board of Directors to ensure that communication is clear and unambiguous.

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Qualifications Managers are responsible for the running of the various ESaT Qualifications and hiring, and mentoring academic staff in the relative ESaT centre. They are also tasked with the responsibility of ensuring that the centre fulfils all conditions of authorisation (see JD 16).

2. Compliance with regulations as set by regulating and accrediting bodies.

In the event that ESaT seeks accreditation or recognition by a regulating or accrediting body such as the MFHEA, it binds itself to be fully compliant with all the relevant regulations and requirements which are imposed upon it.

ESaT will appoint a Responsible Officer to ensure compliance with its Conditions of Recognition and Accreditation.

ESaT is the sole awarding body of MFHEA accredited qualifications offered by the authorised ESaT centres. All ESaT authorised centres must abide by the procedures and standards as set by ESaT and outlined in the various ESaT Handbooks and Manuals. Failure to comply by any of the aforementioned standards and procedures could lead to a centre losing its authorisation.

3. Mitigation of risk associated with governance (See Contingency Plan)

- a) All employees directly associated with management and direction of the company must disclose any criminal offences that they have committed. Employees are also expected to disclose any conflicts of interests.
- b) All senior officer roles have a relevant job description. They will be adequately qualified and experienced in their specified role and an annual appraisal will monitor the status of suitability in relation to the job specification.
- d) The Conflict of Interest Policy ensures that all ESaT employees, assessors and moderators are aware of the need to disclose any potential personal interest in the assessment of any candidates that they have a part in testing as well as disclosing any financial interest in the testing procedure.
- e) ESaT employees and third parties acting on behalf of ESaT will have their work monitored through random checks and feedback received from the stakeholders. Any complaints about the quality of the product or service provided as well as potential or perceived conflicts of interest will be investigated.
- f) Where a conflict of interest has had an Adverse Effect, ESaT will take all necessary action as described in the Contingency Plan.
- g) Where the quality of the product or service provided by a third party has had an Adverse Effect, ESaT will take all necessary action to ensure that it is available to develop, deliver and award qualifications in accordance with its conditions of recognition or validation.

4. Data Protection and Privacy Statement

ESaT is sensitive to privacy issues. The company believes it is important that all users are aware of how the information received about them is treated and how the information is collected.

ESaT has recently updated its Data Protection and Privacy Statement to better inform users of its products and services about their rights and on how ESaT utilises their personal data.

5. IT Security Policy

The ESaT Security Policy covers all data collected via the website and the platform as well as all the security procedures to safeguard against attacks to the platform. Due to the nature of the Policy, the document is not made public.

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6. Resources and financial risk

Management planning provides a financial contingency. ESaT has a policy to avoid borrowing where possible. At present, ESaT has no debts.

The hosting of all documentation, awarded certificates and operating infrastructure on a specific platform designed and, eventually, owned by ESaT reduces the risk of unavailability of client data as well as lowering costs.

Basic maintenance of the resources is low cost and is mostly based on a 'service model' such that demand will pay for supply. Future development depends on growth of the customer base.

6.1 Specific risks associated with financial viability are as follows:

- a) changes in government policy
e.g. in terms of eligibility for qualification funding and legislation that makes it more difficult for non-government backed qualification providers to compete on a specific market. The above-mentioned are beyond the control of ESaT.
- b) committing too many resources to development before revenue is generated to pay running costs.
- c) time necessary for new qualifications to establish themselves on a market and start generating income.
- d) competitors entering the market with new products that make our qualifications obsolete and are, therefore, dropped or not taken up.

The following policies mitigate against these risks:

- a) Maintain a close link with our Master Centres in the various markets to allow ESaT to fulfil conditions imposed by governments for qualification funding in target markets. This open communication also helps ESaT to keep abreast with the latest developments in the testing industry.
- b) Develop incrementally and as far as possible without excessive use of lending facilities.
- c) When possible to use EU funding to develop resources and services.
- d) Analyse the supply chain and reduce all possible unnecessary costs to make products and services as competitively priced as possible.
- e) ESaT must be an active member of organisations such as ALTE to help maintain a high-quality product as well as to keep abreast with developments in the field of testing.

6.2 ESaT personnel must all go through training and regular assessment and appraisals to ensure that every member is efficient and satisfied in his/her role. All new personnel go through an induction period during which they are trained in the principles of teaching and certification.

The Centres (most of which are English language schools) offer great potential. Various Centre Directors have already provided ESaT with a list of potential candidates who might be suitable as Qualifications Managers, Examiners and Assessors.

To ensure management continuity, ESaT must identify a potential candidate who, should the need arise, take over the role of Academic Director. That person will then be mentored by the present Academic Director.

6.3 The company has a staff appraisal system. The Director is responsible for the appraisal of senior staff. Line managers are responsible for the appraisal of the staff in their departments.

ESaT audits Centres regularly to ensure that the service provided meets the required standards.

6.4 The IT Security Policy ensures that backups, security and emergency procedures are in place. One of the key advantages ESaT has over a majority of its competitors is the fact that the technology used for the development, management and running of its tests, enables the organisation to manage very large numbers while only employing a limited number of staff thanks to the fact that the control systems are mostly automated. This allows ESaT to remain competitive in terms of pricing of its products and services,

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while at the same time maintaining a suitable profit margin to allow for development and growth. The limited resources necessary to run the testing service ensures that the whole model is sustainable even in the event of a downturn in business.

6.5 Resources are reviewed by the Board of Directors and the potential for sustainable development within those constraints established.

ESaT will only embark on the development of new qualifications once the Board of Directors has analysed the capacity to complete the development and ensured that it is possible to make a suitable margin from managing the subsequent awards.

6.6 In the case of an incident that could have an Adverse Effect, the following actions will be taken:

- a) identify and implement any policy or procedure to address the circumstances of the incident
- b) in case an existing policy or procedure does not cover the present circumstances, the situation will be prioritised according to the risk and associated Adverse Effect.
- c) all actions will be evaluated to determine the effectiveness of the actions taken
- d) a new policy and/or procedure will be devised to minimise the risk of reoccurrence and to deal specifically with any reoccurrence in cases where an existing policy or procedure was deemed inadequate or did not cover the specific circumstances

6.7 Malpractice and maladministration are potential risks that ESaT takes seriously, at whatever level

they occur. It is the policy of ESaT to prevent malpractice or maladministration from occurring in the first place. Various procedures are in place to prevent malpractice or maladministration from occurring and can be found in the Centre Director and Qualifications Manager Handbook, ESaT Code of Practice, Code of Practice for Centres, Conflict of Interest Policy, Confidentiality Agreement etc.

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7. Malpractice in Centres

Malpractice essentially refers to those actions that may threaten the integrity of ESaT qualifications and certification. The Qualifications Manager is responsible for immediately reporting all cases of suspected malpractice or Breach of Confidentiality to ESaT.

This section:

- establishes the regulations with which examinations must comply
- defines malpractice in the context of examinations
- sets out the rights and responsibilities of ESaT, Centre staff and candidates in relation to such matters
- describes the procedures Centres must follow in cases where there is reason to suspect that the regulations have been broken or that confidentiality has been breached

ESaT requires that the Qualifications Manager train Centre staff and invigilators on how to inform candidates of their individual responsibilities as set out in these guidelines.

ESaT procedures for dealing with suspected malpractice

- ESaT will acknowledge the receipt of reports of malpractice. When dealing with suspected malpractice, ESaT will deal primarily with the Qualifications Manager or their nominated Supervisor. ESaT expects Qualifications Managers to supervise personally all investigations resulting from an allegation of malpractice. It is always in the best interest of candidates, Centre staff and invigilators if Centres respond promptly and openly to all requests for an investigation.
- ESaT reserves the right to withhold the issue of results while investigations are ongoing. Depending on the outcome of the investigation, ESaT may either release or permanently withhold results.
- Centres must send any documents requested to ESaT within 15 days of the date of the request. If they do not, the Academic Director will review the case based on evidence already presented.
- Following review, the Academic Director will consider each case on an individual basis in the light of all the information available at the time.
- ESaT may impose the following penalties:
 - issue a warning
 - deduct marks or award no marks for a component of the final examination at course termination
 - disqualify candidates from the component in which the malpractice took place (in serious cases the disqualification may extend to the whole examination)
 - ban a candidate from entering ESaT examinations for up to five years
 - inform other organisations of the details of the case and the action taken
- in the case of serious malpractice or in situations where the Academic Director is unable to take an independent decision, the case will be referred to the Qualifications Committee
- inform the police in serious cases involving theft, impersonation or the falsification of documents. ESaT may impose other penalties at the discretion of the Academic Director.
- Even if the Centre has breached the regulations inadvertently, the Academic Director/Qualifications Committee may decide that the circumstances are such that the award of an accurate mark is not possible.
- ESaT will inform the Centre Director and Qualifications Manager of decisions in writing as soon as possible after decisions are made. The Centre Director or Qualifications Manager must communicate the outcome to the individuals concerned.
- ESaT will not consider any requests for post-result services for any component(s) for which malpractice has been confirmed.

Suspected candidate malpractice

The following are examples of malpractice by examination candidates and students following a course of study. The list is not exhaustive and ESaT may consider other instances of malpractice at its discretion:

- behaving in such a way as to undermine the integrity of the course and/or examination
- disruptive behaviour in class and in the examination room (including the use of offensive language)
- bringing unauthorised material into the examination room, (for example, notes, study guides and

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- personal organisers, own blank paper, dictionaries, mobile phones or other electronic devices)
- obtaining, receiving, exchanging or passing on information which could be examination related (or attempting to) by any means
- impersonation: pretending to be someone else, or arranging for another person to take one's place in a test
- the inclusion of inappropriate, offensive or obscene material in answer sheets
- copying from another candidate
- collusion: working collaboratively with other candidates
- the deliberate destruction of another's work
- the alteration of any results document, including certificates
- failure to abide by the instructions of an invigilator
- failure to abide by the conditions of supervision designed to maintain the security of the examinations
- any attempt to remove or reveal the content of the examination outside the examination room

Suspected Centre malpractice

The following are examples of malpractice by Centre staff. The list is not exhaustive and ESaT may consider other instances of malpractice at its discretion:

- moving the time, date or venue of a fixed session without notifying ESaT and obtaining permission
- failure to keep examination papers secure before the examination
- obtaining unauthorised access to examination material before an examination
- assisting or prompting candidates with the production of answers.

Suspected malpractice discovered by a Centre

- If suspected malpractice is discovered, the Centre must immediately complete and submit a Suspected Malpractice Report to ESaT.
- If the conduct of a candidate is such that their continued presence in the examination room would cause disruption to other candidates, the Centre may remove the candidate from the examination room. Centres must report to ESaT all cases of disruptive behaviour, whether or not the candidate was removed from the examination room.
- Reports of cases of malpractice in written examinations, identified by the Centre, must include:
 - a. statements from the Qualifications Manager (a detailed account of the circumstances surrounding the suspected malpractice including, in the case of disruptive behaviour, an indication as to whether the behaviour continued after warnings were given, and a report of any investigation carried out by the Centre)
 - b. statements from the invigilator/s (Test Room Incident Log) and other staff concerned
 - c. handwritten statements from the candidates concerned
 - d. any unauthorised material found in a candidate's possession
 - e. seating plans (if appropriate)
 - f. details of the procedures followed by the Centre for advising staff and candidates of ESaT regulations for the conduct of its examinations.
 - g. details of any investigation carried out by the Centre.
- ESaT will consider any statement of mitigating circumstances provided by the Centre as well as any recommendation about the penalty the Centre considers appropriate.

ESaT will be solely responsible for taking all final decisions concerning the case.

Malpractice suspected by ESaT

- If ESaT suspects malpractice, they will send a report with full details of the alleged malpractice to the Centre concerned. ESaT will ask the Qualifications Manager and Centre Director to conduct a full investigation into the alleged malpractice and to submit a written report.
- Reports from the Qualifications Manager and Centre Director following the investigation of suspected malpractice cases must include:

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- a. written statements that the candidate(s) involved have been notified of the report and that they are aware of the content of the report,
 - b. a detailed account of the investigation carried out by the Centre,
 - c. written statements from the invigilators and other staff concerned,
 - d. handwritten statements from the candidates concerned,
 - e. seating plans (if appropriate),
 - f. details of the procedures followed by the Test Centre for advising staff and candidates of ESaT regulations for the conduct of its examinations.
- ESaT will consider any statement of mitigating circumstances provided by the Centre as well as any recommendation about the penalty the Centre considers appropriate.

ESaT will take all final decisions concerning a case.

Malpractice by Centre staff

- ESaT will consider any non-compliance with the guidelines for the conduct of the examinations, or any action by a member of staff that does not follow ESaT regulations, as malpractice by the Centre.
- Centres must immediately report actual or suspected cases of malpractice by staff to ESaT. They must also complete and submit a Suspected Malpractice Report.
- The Qualifications Manager and Centre Director must carry out the initial investigation into any cases of alleged malpractice by a member of Centre staff. ESaT will notify the Centre Director of any subsequent investigation required by ESaT and the nature of the report they must submit.
- The Centre must make any member of staff accused of malpractice fully aware (in writing), at the earliest opportunity, of the nature of the alleged malpractice and the possible consequences should malpractice be proved. Any member of staff accused of malpractice must have the opportunity to respond (in writing) to the allegations made.
- On the basis of evidence received, the Academic Director and Responsible Officer will consider each case and decide on the action to take.
- The Academic Director and Responsible Officer may take the following actions:
 - a. issue a warning about future conduct to the Centre or staff involved,
 - b. ban members of staff from any involvement in the running of courses and/or administration of ESaT examinations for a specified period of time,
 - c. cancel Centre accreditation,
 - d. inform other awarding bodies of the details of the case and the action taken,
 - e. inform the police and other relevant authorities.
- ESaT will endeavour to ensure that candidates are neither advantaged nor disadvantaged as a consequence of malpractice by staff. However, it may be necessary to withhold results until the case has been fully considered.

Cases of suspected or alleged Breach of Confidentiality (including loss or theft of test material)

The Qualifications Manager is responsible for immediately reporting all cases of suspected or alleged Breach of Confidentiality to ESaT. Staff members who have access to key information are all required to sign a Confidentiality/Non-Disclosure Agreement.

Examples of Breach of Confidentiality include but are not limited to the following:

- a. ESaT staff members disclose information relating to a particular examination paper to teachers, candidates or Centres prior to the relevant test session, provided that such information would give an unfair advantage to all or some of the examination candidates.
- b. Theft of test material from a Centre either before or after a test session.
- c. Loss of test material either before or after a test session (i.e. from ESaT Head Office in transit to the Centre and vice versa or in transit from a Centre to an annex).
- d. IT systems getting hacked.

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ESaT procedures for dealing with suspected or alleged Breach of Confidentiality

- (a) ESaT will acknowledge the receipt of reports of suspected or alleged Breach of Confidentiality. When dealing with suspected or alleged Breach of Confidentiality, ESaT will deal primarily with the Qualifications Manager or their nominated Supervisor. ESaT expects Qualifications Managers to supervise personally all investigations resulting from an allegation of Breach of Confidentiality. It is always in the best interest of candidates, Centre staff and invigilators for Centres to respond promptly and openly to all requests for an investigation.
- (b) ESaT reserves the right to withhold the issue of results while investigations are ongoing. Depending on the outcome of the investigation, ESaT may either release or permanently withhold results.
- (c) Centres must send any documents requested to ESaT within 15 days of the date of the request. If they do not, the relevant Committee will review the case on the basis of evidence already presented.
- (d) Following review, ESaT will refer the matter to the Responsible Officer, who will decide what action, if any, ESaT should take. The Responsible Officer will consider each case on an individual basis in the light of all the information available at the time.
- (e) ESaT may impose the following penalties:
 - issue a warning
 - deduct marks or award no marks for a component
 - disqualify candidates from the component in which the Breach of Confidentiality took place (in serious cases the disqualification may extend to the whole examination)
 - ban a candidate from entering ESaT examinations for up to five years
 - inform other examining bodies of the details of the case and the action taken
 - inform the police in serious cases involving theft, impersonation or the falsification of documents. ESaT may impose other penalties at the discretion of the Responsible Officer.
- (f) Even if the Centre has breached the regulations inadvertently, the circumstances may be such that the award of an accurate mark is not possible.
- (g) ESaT will inform the Centre Director and Qualifications Manager of decisions in writing as soon as possible after decisions are made. The Centre Director or Qualifications Manager must communicate the outcome to the individuals concerned.
- (h) ESaT will not consider any requests for post-result services for any component(s) for which Breach of Confidentiality has been confirmed.

Procedures for investigating alleged Breach of Confidentiality

ESaT will seek to establish the full facts and circumstances of any alleged Breach of Confidentiality. In the case of varying accounts of events, ESaT may deal directly with the people involved or their representative.

ESaT procedures for dealing with suspected Malpractice

- (a) ESaT will acknowledge the receipt of reports of malpractice. When dealing with suspected malpractice, ESaT will deal primarily with the Qualifications Manager or their nominated Supervisor. ESaT expects Qualifications Managers to supervise personally all investigations resulting from an allegation of malpractice. It is always in the best interest of candidates, Centre staff and invigilators if Centres respond promptly and openly to all requests for an investigation.
- (b) ESaT reserves the right to withhold the issue of results while investigations are ongoing. Depending on the outcome of the investigation, ESaT may either release or permanently withhold results.
- (c) Centres must send any documents requested to ESaT within 15 days of the date of the request. If they do not, the Responsible Officer will review the case on the basis of evidence already presented.
- (d) Following review, if necessary, the Responsible Officer will refer the matter to the Qualifications Committee, who will decide what action, if any, ESaT should take. The Committee will consider each case on an individual basis in the light of all the information available at the time.

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(e) ESaT may impose the following penalties:

- issue a warning
- deduct marks or award no marks for a component
- disqualify candidates from the component in which the malpractice took place (in serious cases the disqualification may extend to the whole examination)
- ban a candidate from entering ESaT examinations for up to five years
- inform other examining bodies of the details of the case and the action taken
- inform the police in serious cases involving theft, impersonation or the falsification of documents. ESaT may impose other penalties at the discretion of the Responsible Officer/Qualifications Committee.

(f) ESaT will inform the Centre Director and Qualifications Manager of decisions in writing as soon as possible after decisions are made. The Centre Director or Qualifications Manager must communicate the outcome to the individuals concerned.

(g) ESaT will not consider any requests for post-result services for any component(s) for which malpractice has been confirmed.

Procedures for investigating alleged malpractice

ESaT will seek to establish the full facts and circumstances of any alleged malpractice. When a candidate's account of events is at variance with that of the Centre's, ESaT may deal directly with the candidate or the candidate's representative.

Sanctions applied against candidates accused of malpractice

- ESaT, at its discretion, may impose sanctions against candidates found to have broken the regulations.
- ESaT will apply sanctions in order to reflect the particular circumstances of each case and any mitigating factors.
- Sanctions imposed by ESaT, are only based on the evidence presented.
- All sanctions must be justifiable, reasonable in their scale and consistent in their application.
- Sanctions will only apply to the test in which the offence has been committed and possible future tests.

8. Conflict of Interest

Officers, employees, and other representatives of ESaT serve the public trust and are required to fulfil their responsibilities with care and loyalty. All decisions and actions of the board are to be made for the sole purpose of advancing the best interests of the institution and all stakeholders. The integrity of ESaT must be protected at all times, and the fiduciary relationship of officers, employees, and other representatives to ESaT must be respected in both actuality and appearance.

What constitutes a Conflict of Interest?

The following is a definition of what constitutes a Conflict of Interest:

- (a) an Awarding Organisation's interests in any activity undertaken by it, on its behalf, or by a member of its Group have the potential to lead it to act contrary to its interests in the development, delivery and
- (b) award of qualifications in accordance with its Conditions of Recognition,
- (c) a person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition, or
- (d) an informed and reasonable observer would conclude that either of these situations was the case.

Through its Conflict of Interest Policy, ESaT intends to implement the highest possible ethical standards

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and to establish that ESaT will not tolerate conflicts of interest. ESaT will administer this policy strictly, with complete transparency, and in accordance with the following principles:

1. The issue of conflicts of interest will form part of the required staff induction and assessor training procedures for all ESaT personnel. The following are circumstances where a conflict of interest may arise:
 - the item writer, assessor, marker or examiner is related to a candidate,
 - the item writer is related to a teacher preparing candidates for an ESaT test,
 - as a result of a candidate or candidates achieving a qualification, there could be a career or financial benefit to an item writer, assessor, marker or examiner as a result of a candidate or candidates achieving a qualification.
2. High stakes assessment (accredited qualifications at MQF/EQF level 3 or higher) provide an increased risk than entry-level qualifications in relation to conflict of interest. ESaT has implemented a system of random double marking across all levels of the jTELS/TELSa suite of examinations. However, sampling and scrutiny of tests at MQF/EQF level 3 or higher will be given priority for double marking and this will be reinforced regularly with ESaT staff working in this area.
 - Officers (for purposes of this policy, the directors) and senior level administrative/managerial employees (e.g. Academic Director, Senior Examiners) agree to refrain from participating in any ESaT decision taking procedure involving any candidates they might have a personal interest in, members of their immediate family or organisations, except to respond to questions or to provide further information.
 - Testing staff (Qualifications Managers, Invigilators, Oral Examiners and Markers) who have a personal interest in a candidate taking an ESaT examination must immediately disclose any possible conflict of interest to be reviewed and considered by the Responsible Officer/Qualifications Committee.
 - Any proposed business or financial relationship between ESaT and an employee or other representative, or a member of his or her immediate family, or any entity with which the employee or other representative or a member of his or her immediate family is affiliated, is subject to the prior review and approval of the Responsible Officer. The relationship must be thoroughly reviewed and considered by the Responsible Officer and clear procedures to limit any potential conflict of interest issued.
 - Any offer of full-time employment to a member of the immediate family of an officer or a selected employee or other representative, is subject to the prior review and approval of the Managing Director.
 - Any officer, employee, or other representative who has a personal participation in outside organizations shall disclose such participation for conflict of interest (including conflict of duty and loyalty) assessment to the Responsible Officer in the **Conflict of Interest Declaration Form**.

Procedures

Effective implementation of this policy requires:

- the full disclosure of individual interests that might conflict with the best interests of ESaT
- the interested officer, employee or other representative must refrain from participating in ESaT decision making with respect to any transaction or relationship in which he or she is interested.
- the Responsible Officer will monitor the potential conflicts related to roles and when necessary, report any concerns to the Qualifications Committee. The Responsible Officer/Committee will decide on any actions to take based on evidence and recommendations prepared by the Responsible Officer.
- an independent determination by the Responsible Officer/Qualifications Committee must be made that the transaction or relationship meets the applicable standard and should be entered into or continued.

(a) Disclosure

All officers, selected employees and other representatives are required to disclose the information requested on the **Conflict of Interest Declaration Form** including any business or financial relationship they or members

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of their immediate families have or propose to have with ESaT, either directly or through another entity in which they have a significant interest. The declaration form is to be filed by all officers and senior level administrative/managerial employees (e.g. Academic Director, Oral Examiners) at initial hire; an amended form must be filed (by all employees) promptly in the event of a material change in circumstances. All officers or employees shall provide advance written disclosure of any proposed business or financial relationship covered by this policy to the Responsible Officer.

The following guidelines are provided to help officers, employees, and other representatives determine whether a relationship should be disclosed:

- A business or financial relationship includes the sale or acquisition of goods, property or services; the commitment of resources to a common venture; or, in the case of a member of one's immediate family, an employment relationship. It does not include attending ESaT exam preparation courses as a student.
- A member of one's immediate family means (1) a spouse; (2) a child, grandchild, parent, grandparent, sibling, uncle, aunt, nephew, or niece, or the spouse of any such person; (3) a person having a step-relationship described in (2) above; (4) a parent-in-law or a brother- or sister-in-law; or (5) any other person who resides in the same household as the officer, or employee.
- A significant interest in another entity includes service as a director, partner, or management-level employee; the actual or beneficial ownership of more than 5% of the entity; or a compensation arrangement that is dependent upon a business or financial relationship with ESaT.

The foregoing guidelines **are not intended to be exclusive**; other relationships or interests that might conflict with the best interests of ESaT should also be disclosed. If an officer, employee, or other representative is uncertain whether to disclose a particular business or financial relationship, the Responsible Officer should be consulted.

(b) Restraint on Participation

Officers, employees, and other representatives who have disclosed a potential conflict of interest shall refrain from participating in ESaT's consideration of any proposed candidate, business or financial relationship in which he or she is interested, except to respond to questions or to provide further information. If a transaction or relationship requires a vote, the interested party should not be present at the time of the vote.

When a Conflict of Interest is identified.

When a conflict of interest is identified, the first priority will be to replace the senior staff, assessor, examiner or invigilator that has a conflict of interest with someone who has no such conflict.

The over-riding principle will be to achieve fair assessment for the candidate.

Where conflict of interest leads to identified malpractice, the procedures for malpractice must be followed.

Where an Adverse Effect is identified as a result of a Conflict of Interest, the regulators will be informed and any certificate that has been awarded in error will be revoked until the resulting investigation is concluded and sufficient proof of the candidate's ability to meet the assessment criteria provided.

ESaT will cooperate with all regulating bodies to mitigate against any further adverse effects.

Responsible Officer/Qualifications Committee report

All decisions for action in relation to conflict of interest will be made by the Responsible Officer.

The report will record:

- the nature and extent of the conflict;
- the actions taken to manage the conflict and mitigate any Adverse Effects.

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Appealing decisions

There are appeals procedures for individual candidates as well as Centres. These appeals are investigated and assessed by the Qualifications Committee and independent external expertise.

Any appeals must be sent in writing within 15 days from the date of notification of the decision.

The following reasons, in isolation, are not enough to merit an appeal:

- the individual did not intend to cheat
- the individual has a good academic/professional record
- the individual could lose a job/ university place
- the individual regrets his/her actions.

When making an appeal, ESaT staff or Centres must provide ESaT with any extra information or evidence they would like the Qualifications Committee to consider.

Once an appeal has been submitted, all communication relating to the case is to be via email. ESaT will inform the Centre and or related staff member of the outcome of their appeal within 15 working days of the date of the appeal.

Communicating decisions to members of staff and candidates

ESaT will inform Qualifications Managers and Centre Directors in writing immediately after decisions are made. It is the responsibility of the Centre Director to communicate the decision to the individuals concerned.

Exchange of information with recognising authorities

The majority of cases of breach of confidentiality and malpractice are confidential between the individual Centre and or related staff member and ESaT. However, in cases of serious malpractice, in order to preserve the integrity of the examination, it may be necessary for ESaT to exchange information with other parties, for example recognising authorities.

Appeals against decisions of the Qualifications Committee

Any decision taken by the Qualifications Committee after considering an appeal, is final.

9. Whistle blowing

ESaT conforms to the **Protection of the Whistleblower Act, 2013 (Malta)** as well as the **Public Interest Disclosure Act, 2013**.

Any person who believes that actions or incidents linked to ESaT testing are contrary to good ethical practice may contact the Responsible Officer and discuss these issues in complete confidentiality.

If they feel that the outcome is unsatisfactory, they can contact the MFHEA in their role of test Regulators or other Regulating Bodies or Validating Organisations, which ESaT may be regulated or validated by.

ESaT will take no action against any person that indicates any instances of malpractice or unethical behaviour. Any investigation and subsequent action will be aimed at eradicating risk of malpractice and unethical behaviour.

Storage of records and documents relating to an investigation

All relevant records and documents will be stored at the ESaT headquarters for a period of ten years.

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10. Authorisation of Test Centres

- a) The running of courses and administration of exams is delegated to authorised Centres. Each Centre signs the ESaT Centre Contract, the Code of Practice and agrees to all procedures in the Centre Director and Qualifications Manager Handbook. Each centre nominates an accredited Qualifications Manager who acts as the single point of accountability for standards in the centre. The Centres are regularly audited by ESaT.
ESaT is subject to independent quality assurance by the regulators.
- b) All procedures and standards can be found in the Centre Contract and appendix, the Centre Director and Qualifications Manager Handbook as well as the Centre Authorisation Enquiry Form.
- c) Centres must produce sufficient guarantees (human resources, centre resources, financial stability, meet all their obligations under the National Law and National Regulations) during authorisation stage. All documentation will be analysed and approved by the Board before authorisation is granted.
- d) Centres must go through regular audits (Centre Audit).
- e) Reasonable suspicion or confirmed serious violations to the following can lead to a Centre authorisation being temporarily suspended or permanently canceled. Lack of adherence to:
 - Code of Practice,
 - the ESaT Centre Contract,
 - the procedures in the Centre Director and Qualifications Manager Handbook

Self-evaluation and continuous improvement

- a) ESaT carries out an annual review to assess its procedures and when necessary, to make improvements based on evidence. Review takes place as an on-going part of a corporate culture, which continuously seeks to optimise its procedures for the benefit for all involved.
- b) The procedure is to review practice against the Regulatory Arrangements for the Qualifications and Credit Framework and summarise strengths and areas for development. Information is gathered from the minutes of meetings, staff meetings, logs and formal and informal feedback.

Lines of responsibility

- c) The Academic Director is responsible for compiling the evidence for the evaluation.
- d) The Responsible Officer is responsible for reviewing the evidence and presenting it to the Board of Directors during a meeting.
- e) The Board of Directors can then take an informed decision and eventually sign the statement of compliance.
- f) The Responsible Officer in his dual capacity as Responsible Officer and Director of the organisation is responsible for ensuring actions identified are executed and reported to the relevant stakeholders.

12. Policy and procedures for risk management

- a) The key risks the organisation can experience can be found in the organisation's Contingency Plan. This plan also offers ways of reducing the risk and when not possible, ways on how to mitigate the effects. Details can also be found in the Centre Director and Qualifications Manager Handbook.
- b) Stakeholders can contribute to the review and evaluation of procedures through feedback forms, centre audits and through discussion forums on the community web site.
- c) ESaT is committed to co-operating with providing information to the regulators as required.

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13. Plan for Withdrawal of Qualification

ESaT may consider the withdrawal of a qualification for the following reasons:

- lack of learner registrations,
- lack of market demand for the qualification,
- change in the approach in language teaching leading to the qualification not being fit for purpose.

In the case that ESaT withdraws a qualification, it will take all reasonable steps to protect the interests of the learner.

- a. Clear and accurate information will be provided to Centres, teachers, candidates and any other institutions of a qualification that is to be withdrawn.
- b. Transition arrangements will be published and provided to Centres, teachers, candidates and any other institutions of a qualification that is to be withdrawn.
- c. ESaT recognises its responsibility to give reasonable notice to the MFHEA, or other pertinent Regulating Bodies/Validating Organisations, of its intention to withdraw a qualification and will inform them of its intention prior to providing the information to Centres, teachers, candidates and any other institutions of the qualification.
- d. ESaT will ensure its withdrawal plan for a qualification complies with the MFHEA or other pertinent Regulating Bodies/Validating Organisations requirements.
- e. Centres will be required to follow the procedures set by ESaT for withdrawing from the delivery of a qualification.

Qualification withdrawal procedures:

1. Decisions to withdraw a qualification will be made by the Managing Director. This decision will be made after consultation with Centres, all senior staff and the board of directors.
Where appropriate, other stakeholders will be consulted.
2. A decision to withdraw a qualification will first be communicated in writing to the MFHEA or other pertinent Regulating Bodies/Validating Organisations.
3. ESaT will inform the MFHEA or other pertinent Regulating Bodies/Validating Organisations, of its provision made to support Centres, teachers, candidates and any other institutions throughout the withdrawal period and will supply them with a copy of its transition arrangements where applicable.
4. Once confirmation of receipt is received from the MFHEA or other pertinent Regulating Bodies/Validating Organisations, Centres, teachers, candidates and any other institutions will be notified of the plans for withdrawal of the qualification and provided with clear and accurate information relating to the transition.
5. Once notification of withdrawal has been published, no further candidates will be registered for the qualification, unless specific circumstances are included in the transition arrangements.
6. Notification of withdrawal of a qualification will be made to all stakeholders at least 12 months before the final registration date.

14. Outsourcing

ESaT outsources certain parts of development, delivery and awarding of its courses and tests to item writers, accredited centres, recording studios, printers and couriers. Adequate arrangements are in place that reflect the conditions appropriate to their role and which enable ESaT to meet its conditions of recognition.

Comprehensive guidelines and handbooks have been created for those involved in the testing process. All suppliers have to meet the standards as set in the Supplier Minimum Standards.

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Potential ESaT Centres have to go through a screening process, which starts with the Centre Authorisation Enquiry Form. ESaT Centres are normally schools that already have all the necessary resources in place. Once ESaT is satisfied with the experience, knowhow, and resources available at the centre, the process proceeds to step 2 where the centre nominates a candidate (Qualifications Manager Application Form) who could potentially fill the role of Qualifications Manager (Qualifications Manager JD).

The Qualifications Manager is key to the running of ESaT courses and tests and is responsible for the recruitment of trainers, invigilators (at least 1 every 30 candidates as indicated in the Centre Director and Qualifications Manager Handbook (see pg 19) and the Oral Examiners. Every ESaT Centre is required to have an accredited Qualifications Manager (and if running sessions in multiple centres concurrently, sufficient accredited Course Supervisors) to enable it to run ESaT courses and test sessions.

- The candidate chosen to fill the role of Qualifications Manager has to pass an online test (testing his knowledge on ESaT procedures) and an oral test, which focuses more on the candidate's skills in dealing with difficult events, managing staff and overall adequacy to fill a key managerial role. Once all criteria are met by the Centre and the Qualifications Manager, the Centre Contract and Centre Code of Practice are signed.
- All people involved in the testing process are requested to read and sign the Confidentiality Agreement as well as the Conflict-of-Interest Policy.
- ESaT gives priority to inspecting new centres within the second year of operation (Centre Audit).
- Item Writers are requested to complete an Item Writer Application Form and an Item Writer Reference Form. The chosen candidates are then trained so as to standardise level content of tests as much as possible. Item Writing and Test Construction Guidelines have been developed to provide detailed, prescribed guidance to all item writers producing material for ESaT tests. All Item Writers are supervised by the Senior Item Writer who reviews all material produced. The Senior Item Writer has the final say in what material is retained and stored in the ESaT databank.
- Markers, Assessors and Examiners are requested to complete a Marker/Assessor/Examiner Application Form and a Marker/Assessor/Examiner Reference Form. The chosen candidates undergo initial training. Various standardisation sessions are held during the year to ensure an objective and fair assessment to all candidates. Detailed guidelines can be found in the Marker/Assessor/Examiner Guidelines.
- The IT provider has an in-depth knowledge of the products and services offered and guarantees the highest level of security and services as detailed in the Supplier Minimum Requirements and the IT Security Policy.
- Details on the standards expected by ESaT of the Recording Studio and the Printer can be found in the Supplier Minimum Requirements.
- Once recognised and fully operational, a list of Qualified Suppliers is regularly updated (suppliers that meet the Supplier Minimum Requirements) and evaluated (through feedback from all stakeholders). Those suppliers (Centres, Item writers, assessors and examiners) that fail to consistently meet the standards set by ESaT, despite the warnings and possibly retraining, will be struck off the list and no longer used by ESaT in the training and testing process.

Institutional Probity

1. Human Resources and Equality

ESaT strives to become a preferred employer in the industry. For this reason, ESaT has created a standardised Recruitment Procedure to guide the members of its staff during this important process.

ESaT is committed to encouraging equality and diversity between our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation - in providing services and/or facilities - is also committed against unlawful discrimination of customers or the public.

The Equality Policy serves as guidance in the company's endeavour in this regard.

The Staff Recruitment Procedure, Equality Policy, Code of Practice and Contingency Plan are in place in order to ensure suitability for continued recognition by the MFHEA.

Detailed Job Descriptors for all senior and key positions have been created in order to ensure that all personnel in key positions understand, at the time of appointment and once in post, what is expected of them in order to be suitable and competent when carrying out their duties. In the event of new senior or key positions over and above the current ones, new Job Descriptors will be created in accordance with the above.

Applicants for a Senior Role will be deemed to be unsuitable for the role in the following circumstances:

- (a) any criminal convictions held by him or her,
- (b) any finding by a court or any professional, regulatory, or government body that he or she has breached a provision of any legislation or any regulatory obligation to which he or she is subject,
- (c) any proceedings in bankruptcy or any individual financial arrangement to which he or she is or has been subject,
- (d) any disqualification from holding the directorship of a company or from public office, or
- (e) any finding of malpractice or maladministration, in relation to a qualification (whether a regulated qualification or a qualification which is not regulated), to which he or she is or has been subject.

ESaT has nominated a Responsible Officer to ensure compliance with MFHEA standards.

All Senior Officers go through a thorough interview and must meet the minimum requirements set out in the relevant Job Descriptor. The established Staff Recruitment Procedure facilitates and streamlines the process relating to identification of key requisites of Senior Personnel in line with company needs and policies and the engagement of such personnel.

Upon application, the candidates also declare:

- that the information they have supplied is given voluntarily and is, to the best of their knowledge, true, accurate and complete in all respects.
- that they have a clean criminal record and are not facing any charges against them.
- that if they withhold relevant information or supply false or misleading information their application may not be considered further.
- that they understand that their employment may be terminated if, after investigation, ESaT discovers that any information they have provided is false or misleading.

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2. Resources and financial risk

A three-year budget is drawn up by the Managing Director, assisted by the Director of Administration and approved by the Board of Directors. The budget takes into account past performance, industry forecasts, feedback and data provided by the Board of Directors, Director of Institute and the Course and Assessment Committee. ESaT accounts are audited annually.

Management planning provides a financial contingency. ESaT has a policy to avoid borrowing where possible. At present, ESaT has no debts.

The hosting of all documentation, awarded certificates and operating infrastructure is done on a specific software designed by ESaT reduces the risk of unavailability of client data as well as lowering costs.

Basic maintenance of the resources is low cost and is mostly based on a 'service model' such that demand will pay for supply. Future development depends on growth of the customer base.

Specific risks associated with financial viability are as follows:

- a) changes in government policy,
e.g. in terms of eligibility for qualification funding and legislation that makes it more difficult for non-government backed qualification providers to compete on a specific market. The above-mentioned are beyond the control of ESaT.
- b) committing too many resources to development before revenue is generated to pay running costs,
- c) time necessary for new qualifications to establish themselves on a market and start generating income,
- d) competitors entering the market with new products that make our qualifications obsolete and are therefore dropped or not taken up.

The following policies mitigate against these risks:

- f) maintaining a close link with our Master Centres in the various markets to allow ESaT to fulfil conditions imposed by governments for qualification funding in target markets. This open communication also ensures that ESaT keep abreast with the latest developments in the testing industry.
- g) incremental developments and as far as possible, without excessive use of lending facilities.
- h) when possible to use EU funding to develop resources and services.
- i) careful analysis of the supply chain and when possible, the reduction of all unnecessary costs to make products and services as competitively priced as possible.
- j) ESaT must be an active member of organisations such as ALTE to help maintain a high-quality product as well as be aware of developments in the field of testing.

Design and Approval of Programmes

ESaT is not a self-accrediting institution. A specific procedure has, however, been created to standardise the design and approval process.

1. SCOPE

This procedure specifies how ESaT carries out its market analyses to implement its training and test development services, both for courses and test sessions directly managed by Head Office as well as for the management of training and test sessions throughout ESaT accredited centres.

This procedure also describes and regulates the commercial relationship with training centres responsible for the provision of ESaT services.

2. GENERAL PROVISIONS AND DESCRIPTION OF ACTIVITIES

ESaT operations are regulated by an Internal Quality Assurance Document (IQA) that applies to all the training and testing activities as well as any auxiliary services offered, to guarantee efficient and organised training programmes. The IQA describes how the service is developed, and how the different processes interact and relate to one another. The review stage of the IQA guarantees a seamless match between the IQA requirements and the teaching activities at the ESaT centres when running training programmes. This procedure is intended to help identify the specific objectives and requirements of the stakeholders who benefit from training and testing services.

Feedback from various stakeholders (students, teachers, assessors, centres...) is regularly collected and analysed, to better assess the quality and suitability of our products and services. Periodic targeted analyses are conducted and these focus on students, organisations and institutions, centres and competitors, to identify specific training and assessment needs.

The study programmes for most of the language training provided are guided by the work of the European Commission thanks to the CEFR and regulated by national institutions such as the MFHEA in Malta.

ESaT mainly offers courses which have been developed with a wide range of students in mind and with the aim of eventually obtaining accreditation from the MFHEA or other accrediting organisations. This guarantees the quality of the course and offers the successful students a qualification which is recognised in various European and international states.

However, details of the specific training programme to be provided to clients and organisations can be agreed upon with the aforementioned clients, in line with their specific goals and needs. The delivery of the training can also be agreed upon jointly (online, face-to-face, group, 1-to-1 sessions etc.).

The parties concerned must share information on all the matters above and clarify the following:

- the topic of the training session/s,
- the objectives of the training session/s,
- the method of delivery,
- the estimated timeframe for the provision of the training service,
- the budgeted costs,
- frequency and type of assessment of the training provided,
- frequency of feedback, which together with assessment results will establish the degree to which stakeholder expectations were met.

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3. APPLICABILITY

Applicable to market analyses, course and assessment design and when establishing the relationship with the ESaT centres that provide training and testing services.

4. RESPONSIBILITIES AND UPDATES

The Responsible Officer is mainly responsible for applying and updating these procedures. The Responsible Officer works closely with the Qualifications Committee and the Director of Studies/Head Examiner. The primary and secondary responsibilities are detailed below.

5. WORKING PROCEDURES

5.1 MARKET ANALYSIS

The Managing Director regularly receives market analyses reports, periodically reassessing the demand for training and testing services (before developing or proposing new training programmes and testing suites) to obtain an insight into the requirements on the territory/ies.

The market analysis includes:

- an analysis of the requirements of both individuals and organisations/institutions,
- past editions of training programmes or test suites,
- a comparison with the training and/or tests offered by competitors,
- sector development and trends.

The Managing Director is responsible for defining the criteria, methodologies, tools, information sources, responsibilities and timeframes for each market analysis.

The sources to be analysed include requests from other centres, feedback from various stakeholders, specific publications, newsletters etc.

Information provided by institutions such as local and international authorities and institutions, or sectoral organisations, may also be used.

Products and services offered by competitors may also be analysed to assess the way forward, and the results achieved may be compared and evaluated.

The Managing Director analyses the data based on market requirements as well as all the other information that emerged from the market research. The results are used as a reference tool for the development of future products and services.

5.2 DEVELOPING COURSE PROGRAMMES, TEST SUITES, AND ACCREDITATION

The Qualifications Committee, headed by the Academic Director, is responsible for the development of Course Programmes and Test Suites as directed by the Managing Director.

The design of a programme is based on the information gathered in phase 6.1. The Qualifications Committee, assisted by academic staff, must do the following:

- analyse accreditation requirements,
- analyse market research reports,
- when available, analyse feedback from stakeholders of past courses,
- define the course contents,
- establish the course duration,
- establish the target population,
- establish the minimum teacher requirements for the type of course,
- select teaching materials,

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- establish programme review periods,
- establish course outcomes,
- establish number and frequency of progress tests,
- design progress tests and a final test,

- create marking scheme.

All this information is included in the 'Course Information Sheet'.

5.2A DEVELOPING PROGRAMMES FOR CLIENTS WITH PARTICULAR NEEDS or OBJECTIVES The ESaT website provides an overview of the services offered by the organisation. ESaT can also tailor a programme to suit a client's specific needs or objectives. Once the potential client has explained their requirements, ESaT assesses whether the request is in line with the course types that can be offered, and with the availability of the centres across the territory.

a) ANALYSIS OF THE STUDENTS' REQUIREMENTS: **Placement Test and Student Needs Analysis.**

To identify the training requirements of the client, it is essential to start by assessing the students' present language proficiency through a Placement Test. The initial Level Indicator Placement Test consists of an automated reading and language use test, which provides an initial indication of level. Next, a written and/or oral test is completed in the ESaT Centre. The **Written/Oral** part consists of a meeting with a Senior Teacher who assesses the students' production skills in the foreign language. The Senior Teacher records the results and any additional notes on the dedicated Written/Oral Assessment Form.

The Senior Teacher then completes the **Student Needs Analysis Form**. The level the student wishes to achieve is thus established, also taking into consideration his/her expectations and availability.

b) QUOTATION – PERSONALISED PROGRAMMES

Before a personalised programme is developed, a quotation is issued. Based on the results of the feasibility study, the Managing Director or his/her assistant then consult with Qualifications Manager/s of the centre/s potentially involved, to confirm availability and prepare the offer, which should include:

- the total duration of the course (in hours),
- the course level/s for the students concerned,
- the centres where the courses will take place,
- the hourly rate,
- the teaching materials needed, as well as costs,
- learning outcomes,
- any placement test, progress test/s or final test required,
- any certificates to be issued,
- reports.

The contract conditions are also included, listing the obligations and responsibilities of ESaT, the client and any third parties, as well as the reference person/s for the training activities, the costs and payment methods, the offer validity period and the methodology used when carrying out periodic satisfaction surveys on the service provided (by means of a questionnaire). The offer is then submitted to the Managing Director, who checks, approves and signs it before it is sent to the client.

If the offer has expired without having been accepted (the timeframe varies), the Course Director contacts the potential client to check whether or not they are still interested.

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c) ACCEPTANCE AND REGISTRATION

To enable ESaT to move on to the next step, the potential client must return a signed copy of the quotation. Any subsequent contract amendments must be analysed and assessed prior to being accepted.

Once the client has signed an offer for the provision of training courses, the Director of Studies must:

- organise a meeting (face-to-face or online) involving the Qualifications Managers of ESaT centres involved, to discuss the training programme/s in view of the contract signed with the company.
- submit the contract to the branch(es) chosen to provide the training based on the type of contract signed by the client, either before or after the assessment process. The contract must define the training content, goals, duration and hourly fee for the work provided, the service conditions etc.

Moreover, for MFHEA accredited courses held at ESaT centres, the Qualifications Manager must create a file (database) listing all the participants and their starting level (placement test result), the level they aim to achieve, the hours allocated, their attendance, progress test results, final test result and the address where the courses are held. Any other information necessary will be communicated to the centres as necessary.

Clients that book specific courses that are not MFHEA accredited may request a final test at the end of the course. In this case, the Academic Director must be informed, and the order placed on the management software for tests and certificates.

Students attending MFHEA accredited courses and who pass the final exam, receive an ESaT certificate specifying CEFR level, MQF level and number of credits achieved.

For all other courses, a Certificate of Attendance is issued.

All assessment of MFHEA accredited courses are corrected centrally by ESaT.

The correction of MFHEA accredited qualification assessment, is coordinated by the Qualifications Manager of the ESaT centre concerned and monitored centrally.

Every course must comply with the official Course Programme, which includes:

- a detailed course syllabus, rationale and objectives,
- level descriptors,
- teaching material,
- details relating to student prerequisites,
- details relating to course duration,
- assessment and related procedures,
- pathways (ESaT Framework of Progress).

d) DEVELOPMENT OF THE PERSONALISED TRAINING PROGRAMME:

Based on the information gathered in the previous phase, a programme is developed. When designing a programme, the Qualifications Committee, assisted by academic staff, must do the following:

- define the course contents,
- establish the course duration,
- establish the minimum teacher requirements for the type of course,
- select teaching materials,
- establish programme review periods,
- establish course outcomes,
- establish number and frequency of progress tests,
- design progress tests and a final test,
- create marking scheme.

All the above information is included in the 'Course Information Sheet'.

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5.3 PROCUREMENT PROCESS

The procurement process guides the Academic Director and the QMs in the selection of resources, both human and material, necessary to provide ESaT training services. The Supplier Minimum Requirements, lists the characteristics of the externally sourced goods, services and human resources:

- i. technical specifications for the acquired material goods and
- ii. professional competencies for human resources.

These procedures include a definition of the selection criteria, as well as the criteria for the different phases of the procurement process and the monitoring phase.

a.1) STAFF SELECTION AND MANAGEMENT

With the Supplier Minimum Requirements and the Recruitment Procedure, ESaT has defined the requirements in terms of professional experience and specific experience, as well as the abilities and personal training of the persons employed in all corporate processes throughout the organisational chart. The Recruitment Procedure also ensures a clear, objective and fair procedure during the recruitment process. ESaT constantly invests in in-house training and refresher courses for its staff. To this end, it drafts a yearly CPD Plan and assists its centres in running CPD programmes specific to centre needs (teachers attend refresher courses based on the annual observations and appraisals).

In addition to offering CPD programmes to promote continuous quality growth, ESaT recommends that all Centres maintain an effective balance between the number of new teachers with little or limited experience, and the number of experienced teachers. A reasonable ratio, in order to guarantee quality standards are maintained, is one new teacher to every four experienced teachers.

To ensure a clear overview of its organisational structure, ESaT assigns responsibilities and authority by defining, in writing, how the people involved in the project should interact with one another. The organisational hierarchy is illustrated by means of an Organigram. In the corporate structure, every staff member reports directly to a superior and, either directly or indirectly, to the Board of Directors. The teachers are coordinated directly by the Qualifications Managers (QM), who, in turn, are supported by the Director of Studies (DoS).

A specific Teacher Recruitment Handbook has been created to standardise the planning and interview phases of this key process.

5.4 COURSE APPROVAL

Once the Qualifications Committee finalises the programme and checks that all the course specifications (accrediting body standards, course outcomes, course duration etc.) meet ESaT standards, the course is presented to the Managing Director who decides whether to approve or request modifications.

6. COURSE DELIVERY

The course delivery programme is subdivided into three key moments:

⇒ **LAUNCH** ⇒ **PROGRESS** ⇒ **CONCLUSION**

The course delivery programmes are monitored as is the planning of the entire process, the periodic assessment and monitoring of the teaching staff performance, the assessment of the course participants and compliance checks for all the in-house staff and the records they have compiled.

6.1 THE DIFFERENT PHASES OF THE DELIVERY PROCESS

a) **LAUNCH**

The Director of Studies needs to send details of the course programme to the centres involved (Course Information Sheet). This includes a detailed description of resources (human and material) necessary to

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successfully run the course. The QMs then send a list of teachers taking part in the project and the DoS ensures that their curricula meet the standards as described in the course minimum standards. The QM is also required to complete the 'Declaration that Centre Resources Conform with Minimum Standards' to ensure that the centre has all the necessary resources to provide training on behalf of ESaT.

The following must also be finalised by the QM:

- appointment of the teacher/s who will guide the students during the course/s,
- the course calendar,
- the groups and the attendance records,
- room allocation
- ordering of resource material

b) PROGRESS

- During the first lesson, the course and teacher/s are presented to the candidates
- All course material is handed out after the second lesson. This allows the teacher time to assess whether the group is homogenous and whether there are candidates that have to be moved. In this case, the teacher must first speak to the QM to discuss the best options for the student.
- The teacher is guided by the Course Programme when defining the Schemes of Work (SoW).
- Records of Work (RoW) and Registers must be completed after every lesson. All processes related to course delivery are recorded on the RoW and Register, which lists the students attending the course as well as any issues encountered during the course. Moreover, the students' progress is recorded on the Evaluation Report, to assess the conformity of the service provided with the theoretical goals set during the planning phase.

The delivery of the course/s, which is subject to specific operational procedures, calls for each key phase to be monitored by the Director of Studies to ensure that the course/s conform/s with the set minimum standards. During the course, the activities are monitored by means of dedicated assessment tools: satisfaction surveys and progress tests. These assess:

- I. Student Progress
- II. Customer Satisfaction

These tools provide ESaT with the necessary information to assess the students' progress and to check whether they are satisfied with the service provided. Client feedback can also be obtained by means of a third tool, namely the Complaints Form. Any complaints received are immediately analysed. Every complaint is considered in breach of the IQA and must be resolved through corrective measures to prevent the issues from repeating themselves. It is ESaT policy to constantly seek to improve its services, and to improve its performance mainly through the clients' response to the quality measurement tools used. All staff members are informed on the students' needs and are instructed to tackle any problems that may arise immediately.

c) CONCLUSION

Following the final lesson, the students take a final test to assess to which extent the results achieved are in line with targets set. The final test assesses the 4 skills (Reading, Writing, Listening and Speaking). The teacher then prepares an Evaluation Report, which takes into consideration the various Progress Tests as well as the Final Assessment. A certificate is issued for those students that successfully pass the final test. For a more detailed explanation of the test structure, please refer to the Student Handbook.

d) QUALITY MONITORING AND ASSURANCE

The quality assurance process utilises the following monitoring tools:

- I. internal audits: every year, a series of audits are carried out. Particular attention is dedicated to the key players in the provision of the training courses. The aim of these audits is to check compliance with the IQA and all relevant regulations.

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- II. audit once every 5 years by the certifying body to assess the relevance and aptness of the IQA.
- III. systematic, ongoing monitoring of all phases in the planning, development and delivery of the service.
- IV. assessment of the performance of the teaching staff: during the delivery stage of the course, the QM, assisted by Senior Teachers, assesses the professional competencies of the teacher by means of the Teacher Observation Form. This document assesses the teacher's skills using a scale from 1 (poor) to 10 (excellent). The scores reflect the teacher's technical skills, course management skills and interactions with students. The results of the client satisfaction surveys are also taken into consideration. Observations and surveys form the basis of the annual Teacher Appraisal.
- V. Control over the selection process of resources and procurement: quality checks start from the selection of resources and their introduction in the training process (Qualifications of teachers supplying the service, in-depth interviews...). The entire process is subject to quality checks: every phase of the process is monitored by the persons responsible for it, who are, in turn, monitored by other competent persons. This approach to quality assurance guarantees that compliance with the IQA is measured objectively.
- VI. analysis of the student feedback, complaints forms and test results (Assessment Test, Evaluation Report and Final Report).
- VII. corrective and preventive measures, as provided for by the IQA, to guarantee continuous improvement of the processes and the service provided.
- VIII. indicators and targets: every year, ESaT analyses the corporate performance by means of specific indicators. For each indicator, ESaT identifies the targets to be reached and monitors whether or not they have been achieved. If this is not the case, ESaT analyses the reasons for this failure.

6.2 MANAGING of AMENDMENTS

Upon request from one of the parties concerned, on condition that the changes do not prejudice the course objectives and the contents of the training course/s agreed upon by the parties, the course structure or delivery of the course/s may be amended to better suit the clients' specific needs. In such cases, the Director of Studies is responsible for amending the relevant documents. Significant changes to the programme or course objectives (changes in the monitoring phase) must be managed and recorded.

7. ARCHIVING

The Director of Studies is responsible for monitoring the correct compilation and the completeness of the archived documentation. All documents mentioned in this document must be preserved online for a minimum of forty years.

Student-centred Learning, Teaching and Assessment

ESaT is committed to providing students with high quality academic programmes that assist the students in improving their level of English. The students' learning process is enhanced through a range of extra-curricular activities and a school infrastructure that is conducive to learning. It is also the company objective to offer students continuous support and customer service throughout their course.

ESaT strives to achieve these objectives by:

- ensuring that the company delivers on the promises made to students;
- attracting, developing, and retaining high quality teaching staff;
- designing and continually developing programmes that focus on the skills needed for students to improve in a faster and more effective manner;
- providing students with an adequate learning infrastructure that includes comfortable classrooms;
- constantly monitoring student feedback and using it as a tool to help the organisation improve and develop, both during the students' course as well as after they leave.

ESaT will measure its Quality Objectives against students' evaluations of the organisation. The aim is to constantly improve the number of positive evaluations and continuously increase the response rate.

ESaT is committed to developing leadership at every level of the organisation such that all members of staff are empowered to take ownership for their team, their function or for a simple task or decision.

Employees are supported in developing and maintaining standards of professional competence and knowledge through a combination of training, learning, and practical experience.

It is the intent of the organisation that the management system will, as a minimum, satisfy the requirements of customers, any Quality Management Systems standard that the company decides to pursue, and all legal and regulatory requirements.

1. ESaT Ethos

A comprehensive Teacher's Manual as well as an Academic Staff Handbook have been developed to guide and assist teachers and academic staff in understanding the ESaT Ethos.

Once a teacher has been accepted to form part of the Academic Staff, they are sent the Teacher's Manual which they need to read and familiarise with. They then sign a document to confirm they are familiar with our procedures and ethos. New staff are also given a half-day induction to ensure that they are familiar with the premises and organisation.

A holistic language learning experience

A holistic language learning approach fosters learning outside the classroom.

English is a lingua franca and belongs to the world. This vision should have a bearing on our approach to education. It should involve not only teaching English in the classroom, but intercultural awareness, the exposure to different accents when listening to English, and the teaching of study skills.

A linguistic journey to Learner Autonomy for both teachers and students.

It takes an autonomous teacher to foster autonomous learners. Teachers will provide students with academic support, advice on how to study and an opportunity to discuss long term-goals.

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A focus on **learning to learn** will enable students to understand how they learn, which in turn ensures responsibility for their progress. It will encourage students to reflect on, and develop, their understanding of their own learning and to take some responsibility for this.

ESaT strives for Learner Independence.

ESaT will invest in teachers' personal development ensuring that they are trained in wide-ranging and up-to-date methodologies in order that students are able to benefit from their tutorship. ESaT will invest in the latest technology to increase and maximize the opportunities for students to practise the language outside the classroom, which will contribute to their increased fluency in the use and understanding of English spoken with different accents.

ESaT encourages students by advising and offering academic support by offering students various options that will lead to improvement and excellence in the language. Not all students are aware of their options and aptitudes. It is our responsibility to approach, direct and encourage students proactively to follow the linguistic path best suited for them.

ESaT teaches and educates students not to be dependent learners who cannot function without the support of teachers. Students learn to assume responsibility for their learning and learn how to research and use self-study materials. Equipped with such study skills, both in and outside school, students will be able to contribute to their own learning and self-improvement.

2. ESaT 'Rationale'

At ESaT, **Communicative Language Teaching** is the recommended approach, with a clear integration of systems and skills in lessons, thus ensuring that the main focus is on the communicative aspect of the language. Teachers have the flexibility to apply the principles of this eclectic approach to their own contexts. The mixture of systems (grammar, phonology, lexis, discourse) and skills (speaking, listening, reading, writing) depends on the linguistic DNA of the class, and students are encouraged to collaborate with their teacher in order to regularly negotiate input.

Our syllabi are designed to feature a mixture of 'input' and 'output'/'practice' lessons. The teacher uses the course book as a basis for the input sessions. It is recommended that they "cut and paste" as they feel necessary to better adapt to the needs of their students. The teacher should also plan task-based lessons to consolidate what was learnt in input sessions.

The choice of topic should be based on the students' **likes and dislikes**. Teachers are responsible for ensuring that the learning outcomes are achieved in order for students to participate in activities planned.

All lessons should reflect our Academic Rationale, which advocates **Communicative Language Teaching**. Lessons should focus on the **specific needs of the students and should aim at providing:**

1. A balance of Language skills (Speaking, Listening, Reading, Writing)
2. A balance between input and output (i.e. practice - controlled, guided and free)
3. Ample opportunity for students to discover how the language works - encourage students to analyse language in chunks rather than in individual items (words, tenses in isolation)
4. An opportunity to use English in real situations and within real contexts.

Each level has a **detailed syllabus** which serves as the teachers' ultimate guide as to what should/could be covered over the duration of the course.

Teachers are expected to familiarise themselves with this and refer to it regularly to help them plan lessons. It is meant to help teachers and has been designed to maximise preparation time. While it is

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important to use the course book as their main resource, teachers are always encouraged to bring their own touch and creativity to every class they teach.

Some key points that teachers are encouraged to keep in mind are:

- Each and every lesson needs to have clear aims and objectives. It is important that by the end of the lesson, one is able to answer: **'What have my students learnt?'**
- Some students find feedback very embarrassing. Teachers must be sensitive when giving feedback.
- Students should be praised immediately for good work or effort.
- Teachers should make sure that all students have understood the set task by 'Concept checking'.
- Lessons should start and end on a positive note.
- Learning should be made memorable and motivating.
- People learn in different ways. There are visual learners, audio learners, kinaesthetic learners, linguistic learners, logical learners, interpersonal learners, intrapersonal learners, naturalistic learners and musical learners. Teachers must try their best to target all learners by including a variety of materials and activities in their lessons. e.g. Pictures for the visual learners, Music for the musical/audio learners, Puzzles for the logical learners, running dictations for the kinaesthetic learners etc.

3. Observed Teaching and Appraisals

Teachers at ESaT centres will be observed from time to time, and feedback will be given. ESaT expects that teachers will act on constructive feedback and every assistance will be given to teachers to enhance and develop their teaching. Teachers that provide regular contact hours to ESaT will also receive appraisals.

4. Assessment

ESaT is committed to the efficient development, delivery and awarding of qualifications. It has carefully considered all criteria necessary in order to allow the learner to demonstrate level of attainment of the required knowledge, skills and understanding and to allow the assessors to be able to differentiate accurately and consistently a range of attainments.

In order to guarantee that our tests are **fit for purpose**, we ensure that all tests are valid, reliable, comparable, and, as much as possible, we minimise bias, as detailed in the Item Writing and Test Construction Guidelines, Teacher Handbook, Candidate Handbook, Guidelines for Oral Assessors, Guidelines for Markers & Assessors.

a) In order to ensure **manageability**, the following measures have been taken for our tests:

- The test sessions never last longer than 3 hours
- The examination is currently only available in pen and paper format but will soon be also offered online.
- Minimum standards to become an ESaT Centre are accessible whilst guaranteeing maintenance of standards as highlighted in the ESaT Centre Contract and Appendix
- Thanks to efficient cost management and highly evolved management software (see IT Security policy), ESaT offers its qualifications at a very reasonable cost.
- The abovementioned software also facilitates efficient management of courses and tests from booking stage to certificate stage.

The procedures to be followed by Qualifications Managers and Test Centres are clearly detailed in the Centre Director and Qualifications Manager Handbook.

Feedback is encouraged from all stakeholders as can be seen from all the feedback forms available both before and after the sessions.

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b) Internal Consistency and Validity:

ESaT TELSa and jTELS examinations target communicative competence and have been modelled on the Bachman & Palmer's (1996) model of language ability. This is to say that the tests exploit candidates' language knowledge in conjunction with their language use.

In view of this ...

- there are no controlled tasks in the tests,
- the test focuses on all 4 language skills, and
- it has been created with the ALTE 'Can Do' framework in mind.

(See <http://www.cambridgeenglish.org/images/28906-alte-can-do-document.pdf>)

The Test focus ensures learner engagement and learner growth. It also facilitates mobility and employability, i.e. a B2 certificate provides evidence of having reached the target level.

Details to how ESaT guarantees Test Validity and Reliability can be found in the Item Writing and Test Construction Guidelines (p.p. 12-17)

c) To ensure comparability across sessions:

Test specifications are clearly detailed in all related manuals/handbooks/guidelines. Specifications include:

- Exam objectives,
- Test description,
- Referencing to the MQF,
- Referencing to the CEFR descriptors and to other examinations at the same level,
- Pathways for the learner/candidate,
- Description of competencies at targeted level and details about higher/lower-level examinations in the ESaT suite of examinations,
- Criteria against which the targeted level is measured (*i.e.* Assessment Criteria),
- Details of language knowledge and competencies/skills assessed in the examination,
- Test outline and rationale for each section,
- Method of assessment,
- Specimen examination material (*i.e.* Sample test, including Answer Keys and all other related documents specific to the user of the relative manual),
- (For candidates) Guidelines on how best to prepare oneself for the examination,
- (For teachers) Guidelines on how best to help prepare candidates,
- (For other stakeholders, e.g. Item Writers) Clear guidelines for test item creation,
- (For Markers/Assessors/Examiners) clear guidelines for assessment of the related skill/s,
- Test piloting,
- Standardisation sessions for assessors and examiners,
- Random double marking.

d) Minimising Bias:

ESaT takes various measures to minimise bias, namely:

- A list of topics to be targeted in the tests, and another list of topics to be avoided are detailed in the item Writing and Test Construction Guidelines (pp. 88, 106),
- Pictures earmarked for use in the Speaking tests are required to be neutral to race, religion, gender and age,
- Tests are trialled with as many nationalities as possible so as to allow the Academic Director to pick up any bias before the test goes on the market,
- In cases of non conformity or where procedural weaknesses are identified, Oral Examiners, Assessors of Writing and Markers of the other papers are required to provide feedback .

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All feedback material (from all stakeholders: candidates, teachers, invigilators, markers, assessors, oral examiners and examination managers) is analysed and all key feedback is summarised in the Academic Director Report which is issued annually. This is instrumental in maintaining standards (ie. by investigating reports of malpractice, by investigating complaints on quality of delivery, by investigating claims of unfair access in the design of any particular test and request for revision of papers). It also ensures further development of the test papers and procedures in order to meet the market demands.

e) Marking of Tests

(i) Methods of Marking:

The two main classifications in marking of examination papers are as follows:

(ii) Tasks with a format which allows some form of **objective** marking: **Reading and Language Use Paper and Listening Paper**

(iii) Tasks whose nature demands a more **subjective** judgement: **Writing Paper/Section and Speaking Paper**

(ii) Main issues in Marking and Scoring:

Assessment of candidates' work needs to be consistent and reliable as, indeed, every other aspect of the examination process. For this reason, all examination papers are returned to **ESaT** for marking.

This ensures that, regardless of the origin, all papers/sections are marked fairly.

Clerical Markers and Assessors are subject to **strict monitoring** so as to ensure that marking is accurate, standard, and consistent. In order to guarantee fairness and to ensure **reliability** of the ESaT examinations, all marked papers go through the following procedure:

- **Double Marking and Moderation of questionable scores:**

Clearly, 'high stakes' exams, like the TELSa Level B2 and higher, require stricter monitoring than the lower stakes exams. As a rule, however, **all test papers of any one session are eligible for random double marking**. Particular focus is placed on borderline fail scores and particularly high grades.

(i) The following procedure applies for the more **experienced Markers and Assessors**: -

(ii) **Papers 3 and 4: Random double marking** and selective double-marking of papers/sections.

Markers whose work is questionable are firstly contacted to flag the lack of alignment with ESaT standards and earmarked for further training, if no improvement is noticed in the next moderation.

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Oral Examiners are subject to strict monitoring so as to ensure that assessment is fair, accurate, and consistent. New Oral Examiners generally have a very small load, and all the recordings of Speaking Tests carried out by these examiners are double marked.

The full procedure for double marking of Speaking Tests is as follows:

Examiner's first session: 100% double marking

Examiner's second session: 50% of recordings are double marked. Provided there is ample proof that the examiner has performed well in Session 2, the percentage of double marking is reduced, as indicated, during Session 3. In the event of poor performance in this session, the same percentage as Session 2 needs to apply to Session 3.)

Examiner's third session: 10% double marking, unless otherwise required.

The **issue of results** is subject to a **3-stage process**, i.e.

- a) Markers, Assessors, Oral Examiners input scores on the system,
- b) Scores are double marked and moderated, as indicated above,
- c) All scores which have been input by Markers, Assessors and Examiners are double checked for accuracy. A check of the final score of each candidate is carried out before results are published.

Narrow Fails

It is worth noting that ESaT has a policy whereby all narrow fails (50-59%) are automatically double-marked and moderated to ensure that no candidate unfairly fails the exam.

f) Revision of Paper

ESaT procedures have been developed to limit errors as much as possible. It is however, very difficult to completely eliminate this possibility. Candidates or centres who believe that a score does not correctly reflect the candidate's performance during a test can apply for a Revision of Paper.

ESaT will only carry out a revision of paper once the Test Centre applies for an investigation into the result by completing and sending the 'Request for Revision of Paper Form'.

ESaT charges a fee for this service.

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For Revision of Paper:

- (i) Centres must submit the 'Request for Revision of Paper Form'.
 - (ii) the Qualifications Managers responsible for the candidate's entry must submit the request.
 - (iii) Centres must submit the request within **5 days** after ESaT has issued the results.
- ESaT **will not** consider:
 - (i) telephone requests for Revision of Paper
 - (ii) requests for Revision of Paper involving any component(s) for which malpractice has been confirmed
 - (iii) requests for Revision of Paper from individual candidates or their parents/ guardians.
 - Centres must submit all requests for Revision of Paper concerning a particular examination session at the same time

The Centre will not be charged in cases where a mark change has resulted from the Revision of Paper.

Time taken for Revision of Paper results

ESaT will deal with requests for Revision of Paper in the order in which they are received. ESaT cannot guarantee a date by which it will report the outcome of the revision of paper. It will however, make every effort to report the outcome as quickly as possible.

ESaT will send an acknowledgement to the Centre confirming the request for Revision of Paper. If the Centre does not receive an acknowledgement, it could mean that the application has not arrived at ESaT. It is essential that the Centre contact ESaT unless it receives an acknowledgement within 15 working days.

Amendments to results and certificates

ESaT carries out internal quality assurance procedures. ESaT also offers the possibility for a Centre to request a Revision of Paper and appeal a result. As a result of a Revision of Paper, ESaT may need to issue amended analysis of results or certificates.

ESaT reserves the right to amend analysis of results and certificates at any time and without liability, to Test Centres or candidates.

Outcome of Revision of Paper

- Where a Revision of Paper does not lead to a change in a candidate's mark, ESaT will not re-issue an analysis of results or certificate.
- Where a Revision of Paper leads to a change to a candidate's overall mark in an examination, ESaT will:
 - a. notify the Qualifications Manager in writing immediately,
 - b. issue a revised analysis of results and a revised certificate,
 - c. waive all or part of the fee.

Appeals against the outcome of Revision of Paper

- (a) If, having received the result of a Revision of Paper, a Qualifications Manager wants to appeal against that outcome, they may submit an appeal to the ESaT Qualifications Committee. Centres must follow the appeals procedures.
- (b) It is the responsibility of the Qualifications Manager to forward the outcome of an appeal to candidates and parents/carers as soon as it is received. The Qualifications Manager is to also notify the candidates and parents/carers that this outcome is regarded as final.

The Appeals Process

If the Centre is not satisfied with the outcome of a revision of paper or a decision taken on malpractice, special consideration or special arrangements, it can appeal by submitting a request to the Responsible Officer/Qualifications Committee. ESaT will not enter into any communication about an appeal with candidates or their parents. All communication must be through the Qualifications Manager.

ESaT will inform the Centre of the outcome of their appeal within 15 days of the date of the appeal.

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(a) The Qualifications Committee consists of the ESaT Responsible Officer, the company secretary who will minute the meeting, the Academic Director and an independent panel member. Other specialist staff may be invited to give extra information as required. The Qualifications Committee will review the evidence and decide what action, if any, to take.

The Committee will consider each case on an individual basis in the light of all the information and evidence or mitigating circumstances submitted by the Centre.

(b) The Centre/Master Centre will be notified of any decision in writing.

(c) The outcome of an appeal is final and ESaT will not enter into further correspondence.

Action to be taken in case of discovery of failure in the ESaT assessment process

Where the application of an appeals process leads to the discovery of a flaw in the assessment process of ESaT all reasonable steps must be taken to:

- identify any other candidates who have been negatively affected,
- correct or mitigate the effect of the discovered flaw,
- ensure that the flaw is rectified immediately,
- immediately inform all validating and regulating bodies of the relative failure and action/s taken to rectify or mitigate, once a flaw has been discovered.

If a validating or regulating body informs ESaT of failures which have been discovered in the assessment process of another awarding organisation that administers similar tests at the same targeted level which could potentially affect the assessment process of ESaT, then ESaT must identify such potential failure and take all necessary action to rectify as indicated above.

g) Release of results and issuing of Certificates

Results are released through the ESaT platform a maximum of 4 weeks after the final examination date.

All certificates will be issued 15 days after the results are published.

It is important to note that ESaT may withhold or delay the publishing of results and issuing of certificates due to serious suspect of malpractice, maladministration or an appeals process.

In case of serious malpractice, maladministration or a result revealing to be inaccurate as a consequence of an appeals process, ESaT reserves the right to withdraw all issued certificates for that session.

5. Evidence to inform approach

In order to identify and act upon evidence which suggests that a change is necessary in its approach to development, delivery and award of its qualifications, ESaT has created feedback forms for key stakeholders (candidates, teachers, invigilators, markers, assessors and oral examiners).

Attendance registers, Progress Test Results and Final Assessment Results, all provide useful information on the course and assessment. At the end of the course of study all feedback forms are expected to be uploaded onto the ESaT platform along with a general report on the relevant course and assessment from the Qualifications Manager.

One of the duties of the Academic Director is to analyse and summarise all key feedback in the Academic Director Report following every course/test session based on information provided by all the centres. This process is instrumental in maintaining standards (i.e. by investigating reports of malpractice, by investigating complaints on quality of delivery, by investigating claims of unfair access in the design of any particular test and request for revision of papers), and ensures further development of courses on offer as well as the test paper and the procedures so as to meet the market demands. (See Academic Director JD - p. 14)

During the development of syllabi and/or test items, a number of editing meetings are held, as and when necessary, by the Qualifications Committee.

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6. Feedback and Complaints Policy

Educational Services and Testing (ESaT) actively strives to improve its services and products. Every person involved in the design and running of courses and the design and administration of tests is carefully selected and trained, to guarantee a positive overall experience for all students, candidates and stakeholders.

- **Feedback** on ESaT products and services is encouraged as it is an opportunity for the organisation to improve its products and services.

All stakeholders have the right to make a complaint about any aspect of ESaT products or services (as is documented in the ESaT Governance Document). The information on this page will guide you through the ESaT complaints procedures:

- **Complaints:** If a candidate or a stakeholder is unhappy with an ESaT product or service, it is often worthwhile to discuss concerns with the Qualifications Manager at the ESaT Centre, as he/she may be able to sort out the issue. Most problems can be dealt with at this stage.

If a stakeholder wishes to file a complaint, he/she can either do so direct with the Qualifications Manager, or refer to the complaints procedures found in the FAQ section of the ESaT website to communicate directly with ESaT.

All complaints are dealt with effectively, sensitively and in a timely fashion.

ESaT deals with complaints relating to the following:

- Centre Staff (Qualifications Manager, Centre Director, Invigilator, Secretary etc.) behaviour,
- the conduct of an Oral Assessor,
- the administration of a test,
- suspected malpractice,
- a result (if a candidate feels they were affected by circumstances outside of their control, and they do not feel that special consideration was appropriately applied),
- a course,
- a training session on ESaT qualifications for teachers,
- the conduct of an Inspector,
- ESaT services in general (including special consideration, enquiry on results, appeals),
- availability and quality issues with ESaT systems.

Complaints and Feedback Procedure

-Candidates and parents

All complaints dealing with course or examination issues should be first communicated to the Centre. ESaT normally only deals with complaints when made through official channels and following prescribed procedures by the Qualifications Manager.

If, however, after approaching the Qualifications Manager a stakeholder remains dissatisfied with the outcome, he/she may contact ESaT directly through the online Complaints procedure.

-Registering a complaint directly with ESaT:

To allow us to investigate concerns, the person registering the complaint should give a detailed summary of the complaint. The following must also be included:

- full name,
- contact details (email address, postal address and phone number),
- where appropriate, details of the course attended/examination taken, including the course/test session date and the Centre Code and/or Centre name,
- copies of all previous correspondence with the Centre, as well as the outcome of their internal complaints procedure where applicable.

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-Complaints and feedback can be submitted as follows:

Online

After the complainant sends an email with all relevant information to info@esatqualifications.com, ESaT will then contact the person to obtain full details of his/her grievance, along with copies of previous correspondence with the ESaT Centre, as well as the outcome of their internal complaints procedure where applicable.

ESaT will also contact the ESaT Centre to obtain all possible information about the specific case.

- Centres are encouraged to send suggestions or complaints regarding:

- course design and delivery
- test design and administration
- enquiry on or appeal against a result
- request for Special Consideration
- request for Special Arrangements
- test preparation course for teachers
- suspected malpractice or maladministration
- quality and availability of ESaT systems

-Teachers and Testing Staff are encouraged to send suggestions or complaints regarding:

- course design, content and delivery
- test design, content and test administration
- test preparation course for teachers
- suspected malpractice or maladministration
- quality of resources in a particular Centre

ESaT normally acknowledges receipt of the complaint within five working days.

It is normal practice to inform the Centre of the investigation and when necessary to request a report of the event or issue.

A full investigation of a complaint is normally completed within fifteen working days. There are instances when the investigation may take longer and, in such cases, you will be regularly updated with the progress of the investigation.

Any questions regarding a complaint can be sent to info@esatqualifications.com

Student Admission, Progression, Recognition and Certification

SCOPE

The scope of this procedure is to define the methods for the management of student admission, progression, recognition and certification.

RESPONSIBILITIES AND UPDATES

The main person responsible for the application of this procedure is the Academic Director, who works closely with the CDs and QMs. Primary and secondary responsibilities are detailed below. The Responsible Officer is responsible for updating this procedure.

THE ADMISSION PROCESS

The Centre Directors assisted by the Qualifications Managers, Senior teachers and admin staff are responsible for the admission of students in the various ESaT centres. This document caters for two different admission processes:

MFHEA accredited awards Personalised programmes

MFHEA accredited awards

1. The Academic Director ensures that the ESaT centre satisfies all the minimum requirements to deliver the award. This includes a detailed description of the programme, student prerequisites, resources (human and material) necessary to successfully run the course, duration etc.
2. The various Centre Directors advertise and market ESaT programmes according to local needs and requests.
3. The Qualifications Managers (QMs) then send a list of teachers taking part in the project and the DoS ensures that their curricula meet the standards as described in the course minimum standards. The QM is also required to complete the 'Declaration that Centre Resources Conform with Minimum Standards' to ensure that the centre has all the necessary resources to provide training on behalf of ESaT.
4. **ANALYSIS OF THE STUDENTS' REQUIREMENTS: Placement Test and Student Needs Analysis.**
To identify the training requirements of the client, and to ensure that he/she has the necessary prerequisites, it is essential to start by assessing the students' present language proficiency, either through a Placement Test or RPL. The initial Level Indicator Placement Test consists of an automated reading and language use test, which provides an initial indication of level. Next, a written and/or oral test is completed in the ESaT Centre. The Written/Oral part consists of a meeting with a Senior Teacher who assesses the students' production skills in the foreign language. The Senior Teacher records the results and any additional notes on the dedicated Written/Oral Assessment Form. The Senior Teacher then completes the Student Needs Analysis Form. The level the student wishes to achieve is thus established, also taking into consideration his/her expectations and availability.

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Learners joining a course may be exempt from sitting the Placement Test if they provide proof of having successfully completed a recent (proof/certificate not older than 12 months prior to course commencement) accredited course, 1 level lower than the programme they are applying for. In case of doubt, the Qualifications Managers may request that the student sit the placement test which will determine their current level of performance.

The Senior Teacher then completes the **Student Needs Analysis Form**. The level the student wishes to achieve is thus established, also taking into consideration his/her expectations and availability.

5. ACCEPTANCE AND REGISTRATION

Should the potential client have all the prerequisites for the course and be interested in the offer, the admin. staff can then proceed with registration on the Student Application Form. This form has to be completed in its entirety.

All bookings must be channelled through the ESaT platform; candidates must on application, provide adequate proof of identity (National Identification Card or Passport).

The identity of the learner must be confirmed as true by the ESaT representative. No student is deemed registered until all fees associated with registration are paid in full.

On completion of registration, students are added to the ESaT platform and an email is automatically sent to the learner to confirm their registration.

6. COURSE COMMENCEMENT

For MFHEA accredited courses run at ESaT centres, the database lists all the participants and their starting level (final placement test result), the level they aim to achieve, their attendance, progress test results, final test result, and the address of ESaT centre/s involved (if applicable).

-During the first lesson, the students are given an Induction by their teacher. This is aimed at providing them with details on the programme, assessment, attendance, teaching approach/es, centre resources and centre staff and their responsibilities.

-All course material is handed out after the third lesson. This allows the teacher time to assess whether the group is homogenous and whether there are candidates that have to be moved. In this case, the teacher must first speak to the QM to discuss the best options for the student.

-The teacher is guided by the Course Programme when preparing the Schemes of Work.

-Records of Work and Registers must be completed after every lesson. These documents can at no time, leave the Centre. These documents are stored at reception and the relevant material transferred once monthly onto the ESaT platform to ensure that all data is accessible and stored securely. All processes related to course delivery are recorded on the RoW and Register, which lists the students attending the course as well as any issues encountered during the course.

Moreover, the students' progress (tests, final exams, tutorials and teacher comments) is recorded on the **Student Evaluation Report**, to assess the conformity of the service provided with the goals set during the planning phase.

-NB. Once ESaT transitions to an electronic register format, no hard copies will be required.

The delivery of the course/s is subject to specific operational procedures to ensure that the course/s conform/s with the set minimum standards. The DoS carries out random checks to ensure that all courses conform with the set minimum standards. During the course, the activities are monitored by means of dedicated assessment tools: satisfaction surveys and progress tests. These assess:

- Student Progress,
- Customer Satisfaction

These tools provide ESaT with the necessary information to assess the students' progress and to check whether they are satisfied with the service provided. Client feedback can also be obtained by

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means of a third tool, namely the Complaints Form. Any complaints received are dealt with within 48 hrs. Every complaint is considered in breach of the IQA and must be resolved through corrective measures to prevent the issues from repeating themselves. The feedback forms are analysed by the QM who is responsible for monitoring that student satisfaction does not drop below 80%. The QM must also prepare a summary report on student feedback for all courses organised.

It is ESaT policy to constantly seek to improve its services, and to improve its performance mainly through the clients' response to the quality measurement tools used. All staff is informed on the students' needs and are instructed to tackle any problems that may arise immediately.

7. FINAL ASSESSMENT: following the final lesson, the students may choose to take a final test to assess to which extent the results achieved are in line with targets set.

When sitting for a final test, students receive an email with details on test session date and time as well as level booked.

As detailed in the Centre Director and Qualifications Manager Handbook, the QM must ensure that invigilators carry out thorough identity checks. Candidates are required to present a national ID card or passport with photo, each time they attend a session to ensure that they are the same person who was entered for the examination.

The final test assesses the 4 skills (Reading, Writing, Listening and Speaking).

All exams of MFHEA accredited courses are moderated centrally by ESaT.

8. PUBLISHING OF EXAM RESULTS

Exam results are released and certificates as well as Analysis of Results are issued onto the ESaT platform within **15 working days** after the final examination date. It is important to note that ESaT may withhold or delay the publishing of results and issuing of certificates due to serious suspicion of malpractice, maladministration or an appeals process. In case of serious malpractice, maladministration or inaccurate results discovered as a consequence of an appeals process, ESaT reserves the right to withdraw all issued certificates for that session.

(Centre Director and Qualifications Manager Handbook pg.38)

9. ISSUING OF CERTIFICATES: A certificate is issued for those students that successfully pass the final test. This certificate includes a detailed breakdown of their performance (Analysis of Results), reference to achieved learning outcomes, the MQF level, number of credits, content and status of qualification gained. Progress tests and class work are not considered when calculating the final result. ESaT binds itself to ensure that the design of the ESaT certificates will comply with the certificate requirements as published by the MFHEA and revised from time to time.

b) Personalised Programmes

1. SPECIFIC REQUEST: The ESaT website gives an overview of the services offered by ESaT. ESaT can also tailor a programme to suit a client's particular needs or objectives. Once the potential client has explained their requirements, ESaT assesses whether the request is in line with the course types that can be offered and with the availability of the centres across the territory.

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2. ANALYSIS OF THE STUDENTS' REQUIREMENTS: **Placement Test and Student Needs Analysis.**

To identify the training requirements of the client, and to ensure that he/she has the necessary prerequisites, it is essential to start by assessing the students' present language proficiency, either through a Placement Test or RPL. The initial Level Indicator Placement Test consists of an automated reading and language use test, which provides an initial indication of level. Next, a written and/or oral test is completed in the ESaT Centre. The Written/Oral part consists of a meeting with a Senior Teacher who assesses the students' production skills in the foreign language. The Senior Teacher records the results and any additional notes on the dedicated Written/Oral Assessment Form.

The Senior Teacher then completes the Student Needs Analysis Form. The level the student wishes to achieve is thus established, also taking into consideration his/her expectations and availability. Senior Teacher records the results and any additional notes on the dedicated **Oral Assessment Form**.

Learners joining a course may be exempt from sitting the Placement Test if they provide proof of having successfully completed a recent (proof/certificate not older than 12 months prior to course commencement) MQF accredited course, 1 level lower than the programme they are applying for. In case of doubt, the Qualifications Manager may request that the student sit the placement test which will determine their current level of performance.

The Senior Teacher then completes the **Student Needs Analysis Form**. The level the student wishes to achieve is thus established, also taking into consideration his/her expectations and availability.

3. QUOTATION – PERSONALISED PROGRAMMES: Before a personalised programme is developed, a quotation is issued. Based on the results of the feasibility study, the Managing Director or his/her assistant then consult with Qualifications Manager/s of the centre/s potentially involved to confirm availability and prepare the offer, which should include:

- the total duration of the course (in hours),
- the course level/s for the students concerned,
- the centres where the courses will take place,
- the hourly rate,
- the teaching materials needed, as well as costs,
- any certificates to be issued,
- reports.

The contract conditions are also included, listing the obligations and responsibilities of ESaT, the client and any third parties, as well as the reference person/s for the training activities, the costs and payment methods, the offer validity period and the methodology used when carrying out periodic satisfaction surveys on the service provided (by means of a questionnaire). The offer is then submitted to the Managing Director, who checks, approves and signs it before it is sent to the client.

If the offer has expired without having been accepted (the timeframe varies), the Course Director contacts the potential client to check whether or not they are still interested.

4. ACCEPTANCE AND REGISTRATION: To enable ESaT to proceed to the next step, the potential client must return a signed copy of the quotation. Any subsequent contract amendments must be analysed and assessed by the Managing Director prior to being accepted.

Once the client has signed an offer for the provision of training courses, the Director of Studies must:

- organise a meeting (face-to-face or online) involving the Qualifications Managers of ESaT centres involved, to discuss the training programme/s in view of the contract signed with the company.
- submit the contract to the branch(es) chosen to provide the training based on the type of contract signed by the client, either before or after the assessment process. The contract must define the training content, goals, duration and hourly fee for the work provided, the service conditions etc.

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5. DEVELOPMENT OF THE PERSONALISED TRAINING PROGRAMME:

Based on the information gathered in the previous phase, a training programme is developed. When designing a programme, the Academic Director, assisted by academic staff, must do the following:

- define the course contents,
- establish the course duration,
- establish the minimum teacher requirements for the type of course,
- select teaching materials,
- establish programme review periods,
- establish course outcomes,
- establish number and frequency of progress tests,
- design progress tests and final tests,
- create marking scheme.

All this information is included in the 'Course Information Sheet', which is also shared with the client for approval.

6. COURSE REGISTRATION: All students participating in this personalised programme are then registered onto the ESaT platform which automatically generates a welcome email, including login credentials.

7. COURSE COMMENCEMENT

-During the first lesson, the students are given an Induction by their teacher. This is aimed at providing them with details on the programme, assessment, attendance, teaching approaches, centre resources and centre staff and their responsibilities.

-All course material is handed out after the third lesson. This allows the teacher time to assess whether the group is homogenous and whether there are candidates that have to be moved. In this case, the teacher must first speak to the QM to discuss the best options for the student.

-The teacher has to follow the Course Programme when preparing the Schemes of Work.

-Records of Work and Registers must be completed after every lesson. These documents can at no time, leave the Centre. These documents are stored at reception and the relevant material transferred once monthly onto the ESaT platform to ensure that all data is accessible and stored securely. All processes related to course delivery are recorded on the RoW and Register, which lists the students attending the course as well as any issues encountered during the course.

Moreover, the students' progress (tests, final exams, tutorials and teacher comments) is recorded on the **Student Evaluation Report**, to assess the conformity of the service provided with the goals set during the planning phase.

-NB. Once ESaT transitions to an electronic register format, no hard copies will be required.

The delivery of the course/s is subject to specific operational procedures to ensure that the course/s conform/s with the set minimum standards. The DoS carries out random checks to ensure that all courses conform with the set minimum standards. During the course, the activities are monitored by means of dedicated assessment tools: satisfaction surveys and progress tests. These assess:

- Student Progress,
- Customer Satisfaction.

These tools provide ESaT with the necessary information to assess the students' progress and to check whether they are satisfied with the service provided. Client feedback can also be obtained by

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means of a third tool, namely the Complaints Form. Any complaints received are dealt with within 48 hrs. Every complaint is considered in breach of the IQA and must be resolved through corrective measures to prevent the issues from repeating themselves. The feedback forms are loaded onto the ESaT platform and the QM is responsible for monitoring that student satisfaction does not drop below 80%. The QM must also prepare a summary report on student feedback for all courses organised.

It is ESaT policy to constantly seek to improve its services, and to improve its performance mainly through the clients' response to the quality measurement tools used. All staff is informed on the students' needs and are instructed to tackle any problems that may arise immediately.

9. FINAL ASSESSMENT: Clients that book specific courses which are not MFHEA accredited may request a final test at the end of the course. In this case, the Director of Studies must be informed and the order placed on the management software for exams and certificates.
At the end of Personalised Courses, a Certificate of Attendance is issued. The certificate includes information about the course title, level, duration and attendance.
10. Assessment of courses that are not MFHEA accredited are marked by the Qualifications Manager or Senior Teacher of the ESaT centre concerned.
11. PUBLISHING OF EXAM RESULTS: Exam Results are issued to the individual candidate profile a **maximum of 15 working days** after the final examination date.
12. ISSUING OF CERTIFICATES: Certificates will be issued on the same date that the results are published on the ESaT platform. In case of serious malpractice, maladministration or inaccurate results discovered as a consequence of an appeals process, ESaT reserves the right to withdraw all issued certificates for that session.
(Centre Director and Qualifications Manager Handbook pg.38).

Teaching Staff

Commitment to Teacher Recruitment and Development

ESaT has formalised **Recruitment Procedures** for its staff, mainly teachers and full-time staff. The purpose of these procedures is to identify the recruitment and selection process for employing staff at Educational Services and Testing Ltd once the responsible manager identifies the need to either recruit personnel due to an increase in the workload or due to the need for specific expertise not already present in the company. These standard procedures not only guarantee a fair outcome to all candidates but also ensure that key personnel at ESaT are always fit for purpose.

ESaT Teachers are regarded as the ambassadors who shoulder the responsibility of delivering the quality product professed by ESaT.

“Everyone who remembers his own educational experience remembers teachers, not methods and techniques. The teacher is the kingpin of the educational situation. He makes or breaks programmes.” - Sidney Hook.

In the recruitment of teachers, the selection process is of paramount importance since success depends on the attitude to teaching and learning.

The **Teacher Recruitment Handbook** offers centres a very useful tool when:

- trying to understand the centre’s recruitment requirements,
- vetting CVs,
- advertising vacancies
- preparing the interview

A detailed Job Descriptor (**JD20**) ensures that all those involved in the recruitment process (Qualifications Managers, senior teachers, and the candidates themselves), fully understand the role and the duties that come with it.

The **Academic Staff Minimum Requirements** establishes the minimum requirements accepted by ESaT for any specific academic role (QM, teacher, assessor, DoS...).

Selection will be based on merit, that is determined through an assessment of an applicant's qualifications, experience, standard of work performance and personal qualities relevant to the requirements for the position and relative to the credentials and attributes of other applicants. This selection process will be further aided through the use of the information and interview questions laid out in the ESaT Recruitment Handbook - Teachers, which provides a logical and practical guide to follow when recruiting a new Teacher. This process includes, but is not limited to, the opportunity to observe a prospective new Teacher demonstrating a lesson so as to allow the selection committee to evaluate the practical ability of the prospective new Teacher, under lesson delivery conditions.

Applicants will not be questioned in relation to age, gender, marital status, pregnancy, family responsibilities, racial or ethnic origin, religious or political affiliation, disability status, sexual preference or transgender status, except where the position is an identified position (that is, a particular characteristic such as ethnic origin or language background is included in the selection criteria).

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Educational Services and Testing Ltd may make such other enquiries as deemed appropriate to validate the selection process, provided that the applicant's current employer shall only be contacted with the applicant's consent.

Professional development

ESaT is interested in supporting and furthering the development of teachers and pledges to provide teachers the opportunity, both financially and professionally, to continue their professional development. (A sponsorship scheme should be put in place. A budget must be put aside to enable QM's to propose a number of their teachers to follow seminars and courses. The number of teachers should be a percentage determined by the size of the school. Teachers would then be obliged to pass on what they have learnt to the rest of the staff.)

QM's should create a climate of learning by encouraging teachers to take responsibility for their own professional development. QM's are in the ideal position to provide the means to facilitate this endeavour and subsequently reconcile and align it to the school's vision of standards, expansion and innovation.

The concept of reflective practice enables teachers to acquire deeper insight into their own teaching. Thus, peer observation, drop-ins, observations and appraisals should become the norm. It is important, however, that teachers **do not view this opportunity negatively** but consider such actions as **self-beneficial, as valuable practice providing them with a competitive edge leading to further opportunities within the organization and within the ELT community.**

It encourages teachers to reflect and evaluate their own classroom practice, review their approach and to achieve personal development.

It places the responsibility for their development in their own hands, thus mirroring the approach to learning autonomy which ESaT expects its teachers to generate in its students.

Success depends on a clear vision and philosophy. Observations, peer observations, drop-ins and appraisals will only work if it is made abundantly clear to all teachers that the observer/ appraiser is essentially there to support the teacher's efforts to learn from, and reflect on, their current practices.

It is recommended that teacher development workshops should be organized to give teachers the opportunity to examine the aims behind such procedures held in each ESaT centre, to voice any negative and self-destructive feelings in order to be able to develop the appropriate attitudes and expectations towards such procedures.

It is the QM's responsibility to ensure that such procedures serve as a teacher-supportive and developmental function. Our aim should be to create a **non-threatening environment.**

Continuous Professional Development (CPD), then, is the mainspring for ESaT's Core Values, though there is a need to reconcile staff's individual priorities as teachers with those of the school as a whole.

An initial limited list of topics could be examined to give teachers an idea of the range of possible focal points that might be selected.

The most important target outcome of such sessions has to be that participants come away fully aware that these focal areas represent sites for teacher growth, dialogue and reflection.

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It is the QM who carries out observations and appraisals. In the case of bigger schools, it is up to the QM to co-opt suitably qualified academic staff to carry out the observations.

Within an academic year, teachers will get the following:

Annual Teacher Observations & Appraisal		
Obs. 1	Obs. 2	Appraisal which validates Obs. 1 & 2

It is planned that the **ESaT platform** have a dedicated section for teachers, which contains:

- general guidelines for teachers,
- information about workshops and training sessions,
- sample tests,
- details relating to international training events,
- dedicated handbooks for teachers (see Teacher Handbook): the final examinations are based on the same broad aims and objectives as the courses and are in line with other language tests currently on the market. The tests are also aimed at having a positive 'washback' on the course of study by setting standards and providing a concrete qualification for higher education purposes or career advancement. Dedicated handbooks for the teacher and the examination candidate provide clear guidelines on (for the teacher) the rationale behind each and every task in the examination papers, and (for the candidates) on how best to prepare for the examination.

The handbooks also contain...

- test specifications,
- a sample test including answer key.

In the event that a teacher requires information which is not covered in the handbook or included in the ESaT website, they can contact their local Centre for assistance.

Employment

As stated in the **Centre Contract**, the Centre Director pledges and agrees to provide/allow specific training to the Qualifications Managers, Teachers, Oral Examiners and all testing staff. The chosen candidate/s will participate in online tutorials and must be familiar with the ESaT levels, syllabuses and all Academic material relevant to their role.

The Centre Director also pledges and agrees to offer employment conditions in-line with national legislation and standards.

All teachers are to receive the following:

- A contract in line with the national standards
- Job Descriptor 20
- Teacher's Manual

Learning Resources and Student Support

Students are informed about all Learning Resources and Student Support offered at every ESaT centre during the first encounter with their teacher. A power point presentation has been prepared by ESaT centrally, which can then be personalised by the individual centre. The Presentation includes information about the following:

- Teaching approach,
- Staff and relevant roles,
- Course duration,
- Course timetable,
- Attendance policy,
- Learning resources available to the students,
- Student support,
- Progress test and final assessment,
- Complaints procedure,
- Feedback Forms.

Learning Resources

As stipulated in the ESaT Centre Contract appendix, every centre should be equipped with the following training tools and instruments:

- **Wifi:** Ideally, rooms used for training purposes should have WiFi access. This connection must be secure and protected by a secret password. Where possible, a separate line to which only centre staff have access and protected by a password should be available.
- **Classroom Sound System:** Poor speaker characteristics, inappropriate sound levels and reverberations can make listening activities unnecessarily difficult thereby demoralising students. All rooms are expected to have a sound system adequate to the size of the room.
- **Interactive White Boards (IWBs):** Ideally, all rooms used for lessons and training should be equipped with modern teaching tools such as IWBs.
- **White Boards:** There should be a White Board in every classroom.
- **Computers:** A minimum of one computer for use by students and candidates is to be present in every Centre.

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Student Support

Learner Support is provided in various ways:

1. Given the broad objectives of the course, there is no reading list. The programme revolves around the course syllabus which is activated by the teacher through the chosen course book, viewed as the main resource, supported by additional resource available to them.
 - ESOL course books are selected by the Academic Director together with the Qualifications Managers of the various centres, following a comparative analysis of a set of identified course books in relation to the following:
 - relating the course programme, syllabus and broad objectives to the intended teaching-learning situation as stated by the publishers of the books under review (i.e. earmarked course books need to complement the course syllabus and reflect the broad communicative approach advocated by ESaT., thereby maximizing teaching and learning)
 - analysis of the prescribed methodology and syllabus of the identified course book/s
 - comparative analysis of selected sections of identified course books
 - The selected course book is changed every 3 - 4 years, or earlier if deemed necessary, so as to:
 - reflect latest development in ESOL teaching
 - provide up-to-date scenarios and topics
 - cater for return students' needs
 - encourage creativity in teachers which are more book-bound than others
2. Tutorials: These are provided by the class teacher on a 1to1 basis, as and when requested specifically by the student, and as deemed necessary by the teacher, based on his/her assessment of the student's performance during tasks and activities held in class as well as his/her performance in assignments and progress tests
3. Student Handbook: The various Student Handbooks provide study guidelines and information about the final assessment and how the students can prepare for a successful completion of the course. A Student Handbook is available for every accredited course programme.
4. Admin Staff: These provide students with assistance whenever it is requested. All Admin. staff members are knowledgeable about course programmes available, exam session dates, booking procedures, information on course costs and payment methods, Complaint Procedures etc. They play a key role in ensuring that the students have a smooth and enjoyable stay in our centres.
5. Student Evaluation Report: This provides the student with a detailed analysis of their strengths and weaknesses, progress made during the course as well as recommendations to continue progressing.

Information Management

ESaT stores all data online. Due to the sensitive nature of this data, learners and all other users, are required to consent to the storage of their personal data the first time they log on to the ESaT platform after profile creation. In the case that the request for consent is declined, the platform will block access to the user profile. ESaT has recently updated its Data Collection and Privacy Policy to ensure that all students, candidates and users are aware of how ESaT handles their data, what is done with it and to inform them about their rights.

ESaT only uses personal information in the following ways:

- a. When it is necessary for our legitimate interests:
 - to enable us to supply products and services and information that a learner/user has requested
 - to help us in the development of, and to improve our products and services
 - to provide a learner/user with information about products or services that may be of interest to them, using the email address which they have provided or via social media
 - to invite a learner/user to participate in market research activities, such as responding to interview questions or completing online surveys
 - to send a learner/user marketing communications, and show them marketing communications on other websites (including social media sites where they are a member)
 - to ensure that content from our website is presented in the most effective manner for them and their computer
 - to automatically collect data about visitors to our site (for example browsing patterns) by using cookies
 - to maintain our website and ensure network and information security
 - to prevent and detect fraud and other criminal offences as long as, in each case, these interests are in line with applicable law and your legal rights and freedoms; or
- b. where a learner/user has agreed to this for specified, explicit and legitimate purposes; or
- c. where this is necessary for legal obligations which apply to us.

Qualifications Managers are responsible for the uploading of data for their centre.

This data is obtained through the:

- a) Student Application Form, which includes information such as:
 - Name and surname
 - Age
 - Gender
 - Address
 - Email address
- b) Needs Analysis
- c) Placement Test
- d) Progress Tests

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- e) Final Exam
- f) Feedback Forms
- g) Attendance
- h) Copy of Identity Card (National Identity Card/Passport)

This data is regularly monitored by the Academic Director who then prepares an annual report that is presented to the Managing Director and the Board of Directors. The following are examples of how the data collected can help ESaT improve their products and services:

- In the case of a Centre performing below the expected standards, an immediate inspection is to be carried out to better understand the reasons behind such a poor performance and to find ways of improving the performance in the shortest time possible.
Such centres will remain monitored for a 6-month period and if necessary, a second inspection organised before a final decision is taken.
- The Academic Director might also find the data useful in detecting bias towards a particular age group, gender or culture. In such instances, a thorough analysis of the assessment will be carried out to eliminate such bias and in so doing ensure a fair and objective assessment to all candidates.
- The Managing Director is also provided with valuable data on the typical students that attend ESaT courses. This information can guide him/her when planning future strategies together with the Board.

Retention Statement

It is our policy to retain your personal data for the length of time required for the specific purpose or purposes for which it was collected, which are set out in this Privacy Policy. We may keep data which has been anonymised for up to forty years to allow us to carry out analysis of our products and services and also to enable us to issue replacement certificates in case of loss or damage.

Rights of the Data Subject

As an individual you may exercise your right to access the data held about you by submitting your request in writing to the data controller to the address below: ESaT – Calm waters – Block A Flat 9 – Dun Anton Debono Str. St Julians STJ 1470 Malta. Although all reasonable efforts will be made to keep your information updated, you are kindly requested to inform us of any change referring to the personal data held by the data controller. In any case if you consider that certain information about you is inaccurate, you may request rectification of such data. You also have the right to request the blocking or erasure of data which has been processed unlawfully.

Public Information

ESaT publishes all material regarding its activity on the ESaT website.

The ESaT website provides guidelines and handbooks for all stakeholders as well as detailed information about:

- the different suites of exams offered by ESaT,
- the teaching, learning and assessment procedures used,
- further learning opportunities for the learners,

- the various services offered by ESaT.

The website will also include:

- student minimum requirements and prerequisites,
- learning outcomes,
- information about our qualifications such as the EQF/MQF level,
- number of ECTS learning credits

The Responsible Officer is in charge of publishing all relevant material to guarantee compliance of ESaT with its Conditions of Recognition, on the ESaT website, and that the information is updated and correct.

Ongoing Monitoring and Periodic Review of Programmes

Monitoring and Evaluation is a continuous management function to assess if progress is made in achieving expected results, to spot bottlenecks in implementation and to highlight whether there are any unintended effects (positive or negative) from a programme and its activities.

The processes of planning, implementing and evaluating is intended to aid decision-making towards explicit goals. Planning helps to focus on results that matter, while Monitoring and Evaluation facilitates learning from past successes and challenges and those encountered during implementation.

Elements of the ESaT Monitoring and Evaluation system - which if developed together with all key stakeholders will encourage participation and increased ownership of a project are:

- (a) Monitoring and Evaluating: a description of the functions required to gather the relevant data on the set indicators and the required methods and tools to be used. Monitoring and Evaluating are used to systematically collect specific data to be assessed,
- (b) indicating roles and responsibilities of project stakeholders. It ensures that relevant progress and performance information is collected, processed and analysed on a regular basis to allow for real-time, evidence-based decision-making,
- (c) the various processes and methods for monitoring (such as regular input and output data gathering and evaluation, participatory monitoring, process monitoring) and for evaluation (including impact evaluation and thematic surveys, economic analysis of efficiency, and
- (d) the ESaT Platform, which is an organized area where data is stored (often georeferenced) to assist managing key numeric information related to the project and the analysis. It is a very sophisticated and comprehensive software management system which has been developed with the specific demands of educational institutions in mind. The system has been developed and fine-tuned over the past years. New development, iterative improvements, and updates to the system are ongoing.

This IT system manages/will manage, among other functions, the following:

- Storage of all test items: all items are loaded onto the platform
- Student, course and test session bookings: issuing of appointment sheets, student lists etc.
- Student attendance
- Manages payment of courses by centres and students
- Feedback from various stakeholders
- Test paper printing
- Data from various centres is collated into one document to provide an overview of concurrent sessions
- Marking of test papers: optical marking and clerical marking (results input by the assessors and examiners)
- Issuing of results
- Generation of reports on student performance

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When preparing the ESaT Monitoring and Evaluation system, Director of Institute/Managing Director must allocate sufficient:

- funds (for information management, client monitoring activities, classroom observations, surveys, etc.),
- time (to train staff and partners, monitor and reflect),
- capacity and expertise (to support Monitoring and Evaluation development, skilled and well-trained people required for good quality data collection and analysis) for Monitoring and Evaluation,
- flexibility in project design enabling the Monitoring and Evaluation system to influence the project strategy during implementation.

Monitoring and Evaluation tools (means of verification) have to be defined. Examples are semi-structured interviews; focus group discussions; surveys and questionnaires; regular workshops and roundtables with stakeholders. Frequency and responsibilities for applying the tools, for analysing relevant information and for reviewing this information must be specified.

ESaT collects and analyses Feedback from various stakeholders including candidates, teachers, centres, invigilators, markers, assessors and examiners. This data is stored on the ESaT Platform and guides the development of future tests.

To further ensure that any shortcomings are addressed either before or as soon as they occur, ESaT is in the process of creating an Internal Audit document for the Head Office, to guarantee the quality of the development and delivery of the product and to update the product where necessary. The outcomes of such an audit should guide the development and processes of the product.

PLANNING STAGE

Foundations for strategic planning are laid by:

- determining the purposes of the plan;
- identifying stakeholders to include in the process;
- determining what information, roles and resources are necessary for the process and
- developing the timeline for it.

To prepare for the planning process, the **Director of Institute/Managing Director, Academic Director and any other relevant stakeholder/s meet to discuss the following questions:**

- What is the purpose of our strategic planning efforts?
- What is the timeline for the strategic planning process?
- When will we hold meetings?
- When do we need to complete the plan?
- What resources do we have for the strategic planning process (e.g., meeting space, computers to take minutes, budget, human resources...)?
- What resources do we lack, and how can we obtain them?
- What internal and external data do we have that can inform the process?

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At the end of the Planning Stage, the following will have been achieved:

- (1) the purpose of the strategic plan established,
- (2) a workgroup formed, and
- (3) the data necessary to inform the planning process identified.

Market Analysis: The Managing Director regularly requests market analyses, periodically reassessing the demand for training and testing services (before developing or proposing new training programmes and testing suites or modifying existing programmes and test suites) to get an insight into the requirements on the various territories.

The market analysis includes:

- an analysis of the requirements of both individuals and organisations/institutions,
- data obtained from past editions of training programmes or test suites,
- a comparison with the training and/or tests offered by competitors,
- sector development and trends,

The Managing Director is responsible for defining the criteria, methodologies, tools, information sources, responsibilities and timeframes for each market analysis.

The sources to be analysed include requests from other centres, feedback from various stakeholders, specific publications, newsletters etc.

Information provided by institutions such as local and international authorities and institutions, or sectoral organisations, may also be used.

Products and services offered by competitors may also be analysed to assess the way forward, and the results achieved may be compared and evaluated.

The Managing Director analyses the data based on market requirements as well as all the other information that emerged from the market research. The results are used as a reference tool for the development or improvement of products and services.

Ensuring that Course Objectives are being achieved

Assessment of accomplishment of Course Objectives of any one course is subject to the following structure based on the **ABCD Guidelines**, as suggested by Educational psychologist and theorist **Robert Mager**:

A = Audience

Who are the learners on the course?

B = Behavior

What are the learners on the course expected to do, accomplish or retain? Unambiguous behavioral statements will help course designers create content that clearly aims to achieve those objectives. Learning outcomes are regularly monitored by the class teacher during guided learning hours, which in turn are based on the same broad aims as the Learner Outcomes.

C = Conditions

How will learning take place? This may also include context regarding **where** learning will take place, or the **tools and resources** related to the learning.

D = Degree

When is a particular learning objective considered to be successfully met? This is the standard against which the learning objectives will be measured.

Examples of Clear Learning Objectives

- At the end of the course, students will be able to write formal and informal letters and emails for a variety

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of transactional purposes e.g. applying for a job, complaining, thanking, giving advice, apologizing, requesting, etc.

- On completion of this course, learners will be able to exchange information about themselves and take appropriate turns in a conversation.

Typing Course Elements to Learning Objectives

- The design of the course is based on a 'continuous-improvement' process, with interconnected components in each of its six modules.
- The design process of the course initially identifies the desired, **measurable learning outcomes** which support the course objectives, which, in turn, lead to the 'deliberate' design of learning experiences in the syllabus (i.e. Recommended communicative tasks and targeted skills/interaction, these being the two key notions underlying course content, thereby ensuring purposeful use of language as an aspect of classroom language use). This provides useful guidance on the linguistic features which students on the course are, realistically, required to master at any particular level and facilitates 'measurement' of the learning outcomes, which can be instrumental in the revision and 'renegotiation' of course content in the interest of achieving optimal experiences.
- **Course Syllabus:** Consequently, the course programme mirrors the earmarked learner outcomes at any particular level. The syllabus lists a variety of communicative tasks which are meant to help learners feel a degree of accomplishment in using the language, rather than simply studying the structure of the language in a sterile fashion. The syllabus is not meant to be prescriptive – indeed **the modular structure should allow the teacher full freedom to select areas of language which he/she feels require attention, or merit further development. The teacher is encouraged to use the syllabus as a guide to help him/her tailor course content to the general needs of his/her class, as indicated through Needs Analysis sessions.**

Syllabus structure: A series of six 'independent' units, each with an over-riding focus on communicative tasks. Each module provides a bank of ideas, thereby ...

- helping the teacher plan a weekly/monthly scheme of work around it
 - providing guidelines on how to prepare lessons which can guarantee definite improvement in the learners' communicative competence
 - facilitating the selection of specific tasks to be covered in class to aid revision and/or extension of learners' overall competencies and language knowledge, *and*
 - earmarking tasks which can easily be used for self-study purposes, active self-study being an all-important component of the course structure.
- **Assessment:** The earmarked mode of assessment - used for diagnostic purposes at Progress Testing stage and as a proficiency test for Final Assessment is designed to assess the candidates' level of competence relating to language systems and language skills, in line with performance-related scales based on the ALTE 'Can Do' statements (<https://www.alte.org/>) relative to Level B2 of the CEFR (<https://www.coe.int/en/web/common-european-framework-reference-languages>)
[See TELSA Level B2 Exam Syllabus and Assessment Guidelines]

IMPLEMENTATION STAGE

The Academic Director, guided by the data provided by the Centre Director/ Managing Director, makes the necessary changes to the course and/or tests.

Trialling Courses and Tests

When possible (depending on student availability), all reviewed courses and tests are trialled on a small group of students before being put on the market. The Academic Director, assisted by Qualifications

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Managers, tasks a Senior Teacher with this important step in ensuring a quality product. The teacher keeps a 'diary' of strengths and weaknesses of the programme as well as insights gained during the course. Feedback is collected from students, teachers, invigilators, assessors and Qualifications Managers, as well as all data available from placement tests, progress tests and final exams. At least one focus group, led by the Academic Director or the Qualifications Manager, is held while a course is being trialled. **Communicating changes to Products and services**

The **Academic Director** will take all reasonable steps to protect the interests of the learner in relation to a qualification it modifies:

- a. Clear and accurate information will be provided to Centres, teachers, students and any other institutions effected by the change.
- b. Transition arrangements will be published and provided to Centres, teachers, students and any other institutions effected by the change.
- c. ESaT recognises its responsibility to give reasonable notice to all stakeholders of its intention to modify a qualification. A 12-month notice is given to all stakeholders before a qualification is modified.
- f. Information about any changes made to a qualification will be published on the ESaT website and detailed communication sent to ESaT centres. Also, all relevant handbooks and guidelines will be updated to reflect the changes to the programme.

Training of staff and updating of Handbooks, Manuals and Guidelines

It is of extreme importance that sufficient time and resources are allocated to ensure that all ESaT staff members are given the necessary training and provided with all the necessary information to enable them to efficiently deliver the course programme. The Academic Director assisted by the various Qualifications Managers will be responsible for delivering the training.

The Academic Director will be responsible for guiding the update of all Handbooks, Manuals and Guidelines.

EVALUATION STAGE

The review process is an integral part of ESaT's quality assurance system. The responsibility for ensuring the quality and standards of individual courses lies with the Academic Director.

The Academic Director will:

1. ensure that course reviews are conducted and that the recommendations from these reviews are implemented.
2. develop a schedule for course reviews, determining which courses require an in-depth review.
3. ensure that courses are reviewed every three to five years and that consideration is given to course performance, assessment outcomes, topics taught and quality of materials.
4. ensure high fail rate courses be the subject of an in-depth review (regardless of when they are next due for their cyclical 3 to 5 yearly review).
5. provide a report of course reviews conducted and the key outcomes of these reviews to the Managing Director/Director of Institute.
6. ensure that feedback on the course review is provided to students.

Current Process

Self-evaluation and continuous improvement

- a) ESaT carries out an annual review to assess its procedures and when necessary, to make improvements based on evidence. Review takes place as an on-going part of a corporate culture, which continuously seeks to optimise its procedures for the benefit for all involved.

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- b) The procedure is to review practice against the Regulatory Arrangements for the Qualifications and Credit Framework and summarise strengths and areas for development. Information is gathered from the minutes of meetings, staff meetings, logs and formal and informal feedback.
- c) Whether a programme is reviewed or not might be influenced by other factors, namely:
 - feedback data,
 - curriculum reviews,
 - program and accreditation reviews,
 - low or decreasing enrolment numbers,
 - high attrition rates (number of individuals who leave a programme of study before it has finished).

Lines of responsibility

- d) The Academic Director is responsible for compiling the evidence for the evaluation.
- e) The Academic Director is responsible for reviewing the evidence and presenting it to the Board of Directors during a meeting.
- f) The Qualifications Committee can then take an informed decision and decide whether a change is necessary or not.
- g) The Responsible Officer in his dual capacity as Responsible Officer and Director of the organisation is responsible for ensuring actions identified are executed and reported to the relevant stakeholders.

IMPROVEMENT STAGE

This model provides the Academic Director and the Qualifications Committee with a powerful tool for improving the way in which future iterations are created. Getting feedback on every aspect of the course is really important so that the programme can be improved and revised.

Focus needs to be placed on the following:

- Did we meet the goals as set out in the planning stage?
- All feedback analysed and if necessary, the relative course or test material, pushed back to planning stage.
- Identify other training requirements.
- Possible change in media types or approach.

One way that ESaT collects feedback is by asking learners, teachers, assessors and Qualifications Managers to complete surveys during the course. Specific questions target the points above, but we feel it is also important to encourage stakeholders to give feedback in a free text box so that any gaps which may not have been thought of will be highlighted.

One of the duties of the Academic Director is to analyse and summarise all key feedback and data in the Academic Director Report. This process is instrumental in maintaining standards (i.e. by investigating reports of malpractice, by investigating complaints on quality of delivery, by investigating claims of unfair access in the design of any particular test and request for revision of papers), and ensures further development of the course and test papers and procedures so as to meet the market demands.

The report is presented to the Managing Director/Head of Institute and the Qualifications Committee. Based on this data, an informed decision can be taken on the type of effect the changes had on the programme and what actions, if any, need to be taken to ensure that the objectives set out at Planning Stage have been met.

Cyclical External Quality Assurance

ESaT pledges to comply fully with the content of the documents submitted to the MFHEA in relation to ESaT qualifications as well as any other undertakings given to the MFHEA. Furthermore, the organisation binds itself to adhere to, promote and enhance a quality culture, first, through the submission of this IQA document.

Once ESaT is issued the license, our second commitment is towards the enhancement of quality through an MFHEA QA audit every 5 years.

Following the audit and the publication of the Report, ESaT will analyse the identified good practices and recommendations indicated by the panel as well as action plans developed internally and follow the action plan to make improvements in the entity and the programmes offered.