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## **DESIGN CHALLENGES FOR AN E-LEARNING ACCREDITATION SYSTEM FOR THE REPUBLIC OF MALTA**

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### **Introduction**

In response to an increased demand from education providers, including offshore educational providers, the Maltese Government has decided to examine the design of a national accreditation system for e-learning in Higher Education, with particular emphasis on non-traditional forms of education such as MOOCs. This paper describes the first two steps of a design thinking approach, to consider the challenges and opportunities which are informing the thinking of policy-makers, and examines the scenarios which may arise out of each one, with the aim of providing a basis for future ideation, prototyping and testing of an accreditation system.

### **Context**

Malta has one of Europe's smallest Higher Education Systems, with approximately 12,600 students in tertiary education in 2014 (Eurostat, 2016). Traditionally, the educational system has been dominated by three large public providers, namely the University of Malta, the Malta Centre for Arts, Science and Technology and the Institute of Tourism of Studies, which have accounted for the large majority of this cohort (Eurydice, 2012). In recent years, the number of Higher Educational Institutions has increased significantly, with over 30 institutions accredited as Higher Education Institutions, i.e. to offer qualifications at levels 5 through 8 of the European Qualifications Framework (EQF), and a further 45 accredited to offer qualifications at EQF 1 through 8, although in most cases these offer a majority of courses at levels 1-4 (National Commission for Further and Higher Education, 2016).

All qualifications in Malta are mapped to the Malta Qualifications Framework (MQF), which is made up of eight levels and which are mapped on a 1 is to 1 basis to the European Qualifications Framework (National Commission for Further and Higher Education, 2016). The Maltese system for accreditation of institutions and programmes is run by the National Commission for Further and Higher Education (NCFHE), which serves as Malta's Quality Assurance Agency for Higher Education, its qualifications recognition information centre as well as the government's policy and research arm for Higher Education.

Maltese legislation (provides for three kinds of accreditation, namely:

- accreditation of institutions by law (self-accrediting) – this is a privilege limited to the three public institutions mentioned above;
- accreditation of institutions by the National Commission for Further and Higher Education – institutions need to be a body corporate, as well as meet criteria linked to:
  - having an accredited programme on the MQF or EQF;
  - performing due diligence tests on the head of institution and academic staff;
  - establishing and maintaining an internal quality assurance policy;
  - complying with venue regulations;
- accreditation of courses, programmes and modules – all qualifications which are linked to the Malta Qualifications Framework require accreditation, either by NCFHE, or by the self-accreditation institution.

All institutions must additionally undergo periodic quality assurance reviews to maintain their licensing. These are conducted according to the Maltese Quality Assurance Framework which was designed to be in full harmonisation with the European Standards and Guidelines for Quality Assurance in Higher Education. It is envisaged that this will be certified through an application to the European Quality Assurance Register in the near future.

### ***Policy trends***

Maltese educational policy in the field of further and higher education for the years 2009-2020 envisage a set of 12 strategic priorities (National Commission for Higher Education, 2009) which include objectives to:

- attract more students to continue their studies after compulsory education into post-secondary and university studies;
- attract foreign fee paying students to study in Malta in various fields of study and research;
- assure quality provision across all institutions and their programmes.

It is forecast that meeting these goals requires a significant expansion in higher educational provision (both in terms of volume of students catered for by current providers, as well as by the entry of new providers into the system), as well as a significant increase in quality assurance regulation and activities. While no mention is made of e-learning in 2009 policies, the recent Higher Education Strategy for Malta makes specific mention of promoting the development of e-learning as a means of widening participation in Higher Education (Ministry for Education and Employment, 2015).

The last 18 months have seen intensive policy activity in the areas mentioned above. The government has been actively incentivising foreign HEIs to open institutions in Malta with the result of nine new higher education institutions being accredited. Increasingly, e-learning is being seen a way to accelerate this expansion, with the government beginning several exploratory initiatives, including workshops on e-learning quality for local higher education

providers, and the commissioning of a report on opportunities arising out of MOOCs and other non-traditional forms of Higher Education.

## **Objectives of an accreditation system for online learning**

Malta has a significant tradition of using legislation to not only regulate sectors, but also to provide appropriate incentives for growth of local industries, and attraction of foreign players into the market, while at the same time maintaining high standards of consumer protection in full compliance with European Union legislation. This approach has led to enormous growth of a number of service-based sectors in Malta including with regards to aviation, shipping, financial services, internet-gaming and healthcare.

Taking this into account, the possible objectives of an accreditation system for e-learning come into frame, namely to:

- provide incentives, via a light, robust and recognised regulatory framework, for both local and foreign players to open e-learning institutions within Malta;
- ensure a high level of protection for all students studying with Malta-based providers, as well as for Maltese students pursuing education from non-Maltese providers;
- ensure full compliance between the Maltese regulatory framework and European instruments for recognition and portability, in particular the ESGs, EQF and ECTS;
- allow for sustainable growth of quality assurance and accreditation services, in line with the above priorities.

Thus, a properly designed regulatory framework should lead to increased opportunities for Maltese students for study, increase overall employment in the education sector, as well as increase government revenues, without comprising quality.

## **Challenges to quality system design**

Accrediting online learning, with a particular emphasis on leads to three sets of challenges of inter-related challenges, namely:

### ***Jurisdictional issues***

It has long been recognised that course design, delivery, assessment and award of credit must be viewed as separable processes, which might be coordinated by separate actors, possibly even by separate organizations in different countries, with a multitude of different jurisdictions being involved – a phenomenon known as unbundling (Camilleri et al., 2012). Even within a single course – the administration office, legal representative, course design team and assessment centre might be located in different locations, or even be run by subcontractors.

While providing legal accountability is relatively straightforward, by requiring an institution licensed in Malta to either establish itself in Malta, or at minimum provide for a legal representative based in Malta, regulatory accountability is a much more complex issue. Thus, for example, if an institution is based entirely in non-EU third country, but chooses to offer a

course under the Maltese licensing regime for the purpose of awarding ECTS, should the Maltese regime recognise the Quality Assurance system of the third country, accredit the institution the nationally, or only accredit a programme if there is a foreign (reputable) accreditation?

While not perfectly applicable in this case, the Council of Europe's code of practice for the provision of transnational education states that *awarding* and *providing* institutions are fully responsible for quality assurance and control (Council of Europe, 2002), indicating that verification and control of activities at each site of an institution would be required. However, it does not indicate how to share responsibilities for the control and quality assurance between different regulatory authorities. Rather, the avoidance of double-accreditation is currently left up to mutual agreements between different quality assurance agencies (European Association for Quality Assurance in Higher Education, 2015).

### **Quality management issues**

Challenges around quality management essentially boil down to two issues: scope of the definition of e-learning, and equivalence of e-learning with “traditional” processes. These two issues can be rephrased as:

- What constitutes an e-learning programme, and how is it different from a “traditional” programme?
- What constitutes an e-learning provider, and how is it different from a “traditional” provider?

We postulate that, from the perspective of Maltese regulation the essential difference between an *e-learning* and *traditional* programme is that in the former, the concept of physical contact hours has been replaced with a variety of different options. The table below gives some examples of types of contact hours and their e-learning equivalents:

Table 1: Some examples of types of contact hours and their e-learning equivalents

Purpose of the Contact Hours	Traditional Tool	E-Learning Tool
Transmitting Knowledge (i.e. the teachers' interpretation of information) from the teacher to the student using a variety of media	Lecture	Video-lecture
Answering student queries	In-Class Questions In-Office Visits	Synchronous Communication Tools (chat, video-conferencing, etc) Asynchronous Communication Tools (e-mail, forums, etc)
Supporting Students in Learning Processes	Workshops.	Workshops performed over synchronous communication tools
Checking student knowledge	In-Class interaction (raising of hands, etc)	Formative assessment questionnaires built into a learning management system

Verifying that students still have adequate contact hours in e-learning would again be relatively simple to a well-designed quality management system, however a challenge remains in defining equivalence in contact hours between e-learning and traditional learning tools.

With respect to the provider-level of quality assurance, we postulate that the only significant difference between an *e-learning provider* and a *traditional provider* is that criteria on physical facilities required for the latter make little sense in the context of e-learning/virtual providers. However, as already indicated, the opportunities technology offers for unbundling and trans-national provision, seems to indicate that creating a distinction in QA between purely national, and trans-national providers would lead to a better organization of the QA system.

### ***Issues relating to data and trust***

Any successful system of quality assurance needs to be able to have the full trust of all its stakeholders: namely students, higher education institutions, employers as well as society in general, as represented by the government. In the context of trans-national provision, it also needs to enjoy the trust of these same actors in each country where it operates, or where its qualifications may be recognised.

A number of European tools already exist to help facilitate the build of such trust, including networks of quality assurance agencies, such as ENQA and INQAAHE, processes of external review such as those leading to inclusion in the European Quality Assurance Register, and transparency instruments for qualifications such as the diploma supplement and the EQF.

In the Maltese context in particular, communicating its quality procedures outside of Europe involves the communication of the Maltese system with European norms, regulations and guidelines. It also involves communicating the benefits of, e.g. trans-national provision described in terms of ECTS versus the advantages of other transparency instruments. Should the Maltese system also choose to accredit non-traditional learning such as MOOCs, it will also require the communication of the verification procedures to ensure equivalence vis-à-vis

traditional learning within the European Higher Education Community, to ensure that recognition is granted in the sense of the Lisbon Recognition Convention.

## Conclusions

Having described the context and identified potential problems, the next phase of development should be ideation. Our analysis indicates that the key success factors leading towards a successful system for accreditation which will grow and incentivise the sector will need to:

- provide lightweight accreditation for trans-national providers, through exchange of information directly between quality assurance agencies;
- include a method for verification of information received from foreign quality assurance agencies;
- prove equivalence between non-traditional forms of learning and their traditional counterparts, for the purposes of determining workload, and hence allowing for credentialisation;
- include adequate safe-guards to ensure that Maltese regulatory and legislative bodies have full jurisdiction over all aspects of the operation;
- describe all learning and qualifications in terms of existing European transparency and recognition tools;
- make a convincing value proposition for European-accreditation to non-European based courses and institutions.

Our analysis also suggests that the prototyping and testing phases would benefit significantly from full involvement of European and non-European stakeholders in the sector, so as to integrate their requirements into any framework produced, and increase trust and transparency of the same framework.

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