WHITE PAPER

Quality Assurance Guidelines and Criteria for Providers of English Language Teaching

FOR CONSULTATION

This White Paper contains proposed Quality Assurance Guidelines and Criteria for English Language Teaching Providers.

Following publication and consideration of the outcomes of consultation, this paper will lead to Draft QQI Quality Assurance Guidelines which are proposed for adoption by the Board of QQI. Once adopted, the guidelines will be issued to supplement QQI Policy on Authorisation to use the International Education Mark.

QQI is seeking feedback from stakeholders on the guidelines contained in this White Paper.

Submissions may be emailed to

consultation@QQI.ie

The closing date for submissions is **Friday 14 November 2014.**

In your submission please clearly indicate:

1. *Your contact details.*

2. *Whether you are responding as an individual or on behalf of an organisation.*

3. *If you do not wish your submission to be published.*

(1) INTRODUCTION

The Quality Assurance Guidelines and Criteria for Providers of English Language Teaching (QA Guidelines for ELT) are issued under Section 27(1) of the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act) to supplement QQI Policy on Authorisation to use the International Education Mark. They apply alongside the criteria and conditions outlined in the Policy on Authorisation and compliance with the Code of Practice for Providers of Programmes of Education and Training to International Learners[1].

1.1   WHO THEY APPLY TO

The audience for these QA Guidelines is providers of education and training whose provision is solely ELT, including:

» Providers offering ELT programmes leading to awards made by QQI

» Providers offering ELT programmes leading to awards recognised within the National Framework of Qualifications.

They are, however, consistent with all types of ELT provision in all types of provider and parts of these guidelines *may* apply to ELT provision offered by other types of provider in some circumstances.

They do *not* apply to:

» Providers of ELT programmes to newcomer migrants (e.g. refugees, asylum seekers)

» Providers of academic year placement services for second level schools

» Providers of ELT programmes to young learners (ten years old or younger)

» Providers of au pair placement services with ELT programmes of fewer than 15 hours per week

» Providers of overseas development courses for English Language teachers, or English language teaching qualifications.

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1   Draft Policy on Authorisation to use the IEM and a description of the IEM policy framework are available on www.QQI.ie

1.2   PURPOSE OF THE GUIDELINES AND CRITERIA

These guidelines and criteria specify the areas of provision which are crucial to quality and for which providers are expected to establish and implement policies and procedures[2].

The purpose of the specific criteria is to describe the minimum quality policies and procedures that a provider must be able to demonstrate as being in place, as evidence of the effective implementation of their QA procedures.

The guidelines, however, are not intended to prescribe how providers are to carry out their work, but rather, are intended to guide providers through their responsibilities for the quality of their provision. It is essential for providers to understand that these guidelines are not a 'how to' manual. It is the providers' responsibility to establish their own QA system, appropriate to ELT and their own context.

Specifically, these guidelines and criteria are for use by providers when:

» Establishing QA procedures as part of an application to use the IEM in relation to ELT programmes and services

» Evaluating the effectiveness of those procedures at organisational and programme levels

» Establishing and regularly monitoring critical indicators of quality

» Responding to issues identified (either with quality of provision or the QA procedures themselves)

» Seeking ways to improve performance against indicators

» Providing credible and meaningful information on institutional and programme quality for stakeholders.

The agreement of QA procedures with QQI is the first stage in establishing a provider's lifecycle of engagements with QQI.

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2   Draft QQI Policy on Quality Assurance Guidelines is available from www.QQI.ie

(2) QUALITY ASSURANCE IN ENGLISH LANGUAGE PROVISION

2.1   QUALITY ASSURANCE IN EDUCATION AND TRAINING

QA is a term generally used to describe the processes that seek to ensure that the learning environment (including teaching and research) reaches an acceptable threshold of quality. QA is also used to describe the enhancement of education provision and the standards attained by learners.

Quality assurance of provision is primarily the responsibility of the provider. This responsibility includes the legal obligations of providers and should extend to areas including (but not limited to): teaching; assessment; the curriculum; the learning environment; human resources (including teaching staff); Access, Transfer and Progression (ATP); learner support services; finance; planning; partnerships; governance; and management.

In general, ELT providers' responsibilities for quality assurance are to develop and implement the policies and procedures necessary to achieve and maintain this threshold level of quality of services and products (and to agree these with QQI under Section 30 of the 2012 Act). They are also to monitor and enhance these policies and procedures to ensure a dynamic, fit for purpose, and quality-oriented learning environment.

2.2   QUALITY ASSURANCE IN ELT

Quality assurance systems are context dependent and require development which is fit for purpose.

A QA system can exist in a small as well as a large provider. A system that is appropriate, well-communicated and integrated into the normal activities of the provider, will be more effective than one which is overly bureaucratic. This is why it is important that providers' have a QA system that is appropriate to their own scale, scope and context.

The threshold level of quality is dependent on the provider's goals as well as its external obligations to regulators and to statutory and professional bodies, and also on the scope of their provision.

QQI's role is in *external* review and public assurance of ELT provision and quality assurance procedures. While QQI's QA role is external and regulatory, its objectives are broadly the same as providers': maintaining and enhancing quality of English language teaching.

These objectives are achieved by QQI through:

» Issuing QA Guidelines and Criteria for the establishment of providers' QA procedures

» Monitoring and review of ELT provision (and the IEM) to ensure the fitness for purpose, implementation and effectiveness of quality assurance procedures.

2.3   INTERNATIONAL AND EUROPEAN CONTEXT

QA in Irish ELT is influenced and informed by national and international activity in the area of standards for English language training, and in terms of effective practice in provision and quality assurance generally.

2.3.a   Common European Framework of Reference for Languages

The Council of Europe's development of the Common European Framework of Reference for Languages (CEFRL)[3] is a system of levels based on knowledge, skill and competence that is specialised to language. It is a set of principles from which is derived a global scale of bands describing language competence.

QQI is committed to the integration of CEFRL into Irish ELT provision.

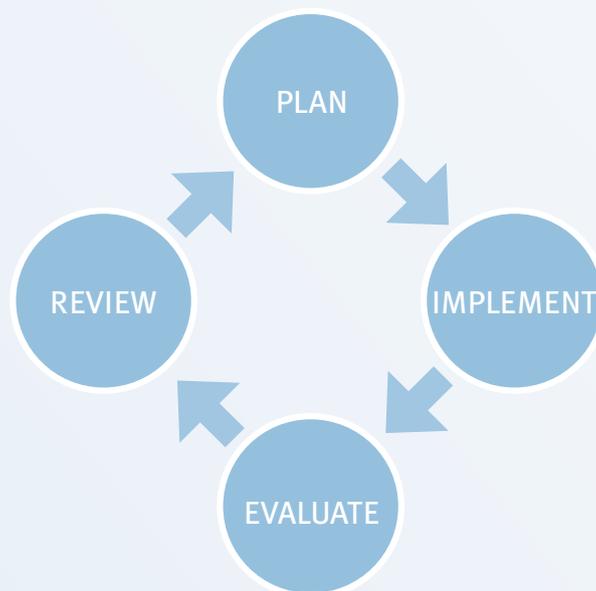3   Further information on CEFRL can be found here.

2.3.b Eqavet

The European initiative for Quality Assurance in Vocational Education and Training (Eqavet)[4], is a framework designed specifically to provide tools for the management of quality in vocational education and training.

QQI is an active contributor to EQAVET as part of its commitment to international effective practice, EU directives and policy commitments.

The EQAVET framework is a useful example of a QA model in considering the related field of ELT. Other models are possible. The framework is based on the quality cycle (figure 1 below) supplemented by indicators, case studies and learning material. This quality model supported by focused resources, allows providers and agencies to comply with the framework, but also to reflect the context and constraints imposed by national requirements.

The EQAVET framework is supplemented by the experiences of providers in the EU who have already implemented quality frameworks aligned to EQAVET to establish and strengthen quality assurance processes.

Figure 1: Eqavet Quality Cycle

4   Further information on Eqavet can be found here.

2.3.c   International Effective Practice in ELT

QQI is committed to applying effective practice in ELT internationally by attending and contributing to symposia for national accreditation bodies which develop core international benchmarks. These guidelines are also informed by international effective practice in ELT including national and international language teaching accreditation schemes:

» Australia: NEAS QA Framework, ELICOS National Standards

» UK: British Council Accreditation Scheme

» USA: ACCET Standards for Accreditation

» International: Eaquals Inspection Scheme

These guidelines will be continually updated to reflect domestic and international effective practice.

③ PROVIDERS' QUALITY ASSURANCE POLICIES AND PROCEDURES

It is important to clearly define QA policies and procedures as providers are expected to be able to demonstrate that have both are in place and effectively implemented.

QA policies and procedures are the means by which a provider organises how it will operate a particular process or service (in this case the provision of ELT). They are also the means for demonstrating that the provider meets the criteria and has due regard to the guidelines.

3.1   QA POLICIES

A policy is a documented statement of a provider's principles and approach. It should be consistent with the provider's overall mission and should provide an underpinning rationale for staff carrying out the associated procedures.

Policies may not contain much detail regarding implementation methodologies but should demonstrate to QQI and others that the provider has a full understanding of its legal obligations, and obligations under QQI policy, and of effective practice in QA for ELT.

To be effective, a policy must be disseminated to all those that it is intended to inform.

3.2   QA PROCEDURES

Translated into practice, a policy must be broken down into clear and coherent procedures. Procedures are the means and methodologies that a provider uses to carry out the intention of a policy.

A procedure covering any process should, at a minimum, specify:

a. The title of the task(s) it is designed to carry out

b. Methods to be used in carrying out the task(s)

c. Responsibility; who is responsible for carrying out the task(s)

d. Monitoring; who should monitor the procedure, how often and in what way

e. Indicative evidence that can be used to demonstrate to QQI that the procedure is effective.

3.3   INTERNAL MONITORING

Policies and procedures should be created in the expectation that they will be effective, and fit for purpose. However, effectiveness is not guaranteed and procedures need to be regularly monitored by the provider. Procedures found to be ineffective must be amended or replaced. The ability to identify ineffective procedures is a crucial part of a QA system and can be done formally or informally.

Internal monitoring should also act as 'an early warning system' which can identify areas of provision that are not delivering quality outcomes and therefore should be improved. In order to do this, providers must identify quality measures appropriate to the area which can be checked in monitoring. For example: learner satisfaction ratings, certification rates, relevance of outcomes to the market place, error levels etc.

Where monitoring indicates that a procedure is ineffective or an area is not reaching sufficient quality, the provider must take remedial action. This might mean the relevant procedure needs to be applied more consistently, relevant staff need further training or that the procedure or associated policy needs to be updated. In this way, continuous enhancement can become a reality.

A clear and potentially effective system for internal monitoring will be expected of any QA system submitted for approval by QQI.

3.4   SELF-EVALUATION AND ENHANCEMENT

The self-evaluation by a provider of its own programmes and services is a fundamental part of its QA system and is required by the 2012 Act.

The purpose of self-evaluation is to explore, reflect and report on the effectiveness of programmes, services and the quality assurance system which supports them in a structured way. In doing so, existing good practices can be identified and maintained while areas needing improvement can be addressed.

The distinction between internal monitoring and self-evaluation is in frequency and scale. A self-evaluation will have a broad focus and it will be relatively infrequent. Internal monitoring is on-going and focussed on specific indicators.

A provider may seek to learn many things from a self-evaluation and, ideally, these should be for the benefit of the provider and learners themselves, for example:

» The quality of programmes in enabling effective learning

» The standard of the associated services being provided

» The effectiveness of the internal quality assurance procedures.

The self-evaluation will examine many aspects of the programmes and services but should focus particularly on the quality of the learners' experience and achievements. When making judgements on any aspect of provision, the emphasis should be on the impact on learners and other stakeholders rather than on policies and procedures.

A self-evaluation also provides an opportunity to engage in crucially important dialogue with stakeholders and peers (sponsors, other ELT providers, other providers generally and any other agents relevant to the programme and the learners' use of it).

3.4.a Outputs

A self-evaluation has two primary outputs:

i.   Self-evaluation Report

A self-evaluation report (SER) includes findings and recommendations for the improvement of the QA system, provision and any other area. The SER should be submitted to QQI mid-way through the provider's review cycle.

ii. Improvement Plan

An improvement plan details actions the provider will take to address the recommendations in the SER. It should consolidate areas of effective practice and address areas requiring improvement.

The SER and the Improvement Plan must be submitted to QQI as part of the external QA review of an ELT provider on a cyclical basis or as otherwise deemed appropriate and necessary.

④ AREAS TO BE QUALITY ASSURED

Providers must have policies and procedures in place to address the nine core areas of ELT services and provision listed below. Specific criteria and guidelines for each of these nine areas are set out in Section 5. These QA Guidelines are also improvement focused, as providers must also specify the mechanisms by which their policies and procedures will be monitored and enhanced over time.

It is the provider's policies and procedures on the nine areas listed below that are subject to approval and review by QQI. The provider must be able to demonstrate that relevant polices and procedures are in place, are appropriate to the provider's context and are effective.

Policies and procedures for Access, Transfer and Progression, and Protection of Enrolled Learners are requirements of the 2012 Act. Providers should also refer to QQI's policies, protocols and guidelines on these areas.

In line with international norms, the nine areas covered in these QA Guidelines are:

a. Governance

b. Quality Management

c. Staff Recruitment, Management and Development

d. Programme Design

e. Teaching and Learning

f. Assessment

g. Access, Transfer and Progression

h. Protection of Enrolled Learners

i. Internal Monitoring, Self-evaluation and Enhancement of Programmes and Services

(5) GUIDELINES AND CRITERIA

In order for QQI to approve an ELT provider's QA procedures, the provider must demonstrate that it meets the criteria set out in this document and that it has had regard to the guidelines in each of the areas to be quality assured.

The criteria set out in this section are the minimum threshold that providers must meet for the approval of QA procedures by QQI.

The guidelines set out in this document describe elements of a provider's QA system and procedures that should be in place, but the manner of their implementation is at the provider's discretion. It is the responsibility of the provider to demonstrate to QQI that they have due regard to the guidelines below.

5.1   GOVERNANCE

Governance relates to the organisational structures that a provider has in place, and the roles and responsibilities of individuals therein, to oversee the work of the organisation; to support provision; and to ensure its validity and effectiveness.

CRITERIA

i.   The provider must have clear and appropriate (and documented) management and administrative structures.

ii.   Provider centres must have academic oversight and management in place (for example through academic managers).

GUIDELINES

Providers' governance structures should have a separation of responsibilities between those who develop programmes and those who approve them.

Included in the governance structure should be academic management groups[5] which approve:

» Proposed programmes and supporting systems;

» Approve learner results prior to progression (to another programme or level) or submission for certification; and

» Self-evaluation and programme improvement reports.

These groups should be identified by the provider and their terms of reference and outcomes should be documented.

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5   Depending on the scale of the provider, these may be the same academic management group. This may be reflected by group members having a range of responsibilities.

5.2   QUALITY MANAGEMENT

Quality management is the means by which the provider develops its QA policies and procedures, divides responsibility for their management and ensures their effective implementation.

CRITERIA

    i.   The provider must have documented QA policies and procedures which set out:

        a)   The provider's understanding of their various legal obligations

        b)   The policies and procedures relating to areas that are to be quality assured (see Section 4)

    ii.   The provider must clearly delineate management responsibility for policies and procedures.

    iii.   The provider must have data management systems in place. These should include the following:

        a)   Procedures for the collection and recording of learner attendance and procedures for addressing student absenteeism

        b)   Appropriate programme enrolment procedures with records kept and maintained in relation to learners' details.

GUIDELINES

It should be clear who has management responsibility for QA and who has responsibility for resourcing the implementation of its various policies and procedures. The provider's understanding of, and commitment to, the quality of their ELT provision should be made clear in the policy.

The QA policies and procedures should also detail the provider's wider information systems (as detailed in later criteria and guidelines). This should include the controls and structures in place to generate information to be used for monitoring purposes.

5.3   STAFF RECRUITMENT, MANAGEMENT, COMMUNICATION AND DEVELOPMENT

Providers' Providers' policies and procedures in relation to the recruitment, management and development of staff are crucial to sustaining their QA system.

5.3.a   Staff Recruitment

CRITERIA

   i.   The duties and responsibilities of each post to be filled must be described in a documented job description.

   ii.   All staff must be issued with written contracts or letters of employment specifying the terms of employment. Where freelance or self-employed staff are contracted, the terms and conditions of employment must be clear and legal.

   iii.   The provider must have an induction process for new staff which covers:

   a)   Intercultural awareness

   b)   The provider's QA policies and procedures

   c)   The provider's approach to Teaching and Learning

   Current staff must be kept informed of these areas on an on-going basis.

   iv.   Recruited staff must meet the thresholds of qualifications and experience for their position[6]:

All _academic staff_ must hold the following threshold qualifications:

   »   A major award at NFQ Level 7 or equivalent

   »   A recognised ELT certificate (see ELT Certificates below)

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6   These threshold qualifications are an ELT industry norm and an effective practice that QQI is adopting as criteria.

Academic managers in year-round centres; seasonal multi-centres; and home tuition services must meet the threshold requirements for academic staff. In addition they must hold a higher qualification in ELT (such as a Diploma in ELT, ESOL or equivalent, or a Masters Degree in ELT or ESOL). In the case of the manager holding higher qualifications and not holding the threshold recognised ELT certificate, the higher qualification must contain a supervised teaching component as part of the qualification. There must be evidence of the post holder having minimum of 5 years' consecutive experience in the field, immediately prior to appointment.

Academic managers in seasonal single centres (25 weeks or fewer) must hold the minimum of a recognised ELT certificate with evidence of relevant professional development activity undertaken since gaining the threshold qualification. There should be evidence of a minimum of 2 years' consecutive experience in the seasonal ELT sector immediately prior to appointment.

Assistant academic managers must either hold the same higher qualifications as an academic manager or may be in the process of gaining higher qualifications. There should be evidence of the post holder having a minimum of 3 years' consecutive ELT experience immediately prior to appointment.

One of the following _ELT certificates_ is required for ELT teaching (or as a self-employed person contracted to an ELT provider):

» A Certificate in English Language Teaching (CELT), or equivalent if gained prior to 1st January 2005 (e.g. a TEFL Certificate of not less than 70 hours duration).

» NFQ Level 7 ELT Special Purpose Certificate

» Level 7 ELT Certificates awarded by QQI's predecessors or a provider with delegated authority to make awards (arising from a programme of not less than 115 hours duration).

» ELT Certificates arising from programmes validated or accredited by Designated Awarding Bodies or other awarding bodies with a status in law or are otherwise recognised as having authority to make awards which have national recognition in their host jurisdiction. This includes ELT Certificates made by universities, CELTA (Cambridge Teaching Awards); TCL Cert TESOL (Trinity College London).

In seasonal centres for juniors (teenagers), academic staff may also hold:

» A recognised Irish teaching qualification (primary or post primary)

» A Preparatory ELT Certificate, if gained after 1st January 2005. Qualifications as required by regulations pre-2005, continue to apply to anyone qualified pre-2005.

GUIDELINES

The provider's general process and criteria for the recruitment and appointment of academic and administrative staff should be clearly described and documented in the QA policies and procedures.

5.3.b Staff Management

CRITERIA

i.   The provider must have a code of conduct for staff which addresses (amongst other things):

   a)   Intercultural awareness

   b)   Disciplinary issues

ii.   The provider must have a Teachers' Handbook which addresses:

   a)   Development of weekly lesson plans with associated learning objectives

   b)   Selection, production and monitoring of teaching and learning materials

   c)   Assessment mechanisms

   d)   Appropriate teaching and learning methodologies.

iii. Observation and appraisal for academic staff must be in place to support and enhance teaching and learning. Structured support must be available for new teachers including guidance on lesson planning and delivery.

GUIDELINES

The provider's general process and criteria for the promotion of academic and administrative staff should be clearly described and documented in the QA policies and procedures.

In addition to legal requirements, appropriate human resources policies should be in place, and in operation. There should be a system for the appraisal of all staff including procedures for dealing with unsatisfactory performance.

5.3.c   Staff Communication

CRITERIA

i.   The provider must have formal communication channels for staff, including scheduled staff meetings (with documented outcomes), to ensure that issues arising regarding delivery of programmes can be raised and addressed.

GUIDELINES

The provider should make clear how the views of all staff are collated and used on an on-going basis through internal monitoring. It should also be clear how staff members are kept informed of issues relating to their areas of responsibility. Staff meetings should be regular with documented outcomes.

Effective channels of communication between all involved in the ELT provision should be in place (including host families, group leaders and other centres and the wider provider organisation as appropriate).

5.3.d   Staff Development

On-going development of staff capacity is crucial to the quality of provision.

CRITERIA

i.   The provider must have an appropriate and documented system of professional development for all staff.

ii.   The provider must keep a record of staff activities in relation to professional development.

GUIDELINES

There should be a policy and formal systematic procedures in place to identify staff needs and to provide professional development opportunities in order to meet the needs of the provider, the employee and the learner.

A mechanism should be in place to impart feedback to staff members on their strengths and areas for improvement. An internal system of support for newly qualified academic staff, or academic with minimal experience should be documented and in operation.

5.4   PROGRAMME DESIGN

A provider's policy on Development of Programmes should inform the work of staff engaged in the design and delivery of programmes, so that programmes are constructed and delivered in such a way as to allow learners to achieve the intended learning outcomes.

CRITERIA

i.   Providers must state the educational need that each programme is designed to address.

ii.   In developing programmes the provider must identify the resources total required to successfully deliver the programme.

iii.   Providers must articulate a learner pathway through the programme as scheduled. This must include:

a)   Programme entry requirements

b)   End-of-component learning outcomes

c)   Related self-study and guided learning opportunities

iv.   Programme design must:

a)   Reflect educationally sound approaches and methodologies

b)   Reflect the mission of the provider

c)   Include programme tuition hours of not fewer than 15 hours per week (15 times 60 minutes)

d)   Include guided learning hours for learners to engage in self-directed learning outside the classroom (including a statement of the total number of notional learning hours expected to achieve the learning outcomes)

e)   Facilitate learners to achieve learning outcomes

f)   Allow for adjustment and modifications based on staff and learner feedback

g)   Reflect the provider's assessment framework (see Section 5.6)

h) Include opportunities for learners to develop cultural awareness, and understanding of academic conventions and norms in an Irish educational context

i) Include opportunities for learners to develop strategic competences and study skills to support effective learning and achievement, supporting development of learner independence

j) Facilitate opportunities for learners to practice English language skills outside the classroom (e.g., through guided social interactions or participation in social activities).

v. Where programmes are <u>12 weeks or longer</u> the programme design must address:

a) Holidays and breaks for learners. Learners should only normally have a scheduled break after the first 8 weeks of course

b) Punctuality and absenteeism, with documented procedures for staff and learners

c) Entry to end-of-programme Public Proficiency exams, and recording learners' results

d) Remedial routes for programme completion (for programmes lasting an academic year or more).

vi. For junior programmes (typically offered by seasonal centres) the programme design must address:

a) Integration of all activities (inside the teaching and learning environment and any social/cultural programme) into the English language learning provision. This integrated provision must encourage the use and activation of language in an age appropriate context

b) Irish life and culture.

c) Appropriate teaching and learning for the intended age group, and cognitive level of the learners.

vii. For programmes to be delivered online or at a distance the provider must make clear to learners what the implications of this mode of provision are.

viii. Programmes must be approved by the provider's governance system prior to being included in a provider's public information. A record of the approval must be kept.

GUIDELINES

Programme design should reflect a provider's mission and commitment to quality ELT provision.

5.5   TEACHING AND LEARNING

A provider's policies on teaching and learning set out how the provider expects staff to deliver programmes in a learning environment that is appropriate and of a sufficient standard to facilitate learners' achievement of learning outcomes.

5.5.a   Resources, Facilities and the Learning Environment

CRITERIA

Provider centres and teaching premises

i.   Provider centres (including temporary premises) must be suitable for ELT provision and have:

    a)   Classrooms which are adequately and appropriately equipped

    b)   An adequate staff room exclusively for the use of academic staff

    c)   Recreation areas and common rooms available to learners.

ii.   The provider must establish policies and procedures and appoint responsible staff in relation to emergency situations.

iii.   The provider must have an office staffed during operational hours providing assistance to learners.

iv.   Where teaching and learning takes place off-site, the teaching area must be adapted in so far as possible for delivery of ELT.

Resources to support teaching and learning

v.   The provider must supply teaching materials, books and other resources to support effective delivery of the programmes.

vi.   The provider must supply appropriate educational technology to support teaching and learning needs, including multi-media options.

vii.   The provider must make resources, equipment and learning materials available for learner use outside of the classroom in self-access facilities or a study area.

viii. Providers must have administrative systems supporting the academic operation for generating resources such as class lists; substitutes for absent staff; and records of work by teachers.

Class sizes

ix.   The classroom environment should have a student:teacher ratio per class of a maximum 15:1 to facilitate a communicative language learning approach.

Learner record system

x.   The provider must have a robust and comprehensive learner record system[7] capable of:

   a)   Maintaining secure learner records for current use and historical review

   b)   Providing reports required for internal monitoring

   c)   Generating information required for and compatible with QQI's certification system if appropriate

   d)   Generating statistical and other reports to meet provider information requirements.

xi.   The provider must have data access controls and data backup systems in place.

xii. Administrative and IT resources must be sufficient to maintain the system and keep it secure.

GUIDELINES

The adequacy of the resources available to learners should be monitored on an on-going basis. Learning resources should be updated and expanded as necessary to reflect up-to date approaches to ELT, and the needs identified through feedback on teaching and learning.

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7   The learner record information system should be appropriate to the scale and context of the provider.

Resource requirements will vary according to context and provision, and the provider should establish additional resources as required (e.g. guidance and remedial support services).

5.5.b Delivery and Learning Opportunities

CRITERIA

Programme Delivery

i.   The teaching methods used must give students the opportunity to meet the programme's learning objectives.

ii.   Delivery must be monitored by academic managers in a proactive constructive manner which allows for the identification of needs and modification and adjustment of the programme and the delivery method.

iii. Programme delivery should incorporate:

   a)   Sound teaching methodologies and a supportive learning environment

   b)   A sound understanding and knowledge of English language teaching norms and conventions

   c)   An understanding of classroom management

   d)   An understanding of and competence in lesson planning

   e)   An ability to monitor and evaluate learning in their classes (including provision of formative and summative feedback to learners)

   f)   An ability to adapt and change teaching approach in accordance with the needs and learning styles of learners

   g)   An awareness of inter-cultural differences and management of these to create and maintain a constructive learning environment.

iv.   Programme delivery must include regular feedback for learners on progress, achievement and remedial areas.

Learning Opportunities

v. Providers must provide learners with an induction including:

  a) A Student Handbook

  b) A Code of Conduct

  c) Their Programme and Syllabus

vi. Providers must advise learners of public exams and exam preparation which are best suited to their needs.

vii. Providers must provide opportunities for remedial support and advice on self-study to enable learners to focus on areas for improvement.

viii. Providers must facilitate learners developing learning strategies suitable to them which support the development of their independence.

GUIDELINES

Normally, academic staff should share delivery of classes in order to facilitate joint planning and sharing of effective practice. This also enables learners to experience a variety of delivery methods.

5.5.c Feedback

GUIDELINES

Staff should be encouraged and facilitated to reflect constructively on their experience of delivering programmes and to use such reflection to make improvements as required. It is important that such feedback be collected by the responsible academic manager and used in the planning of professional development activities, support for teaching staff, development of the curriculum or other service areas as relevant.

The views of learners should be collected on a regular basis and the feedback used to enhance provision as required. The procedure should cover not just how feedback is gathered, but how it is analysed, represented and acted upon (see Section 5.1 Governance). Feedback should be sought on issues such as:

» Programme content

» Delivery modes

» Teaching and learning

» Learning resources

» Assessment

» Information provision

» Support services including accommodation, social activities and pastoral care

» Health and safety.

It is important that the views of external stakeholders on the efficacy of provision be collected when possible. Possible sources include:

» Agents

» Sponsors, employers, home country schools, parents

» Alumni.

The provider should clarify how it will communicate and use the feedback gathered from staff, learners and others.

5.6 ASSESSMENT

A provider's Assessment Framework establishes the provider's philosophy on and approach to the assessment of learners in both formal assessments (where it leads to certification) and in-house assessment. It also addresses the administration of assessment by the provider.

CRITERIA

The Assessment Framework

i.   Providers must have a documented Assessment Framework. It must reflect assessment that is fit for purpose (i.e. aligned to learning outcomes) and capable of providing valid and reliable assessment results to learners.

ii. Providers must be able to demonstrate that procedures are in place to ensure that:

   a)   Assessment is fair and consistent, through internal verification

   b)   Learners are informed of expected outcomes and of their progress.

iii. The Assessment Framework must include:

   a)   Placement procedures for newly enrolled learners

   b)   Diagnostic evaluation of learners on an on-going basis to identify areas in which a learner may need support or additional help

   c)   Assessment of progress to support learning, provided through learner feedback.

iv. The Assessment Framework must be expressed with reference to CEFRL.

v.   Records of learner assessment must be kept and provided to the learner on request at the end of the programme or enrolment period. In the case of juniors, this is provided to the parents or guardians.

vi. All pertinent information relating to the assessment process must be available to learners prior to assessment commencing, including:

   a)   Assessment methods and types

b) Learner responsibilities in relation to assessment

c) Provider certification or reports relating to learner participation and attainment

d) An assessment calendar, including expected exam sitting or certification date

e) Guidance for learners on the selection of a proficiency exam appropriate to their needs

f) In the case of EL proficiency exams, there must be clear information on the grading system for the exam and its relationship to the CEFRL scale.

g) English language requirements for progression into higher education.

vii. The Assessment Framework must incorporate procedures and systems for the security and integrity of the assessment process, to include:

a) Assessment materials (test/task briefs, exams briefs etc.)

b) Assessment processes (supervision of tests etc.)

c) Learner work (assignments, practical tests, exam scripts, project work etc.)

d) Records of learner assessment maintained by the provider.

viii. The Assessment Framework must include provisions for the reasonable accommodation of learners with a disability, or others who require reasonable accommodation to participate in assessment.

ix. Providers who offer programmes on a distance/e-learning basis must demonstrate that they have procedures to ensure the validity and consistency of assessment.

Where a QQI award is being made

x. Providers must have policies and procedures in place for the selection and appointment of external authenticators with sufficient independence and subject matter expertise[8].

xi. External authenticators must have access to the provider's internal verification systems.

xii. National standards and guidelines must be applied.

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8   New providers must liaise with QQI on the appointment of external authenticators.

xiii. Providers must have procedures for the formal approval of the outcomes of assessment (which must be submitted to QQI for certification)

xiv. Providers must have an appeals process in place for learners who consider an assessment result to be unfair or incorrect.

GUIDELINES

Errors can occur between the carrying out of an assessment and its subsequent submission for certification and these can be picked up and corrected by systematic internal verification procedures. Examples of checks to be carried out during internal verification include looking for:

» Missing or inappropriate evidence

» Missing or inappropriate assessment briefs

» Data omission, transcription/calculation errors

» Learner identification errors

» Grading inconsistency between assessors.

After each assessment period, learner outcomes should be reviewed in light of input from programme staff, internal verification report(s) and external authenticators' report(s). Part of the review should include comparative grade analysis.

Learners should receive timely and constructive feedback on their assessments which informs their participation on the programme. The feedback should be appropriate to the nature of the assessment.

5.7 ACCESS, TRANSFER AND PROGRESSION[9]

GUIDELINES

The 2012 Act sets out the responsibilities of providers in relation to Access, Transfer and Progression (ATP). The Code of Practice for Providers of Programmes of Education and Training to International Learners sets out many of the requirements in the related areas of information for learners.

A provider's ATP policies should demonstrate its awareness of its legal obligations in this area, its cognisance of the Code of Practice and should express the provider's commitment to enable learners to:

» Make informed choices regarding the programme(s) on offer

» Enter onto a programme through the recognition of prior learning (e.g., through placement which identifies and recognises the learner's prior English language competence)

» Successfully participate in a programme achieving the expected learning outcomes

» Transfer or progress to another programme offered by the provider or another, leading to an award within the National Framework of Qualifications (as appropriate, as the learner desires).

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9   QQI will issue further guidance on ATP for quality assurance in due course.

5.8   PROTECTION OF ENROLLED LEARNERS

The 2012 Act sets out the responsibilities of providers in relation to the Protection of Enrolled Learners (PEL). It establishes that it is the responsibility of providers to ensure that there are adequate arrangements in place for PEL on specified programmes. QQI has published protocols for providers on the implementation of Part 6 of the Act on PEL.[10] Providers are directed to this document for a full description of the 2012 Act's requirements. Unless specifically exempted, PEL protocols as detailed in that policy shall apply to ELT providers.

CRITERIA

i.   All providers regardless of their relationship with QQI must make certain categories of information available to learners prior to enrolment (Protection of Enrolled Learners: Protocols for the Implementation of Part 6 of the 2012 Act), including whether PEL arrangements are in place for programmes offered; the details of the arrangements for PEL that the provider has in place in accordance with Section 65(4) of the 2012 Act, or where no PEL arrangements are in place, that this fact be made clear.

ii. For the Purposes of the IEM, all private, voluntary and public providers (unless specifically exempted in the Code of Practice for Providers of Programmes of Education and Training to International Students) that charge fees and offer programmes of three months or longer must demonstrate compliance with the legal requirements for PEL (Protocols 3.2, 3.3, 3.4, 3.5 and 3.6 apply).

iii. All relevant providers (including public providers) shall, if requested, assist QQI in the accommodation of learners affected by the cessation of a programme (Protocols 3.6 apply).

iv. Providers who enter into a PEL alternate provision agreement with another provider must have appropriate PEL policy and procedures in place.

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10   See Protection of Enrolled Learners: Protocols for Implementation of Part 6 of the 2012 Act

5.9 INTERNAL MONITORING, SELF-EVALUATION AND ENHANCEMENT OF PROGRAMMES AND SERVICES

Internal monitoring and Self-evaluation are processes operated by providers as part of their QA system that ensure that its policies and procedures are effectively implemented, up-to-date and compliant with regulatory and legal requirements.

The provider should have comprehensive internal monitoring (see Section 3.3 Internal Monitoring) and self-evaluation policies (see Section 3.4 Self-evaluation) and procedures, which should be designed to facilitate the on-going enhancement of the learning experience.

5.9.a Internal Monitoring Procedures

CRITERIA

i.   Providers must regularly review programmes with a view to evaluating their performance and improving them, taking into account current effective practice.

ii. Internal monitoring should include:

   a) Identifying adaptation and modifications required for programmes based on changing needs of learners and feedback from teachers and others.

   b) Tracking enrolment and attendance of all learners in their allocated class for the duration of the programme.

GUIDELINES

For each area to be quality assured the provider should identify quality measures appropriate to the area which can be systematically checked in monitoring. For example: learner satisfaction ratings for programme delivery.

When a provider identifies that an area is below an acceptable level of quality, or that a procedure is ineffective or hasn't been properly implemented the provider must take remedial action. In circumstances where internal monitoring reveals a problem that may be a threat to the provider, or to the reputation of the IEM, Irish ELT or QQI, this information should be reported to QQI.

5.9.a Self-evaluation[11]

Self-evaluations should seek to:

- » Engage stakeholders and peers

- » Gather credible evidence from a range of sources

- » Draw and justify conclusions

- » Make recommendations for improvement

- » Ensure the use and sharing of lessons learned.

It is important that the provider identifies in advance what is to be evaluated and the criteria to be used to measure success. The provider can choose criteria which are of particular relevance to its own context. There are some aspects of the programme(s) which QQI require to be evaluated and reported on. These relate particularly to the quality of the programme(s) and provision of services, and the effectiveness of the quality assurance system.

CRITERIA

i. Providers must demonstrate that learners are involved in self-evaluation.

ii. The self-evaluation process must be seen to have the approval and commitment of management.

iii. Self-evaluation must be sufficiently supported in terms of allocation of time, expertise and resources.

iv. Both academic and administrative staff's contributions must be facilitated.

11 QQI will provide guidance to providers on Self-evaluation report criteria in due course.

GUIDELINES

Self-evaluation should invoke a positive climate in which staff can be reflective and open in giving their views and suggestions on the performance of programmes and services. Management can show commitment to the process by assigning responsibility for coordinating the evaluation to a person with authority and decision making responsibility.

Self-evaluations should be carried out at the mid-term point between QQI reviews of the provider, i.e. every three years.

The provider should seek information from a variety of sources including its own internal monitoring processes. This may require the use of a variety of techniques. For example:

» Learner interviews

» Teacher meetings

» Questionnaires

» Review of records and statistical reports

» Review of complaints/incident reports

» Meetings with management

» Observation.

The Self-evaluation Report should include considered reflection on the strengths and weaknesses of the programmes and services, together with agreed recommendations under a number of headings such as:

» Design and content of programmes

» Programme Delivery

» Assessment of Teaching and Learning

» Provision of Services and Resources.

An Improvement Plan for ELT Provision must be realistic and achievable, with priority given to those areas which will have the greatest potential for improving learner outcomes, and satisfaction.

Both the Self-evaluation report and improvement plan must be sent to QQI.

Submissions can be emailed to

consultation@QQI.ie

The closing date for submissions

is **Friday 14 November 2014**.

In your submission please clearly indicate:

1. *Your contact details.*

2. *Whether you are responding as an individual or on behalf of an organisation.*

3. *If you do not wish your submission to be published.*