NCFHE AUDIT
FOLLOW-UP REPORT
2018-2020

Last revision: 07/07/2020

Table of Contents

Standard 1: Policy for Quality Assurance

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
KR1: The institutional mission and vision needs to be revised to be translated into concrete institutional objectives and management targets. It should include a reference to the organization's social responsibility	AeA has updated its current business plan which contains clear measurable goals (number of courses, number of students, financial targets, employee targets). AeA's CSR corporate social responsibility policy as defined in Attachment 5. **This was developed and published on the company's website back in May 2019 -** https://aea.academy/wp-content/uploads/2020/03/Corporate-Social-Responsibility.pdf
KR2: The institution should publish its quality assurance policy. Any exceptions to this recommendation should be duly justified.	AeA has developed an overall Quality Assurance Policy incorporating current practices and formalising systems and processes. This is provided as Attachment 6. Work has already been carried out in the development of web-based systems to host the IQA infrastructure which will allow for a better documentation and monitoring of the implementation of the quality assurance initiatives within Advenio eAcademy. **AeA published an overview of this updated Quality Assurance Policy on its website at the end of June 2019 -** https://aea.academy/wp-content/uploads/2020/06/AeA-Quality-Assurance-Policy-20200609.pdf
R3: The institution should identify, as part of its policy, the minimum research portfolio to be held by its staff for delivery of a programme. Such research-complement should be appropriate to the level and subject-matter of the programme.	AeA updated its Faculty Handbook (Attachment 7) which is readily available to Faculty in the designated secure area of the e-learning platform. Discussions were held within the Academic Board and with individual partners to establish such research guidelines. A general research policy for the Faculty Staff has been developed within the Faculty Handbook. At this stage the general policy is that no research portfolio is required for tutors engaged in Levels 4, 5 and 6. Tutors engaged in Level 7 programmes need to deliver a minimum of one published paper related to the topic or involved in business consultancy projects in the related field. **Provisions included in Faculty Handbook in July 2019.**
KR4: The institution shall introduce a system of performance appraisals for all staff, including all	Following the audit report recommendations, in 2019, AeA has created an Appraisal System and a

staff teaching its MHEI, establishing clear evaluation benchmarks, a set time period for evaluations and interview objectives.	form for staff assessment – Evaluation once a year and includes the objectives of evaluation – training needs, motivation, feedback, areas for improvement and setting goals/objectives. Attachment 9 includes a sample of the current staff appraisal form which is used for ad hoc evaluations. As proposed in the 2019 feedback to NCFHE, these will be more formalised and held on an annual basis. Where appropriate, the eb-ISP platform will be used to carry out these evaluations. **As from July 2019 the new staff appraisal forms were introduced.**
CC5: The institution shall establish quality procedures for selecting placement providers and doing continuous and summative evaluation of the quality of placements provided by those providers. Such procedures need to cover all placements provided within qualifications awarded by the institution (including all MHEI placements).	Internship agreement document was developed after the Audit in 2018. Attachments 10-13 respectively include: a copy of the Internship Host Survey, a copy of the Internship Student Survey, a copy of the Internship Student Completion form and a copy of the Internship – AeA-Student-Host Agreement. These have been used for the MHEI-ME Intake 2018-19 students who started their internships in January 2019. In addition, students were asked to maintain online logs and to work on pre-determined work packages related to each subject module. These work package reports were uploaded on the e-learning platform for evaluation by the relevant subject tutor. **All amendments implemented by July 2019.**
CR6: The institution's QA policy should make explicit reference to how it ensures QA of programmes it awards, where certain activities are done in partner institutions and/or subcontractors.	AeA confirms that is highlighted in the QA policy - With an online programme AeA has full control to evaluate the content material together with the implementation – Tutorials, forums and grading. AeA will has also created a course-design-review template which was circulated to Faculty in June 2019. This is now integrated within the ECB Checklist framework and Quality Assurance AeA currently includes a Tutor Feedback Evaluation for individual performance of each student. This is maintained throughout each module and updated as coursework is submitted for evaluations. Attachment 14 includes a copy of this form. AeA has updated the students feedback questionnaire that students need to submit after each module to include feedback on the Tutor. Attachment 15 includes a copy of this form which is currently being used for accredited programmes.

Standard 2: Institutional Probity

Judgement: Standard met	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
AeA Ltd should prepare a fully-fledged business plan underpinned by financial projections for the next two to three years, which sets identifiable and measurable financial and volume targets for its growth and puts into place adequate policies for the continued monitoring of progress and to take necessary corrective actions in a timely and effective manner.	An updated and current business plan is in hand and available for on-site review by the NCFHE. The business plan deals with the period 2019-2021 and by end of June 2020 will be updated for the period 2020-22. It includes projections for 2020 and 2021. The current business plan includes project business operations related to AeA and joint programmes (online & blended learning in Malta) as well as EU funded projects in which AeA is a partner. These projects have been submitted for funding in 2020 and if successful would be operational by the end of 2020 generally lasting between 2 to 3 years. **Following 2018 audit feedback report, business plan was updated on an annual basis for a rolling three year period.**

Standard 3: Design and Approval of Programmes

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
R7: Advenio should develop a strategy for the consultation of internal or external stakeholders in the course-design process.	AeA has developed its programmes based on collaboration between internal (faculty and adjunct faculty) and external (faculty of partner HEIs) specialists and third-party clients. The successful completion of MHEI-ME Intake 2018-19 graduation in Nov. 2019, provided another opportunity for one-to-one discussions with students. These all provided very positive feedback on the programme and the partner organisations as per Attachment 1. Current plans are to bring in an external auditor in 2020/21 to review ongoing programmes. Such an independent evaluation of the updated IQA system and its implementation will be useful. In 2018, Advenio eAcademy launched "eBiznify, An Award in ecommerce practice". This is a Level 4 – 4 ECTS credit programme developed in collaboration with the Malta Communications Authority. It was designed to promote the concepts of ecommerce and the many entrepreneurial opportunities in this sector. Seven intakes were run during 2018-19 period and an award giving certificate in February 2020. Again very positive feedback was collected from participants as shown in Attachment 2. In 2018-19 AeA designed, developed and launched an online accredited programme in Gender Based Violence Support for HR Professionals in collaboration with SOS Malta. Dr. Marceline Naudi, a member of our Adjunct Faculty, was the lead tutor on the 2 ECTS - Level 5 programme. The first intake was launched in October 2019 and the second intake was launched in January 2020. The feedback from students on this programme was also very positive as shown in Attachment 3. AeA will continue to lead in the programme design and development process. It will continue to involve one or more partner HEIs or external lead tutors/consultants in the design and development of particular programmes where so required.

Standard 4: Student-Centred Learning, Teaching and Assessment

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
CC 8: The institution shall establish an effective means of quality assurance of all assessment processes conducted within its masters programme, including through sampling the actual assessment processes done by non-Advenio examiners.	Following the audit, AeA has since increased the formality of its current policy of review and discussion of all marks and grades issued by its partner HEIs. The current practice now includes having each grading document reviewed, endorsed and confirmed with a counter signature by a representative of the Academic Board as shown in Attachment 14.
CC 9: The institution shall establish and publish a procedure and criteria for the evaluation of internships.	In 2018, and prior to the commencement of the first intake of internship students in 2019, AeA has formalised the Evaluation criteria of the Internship assessment. AeA has created an evaluation form which identifies the criteria for evaluation of the work packages and the relative weighting to be given to each of the elements. Attachment 16 includes a copy of this form which will be used in programmes with Internships.
CC 10: The institution shall establish and publish a procedure and criteria for the evaluation of final projects.	In Q1 2019, prior to the commencement of the first set of students in the Business Plan stage, AeA has set-up the evaluation criteria for the Business Plan projects. This was made available for both the students, supervisors and tutors. Attachment 17 shows the detailed rubric and weightings for the evaluation of the research project and its presentation.

Standard 5: Student Admission, Progression, Recognition and Certification

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
CC 11: The institution shall remove all references to non-awarding institutions from its certificate, with immediate effect.	The inclusion of the non-awarding institutions on the certificate including text was approved by NCFHE in 2017 prior to collaboration agreements being signed with the relevant partner HEIs. In fact, copies of the draft certificate approved by NCFHE were circulated prior to finalisation of collaboration agreements. Following the report, after a meeting with the NCFHE in April 2019, it was agreed that AeA will update the certificate by repositioning the logos. Advenio logo will be at the top of the page with the partner logos beneath. AeA has reviewed all PR and Student material such as the Manual to ensure clarity in the content showing that Advenio eAcademy is the Awarding body and programme is run in collaboration with the partner HEIs all operating within the IQA established and maintained by AeA. These arrangements have subsequently been approved by NCFHE and certificates issued and awarded in November 2019. Following a revision of the programme structure in 2019-2020, NCFHE requested some minor changes to the certificates which these have been approved in June 2020 for the next intakes.
R12: The institution shall publish clearer guidelines on RPL.	AeA has carried out extensive research on the matter and has sought advice form its international partners which have direct experience in the development of RPL and APEL programmes for graduate admissions. This is a work-in-progress and will be tied into an international research project AeA is leading in this area. Separate discussions were held with NCFHE in 2019 on this project to allow for a Level 6 RPL programme to be launched with international partners. On this basis, an RPL policy should be in place by end of 2020. Appendices 18 and 19 includes current RPL policy and application form as approved by the Academic Board – 3/07/2020.

Standard 6: Teaching Staff

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
KR13: The HEI should establish a minimum level of qualifications and competence to qualify for each of its positions.	AeA confirms that as per the NCFHE Courses accreditation form it specifies the minimum requirements for a tutor to develop and implement a module at any MQF Level of that particular programme. This framework has been adopted for MHEI-ME Intake 2018-19 and will be implemented in subsequent intakes. AeA also included further details on such requirements for qualifications and related experience in its Internal Quality Assurance and Faculty Handbook. The specific qualifications, competences and experience will be related to each role – Tutors and Admin. AeA also formalised its current policy based on the publication of a call for applications through its website, publishing of such vacancies through JobsPlus. The Academic Board then reviews the applications and holds interviews with the selected candidates. This process has been formalised as its recruitment procedures within the overall Quality Assurance Policy.
KR14: The HEI should establish a minimum level of qualifications and competence to be held by its faculty body. This means, that the institution should identify which skills, knowledge and experience should be present within Advenio, and ensure that these needs are met by the faculty.	Following the Audit recommendations, AeA has included in its Internal Quality Assurance and Faculty Handbook the qualifications and competences required by tutors to lecture at a particular MQF level based on the Skills, Knowledge and Experience. This is included in a standardised form and all prospective tutors will be evaluated on criteria set out in this form prior to their involvement in a module. An integral part of the tutor's qualifications is the direct entrepreneurial experience as AeA is determined to use this as a source of competitive advantage against many of the established traditional universities where tenure has kept qualified but totally outdated academics at the front line to the detriment of practicing entrepreneurs who seek academic direction blended with real world experience.
CR15: The HEI should establish a minimum level of qualifications and competence to be held by the	AeA has included in its Internal Quality Assurance and Faculty Handbook the qualifications and

faculty teaching the MHEI, and evaluate all faculty against that benchmark.	competences required by tutors to lecture at a particular MQF level based on the Skills, Knowledge and Experience. This is structured in a form and the partner HEI is required to review prospective tutors to ensure compliance within the criteria set out in the form prior to their involvement in a module.
	AeA is requesting each lecturer to be engaged on a new intake to update an Activity Report (Courses lectured for the year, seminars/conferences attended or spoken at, articles/papers published, research being undertaken and students supervision for the year prior to engagement. Regular tutors will be requested to present this on an annual basis.

Standard 7: Learning Resources and Student Support

Judgement: Does not meet Standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
CR16: The institution must provide access to an academic library containing a significant number of full-text academic publications, monographs and journals in each subject-matter being studied, to all students, as appropriate for their level of study. At bare minimum all materials on the reading lists should be available in the library, and a specific budgetary allocation should be made to developing it further.	Students at Level 7 programmes have access to the internationally acclaimed EBSCO online library. This is activated per intake and gives them access to thousands of resources relevant to their studies. Students at Levels 4, and 5 have access through the e-learning platform to other online libraries such as, BookBoon and Google Scholar.
R17: The institution should establish a procedure whereby senior academic staff / course directors / programme designers indicate which learning resources (including books, equipment, access to facilities etc) are required to adequately teach the learning modules, and make appropriate arrangements to purchase them	Appendix 20 includes a copy of the Teaching Resource Requisition Form which is included in the Faculty Handbook which is available online to Faculty within the reserved access area of the Advenio eAcademy elearning platform. Faculty members are invited to complete the form and submit to the courses Co-ordinator for acquisition of any teaching tools that may be required for the development and delivery of the programme. These include:- Online tools – software tools and resources such as for the design, development and production of course content Online resources – ebooks, participation in conferences/seminars/webinars etc, digital image libraries, etc Ancillary equipment – hardware required for development, production and implementation of course content AeA Faculty have access to online libraries including EBSCO, Google Scholar, BookBoon which are sufficient for the specific area of entrepreneurship and related subjects.
KR18: The institution should establish a procedure whereby students indicate which learning resources (including books, equipment, access to facilities etc) are required to adequately conduct their research, and make appropriate arrangements to purchase them	AeA states in the Student Manual that if there is a learning resource not available within the online library they can contact Advenio eAcademy to enquire about the possibility of its assistance in getting access to the required material, even if necessary at a separate charge to the student. In this respect, Advenio eAcademy has access to other research resources offered by third parties,

	such as Kompass, EuroMonitor. For local students arrangements may be made for them to access these resources at third party sites. For international students, assistance in collection of such data will also be provided by AeA staff. Appendix 21 includes the new form created to assist students in requesting additional research data from the above mentioned third party libraries which are available to AeA but not directly to students online.
R19: The institution shall prepare an accessibility policy which indicates relevant and appropriate the categories of special needs students it is able to cater to on its website.	The institution provides programmes and courses primarily online. Its commitment to online education is not a COVID-19 quick fix, but a strategic investment in the development and maintenance of a powerful elearning platform that allows for combinations of self-learning and collaborative learning elements. This involves far more than just plugging in the use of a video conferencing tool, but in fact calls for upfront investment in the design, development production, including post-production editing and voice captioning. AeA is fully committed to the provision of online learning facilities that provide access to content as per FITA Guidelines. With regards to blended learning programmes, AeA uses various onsite locations all of which are NCFHE approved sites. These include STC Training Campus, Swieqi and English Communications School, Sliema. The blended learning programmes are based on students full participation in the standard online programmes with additional supplementary weekly support classes to assist students. The accessibility policy is also included as part of the Overall Quality Assurance of the academy.

Standard 8: Information Management

Judgement: Standard met	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
R20: The institution shall institute a tracking system for graduates.	The success of the accredited programmes over the past few years has led to the set-up of the AeA Alumni Association which was officially launched in 2020 Q1. The elected officers of the AeA Alumni Association are: Oleksandr Ustain, Chairman, Mario Zammit – Hon Secretary and Robert Micallef – Hon Treasurer. Attachment 4 includes the Statute which was approved by the first Annual General Meeting and defines its purpose as being to "*assist members in the continued development of their skills and competences and to serve as an international network to assist them in the development of their entrepreneurial activities. The Association is a non-profit association and seeks to generate revenues in a sustainable manner to enable it to implement the activities and events it chooses to organise for the benefit of its members. In furtherance of this scope the Association seeks to cooperate with institutions and associations which share similar goals.*" Advenio eAcademy will strive to involve alumni in programme reviews to provide a more student centric approach to the programme revisions. One of the initiatives in this area is the setting up of an Advenio eAcademy Alumni LinkedIn Page. Incentives will be provided to graduates for their continued involvement in the activities of Advenio eAcademy as mentors as well as on various programmes to be run by AeA in the future. Later on this year, Advenio eAcademy will be launching the Alumni Ambassador Programme through which a number of alumni will be appointed as AeA Ambassadors and will be engaged in the on-going promotion of the AeA programmes as well serving as mentors to new students from their country of origin registering for the MHEI-ME programmes. These will be invited regularly to Malta to participate in seminars, conferences and graduation events which are planned to be organised by Advenio eAcademy in the future as the student population grows.

Standard 9: Public Information

Judgement: Standard met	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
No recommendations	

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

Judgement: Requires improvement to meet standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
KR 21: The institution must elaborate a procedure for the evaluation and improvement of all courses, specifying at minimum the objectives and the inputs to be considered at a revision, the frequency of revision and the persons responsible for such revision.	Following the Audit recommendations, in 2019, AeA improved on the ECBCheck on procedures for the planning, evaluation and review and includes the PDCA Cycle Framework to outline the responsibility, frequency, inputs (students feedback, assessment evaluation, lecturers feedback, course audits). A member of the Board of Directors has been given specific responsibility to oversee the ongoing development of the IQA, periodic programme reviews. Reference to these activities is also found in the Corrective Action Log. Advenio eAcademy is not an organisation with hundreds or thousands of students on its books. Typically, it has less than thirty students on any intake at level 4, with smaller numbers for higher level programmes. It offers a limited range of online courses, supported by a strong administrative team, a modern-multi-function elearning platform that caters for both self-learning and collaborative learning and a dedicated team of specialist tutors who are keen to share their expertise and experience. Advenio eAcademy is not a recent convert to online education. Regrettably, we have seen as a result of the COVID -19 crisis, so many traditional educational institutions merely plugging into a video conferencing system and claiming that they offer elearning. This approach is a dis-service to elearning and will no doubt leave many disappointed students in its wake. Such institutions seem to have been able to convert their on-site programmes to online programmes without any difficulty and in no time at all. Advenio eAcademy has not had such a smooth ride. As pioneers in this field, the core concepts related to the design, development and implementation of online learning programmes have missed in the search for bureaucratic detail relevant to institutions catering for hundreds and thousands of students.

Standard 11: Cyclical External Quality Assurance

Judgement: Requires improvement to meet standard	
Recommendation/s (as per EQA Report)	**Take-up and Implementation of Recommendation**
R22: In future audits, the institution should be sure that all staff are available to interview, and that all requested key information is provided in the form specified.	Provided AeA is given suitable advance notice and that the audit interviews are carried out within realistic time frames, AeA will do its best to ensure that all Faculty will be available for online/onsite interviews in future audits. NCFHE evaluators need to be aware that the Adjunct Faculty are engaged in various overseas institutions and as senior Faculty member are very heavily committed. The evaluators and the Adjunct Faculty need to agree to a schedule and all parties need to work to that schedule. In future NCFHE should ensure that the Audit team is better structured in relation to the size and complexity of the institution being inspected. There should also be a cost-effective utilisation of resources and the completion of the audit report within a reasonable period of time. The focus should be away from the bureaucratic tick-box approach so evident in the first audit, to one based on an understanding of the processes and context of deliverables. Evaluators need to have an understanding of elearning and the manner in which this differs from traditional onsite course delivery.