

# RICHMOND FOUNDATION

## INTERNAL QUALITY ASSURANCE POLICY

October 2022  
Version 3

## INTRODUCTION

Richmond Foundation (RF) was founded in May 1993 as a non-governmental, non-profitmaking NGO. When the Foundation was set-up, its main intent was to provide persons suffering from mental health difficulties with supportive, therapeutic and rehabilitation services. However, over the years, aside from providing mental health services, the Foundation is also focused on breaking the stigma associated with mental health through education and training. As a matter of fact, in 2016, Richmond Foundation rebranded its business model through the introduction of Mental Health First Aid Courses. Since then RF has also introduced other courses to reach out to more institutions in the country. Richmond became a licensed Further and Higher Education Institution by the Malta Further & Higher Education Authority (MFHEA, Licence No. \_\_\_\_\_), in \_\_\_\_\_.

Richmond Foundations' mission is to provide optimal community mental health services that promote mental health, wellbeing, address the prevention of mental health problems and provide support for a good quality of life.

Whilst the intent is to provide high-quality services through both academic and professional learning experiences for educational institutions, companies and community members at large, we also provide individualised support for those who wish to avail of our services. We also provide continuing professional development (CPD) opportunities for our own members of staff. Central to our endeavours is the development and implementation of a robust IQA system and structure as a central pillar of our operational management. Such a need has grown as the Foundation has felt the need to address the growing demands for wellbeing courses by the community at large.

Within this context, the development of this reviewed and update Internal Quality Assurance (IQA) document aims to achieve this strategic objective by addressing all eleven quality assurance standards as defined in the National Quality Assurance Framework (NQAF) and the *Guidelines for External Quality Assurance Audits of Further Education Institutions* (MFHEA, June 2021).

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## **Section One      Internal Quality Assurance Policy**

This IQA policy covers all aspects of the Foundation's operations. The leadership team, together with the teaching staff/trainers and administrative staff, work together in order to address the mission and aims of the Foundation. To facilitate and ensure that standards are met and quality is assured this policy document covers the eleven quality criteria as defined by the National Quality Assurance Framework (NQAF) and other documents developed by the MFHEA. This IQA policy is also made public as part of the Foundation's public information policy.

In line with the Foundation's mission and its impact on society the services provided now also include a growing teaching and learning component. As such, learning and development serves as the core business of the Foundation. It is also thanks to this service that the Foundation boosts its finances so as to have adequate financial resources to undertake the initiatives that are desperately needed within the Maltese community which is slowly becoming more appreciative of the importance behind wellbeing in everyone's life.

The teaching staff, known as trainers, within the Foundation, whilst ensured in delivering their teaching, learning and assessment with the highest level of academic integrity they are constantly engaged in varied activities so as to enhance their pedagogical skills (see Section Six).

All staff, academic and non-academic, are familiar with the Foundation's IQA policy document and are expected to comply with the respective policies and procedures as defined in this policy document and elaborated upon in policies developed by the Foundation over time.

No form of intolerance and/or discrimination against students, academic staff and administrative personnel is accepted. This policy ensures that the Foundation maintains a high standards of ethical practice throughout its lifetime as a Further and Higher Institute provider in Malta. This requires that all teaching staff adhere to this policy. In addition, the CEO, the 'Manager' of the Learning and Development Unit .... also monitor the performance of teaching staff as presented in this document. Consultants are also involved, from time to time, to support the Foundation.

Richmond Foundation is committed to conduct annual reviews as part of its IQA, as expounded in Section Ten. This ensures that the policy per se and the various programmes, procedures and processes are evaluated and help the Foundation to undertake a thorough review leading to further improvements and/or developments.

In order for this to happen, regular meeting between the CEO, the COO, and the various units are held. The organisation structure of the Foundation is presented below:

The roles and responsibilities of current staff members at Richmond Foundation are defined below:

**Chief Executive Officer:**

- Overall responsibility for the vision and strategic management of Richmond Foundation
- Corporate management
- Overall operational management of the Foundation
- Financial and human resources
- Reviews Foundation's policies, procedures, advocacy, media and public relations
- MFHEA Accreditation communication
- Chairs top management meetings.

**Chief Operations Officer:**

- Corporate responsibility for managing the Richmond Foundation operations
- Defines, promotes and maintains the Foundation's role in developing and reviewing curricula for training, progression through the career framework with the relevant bodies responsible for this process
- Overseeing the recruitment of the Trainers and Academics.

**Quality Assurance (QA):**

- Ensures that Trainers are competent and familiar with the programmes on offer
- Trainer observations and feedback
- Monitors Trainers performance via student feedback questionnaires
- Works with the Centre Manager to ensure that all procedures are carried out in accordance with this document, subject to regular review
- Quality Assurance regulations stipulated as per MFHEA and the Mental Health First Aid qualification awarding body are strictly adhered to.

**Centre Manager:**

- Administrative processes work smoothly and Foundation policies are adhered to
- Internal verification procedures are followed appropriately
- Provides advice and guidance to all Trainers
- Ensures procedures are carried out in accordance with this IQA
- Reviews and updates Foundation's policies and procedures in consultation with the CEO and COO
- Ensures that quality assurance policies are readily available in print form and Foundation's website
- Monitors marketing strategy
- Ensures the Foundation, the Mental Health First Aid branding guidelines are adhered to and that the Foundation's services are marketed
- Ensures good liaison amongst the different sections and staff members to enable learners to make full use of existing courses and assist them with their self-development journey
- Ensures that assessment specifications are strictly adhered to and that all procedures for recording purposes meet the appropriate standards stipulated by the NCFHE and qualification awarding body
- Attend CPD sessions organised and or promoted by the Foundation.

### Trainers/ Lecturers:

- Responsible for module preparation and delivery of sessions
- Follow up course participants' attendance and progress
- Provide constructive feedback to the learner
- Responsible for course participants' assessment
- Review and adhere to all policies and procedures outlined in the Foundation's IQA
- Meet the Internal Verifier to assure consistency of approach
- Lecturers need to hold at least one MQF level higher than the course level being delivered and to have at least 1 year lecturing/teaching experience
- Attend CPD sessions organised and or promoted by the Foundation.

### Internal Verifiers:

- Moderates work submitted to ensure fair assessment across courses
- Monitors the tutors marking scheme, making sure the stipulated criteria are followed
- The internal verifiers selection criteria includes certification in mental health first aid and 3 years experience in delivering MHFA training.

### Head of Institute

- Responsible for Internal Quality Assurance
- Responsible of teaching, learning and assessment framework/criteria
- Review of Foundation's policies and procedures
- Development of programmes offered with CEO, COO, and Central Manager
- .....
- .....
- .....

The Foundation also avails itself of the services of **External Verifiers** who are there to:

- Monitor standards of qualification and/or programme provision, assessment, internal quality assurance and operations
- Mental health First Aid Australia assigns qualified and experienced (3 years or more) mental health first aid instructors to externally verify the quality of the training provision provided locally.

An integral part of the Foundation's mission is the involvement and impact we have on those who follow our programmes and/or avail of our services. As such, the Foundation aims to ensure that **Course Participants** involved in any of our programmes:

- Submit work, and respond to questions relating to their work, to test their learning success
- Re-submit work and develop their learning, as required, if they cannot meet the assessment criteria initially
- Make use of the student online learning platform
- Seek support if and when required
- Engage in meaningful relationships with staff members and colleagues.

## **Section Two      Institutional Probity**

### **Ownership**

Richmond Foundation is a fully registered Non Governmental Organisation operating in the Maltese Islands. Annual audited accounts and regular budget plans of the Foundation's various activities is maintained and certified by the auditors appointed by the Foundation. The legal representation of the Foundation is its CEO, Ms. Stefania Dimech Sant.

### **Finance**

The business plan of the Foundation spans over ..... years. Yearly budget plans are reviewed quarterly on the basis of management accounts. It also incorporates a training arm which employs a computer-based accrual accounting system as a separate cost-centre within Richmond Foundation's overall accounting framework. Through the Centre the Foundation runs a variety of courses, seminars and workshops. A financial plan for the Training Centre is drawn up annually on the basis of the audited accounts of the previous year. The plan takes into consideration the planned expenses, particularly recurrent expenses, and anticipated revenue. The Training Centre will sustain the aims for a surplus on an annual basis, which surplus will be re-invested into the development and enhancement of the training portfolio and the capabilities of the trainers. Any further surplus will be re-directed into the Foundation.

As a means of ensuring its long-term sustainability, the Centre will, on an ongoing basis, endeavour to identify training opportunities, both home grown and those available overseas, which fall within its area of specialisation. It will invest in the continuous development of its trainers, and assure a pool of trained staff to address existing demand for training. It will also actively engage in the promotion of its training portfolio among entities which may benefit from it in order to amplify the demand for its training. Training will be offered at a reasonable margin of profit to ensure the long-term viability of the Centre. As a subsidiary of Richmond Foundation, the Training Centre is financially supported by Foundation, and in the event of a deficit, would be supported by the Foundation to adhere to its responsibilities, particularly in view of staff remuneration.

### **Recruitment**

Richmond Foundation applies a fair and transparent process for the recruitment of all members of staff and ensures that conditions of employment are in accordance with employment law. The Foundation adopts a recruitment procedure whereby a call of interest is made publicly available. Achieved through varying advertising mediums, including, website adverts and marketing on social media. Staff are selected on the basis of an interview process where applicants are interviewed by a selection panel including a representative of the Board of Trustees.



In the event that no applications are received, individuals who meet the criteria stipulated for a specific post may be head-hunted to fill the position.

## **Section Three     Design and Approval of Programmes**

### **Programme design**

Richmond Foundation currently adopts a two-pronged approach to designing programmes. The flagship of the Foundation is the Mental and First Aid course that were designed by Mental Health First Aid Australia specifically, adapted for Malta's context by qualified staff within Richmond Foundation and accredited by the MFHEA as per MFHEA regulations.

The Foundation, thanks to the staff's diverse expertise, also develops its own home-grown courses (e.g. ....) that are made available to companies and the general public. The proposal for the development of such courses are first presented and discussed within management meetings. Ideas are discussed and developed further. Decisions to design a new course depends on potential clients, resources available, and the potential of recruiting experts from outside to support these initiatives. Naturally, such courses need to be aligned with the Foundation's principles and strategy.

### **Course design**

Before any course is developed the person/s who come forward with the idea present a concept paper that explains the rationale behind such a proposal and the proposal takes also into consideration the need behind the proposal, target audience, course workload in terms of ECVET/ECTS, eligible criteria, learning outcomes, the staff that are needed to run such a course, and the overall costs.

Once there is agreement, the Foundation considers the involvement of internal and external experts that could design and develop the programme content, namely knowledge, skills and competences; teaching methods and approaches; fieldwork (if required); assessment procedures. The course, or the various modules, are developed round the standard study-unit templates that articulate the aims of the programme; the learning outcomes (as outlined by the MFHEA Referencing Report (2016)); the associated knowledge, skills and competences; assessment criteria; mode of delivery; reading and other resources.

These are to be made available to all students through the Foundation's website.

Once the course has been designed and developed it is first discussed internally and then shared with a critical friend outside the Foundation so as to provide insights, expert advice as to how to address any gaps and/or improve the overall quality of the course.

**Review**

MHFA courses are evidenced based and go through a process of continuous evaluation. Teaching staff, students and stakeholders are involved in reviewing the impact of both course implementation and its impact on the participants. Data collected from these evaluations are filed, shared with course participants and made readily available on the Foundation's website.

Once a new course has been designed and developed and approved internally it is then submitted to the Malta Further & Higher Education Authority (MFHEA) for the external evaluation/ approval process to commence.

## **Section Four      Student-centred Learning, Teaching and Assessment**

This is a very important aspect of the implementation process. It shows the Foundation's commitment to the overall learning of the course participants. Given the delicate nature of the courses that we organise, with a focus on wellbeing, it is crucial that we create opportunities for learning that can impact one's life and not merely address the needs of a given course. We are after a sustainable approach. This implies that we create varied learning opportunities that include individual, pair and group work, role play, discussions and case studies.

Besides the face to face tuition, we give further support via our online learning platform by giving further exercises, material to supplement the tuition. The online learning platform provides the students with the course session details including dates, time, duration, venue and the teaching staff involved in their course; it allows them access to the learning material including the MHFA manual and learning videos; allows the students to take the online fully automated assessment. The platform is used also for communicating with the students, to allow students to provide their feedback about the course and allows the CEO to issue the course certificates. The learning platform includes also a mobile app which allows the students to access the course learning material offline (including the course manual and learning videos) and to view their course session details.

Richmond teaching staff ensure that each participant leaves the event with a realistic action plan to follow and execute.

Each course has a course co-ordinator who is responsible for the following aspects, namely:

- Implementation of the course
- Scheduling of the course
- Monitoring of the teaching and learning as the course unfolds
- Scheduling of the learning that is to take place
- Management of assessment processes
- Evaluation of the course through student and teaching staff feedback
- Moderation of the course assessment
- Address any particular student needs raised during the course.

Through this system and the procedures in place the Foundation ensures that student-centred learning is taking place. Diversity is acknowledged and respected through the use of varied teaching methods and formative and summative assessment modes. Individual mentoring is provided to students who request it. Students with identified learning difficulties and/or special needs are provided with focused attention, ensuring that they are supported as the course unfolds.

The Foundation's teaching staff focus on what the participants are expected to be able to do at the end of the course/s, an approach commonly referred to as an outcome-based approach. Learning outcomes are used to express what it is expected that learners should be able to do at the end of the course/s.

The Foundation's teaching staff use their 'performing skills'; e.g. thinking skills, communication skills, leadership skills, discussion-provoking skills, questioning techniques, helping skills, to probe, paraphrase and provoke dialogue to assess whether learning is taking place. Through this process, participants would be empowering themselves through the development of communication skills, thinking skills and negotiation skills which lead to an increased sense of competence, self-confidence, self-esteem, and being constantly challenged to review their attitudes.

### **Assessment Criteria**

Criteria for and method of assessment as well as criteria for marking are stipulated. The Course Co-ordinator ensures that achieved learning outcomes are analysed in relation to the intended outcomes and that students are given the necessary feedback and advice. The feedback is provided instantaneously online showing the students which answers are correct and which ones are wrong. This policy is reviewed periodically and may be revised in response to feedback from students, tutors and external organisations. This is reviewed annually. As part of the review we check if the Centre had any issues throughout the year and we would only change it if there is the need. This is in line with Richmond Foundation's ISO certification.

Criteria and method of assessment as well as marking criteria are stipulated. The performance is graded according to the table below:

.....  
.....  
.....  
.....

Each assigned piece of work is initially assessed by the course tutor. These are then reviewed by the course co-ordinator. All students are obliged to submit their first submission and a resubmission in event of not passing the assessment first time round. When a student attains less than 45% in the re-submission, the student cannot repeat the module in question. In the case of mitigating circumstances, students are expected to write directly to the Course Co-ordinator at least one week prior to the final submission/assessment date. All cases are discussed with the **Head of Institute** who decides whether the student is permitted to submit assessment as a first initial submission or as a re-submission.

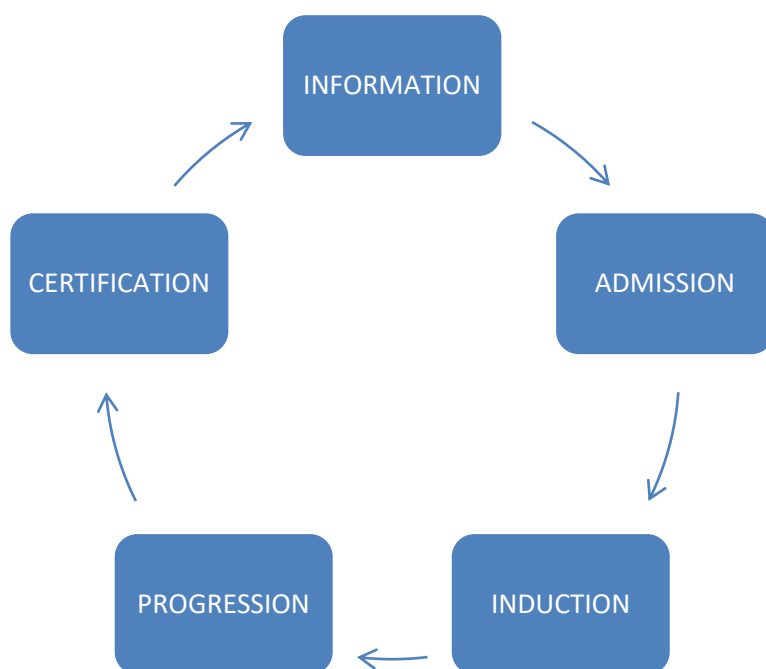
### **Appeal Procedure**

Students who express concern or would like further feedback related to any assignment or piece of work submitted can do so by approaching the Course Co-ordinator of the said course. Such concerns are addressed in a meticulous manner to ensure fair treatment and individual attention that is essential for learning to take place. The Course Co-ordinator, in consultation with the **Head of Institute** and the COO, will decide on the case of appeal.

## Section Five      Student Admission, Progression, Recognition and Certification

The admission, progression, recognition and certification of students within the Foundation is managed by the COO, together with the Head of Institute, Centre Manager, and the respective Course Co-ordinator. This collaborative approach ensures that all students are supported effectively throughout their life-cycle in accordance with the Foundation's internal quality assurance policy.

The admission procedures, including the entry requirements are set according to each course. For each course the following five-stage process is adopted:



These five stages show how a person who expresses an interest in one of the Foundation's courses is provided with support both prior to enrolment, once the person has enrolled and throughout the course, leading to course completion and certification.

### Stage 1: Information

Information concerning all courses is made publicly available. Potential students are assisted/provided with further information via one-to-one meetings/briefing sessions.

### Stage 2: Admission

Selection criteria are clearly presented for each respective course. Students apply for a given course through a dedicated online form. During this process, all entry requirements are checked against the presentation of documentation. In the case of evidence presented in the form of foreign qualifications, students are requested to submit an MQRIC statement.

Students' special requirements are discussed during this phase to ensure that their needs can be exceeded to.

### Stage 3: Induction

Every student is provided with a course induction session. The induction session is structured into four parts:

- 1) Welcome address by the CEO and Course Co-ordinator
- 2) Policies and Regulations re the course are presented and those pertinent to the Foundation
- 3) Course Overview and Expectations
- 4) Optional Student Support Services.

### Stage 4: Progression

As students progress through a course all assessment results are monitored by the respective Course Co-ordinator. Data is collected, monitored and analysed through a specific database that is in place for academic operations.

This stage goes beyond merely collecting results and the management of student information. The focus is on *progress*. If a student is facing difficulties she/he are called in to discuss matters and consider support options.

### Stage 5: Certification

On successful completion of the course, course participants will receive a certificate and documentation explaining the context, MQF level, amount of learning credits, reference to achieved learning outcomes, content and status of the qualification gained, in line with MFHEA regulations.



## Section Six      Teaching Staff

The COO and the Centre Manager are responsible for the recruitment and development of trainers. Their role is to apply clear, fair and transparent processes for the recruitment, conditions of employment and professional development of our teaching staff. The training staff needs to be already employed with Richmond Foundation in one of its services. The training staff for MFHA courses need to be qualified at level 6 in a related social field qualification. The process involves an open invitation to all the staff that meets the criteria to be engaged as a MFHA Instructor / Trainer.

As our profile is extended to include other courses we will adopt open recruitment systems that encourage potential and eligible candidates the opportunity to apply. The Foundation's policy is to apply a fair and a transparent process for the recruitment of teaching staff and to ensure that conditions of employment are in accordance with employment law. In order to effectively deploy this policy, the Foundation adopts a recruitment procedure whereby a call of interest is made publicly available. This will be achieved through varying advertising mediums, including, website adverts and marketing on social media. Teaching staff are selected on the basis of an interview process that is initially carried out by the COO and Centre Manager/ **Head of Institute**. A second interview with short-listed candidates will include the CEO.

The Foundation promotes innovation in teaching methods, and continuous professional development (CPD). The Foundation organises CPD for its teaching staff/Trainers. MFHA Australia continuously provides new and updated training material for the MHFA courses. Richmond Foundation invites the MHFA Australia experts from time to time to provide CPD for the trainers. **The Centre Director** and Manager of the Centre are also both certified as Train the Trainers and they also organise CPD training to the trainers.

The Foundation provides access to learning material to those involved in delivering the Course that they are teaching. Furthermore, the Foundation promotes the sharing of good practices during trainers meetings. Trainers also have access to the online learning platform. During the meetings the trainers share their experiences in delivering the training. **The Centre Director** and the Centre Manager provide constructive feedback to the trainers.

The Foundation also provides customised CPD sessions which are organised during the calendar year. Procedures are in place to encourage peer observation and observation by a critical friend. The intent is to always enhance pedagogies of teaching and learning. This ensures that a community of practice is nurtured.

Funds are also allocated for learning resources.

After the successful completion of a course this is evaluated. An online form is given to course participants at the end of the course. Results are first analysed by the course co-ordinator, shared with teaching staff and a final report presented to the Centre Director.

## **Section Seven**

## **Learning Resources and Student Support**

The premises and the facilities currently available allow for easy accessibility for all course participants and are in compliance with national regulations. A variety of rooms are available that allow the Foundation to run its services, whether they are fully-equipped lecture rooms, or meeting rooms that allow for small group or one-to-one sessions.

Appropriate learning resources for the courses that the Foundation runs are identified during the design and development stage and then discussed with the management to ensure feasibility and viability. Such an analysis/ procedure ensures that whilst adequate resources are made available, the financial capacity of the Foundation are not at risk.

Courses offered by the Foundation use a variety of teaching and learning resources. Students pursuing courses are also provided with course notes and materials, together with access to online material and links for further indepth studies.

Course information about what the Foundation offers are readily available on the Foundation's website.

One of the foundation principles of the Foundation is support. We ensure that any person enrolled for any of our services is made aware of our current provision and that academic, administrative and personal matters are handled by specialised staff. If particular needs are identified then specialists may be appointed on an ad hoc basis to address them.

## **Section Eight**

## **Information Management**

The Foundation understands the responsibility of confidentiality and the secure management of all forms of data. The confidentiality of all information falls under the direct responsibility of the CEO, but is assisted by the COO and Centre Manager.

The Foundation's information management policy endeavours to maintain all information and records in a dedicated secure password protected database. Retention of all records is compliant with regulations and archived for the mandatory period of 40 years.

In addition, the Foundation is compliant with the GDPR regulations and requests the consent for the inputting and processing of data from all stakeholders including students and teaching staff. The Foundation ensures that the information is made widely available through effective communication and constantly updated portal.

The following three categories of information are held:

### **Student Records**

Records of students' course admission, including background information, course progress reports, records of meetings held (if applicable), assessments per study unit/course, results and certification. In addition, students with dedicated needs/ access requirements are archived. Database includes individual (SEN) cases, other mitigating circumstances, etc.

### **Feedback and Evaluation**

Evaluation forms are sent to all students at the end of each study unit/course. Feedback is analysed and reports are presented and made available on the Foundation's platform. Feedback from teaching staff is also sought both through written means and also through course evaluation at the end of a course. This helps the Foundation to ensure that such feedback feeds into course enhancement/development.

### **Traceability**

The Foundation does its best to maintain contact with students that pursue our courses and/or use our services.

## **Section Nine**

## **Public Information**

The Foundation manages its courses through its website and learning platform. The website and learning platform (together with its learning accompaniment mobile app.) are constantly updated providing the latest details and information. The course material is also kept up to date via the mobile app. Feedback from students is constantly taken on board to fine-tune the website and learning portal information especially when the feedback shows that certain information is not being understood clearly by all the students.

The information that is made public is categorised to provide information that can be easily accessed, is clear and transparent. The website and the learning platform provide the following information through four main categories:

### **Strategic Nature**

- Mission Statement
- Organigram
- IQA Policy
- Richmond Foundation Policies.

### **Selection Criteria**

- Selection criteria for the programme
- Intended learning outcomes
- Course structure, aims and objectives
- Qualification/ Award
- Information on EQF/MQF level and ECTS/ECVET learning credits
- Teaching, learning and assessment methods used
- Pass rates
- Further learning opportunities available at the Foundation.

### **Teaching Staff**

- Foundation's staff members
- Roles and responsibilities
- Contact details.

### **General information**

- Events of the year.

Material is routinely updated and made easily accessible to the general public. The Public information section is managed by the ..... The frequency of such updates is dependent on development of courses or events. In addition, the Foundation commits itself to review and update content at least on a quadrimester basis as a minimum requirement. Furthermore, the evaluation and review of public information forms part of the annual meetings that take place with teaching staff, in addition to, student feedback reviews.

## **Section Ten      On-going Monitoring and Periodic Review of Programmes**

The Foundation is committed to monitor all activities undertaken. It implements the quality cycle by monitoring and periodically reviewing the courses in terms of its IQA policy and standards. This includes feedback from students, teaching staff and external stakeholders. The external stakeholders include the Commissioner for Mental Health, educators in schools especially heads of school, and Youth leaders. Richmond works closely and regularly with the stakeholders.

This includes:

- Feedback on audits [by MHFA Australia and NCFHE]
- Students' feedback [An online form is given to the course participants at the end of the course.
- The results are discussed with the teaching staff.  
<http://learningplatform.mhfa.org.mt/surveys/fill/Courses/2#/surveys/Courses/2/add-record>]
- Student and teaching staff ratings/feedback provided through evaluations are assessed.
- An annual colloquium is organised by the CEO that brings together all teaching and administrative staff, to discuss the satisfaction levels on the various aspects of the Foundation, and address expression of needs, concerns and other issues.

Once the feedback is analysed, a decision is taken to either retain, stop running the course/s or possibly make changes and submit for review to MFHEA. The feedback through the evaluation forms looks at various aspects such as the impact on the personal and professional development of the course participants and the relevance of the course at the work place, school, voluntary organisations etc. This is carried out by the Centre Director, the Centre Manager and the teaching staff. Such feedback has an impact on the content and delivery of future programmes or the same programme to a new cohort. The feedback is communicated and followed up via email or via a specific trainers' meetings depending on the nature of the feedback.

Reports of both internal and external reviews are readily available for improvement purposes.

## **Section Eleven   Cyclical External Quality Assurance**

All evaluations and reports related to the programmes undertaken by the Foundation are readily available and will be presented to the local authorities (i.e. MFHEA) and other bodies concerned directly with any of our courses (e.g. MHFA Australia) when an external quality assurance exercise is being undertaken or when requested.

Richmond is ISO certified and therefore .....

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