BRITISH COUNCIL

A Framework for Quality Assurance in English-Medium Higher Education in Turkey

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EXECUTIVE SUMMARY

Drawing on a range of data sources, including current international QA schemes in higher education and English language teaching, previous documents produced by Turkish institutions, interviews with key informants and a workshop held in Ankara in February 2018, this report outlines a framework for an accreditation scheme for English-Medium Instruction (EMI) in Higher Education in Turkey.

Key issues that were repeatedly identified included the need for transparency, consultation and practicality, and the recognition that practice in EMI across Turkey is highly varied.

A balance between self-review, peer-review and external review is advised to ensure both the professionalisation of the sector and accountability to the public for high-stakes testing.

It is recommended that an Association is set up to admit members who provide the necessary evidence to show a commitment to QA in EMI. The recommended aims of the Association (to be ratified) are

- To raise the quality of English language instruction and assessment in HEI Language Centres
- To improve student outcomes in all respects in full, partial and non-EMI (English Medium of Instruction) universities
- To set and maintain quality standards in the processes which deliver student outcomes, leading to full accredited membership of the Association for those institutions that meet all quality standards
- To promote full integration of English Language Centres, their staff and students into the academic, cultural, social and well-being structures and services of the University of which they are part
- To establish and train a team of Advisors who will monitor, as peers, those institutions applying for initial or continued membership of the Association
- To promote inclusivity, transparency, collegiality and the sharing of good practice within and between H.E. Language Centres

The association will employ at least one person on a full-time basis to ensure that it functions effectively. It will be run by a board and a chair will be elected by its members. Further details of the recommended constitution are in Appendix 2.

The proposed accreditation scheme looks for quality in the areas of Staffing, Curriculum, Assessment and Student Outcomes, Managing Student Outcomes and The Learning Environment.

Each of these areas is described by Principles which determine Standards. Evidence is required to demonstrate the Standards. Suggested examples of these are provided in Appendix 3, but these too need to be determined in consultation with stakeholders. It is expected that the Association can be established and accreditation operational within a year (see Appendix 4 for a timeline).

QUALITY & ENGLISH-MEDIUM INSTRUCTION IN TURKISH HIGHER EDUCATION

Higher Education in Turkey

The Council of Higher Education (YÖK) in Turkey has overseen extensive growth in the higher education (H.E.) sector over the last 30 years. From around 18 universities in the 1970s, through the establishment of YÖK in 1981 and the first foundation (non-state, not-for-profit) university in 1984, the first two decades of the 21st century have seen increasingly rapid development. In 2000 there were 71 universities, and from just under four million students in around 175 universities in 2013, student numbers rose to over seven million in 182 H.E. institutions in 2017 (The Council of Higher Education, 2017).

The establishment of the Quality Commission for Higher Education (YKK) in 2015, and its recently granted independence from YÖK, demonstrates a commitment to matching the increase in quantity in Higher Education with an equivalent improvement in quality. This move is also in recognition of the apparent mismatch between Turkey's improving global position in economic production, as measured in GDP, and its position on measures of education, such as PISA. Accreditation associations such as MÜDEK, for engineering degrees, TEPDAD, for medical degrees, and TURAK, for tourism degrees, have already been recognised by YKK in offering nationally (and in many cases internationally) recognised accreditation schemes.

H.E. in Turkey retains its key role as a lever for social mobility in society, providing educational opportunities to a wide range of students across the country, and consequently it is incumbent on universities to provide fair and transparent access to higher education. English-medium instruction in higher education presents universities with the challenge of removing the barrier to education that a foreign language places in front of students, particularly those from state high schools.

English-Medium Instruction in H.E. in Turkey

Higher Education is in a period of change across the globe. Student numbers are increasing; students are paying more for their education themselves; and education, like society in general, is taking on a more international vision. To support the international scope of current post-16 education an increasing number of courses are being delivered through the medium of English. English is not only the language of the internet, science and travel, it is the *academic lingua franca*. Students, staff and university structures are challenged by the use of English in their classrooms, research output and administration but many are innovating with English language support programmes both for those hoping to enter the university and those already inside.

More and more universities around the world are providing courses in the English language (Graddol, 2006). While there is frequently resistance to this movement, often based around indigenous language rights (Phillipson, 2009), the global demand for English-Medium Instruction (EMI) in higher education grows at an increasing rate. The frequently-cited benefits of EMI include:

- faster access to the latest research
- access to more publications, including a wider range of textbooks
- greater international cooperation between universities
- increased enrolment of international students
- increased opportunities for international research
- increased employment opportunities for graduates

However, there are significant difficulties experienced in most contexts when delivering undergraduate and postgraduate degree programmes in English, especially in countries where English is not an official language.

There is a tension between the role of H.E. in offering opportunities for social mobility and the role that English-Medium Institutions occupy in Turkey. For more than 50 years the most successful universities in Turkey, nationally and internationally, are those that offer English-Medium degrees. Set against a context where the average high school graduate from a state school has a very low level of English (Vale *et al.*, 2013), places at the top universities are more accessible for students from select state or private schools where subjects are taught in English. This situation can allow English-Medium Instruction to favour the children of the elites as inequality is reproduced due to the ability of affluent to send children to private English-Medium schools (Qorro, 2013). For the same reason, entrance to the state-run "Anadolu lise" (Anatolian High School) system has always seen fierce competition: parents see the need for English-Medium Instruction to access the universities that carry the most status. With the expansion of state and foundation universities in the last 30 years, the demand for English has increased as many new universities follow the lead of the top status universities by offering at least some EMI degree programmes, even when the demand may not justify the opening of more programmes (West *et al.*, 2015).

Quality Assurance

Education sectors across the world require evidence that their innovations, provision, and strategic goals operate at a maximally efficient quality. If students are to study in English, the students and their families, academic staff and the receiving faculties need assurance that they are ready to benefit fully from the courses. Where the nature of the provision is contested, the evidence-base that Quality Assurance (QA) can provide offers an opportunity to ensure quality and speak to concerns about social mobility.

The practice of QA grew out of the need for standardized processes to improve productivity and efficiency in manufacturing about 100 years ago. When applied to services, QA developed into strategies to ensure meeting customer expectations through the articulation of standards and processes to achieve those standards. Once education is seen as a service to particular customers, quality assurance can

be applied to schools and universities. There are numerous definitions in quality as applied to higher education, but three main possibilities emerge:

- How well the provision delivers on its pedagogical objectives;
- How well the provision delivers what is needed by society (increasingly the business needs of that society); and
- How well the provision meets a set of articulated standards.

All three possibilities draw on a wider frame of reference than delivering profits to shareholders and instead call on wider social interests and as such are often contested and culturally specific.

Quality Assurance in English Language Teaching

The three possible approaches to QA above are given additional complexity with English language teaching where questions abound about how languages are learned, the needs of societies which do not operate in English, and the understanding that language varies in different registers and disciplines. Language has a facilitating function in education as well as being an end in itself, leading to questions about how to establish whether a student's proficiency is sufficient to study through the medium of English, and whether that sufficiency should be gauged in the specific context of an academic discipline. Arguably, the value to a student of their education can only be gauged after it has been completed. A preparatory course is by definition linked to future performance and so may only be comprehensively assessed after the completion of the target course. By that time the opinions of the students have been shaped by their subsequent educational experiences and career choices. The complexity of language learning in H.E. deeply problematises traditional approaches to QA measures such as customer satisfaction and the consistent application of management processes.

Most QA processes in English Language Teaching have, until very recently, focused more on private, independent language schools than on language teaching operations within larger institutions such as a university. Accreditation UK, for instance, retains a focus on under-18 safeguarding, the accuracy of promotional materials and the financial security of an institution (British Council, 2015). These concerns are far more pressing for private institutions than those supported by international students paying fees to a university. Similarly, CEA (2017) retains a focus on ensuring that students' visas are current - a concern only if your students come from overseas, which is not the case in many EMI universities around the world. However, there are a range of factors that are common to all language teaching contexts in H.E. In a detailed review of QA and its application to language teaching, Heyworth notes several processes that contribute to good practice: "reflective practice, different forms of observation, action research as an instrument for change and innovation, to establish the involvement of all staff in an evaluative and innovative process" (p.291, 2013), and so these need to be noted in the development of QA schemes for language teaching.

METHOD OF DATA COLLECTION AND ANALYSIS

The current study has examined relevant evidence from a wide range of sources. While the approach to data collection and analysis is broadly qualitative, the approach reflects a sequential mixed methods design (Tashakkori, Teddlie & Johnson, 2015) as data from different sources have been used to inform subsequent stages of data collection. The project aims, methodology and research tools were approved by the Sheffield Hallam University ethics committee.

Data collection

The data collection stages below are presented in the order in which they were carried out. Consequently, the design and analysis of later sections are dependent on earlier sections.

Best Practice in QA in H.E. & EMI

The aim of this report was to provide the Turkish Council of Higher Education (CoHE) with a set of relevant, practical recommendations to create the core principles for a quality standards framework for English language Programmes in Turkish universities. A review of state-of-the art QA in language education (Hayworth, 2013) provided a framework for compiling a corpus of quality standards frameworks and the various associated accreditation schemes. Our corpus contained national frameworks for H.E., those for general-language centres inside and outside the H.E. sectors and one which is for the specific field of EAP. The corpus contains ten scheme handbooks, the majority in English. A content analysis of the four most relevant documents was conducted to evaluate the core principles of the schemes and formulate recommendations (Newby, 2014). The process was evaluative in the sense of understanding what is happening in the use of the existing schemes. The results are presented in the "International Comparison of H.E. Quality Frameworks" section below. These results were used as the basis for a workshop in which the core principles were put to a group of Turkish academics. The evaluations of the workshop operated as an evaluation to help form the policy and apply it to English language Programmes in Turkish universities.

Previous Reports & Studies

Within Turkey, previous work carried out into establishing a framework for quality assurance in preparatory English schools was also consulted. This includes: a report commissioned by CoHE and prepared by representatives of universities that are fully English-medium; a pilot 'Quality Development' programme carried out by the British Council; and the preliminary work produced by working parties under the auspices of DEDAK - an organisation set up to implement a QA scheme for EMI in Turkish universities. The main findings of these unpublished reports are summarised below. This report also draws on the published findings of Vale *et al.* (2013) and West *et al.* (2015) which investigated more general aspects of English language learning and teaching in Turkey.

FRAMEWORK FOR QA IN EMI IN TURKISH HE

Workshop at CoHE

On 27th February 2018, at the invitation of the president of Council of Higher Education (YÖK), 32 representatives of Turkish universities attended a meeting at the headquarters of CoHE. The aims of the workshop were to:

- discuss and agree on how a framework for a national quality assurance system should look, its agreed scope and indicators of quality in English in Higher Education;
- form a road map for the next two years to pilot and implement a local quality assurance system for English Language teaching in preparatory courses in Turkey.

The assembled group represented: universities from large and small cities; directors of English-language preparatory schools, rectors and vice rectors; those with entirely EMI degrees, those with only selected degrees in EMI, and those with mixed-medium programmes; universities with and without international accreditation were present; some universities represented the "Quality Development Programme" instigated by the British Council in Turkey; a team assembled by British Council, Turkey; and members of YÖK and YKK.

All workshop participants were welcomed personally by Prof. Dr. Yekta Sarac who introduced an ambitious plan to make the quality of each university's language provision clear to students choosing their courses for the 2018-19 academic year. The external consultants for the project, Dr. Nick Moore of Sheffield Hallam University, Sue Sheerin of EAQUALS and Dr. Jamie Dunlea of the British Council offered presentations on "*Best Practice Worldwide in QA for English-Medium Higher Education", "Setting up a QA Process" and "Benchmarking and Assessment of Outcomes"*, respectively.

Participants were then provided with instructions on how to proceed with their discussions and record-keeping in the afternoon sessions. Six groups were selected to offer a cross-section of the types of EMI context represented at the workshop and were given one of the following six areas to discuss:

1. *Staffing (Recruitment, Induction, Retention, CPD, formal training, opportunities for research)*
2. *Assessment (standards, benchmarking, suitable objectives, testing formats, skills, entrance exam, sustainability, consequences of success/failure)*
3. *Monitoring & scrutiny (internal / external board / advisor / examiner)*
4. *Curriculum (needs analysis, EGP/EAP/ESAP/EGAP/ESP, specification of objectives, measurement of levels, progression)*
5. *Integration with university (prep as part of EMI strategy, cooperation with faculty, implementation of needs analysis.*
6. *Processes for improvement focused on student outcomes (QA for management, curriculum etc.)*

Areas 3 and 5 were general issues that need to be resolved when considering how to implement a QA process in the Turkish EMI context, while the other areas were more focussed on typical areas of what is likely to be evaluated in an accreditation system. Each group was asked to discuss the following questions:

- *What is the current situation?*
- *What did you hear from the talks this morning that could be relevant?*
- *What would you like the situation in Turkey to be?*

In order to encourage participants to share salient issues relevant to their context, and to appreciate the different contexts that constitute EMI in Turkish H.E., participants were requested to limit these discussions so that they could focus on the main task to assist in the development of a QA process. Participants were asked to consider the following four areas in relation to their topic (see 1-6 above):

- What are the minimum standards needed for…
- What are the expectations for good standards in…
- What evidence will demonstrate that this is happening?
- What issues need to be discussed & resolved?

Each group recorded the results of the discussions on large sheets provided. The discussions were recorded, where participants offered their signed consent, in order to confirm that the written record provided full coverage of decisions and conclusions for each group. The results of the discussions were then presented in a plenary session to all groups.

Interviews with Key Informants

On 28th & 29th February 2018, four key informants were interviewed. The key informants were able to provide over five hours of interview data. Their interviews were recorded, with their informed consent, and reviewed using a theme-based analysis. The four key informants represented, variously, the Higher Education Quality Commission, positions of Dean, Director or Head, a state university, a private university and EMI education in compulsory schooling and across the university. All were invited to interview for their differing perspectives on QA in EMI in H.E., and together represented over 100 years of experience.

All interviews were semi-structured, based on schedules prepared during the review of QA in Higher Education (see appendix 1). The interviews were coded based on the predetermined themes (Newby, 2014) derived from the interview objectives and were then cross-referenced to identify common points identified by the different informants.

Data Analysis & Results

This section outlines key findings from the data gathering activities described above.

International Comparison of H.E. Quality Frameworks

QA & Accreditation in Higher Education
Today, many national education systems have bodies with oversight for quality in higher education. These may take the form of direct government bodies, but typically have some form of independent or charitable status. They aim for transparency, clear articulation of standards, social accountability, and they set and monitor standards. The range of the

standards and their precise format differ across sectors such that any education system seeking to develop their own QA system can do so from an existing range of options.

The UK's Quality Assurance Agency for Higher Education, for instance, articulates its primary aim as 'to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world' (QAA, n.d.). The strategic objectives of the QAA are to address the needs of students, to safeguard standards, to drive improvements and to improve public understanding of UK higher education. The UK Quality Code for Higher Education was developed after consultation with the sector and provides guidance on designing programmes of study and policies on academic standards. This is articulated through subject-specific benchmark statements which set out the skills and knowledge that graduates are expected to have at the end of specific degree courses. The QAA is able to take a role in improving standards through organising training and CPD events. The QAA's role extends to policing, and they provide publically accessible reviews of the extent to which the sector maintains academic standards. The QAA also has a role in investigating concerns about the H.E. sector and sets and monitors standards of access to H.E.

The UK's QAA provides supplementary guidance for international students. It works closely with UK Council for International Student Affairs (UKCISA), the UK immigration department and the British Council. There is a high degree of coherence and strategic alignment between these bodies. International students whose first language is not English must meet course specific requirements (often an IELTS band of 6.0) but are also obliged to demonstrate minimum standards of English for a (Tier 4) student visa. Demonstration of English language level can be achieved either through a Secure English Language Test (currently only IELTS and Trinity examinations), or students can pass an accepted pre-sessional, or preparatory, course at a UK university with an in-house test (Home Office, 2018).

In Australia, the Australian Qualification Framework (2013) underpins the national system of qualifications, ensures access to education and training, and supports the regulatory and quality assurance processes of the sector while ensuring international mobility of graduates and the alignment of national with international qualifications. The framework specifies learning outcomes in terms of knowledge, skills, application, and volume of learning for each level and qualification type. The criteria are used by educational institutes, employers and specified accrediting authorities. Students applying to university must satisfy the learning outcomes and English-language requirements. The English language requirements can be met by demonstrating prior study in the medium of English, a particular score on a set of English language tests or completion of an English language preparatory course. In common with the UK higher education system, there are also national English language requirements set by the Australian Department of Immigration and Border Protection (DIBP) to obtain a student visa.

In New Zealand, a similar quality assurance system is coordinated by Universities New Zealand. The Committee on University Academic Programmes builds and applies the qualification and regulation approval, accreditation and programme moderation procedures. The Academic Quality Agency for New Zealand Universities is an independent body that monitors the universities standards of achievement for research and teaching objectives. It uses regular institutional audits to promote the enhancement of practice across the sector. The qualification scheme uses Tertiary Evaluation Indicators (TEIs) linked to Key Evaluative Questions (KEQs) which are used for self-evaluation and to develop the provision of particular courses (NZQA, 2017). New Zealand's universities recognize prior study in

English, a range of independent English language assessments and preparation courses. In contrast to the UK and Australia, an additional English language qualification in addition to a university offer is not required for a student visa.

The approach to QA in Hong Kong, where the national language policy promotes bilingualism (Cantonese and English) in literacy and trilingualism (Cantonese, English and Putonghua) in oracy and where most state universities are EMI, has evolved quickly to emphasise learning outcomes and continuous improvement in an audit-based system (Sun, 2017). QA has also encouraged a wider range of assessment practices, although Hong Kong continues to operate two separate accrediting bodies for qualifications and for institutions.

QA and Accreditation Schemes in Language Teaching
In the English-speaking world, there are a number of quality assurance schemes which cover English language courses or centres. They offer criteria and inspections which are typically aimed at private language schools but are also taken up by H.E. institutions for their non-credit-bearing courses (which stand outside the QA schemes outlined above). The reports are generally available online and come with a 'badge of success' which the accredited school can use for promotional purposes. As such they provide the indices and policing described above, but do so for a wide range of business and institutional contexts. Their custom and practice has evolved over time in dialogue with the market that they serve. The level of specificity becomes greater in the schemes which recognize a greater specificity in student need.

Broadly speaking, the schemes establish standards, provide a platform for demonstrating that the standards have been met and offer a system to encourage continuous improvement. The summary below focusses on five schemes as they are indicative of the how such schemes work and vary.

The NEAS scheme in Australia divides its framework into seven quality areas:

1. Teaching, Learning and Assessment
2. The Student Experience
3. Resources and Facilities
4. Administration, Management and Staffing
5. Promotion and Student Recruitment
6. Welfare of Students Aged Under 18 Years
7. Strategy, Risk and Governance.

Within each area there are quality principles and quality drivers. An example of a quality principle in area Teaching, Learning and Assessment, is: "Course delivery, assessment and teaching approaches optimise outcomes for students" (NEAS, 2018). This is broken down into six drivers, for example, "Where an ELICOS course is accepted for direct entry into a tertiary education course, assessment outcomes are formally benchmarked against relevant tertiary education admission criteria" (NEAS, 2018). Already a finely calibrated scheme the specifications are further detailed in an appendix of notes; the example above has a class size specification in the appendix. Benchmarking is not only done with admissions criteria but there is a strong recommendation to benchmark to the CEFR, too.

The NZQA (2017) scheme for private training establishments in New Zealand is designed to evaluate the quality of the EFL sector through context specific 'reasonable expectations' in

how it approaches performance. It is built on their evaluative quality assurance framework and so the quality areas are expressed as TEIs. TEIs express what 'good' looks like in a particular area and so are a useful tool for continuous improvement in a school and enable self-assessment. The self-assessment works through KEQ which are also used during external reviews. The TEIs are grouped into one set of outcome indicators and four sets of process outcomes:

1. needs
2. student engagement
3. governance & management
4. compliance

For student engagement, for instance, a key evaluation question is: "How effectively are students supported and involved in their learning?" (NZQA, 2017) Beneath that question an indicator is "student learning goals are well understood". This is supported by an explanation and request for evidence (how do we know?). In applying the system to tertiary organizations, the school is expected to identify what is relevant. The scheme recognizes that reasonable claims cannot be made beyond the current knowledge of language acquisition or assessment practices; they may rely on "the expertise of an independent subject expert". English New Zealand further supplement the scheme with a set of standards for their members (schools) covering

- staffing, employment and professional development
- curriculum and course delivery (including assessment)
- the student experience
- governance and management
- promotion and school recruitment.

In the UK, the British Council runs an accreditation scheme in partnership with English UK (British Council, 2015). The scheme aims to develop, establish and maintain quality standards for UK English language teaching provision. Currently UK English accredited schools include both private language schools and some universities. The scheme's purpose is to give an assurance of quality to international students who plan to study in the UK. The scheme has five overarching sets of standards:

1. Management
2. Resources and environment
3. Teaching and learning
4. Welfare and student services
5. Care of under 18s

As such it covers the same ground as the Australian and New Zealand schemes.

The British Council scheme limits itself to English and the UK. A scheme that was designed to be pan-European, but has expanded beyond those limits, was set up by Eaquals. Eaquals is an independent organization supporting excellence in language education through developing quality standards, accrediting providers against those standards and offering training and consultation. The Eaquals (2018) quality standards, based on organisation's charters, are arranged around twelve domains:

1. management and administration
2. teaching and learning
3. course design and supporting systems
4. assessment and certification
5. academic resources
6. learning environments
7. client services
8. quality assurance
9. staff profile and development
10. staff employment terms
11. internal communications
12. external communications

The Eaquals manual contains within course design and supporting systems a standard which demands that "all language course programmes are specified by levels which refer to the CEFR, and learning objectives are related to the global descriptors of CEFR levels."

Another accreditation scheme that is regularly used internationally is the CEA (2017) scheme. Originally set up by members of TESOL International, the scheme includes

1. 1 standard for Mission
2. 3 standards for Curriculum
3. 7 standards for Faculty
4. 1 standard for Facilities, Equipment, and Supplies
5. 12 Standards for Administrative and Fiscal Capacity
6. 8 Standards for Student Services
7. 3 Standards for Recruiting (students)
8. 4 Standards for Student Achievement
9. 1 Standard for Student Complaints
10. 2 standards for Program Development, Planning, and Review (CEA, 2017)

All of these Standards are elaborated discursively, and for some the evidence that each has been achieved is specified. For the quality indicators in the eight Standards for Students Services, six refer to the student's immigration status or visa. The 12 standards for Administrative and Fiscal Capacity provide assurance that the language school is unlikely to fold unexpectedly. For most language centres attached to a university, this scenario does not apply, even though they must demonstrate financial management and planning. That is, while the CEA scheme is applied internationally, it takes a U.S.-centred view of indicators of quality.

A comparison of the scope of the schemes shows some commonalities. The differences are in the connection to the national H.E. QA schemes, the way the standards are articulated, and the way that the standards are grouped and ordered both sequentially and hierarchically. Our comparison of these schemes, and the scheme in the following section, produced the following core categories:

1. Staffing (Recruitment, Induction, Retention, CPD, formal training, opportunities for research)
2. Assessment (standards, benchmarking, suitable objectives, testing formats, skills, entrance exam, sustainability, consequences of success/failure)
3. Monitoring & scrutiny (internal / external board / advisor / examiner)

4. Curriculum (needs analysis, EGP/EAP/ESAP/EGAP/ESP, specification of objectives, measurement of levels, progression)
5. Integration with university (prep as part of EMI strategy, cooperation with faculty, implementation of needs analysis
6. Processes for improvement focused on student outcomes (QA for management, curriculum etc.).

Language teaching schemes commonly have assessment practices and the curriculum in their scope. Criteria for assessment tend to cover the placement and progression tests that operate between levels of proficiency. They often include monitoring of progress and the provision of certification after a course ends. Accuracy of assessments is an important feature of language school quality. Although some private language schools offer certification for progression into university, more often they will work towards internationally recognized tests which have the quality assurance of being conducted independently. Language centres within universities, on the other hand, more often develop and administer their own assessments which can be used for entry to H.E. and for obtaining a visa. The curricular criteria are often called the teaching and learning standards. They involve notions of 'good teaching' (such as support in student autonomy), the appropriacy of the syllabus and the availability of clear, structured lesson plans and quality published or in-house produced materials which meet the needs of students and of the course. At the juncture with management, some schemes include standards for course reviews and staff development. Together the set of standards give an indication of good practice, what counts as good, in language schools and set a quality assurance standard for student experience.

English for Academic Purposes and Accreditation
Contemporary teaching of English for Academic Purposes (EAP) is driven by an analysis of student need. In the 1970s, models of course design developed which analysed a student's current situation in comparison with their target situation. If the students target was to use English in business situations then the patterns of language use in that target situation informed the syllabus for the course. English for General Academic Purposes (EGAP), as a domain of language teaching developed from this approach to syllabus design (Jordan, 1997). Through the 1990s, research in systemic functional linguistics, corpus analysis, and genre pedagogy refined the EFL sector's understanding of how language is used in academic contexts. Driven by this understanding of the context of language use, the evolving field of EAP further refined an understanding into one of English for Specific Academic Purposes (Charles and Pecorari, 2016), or ESAP. Although the value of ESAP over EGAP courses is contested (Hyland, 2002; de Chazal 2014), many larger language centres globally provide language preparation courses designed to meet highly specific target needs of students going on to particular courses in their university. The level of specificity of a course has become an important criterion in quality assurance for some language centres.

BALEAP is a professional body with charity status based in the UK. It runs an accreditation scheme (BAS) for university English language courses which are delivered by an institutional member, and a similar scheme (TEAP) for EAP Practitioners. The BAS scheme (BALEAP, 2014a) currently has 25 members and is mainly UK-based. The scheme for practitioners (TEAP) offers a fellowship scheme similar to the UK's HEA Fellowship. The purpose of TEAP is "to enhance the quality of the student academic experience through facilitating the education, training, scholarship and professional development of those in the sector" (BALEAP, 2014b). The emergence of both these schemes is a response to general language teaching accreditation schemes not meeting the requirements of language

teachers who deliver EAP in university contexts. BALEAP is not a teacher training organization but the schemes are used to develop the capacity and competency of their members and have been developed for quality assurance purposes.

The general areas that are assessed by BAS are familiar but the sub-areas reflect the highly specific nature of its remit. The main areas are

1. Institutional Context
2. Course Management
3. Course Design
4. Teaching and Learning
5. Assessment, Evaluation and Progression.

An example of a sub-area in institutional context is "Course Directors will nurture relationships with receiving departments, in order to understand the academic culture and work in receiving departments." Such a criterion is borne of the dependence that an EAP needs analysis has on data from receiving departments in an ESAP course. A further level of complexity borne of the ESP nature of the accredited provision is that the BAS framework has a parallel framework in the BALEAP TEAP Competency Framework. Three levels of practice are recognized in the scheme with each mapped to areas of professional activity:

1. Professional Development, Research & Scholarship
2. Programme Development
3. Academic Practices, the Student and Course Delivery.

As such the BALEAP scheme offers a detailed description of what good teaching looks like on a university language course.

Previous Reports & Studies

Previous work by a group of directors for EMI universities, the pilot QA programme organised by the British Council, Turkey and the DEDAK group indicate that there is a clear need and desire for QA processes in H.E. in Turkey. The British Council report into pilot QA interventions also demonstrates that the need for QA processes is recognised beyond those responsible for language teaching.

Some detailed discussions in the group of EMI directors commissioned by CoHE have already produced a selection of key language objectives derived from the GSE (Pearson, 2015) at the CEFR B1+ level which could be considered as a statement of minimum testing objectives, assuming that these align with the needs identified for a university's language programme. Similarly, conclusions and standards identified by this group, the pilot projects and DEDAK can be used to inform the consultation documents proposed in this framework. It is essential, however, that all proposals are shared among the community and stakeholders concerned before being integrated into the framework. A key term that has arisen in nearly all discussions is that of transparency and so these groups need to make their findings and discussions more open.

CoHE Workshop

The discussions from each group are summarised below, based both on the written record provided by each group, and a check of the recorded discussions.

Staffing

Overall, this group reported that regulations placed by CoHE (YÖK) on the sector had a greater influence than institutional discretion and practice. Tests such as ALES (a general test for all university lecturers) were considered unhelpful and largely irrelevant to the requirements for an English language teacher in preparatory school. More important for considerations for recruitment were suitable training, at least a C1 level of English, language teaching experience, and a professional approach to teaching and professional development.

Under evidence of standards, the group suggested an appraisal system that included the following elements: self-assessment; student evaluation; peer observation; target setting / action plan & review; supervisory observation; CPD; conference attendance; in-service training, and one member described the proportion allocated each element in one university, presumably resulting in an overall score. The group also raised the question of national standards of employment in universities and suggested that good teaching performance should be recognised.

Assessment

The group discussing assessment noted a clear difference between minimum and good standards. For instance, while B1+ on the CEFR (Council of Europe, 2001) was considered the minimum required level of proficiency for completion of the preparatory school, B2 was considered a good level. Minimum standards demand a link between a CEFR-levelled test and the curricular objectives, and set expectations that tests will measure all skills and vocabulary, that they will be subject to item analysis, and will be externally validated (locally if necessary). Good standards demand transparency in test format for students, and set expectations for Rasch analysis of tests items as well as processes to ensure the reliability of the stated exit level for the test.

Evidence that standards are being achieved and maintained will be found through student handbooks making the testing system clear to students, through clear testing objectives, and through records of test analyses and students tracking data. Key themes for issues to be resolved centred on greater collaboration between institutions including the sharing of testing items and expertise. A proposal could be made to fund a collaborative research project that encourages capacity building in English language assessment.

Monitoring & Scrutiny

The key terms from the discussions from this group, emphasised in their plenary feedback to the whole group, was that decisions around monitoring and scrutiny need to be practical, affordable, realistic and inclusive. The group considered options for internal, peer and external review of evidence and documentation and found value in all types. Some aspects of the QA process or some types of data collections, such as a needs analysis, however, were marked principally for internal review. Also emphasised was the need to recognise the student's whole journey through English-medium education from registration to graduation. There was general agreement that transparency required the sector to publicise reports or results through YÖK and/or a national quality panel. Issues that need to be resolved

included the question of financing for a scheme, a possible national examination or bank of test questions, and a possible grading of university English provision.

Curriculum

The group discussing Curriculum focused on the very practical steps required to ensure that teaching materials, teaching methods and assessments match student needs through transparent processes. As well as suggesting a minimum of B1+ on the CEFR, the group advocates a vocabulary syllabus covering at least the 2,500 most common words and from 300 to 500 words from the New Academic Word List (Coxhead, 2000). To aim for higher standards, this group suggested revising these targets to B2 on the CEFR, the first 3-4,000 most common words and the complete New Academic Word List. In addition, more attention would be paid to Freshman year English courses and extra-curricular activities.

Evidence for achievement in this area was not detailed, but suggestions included student satisfaction surveys and indications of transparency such as the inclusion of test specifications in student handbooks. A final issue that the group believe needs to be considered is how to improve the overall level of teaching on EMI courses.

Integration with University

Reviews of work in EAP contexts regularly reveal the importance of good communication and the institutional relationships between the university in general and EAP practitioners (Blaj-Ward, 2014). As such, this group was tasked with considering how best to ensure language teaching goals can be enabled in the university context. A key strategy from this group was for preparatory faculty to regularise contact with department faculty and students in order to carry out and verify the needs of the stakeholders. Minutes and action plans should be produced as evidence of these meetings. As well as meeting other departments and faculties, the director of the English language courses should hold meetings at Senate level as a minimum measure of integration. Integration would also be improved with a more realistic understanding of students' progress in learning English and with a better standard of English language at the end of high school. This final point was reiterated by a number of groups in the plenary meeting.

Good examples of integration included clear involvement of preparatory students in university-wide extra-curricular activities (including giving preparatory students access to the faculty), the sharing of good EMI pedagogic practice across all faculties, and English language teaching that is delivered as needed throughout the student's university career. It was also suggested that the results of needs analyses should be publicised for greater transparency, and that students should be tested at graduation. Issues that remain unresolved centre around the area of teacher competencies, especially for faculty lecturers, and the level of resources that are available in some institutions.

Processes for Improvement Focused on Student Outcomes

To begin the alignment with the broader goals of QA and accreditation in Turkish H.E., there was a need to maintain a focus on student outcomes. Consequently, the discussion of management processes was focused on improving student outcomes. All institutions should make public clear objectives and outcomes for each level, based on regular needs analyses, and more work needs to be done in and outside the classroom to help students once they leave the preparatory school. Issues of student entry level and the lack of resources for some universities were raised again by this group.

In general the workshop provided valuable guidance towards achieving its aims. Through the workshop, it was possible to plan a framework and a design a plan to implement a national framework for quality assurance in Turkish universities engaged in EMI. It was not possible, however, due largely to time constraints, to gain consensus on all the indicators of quality, and so this will form part of the preparation work that needs to be done over the next 1 or 2 years.

Interviews with Key Informants

Key themes that emerged from across the interviews addressed accreditation schemes, the position of preparatory schools within the university, management processes, external factors, working with subject specialists, staffing, entry and exit levels, and needs analysis, which was recognised as a key component by most informants.

When discussing a suitable accreditation scheme, informants suggested different levels of accreditation, including partial accreditation, the need to observe classrooms, the combination of local and international expertise, and the need to align any proposal with international standards including, for instance, the necessity that the association is independent. A suggestion was made to exploit online technologies so that an Advisor on a verification visit will not be presented with documents produced just for an inspection, but will have had prior access to records and so will only need to verify that the records match the activity at the institution. Finally, comments were made on the positive impact of QA processes, including accreditation schemes, in raising the awareness of managers in developing cycles of improvement for all institutions, even when accreditation is not achieved.

All informants noted the key position of the preparatory school within the university, both structurally and physically. With strong support from the institution, particularly key educational leaders, the goals of the university and English-medium instruction can be better aligned for the benefit of all students. Decisions including where to locate the preparatory school can have a significant effect on how much students feel that they have been accepted into university from their first day.

Related to the integration of the preparatory school with the wider university was the issue of training for academic faculty teaching on English-medium programmes. While schemes to promote better teaching have been attempted in various universities, they often run up against resistance from academic colleagues. However, this issue needs to be confronted to improve learning for all students, particularly those in EMI education. One suggestion was to require a teaching certificate or a teaching qualification specific to higher education (similar to the UK's Higher Education Academy Fellowship scheme).

The external environment has different effects on universities and on English-medium instruction. For some, the budget from the government or the budget within the university can enable or prevent the provision of suitable learning materials or the resources to train staff suitably. Another external factor repeated across interviews was the influence that regulations have over staffing, particularly in the hiring, retention, promotion and firing of suitable teachers.

Management processes, and who is responsible for managing English language programmes, were described as crucial to QA. The need for established processes for continuous improvement, such as those in place for preparing and analysing proficiency tests or for matching curriculum goals with teaching plans, was emphasised, as was the need for both consultation and inclusivity.

The issue of the entry and exit level of English language was a key factor. Those with some experience in Turkey concurred with the general attitude in the workshop that the level of language among students entering the preparatory school had not been so low for two or three decades. While changes are being implemented in the school system to attempt to rectify the current situation, it seems likely that the number of self-declared complete beginners in English (at least in terms of productive skills) will continue to form a significant proportion of university entrants. The tension between students needing at least a B2 level (in CEFR terms) to begin their undergraduate studies and the very low level that students enter the preparatory school with a statutory maximum stay of two years could be mitigated by more of an emphasis on the level of English with which students graduate. This perspective puts more emphasis on the university as an institution taking overall responsibility for language development, rather than placing all of the responsibility on the preparatory school or the relatively few hours that students might spend in English classes from Freshman to Senior years.

Finally, one suggestion was made that the university should not forget its responsibility to educate the student as broadly as possible, making sure it provides them with experiences and opportunities that will influence the type of graduate that they will become.

CONCLUSIONS

A profession is defined by its ability to regulate itself and maintain its own standards. Modern QA processes enable the regulation of institutions and members of a profession to not only monitor standards in an industry but also to share best practice and enhance the profession for the benefit of all. While there are pressures to highlight the controlling function of an accreditation scheme, this report concludes that the proposed association (see Appendix 1) offers an opportunity for the language teaching industry to mature into a profession through its role in universities. Consequently, a balance is proposed between self- and peer-review in the accreditation process, while external scrutiny and rigorous analysis are considered essential elements for all high-stakes testing.

While advisory visits form an integral part of the verification process for membership of the association, these visits should be planned into the academic calendar to encourage QA processes across the sector. Common practice, suggestions from the workshop and comments by our informants all call for the need for visits to institutions, which should include some form of classroom observation. These visits can also advise on testing practices, general processes for improvement and other teaching and learning concerns. Sharing practice and increasing trust across institutions will bring a better appreciation of the variety of contexts in EMI in Turkish H.E. as well as an overall improvement in standards.

Key terms that were repeated across different forms of data include Transparency, Consultation, student outcomes and practicality. Every effort has been made to include these key concepts throughout the proposal.

One of the over-riding conclusions, borne out by the differences between documents provided by the two working groups already investigating QA in Turkey, the comments made by key informants and the discussions in the Workshop, is that there is a wide variety of current practice across EMI universities in Turkey. Some of this variety is due to the level of resources available to each institution, but the variety of responses to the challenge of ensuring that students are prepared for EMI, and that they can continue to learn in EMI contexts, also shows that each context demands its own strategy. It is for this reason that any QA or accreditation process needs to be adaptable to any approach that achieves its objectives. This can only be achieved by committing to a process of consultation and transparency in setting up the Principles, Standards and Evidence for the accreditation scheme.

The different accreditation schemes considered for HE and for language teaching all combine different levels of documentation, so that general statements of intent are converted into material evidence. The scheme proposed here follows that pattern by suggesting a hierarchy consisting of four levels. The most general level is stated in the aims of the association, although these are not used in verifying accreditation applications. Statements at the next level are called the Principles of the association, and make general assertions about the desired state of the sector. These Principles determine the Standards. The Standards state what the association expects of each member for accreditation. In order to prove that the member has achieved each Standard, it will need to produce the required Evidence. It is expected that this hierarchy is mirrored in the relative flexibility of the statements. That is, while Evidence may change frequently, with the agreement of the majority of the board and the Advisors, the Aims of the Association should remain fixed.

FRAMEWORK FOR QA IN EMI IN TURKISH HE

Trends in QA in higher education, and comments made in interviews, conclude that QA processes and accreditation schemes run the danger of becoming little more than exercises in document production. For instance, it is relatively simple to produce action plans for a department as evidence of institutional improvement, but far harder to measure and evidence changes that were previously implemented. A focus on student outcomes not only reduces this danger, but demands that students are placed at the centre of all aspects of QA. Interviews with YÖK and also emphasised the need for student outcomes to stay central to all considerations of QA processes.

The issue of level was rarely far from discussions. There were widespread concerns over the low entry level of students, but concerns were also raised over the level of teachers' language in both language courses and in the faculty, even though this was not considered a cause for concern by West *et al.* (2015). Questions that need to be considered here include the ability to test, counsel and even reject students at entrance, the robustness of high-stakes tests for each institution, and the possibility of testing teaching staff. Questions are then raised about what action would be taken if staff are considered to have a language proficiency below the C1 minimum expressed in discussions.

Central to assessment and curriculum design is needs analysis. There are indeed many approaches to needs analysis (Nation and Macalister, 2010), and many can be informal, but for the purpose of QA, it is essential that curricular decisions can be traced back to needs analysis evidence. Student outcomes, assessment and teaching plans all depend on accurate needs analysis, and so language centres need to be able to communicate effectively with the university and destination departments. Often this communication can be enabled by strong supportive leadership in the university and a strategic position in the structure of the university, such as inclusion in senate meetings for the director of the language school.

Whether it is student satisfaction or student achievement, the ability to predict likely success or the profile of incoming and outgoing staff, data is critical to the successful implementation of QA processes. Although few workshop participants mentioned difficulties in this area, there was little mention of data collection in the previous QA reports.

It is essential to maintain a broad view of education when designing the QA framework. It becomes easy to focus on the immediate goals of preparing students to cope with the language demands of undergraduate or postgraduate study, but unless students feel that they are part of the university they may quickly become demotivated (West *et al.*, 2015). As educators, we need to keep in mind the type of graduates that we want to deliver to the world. Offering regular contact with the many facilities that universities offer within faculties, in clubs, sports teams and societies and in other extra-curricular events is likely to enhance the learning environment for all students.

The university has a duty towards the student from registration to graduation, and this perspective needs to be considered when planning how best to help a student through an EMI degree programme. Many innovative responses across Turkey that support students across all years while they are completing their degree course supplement the initial support provided by preparatory schools, and these need to be considered as part of the university's overall response to supporting students in EMI degrees. Language teachers can play a key role in identifying, preparing and providing some of this support, but the university has an overall responsibility to support students wherever it can.

RECOMMENDATIONS

To ensure sustainability of the scheme, it is recommended that an association is set up enabling the management of the scheme and ensuring the independence of the Board and Advisors (see Appendix 2).

Membership of the Association will be voluntary and will attract a fee in addition to the expenses and fee required for a verification visit. This will enable the Association to maintain its independence and achieve its goals.

The division into Aims of the Association (Appendix 2), Principles, Standards and Evidence (Appendix 3) will provide a flexible but ethical framework into which a variety of responses can be recognised as providing high quality EMI provision. These need to be agreed upon by all stakeholders.

Principles of a QA process require that consultation with key stakeholders forms a central principle for the establishment of standards (Heyworth, 2013). This report represents a major step in the bringing together, through the workshop and in interviews as well as the review of international experience, key perspectives for QA in English-Medium Higher Education in Turkey. The conclusions and the suggestions (in appendices 2-4) for the next steps can only be implemented by the stakeholders involved. A great deal of work has already been carried out towards establishing standards, through the CoHE workshop, by the DEDAK group and the group of directors for instance, and this work should be shared and positioned within the framework provided by this report. It is recommended that through the proposed association, working parties are formed to collate, propose and refine the Principles, Standards and Evidence that complete the framework. It will be the responsibility of these working groups to find a suitable position for the proposals already put forward by the different groups.

While the research into international QA systems reveal a tendency towards self- and peer-evaluation in H.E. in order to promote professionalism, data gathered in Turkey showed a strong preference for an external agency to ensure standards. Further investigation also showed a tendency for English language QA processes to favour classroom observation. For this reason, a balance between a self-review and a peer-review covering all main processes is recommended alongside robust quality-control practices to ensure that high-stakes tests withstand external scrutiny and can be reliably measured against external benchmarks, such as CEFR (Council of Europe, 2001) or GSE (Pearson, 2015).

To prepare for a full national accreditation scheme, and provide some guidance in this year's national university course guide, the consultation team recommends that only those language teaching institutes with external accreditation are recognised as voluntarily accredited in this year's catalogue. A realistic schedule is provided (Appendix 4) that will ensure that the association can be operational in time for the compilation of the YÖK catalogue in the following academic year, with the first members in the different categories.

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APPENDICES

Appendix 1 - Interview schedule for key informants

AIM: to evaluate the current role and opportunities of accreditation schemes in language preparation courses & in English-Medium Instruction in Turkish universities

Position: Director (or similar) of English language preparatory schools attached to a university.

Objective	Lead-in Questions	(Possible) Follow-Up Questions
Summarize parameters of prep course	What are your minimum and maximum student populations and pass rates for the prep school?	How many students do you register on average? How many students progress/fail to progress each year? How do you recruit students?
Identify contextual features of preparatory courses in PS	Can you outline how your course fits with the university structure? What are the objectives of the PS course?	What status does your department have in the university? How are you represented on decision-making panels for the university? In what ways do you think the prep school contributes to your students' lives and academic success?
Evaluate challenges of delivering preparatory courses in PS	What are the key support mechanisms and what gets in the way of you achieving your objectives?	How do you identify and share the learning objectives for the prep course? How do your teachers select, adapt or adopt relevant classroom materials? How do you manage the writing process for the tests the end of the prep course? To what extent do you make provision for the students' particular subjects? To what extent do different sectors of the university help in the delivery of preparatory courses?
Evaluate challenges of recruiting, training & retaining staff	How satisfied are you with your current teaching team?	How easy or difficult is it to attract and recruit new members of staff? What kind of induction for new teachers do you carry out? How much training and development do most new teachers need? What are the most common areas of training needs? When you lose a teacher, what are the most common reasons?
Identify current QA processes in PS; understand impact of external schemes;	Are you involved in any external accreditation or quality assurance (QA) schemes?	**Yes:** What does the scheme cover? What made you choose this scheme? What benefits have this scheme provided your institution? What challenges have been presented by the scheme? Were any aspects not relevant or not useful?

Find out why this was not pursued;		**No:** Have you considered a QA scheme? What prevented you from implementing one?
identify internal quality processes	What internal Quality processes perform a similar function to external QA?	What processes are in place for lesson observation? Is this a peer, supervisor or other scheme? How much CPD are most staff involved in? What kind of appraisal or performance review do you engage in? What resources do you feel you need to improve the standards in the prep school?
Gather general views on QA	What do you think a QA process can bring to an institution?	What benefits can the best ones offer? What difficulties can they bring?

Position: Dean (or similar) responsible for English-medium degree courses.

Objective	Lead-in Questions	(Possible) Follow-Up Questions
Summarize parameters of university	What are your minimum and maximum student populations and pass rates for the prep school?	How many students do you register on average? How many students progress/fail to progress each year? How do you recruit students? What proportion of your courses are in English? What proportion of your students come through the prep school?
Identify contextual features of preparatory courses in PS	Can you outline how your course fits with the university structure? What are the objectives of the PS course?	How do you see the status and the role of the prep school in the university? What representation on decision-making panels for the prep school do you think is appropriate? In what ways do you think the prep school contributes to your students' lives and academic success? What more do you think the prep school could do to improve the lives of your students?
Evaluate challenges of delivering English-medium course	What are the key support mechanisms and what gets in the way of you achieving your course objectives?	How do you identify the learning objectives for the different degree courses? What approaches do your faculty take to designing suitable courses, materials and assessments? To what extent do you make provision for the different learning needs of individual students'? To what extent do you contribute to the objectives or delivery of preparatory courses?
Evaluate challenges of recruiting, training & retaining staff	How satisfied are you with your current teaching team?	How easy or difficult is it to attract and recruit new members of staff? What kind of induction for new lecturers do you carry out? How much training and development do most new lecturers need? What are the most common areas of training needs? When you lose a lecturer, what are the most common reasons?
Identify	Are you involved in	**Yes:**

current QA processes in PS; understand impact of external schemes;	any external accreditation or quality assurance (QA) schemes?	What does the scheme cover? What made you choose this scheme? What benefits have this scheme provided your institution? What challenges have been presented by the scheme? Were any aspects not relevant or not useful?
Find out why this was not pursued;		**No:** Have you considered a QA scheme? What prevented you from implementing one?
identify internal quality processes	What internal Quality processes perform a similar function to external QA?	What processes are in place for lesson observation? Is this a peer, supervisor or other scheme? What kind of CPD for improving reaching and learning are most staff involved in? How often does this take place? What kind of appraisal or performance review do you engage in? What resources do you feel you need to improve the standards in your faculty?
Gather general views on QA	What do you think a QA process can bring to an institution?	What benefits can the best ones offer? What difficulties can they bring?

Position: Member of Turkish Quality Commission

Objective	Lead-in Questions	(Possible) Follow-Up Questions
Summarize parameters of prep course	How do you see the role of prep schools evolving?	Can you see a time when they are no longer needed? How do you see the development of universities and degrees using English-as-Medium-of-Instruction in Turkey? Do you see a time when undergraduate programmes will not require extra English language skills? What role do you see Turkish prep schools playing in the expansion of university places for international students?
Identify contextual features of EMI	Can you outline the strategy for courses, undergraduate and postgraduate degrees and universities that use English-as-Medium-of-Instruction in Turkey?	How do EMI courses and institutions fit in the overall planning of Turkish higher education? What are the main purposes of undergraduate and postgraduate EMI courses? Do you see them filling a role that Turkish-medium universities and courses do not? Is so, what is that role? What plans do you have for increasing international student enrolment?
Evaluate challenges of delivering EMI	What are the key support mechanisms and what gets in the way of Turkish universities teaching	What factors do you think prevent Turkish students from achieving a good grade in English when leaving high school? What systems are in place for students to deselect (opt out of) English-medium higher education?

	undergraduate and postgraduate courses in English?	What systems are in place for universities to refuse students a place (on the basis on language proficiency)? What plans are in place to align the university entrance examination with CEFR levels or EAP goals? What help can students find to improve their level of English and avoid a prep school?
Evaluate challenges of recruiting, training & retaining staff	How satisfied are you that there are enough resources in the country to satisfy an extensive EMI programme?	How easy or difficult is it to attract and recruit new members of staff? What plans are in place to expand the number of qualified language teachers and lecturers? What are the most common areas of training needs?
Identify current QA processes in CoHE	Is the quality commission or the Council of Higher Education involved in any external accreditation, standardisation or quality assurance (QA) schemes?	**Yes:** What does the scheme cover? What made you choose this scheme? What benefits have this scheme provided your department? What challenges have been presented by the scheme? Were any aspects not relevant or not useful?
Find out why this was not pursued;		**No:** Have you considered a QA scheme? What prevented you from implementing one?
identify internal quality processes	What internal quality processes do you think can perform a similar function to external QA? What processes do you think can only be performed through external scrutiny?	Which QA processes do you think are best left as internally moderated and controlled? Which QA processes do you think could benefit from external scrutiny? Which standards do you think must be moderated by an independent assessor?
Experience and expectations of external QA schemes	What accreditation and QA schemes have the quality commission been involved in previously?	What benefits have the schemes provided the universities being assessed? How confident are you that these schemes offer the most suitable processes for the universities? What plans do you have for further accreditation and QA processes?

Appendix 2 - Association of Accredited English-Medium Universities

The setting up and implementation of a functioning, credible Quality Assurance (QA) Scheme requires careful planning and consideration of a number of issues, if the desired outcomes are to be successfully achieved. Below is a very broad-brush outline of an Association considered to be the most effective means of achieving the objectives.

The Consultants propose the following:-

1. **Association of Accredited HEI English Language Centres:** This is the suggested working name of an association of Higher Education Institution (HEI) English Language Centres. The Directors of HEI English Language Centres, with the support of their University senior management, will found an association for the purpose of establishing a peer-to-peer monitored QA framework.

2. **Goals of the Association**: As a first step, the overall goals of the Association should be considered and stated. The following are suggested aims:
   - To raise the quality of English language instruction and assessment in HEI Language Centres
   - To improve student outcomes in all respects in full, partial and non-EMI (English Medium of Instruction) universities
   - To set and maintain quality standards in the processes which deliver student outcomes, leading to accredited membership of the Association for those institutions that meet the quality standards
   - To promote full integration of English Language Centres, their staff and students into the academic, cultural, social and well-being structures and services of the University of which they are part
   - To establish and train a team of Advisors, who will monitor as peers those institutions applying for initial or continued membership of the Association
   - To promote inclusivity, transparency, collegiality and the sharing of good practice within and between HEI Language Centres

   These goals should guide all subsequent action.

3. **Governance**: This can be provided by a Board of Governors. Suggested constitution of the board:

7 elected members:	3 office-holders: Chair, Vice-Chair, Finance Secretary
	4 Directors or members of the leadership team of a Full Member institution (see below) - one elected from each of the following categories of university: 1 state, 1 foundation, 1 city and 1 regional university
1 full-time employee:	Membership Secretary
Up to 4 invited members:	The Board can invite up to 4 advisory members (non-voting) to serve on the board, for example a representative of the British Council, a representative of MUDEK, a representative of the QAA etc.

External auditors: To be appointed by the Chair or Finance Secretary and approved by the membership.

To be decided:

- Terms of reference, job descriptions and period of service of all Board members to be determined.
- The number of Board meetings per year and whether an Executive Committee of the post-holders and Membership Secretary should meet more often than the full Committee.

4. **Funding:** It is envisaged that there will be an appropriate fee for membership and a fee as well as expenses for Advisory Visits, which are integral to the Scheme (see below). Initial funding may be needed to set up the association. Professional financial advice should be available to the Board on estimating the costs of setting up and operating the QA Framework and the setting of fees.

   Remuneration in terms of time and/or money of Board members, Advisors, those engaged in producing the support documentation (see below) will need to be considered. At least one administrative salaried post (Membership Secretary) will be necessary.

5. **Legal aspects:** With professional advice and guidance the Association will be legally constituted and Articles of Association drawn up.

6. **Membership:** HEI English Language Centres (ELCs) can apply for membership on a voluntary basis. A trained Advisor will then verify whether the ELC meets the quality standards by reviewing key documentation and conducting a verification visit to the ELC.

   There will be **three levels of membership** to accommodate currently varying levels of institutional QA and accreditation readiness and experience:

   Full members: ELC that meets all the QA standards on first visit. Full Membership lasts **four years**.

   Associate members: ELC that meets some of the standards and which has an agreed (by the Advisor) action plan in place to meet all quality standards within the period of **one year**

   Candidate members: ELC that has applied for membership but is not yet in a position to achieve Full or Associate membership. Candidate members are supported by an Advisor in drawing up an action plan to achieve Full membership within the period of **two years**.

   (Variable fees for the three different membership levels may be appropriate.)

7. **Peer Monitoring:** The Board will be responsible for overseeing normal recruitment procedures in order to appoint a panel of Advisors who will visit ELCs applying for initial or continued membership of the Association in order to verify evidence of compliance with the Association's QA Framework.

   It is recommended that Advisors appointed to the panel can show:
   - at least 3 plus years' of experience of EAP teaching (essential)
   - at least 1 year of management experience (essential)
   - experience of being involved at least once in a QA process (desirable)

- expertise in one or more of the following: curriculum design, assessment, training, management, involvement in another QA scheme (desirable)

8. **Verification visits:** The verification visit aims to confirm that the documentation provided by the applicant member matches the reality of the institution, when viewed by a peer in the role of an Advisor. The role of the Advisor, then, is to ensure that the evidence provided in the application for membership can be verified and that it meets the requirements of the Association. The Advisor may offer suggestions for improvement, as a peer, but these will be separate from the verification report which aims only to confirm that the applicant has met all of the requirements for membership. Where this is not the case, the Advisor will work with the applicant to plan and monitor how the institution can meet the requirements. If it is decided that this can be achieved within one year, the applicant will be granted Associate membership. If the institution is judged to require more than one year, it will be granted Candidate membership, which will expire after two years or until the institution achieves Associate or Full membership through a re-application to the association.

   The Board will arrange for suitable training of the panel of Advisors in how to conduct verification visits in a fair, impartial and collegial fashion, using the QA Scheme Handbook and the Handbook for Advisors (see below). Advisors should also be trained in report-writing following the verification visit. At least two Advisors should visit as a team over two days, one of them to be designated the lead or coordinating Advisor, and it is suggested that a third, less experienced Advisor should also be present in a junior, learning capacity in order to train up Advisors. How Advisors will be allocated to visit the various ELCs and who will allocate Advisors will need to be decided taking account of the need to be as impartial as possible.

   The Membership secretary will be responsible for keeping full and accurate records of verification reports and their outcomes, of informing the Board when re-inspection visits to ELCs are due every four or five years (to be decided), and for publicising verification reports through the association website and through distribution to YKK.

9. **Reports:** Following the verification visit, the Advisor team will determine whether the ELC meets of the quality standards and the lead Advisor will write a report, which will include recommendations where appropriate and requirements where action to achieve compliance is necessary. Requirements will be stated precisely with the outcome to be achieved, the evidence required and the time-scale for completion. Reports will be written using a report template (see below); they will be submitted to the Board for approval and a summary published online.

10. **Supporting documentation:** As a minimum, there will be a need to produce the following documentation:
    - The Association Quality Assurance Scheme Handbook containing as a minimum:
      - Introduction, with the goals of the scheme, etc.
      - Under various category heading, such as Curriculum, Assessment etc. the Principles of the Association, the Standards to be met in these categories and, in more detail, the Evidence (or indicators) which will show how the Standards are met.

- A Handbook for Advisors on preparing for, setting up and conducting a verification visit, with guidelines for report-writing
- A verification visit report template to be used for all reports
- A handbook for the Board containing the rules and regulations the Board and the Association need to follow

Due consideration will need to be given to naming, branding, a logo etc. for the documentation and communications of the Association.

A website will also need to be set up, designed and maintained by the association either through voluntary participation or through tendering to an external agency. The website will need to include all of the documentation listed above, notification of board meetings and minutes of past meetings, as well as the completed verification reports.

11. **Implementation plan:** Consideration needs to be given to the implementation plan for the creation of the Association. A broad suggested timeline could be as follows (see also Appendix 4):

   i.   Put the proposed plans for the founding of Association and the QA framework to a vote of acceptance by all the Directors, Rectors and Vice-Rectors who participated in the 27th February 2018 workshop; a 'Yes' vote of 50% or more being needed. The composition of the acceptance voting group should be decided in consultation with CoHE and the QAA.

   ii. Elect a provisional Chair and members of the Board to see through the setting-up of the association and, at a suitable time, recruit a Membership Secretary. It may be advisable to appoint the Chair for an initial period of up to two years from among applicant institutions, particularly those involved in the annual 'Directors Meetings', in order to establish the Association and install democratic voting mechanisms and rules.

   iii. Set up working parties for the five areas of Staffing, Curriculum, Assessment & student Outcomes, Managing Student Outcomes, and the Learning Environment to collate, prepare, send for consultation and refine Principles, Standards and Evidence in each area.

   iv. Set up a working group to produce the Scheme Handbook under the aegis of the Board, and to be approved by the Board

   v.   Establish and train a panel of Advisors

   vi. Pilot the scheme with a verification visit to a small number of volunteer ELCs. Revise the Scheme and Handbooks as necessary.

   vii. Launch the Scheme to all ELCs, possibly through a regional or international conference.

Appendix 3 - QA Framework for Preparatory Schools in English-Medium Universities in Turkey

The Quality Assurance (QA) Framework covers the five main areas of

- Staffing (including Recruitment, Induction, Retention, CPD, formal training, opportunities for promotion & research)
- Curriculum (including needs analysis, EGP/EAP/ESAP/EGAP/ESP, specification of objectives, measurement of levels, progression)
- Assessment and Student Outcomes (including standards, benchmarking, suitable objectives, testing formats, skills, entrance exam, sustainability, consequences of success/failure)
- Managing Student Outcomes (including QA for management processes, consultation with stakeholders, budgetary & financial planning, internal & external communications, stakeholder satisfaction, complaint & dispute resolution)
- The Learning Environment (including access to learning resources for students & teachers, self-access & independent learning schemes & centres, opportunities for personal development, integration with university programmes and general education)

All of these areas are equally important to the quality assurance scheme. Each area covers a wide range of considerations.

The scheme requires three levels of description to ensure that standards are agreed and can be specified (see Table A5.1 below).

The most general statements covering each area are called the Principles. The Principles for each area encompass all considerations for that area and set out in general terms what is to be expected, and should be limited to no more than ten. Principles can only be changed with the agreement of the majority of the members of the association.

Derived from these Principles are the Standards. The Standards make explicit what is required of each institution for each of the five areas. To gain full membership of the association, each institution must demonstrate that they have achieved all of the Standards. Standards can only be changed with the agreement of the majority of the members of the board.

The final set of documents, the Evidence, make explicit what the institutions need to produce in order to demonstrate that they have achieved each Standard. Where possible, institutions need to produce all the Evidence specified but, in some cases, institutions may be able to demonstrate Standards using alternative evidence, with the agreement of the Advisor. Evidence should be reviewed periodically, and can be changed with the agreement of the board and the majority of Advisors who should be balloted.

FRAMEWORK FOR QA IN EMI IN TURKISH HE

Table A5.1: Overview of Framework for Quality Assurance in English-Medium Instruction

	STAFFING	CURRICULUM	ASSESSMENT & STUDENT OUTCOMES	MANAGING STUDENT OUTCOMES	THE LEARNING ENVIRONMENT
Principles	see suggestion below				
Standards			see suggestion below		
Evidence		see suggestion below	see suggestion below		

Staffing
Principles
  a) Employment terms and conditions comply fully with legal requirements.
  b) Staff feel valued through opportunities to engage with decision-making processes, clear and transparent complaints and disciplinary procedures and inclusive treatment by all.
  c) Opportunities for relevant training and meaningful professional development are made available at suitable times to all staff.
  d) The institution has in place processes that ensure all staff have sufficient and appropriate training, qualifications and skills to carry out their assigned duties.

Assessment & Student Outcomes
Standards

1. Assessment procedures are compatible with the institution's educational philosophy and the approach to teaching.
2. Entry requirements for preparatory courses in respect of language level and competence are clearly communicated, set at an appropriate level for the course/programme to be followed, and are referenced to the CEFR or other internationally recognized language scale.
3. Systems and processes for assessing language competence provide valid, reliable and fair means of evaluating progress and achievement in a way that is appropriate for the course/programme and the students, and the results are clearly communicated in terms of current status and future priorities to staff and students.
4. Regulations, systems and processes for progress and achievement tests are fully documented and clearly communicated at an appropriate detail to reliably inform staff and students.
5. All high-stakes assessments are subjected to analyses that demonstrate both the reliability of individual items and the validity of the test as a whole in relation to the CEFR, other internationally recognized language scales or other internationally recognized language tests.
6. Formal assessment for progression within the Preparatory year, or progression to first or higher degree programmes, is conducted in line with clearly documented, secure systems designed to ensure the highest levels of integrity, accuracy and impartiality in grading.
7. There is a clearly stated minimum language level requirement for entry to (full or partial) EMI first or higher degree programmes and/or stipulated additional quality language support tuition provided during degree study.
8. Assessment processes are overseen by staff appropriately qualified and experienced in test design and production, and all teaching staff engaged in evaluation of students' productive skills, are adequately trained for this role.
9. Student assessment data is collected and analysed and reviewed and regularly reported on in order that measured student outcomes can inform the Quality Assurance process and provide feedback on institutional performance with respect to student outcome goals.

Assessment & Student Outcomes
Evidence (Selected)

Evidence for Standard: 1. Assessment procedures are compatible with the institution's educational philosophy and the approach to teaching.

1.1   Statements of teaching approach/philosophy for individuals &/or institution
1.2   Matching up of curriculum objectives and testing types of item
1.3   Testing specifications include item types and their testing objectives
1.4   Selected teaching materials from course designed to prepare students for testing types and syllabus objectives
1.5   Records of changes of teaching materials &/or item types as a result of student &/or teacher &/or needs analysis feedback
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Evidence for Standard: 9. Student assessment data is collected and analysed and reviewed and regularly reported on in order that measured student outcomes can inform the Quality Assurance process and provide feedback on institutional performance with respect to student outcome goals.

9.1   Records of student performance, including assessment scores and timely feedback provided to students, used in conjunction with teaching plans and lesson or materials preparation
9.2   Item analysis with recommendations for continued use or rejection of item
9.3   Record of changes to testing items, testing specifications &/or syllabus objectives as a result of feedback on previous assessment results &/or feedback
9.4   Records of student performance with analyses showing areas of strength and areas for improvement resulting in proposed action for improvement in language school or university; monitoring records/reports of previous proposals for proposed action
9.5   Minutes of meetings or changes in documentation that show how consultation was carried out to make changes to student outcomes
9.6   Analyses showing performance of past students and current performance in university, with projections for predicting student achievement on different courses based on achievement in proficiency test and other assessments

Curriculum
Evidence

- A statement of philosophy or approach to teaching and learning language that informs the design of the curriculum; where this varies from one part of the university to another (e.g. preparatory and final year courses), a statement justifying the need for different approaches and a description of how students are inducted or oriented to the newer approach.
- A syllabus document outlining all learning objectives and outcomes, distinguishable from one level to the next, and divided according to the stated teaching and learning philosophy of the institution.
- Teaching materials, including commercial or self-produced coursebooks, designed to achieve the entire set of objectives and outcomes specified by syllabus documents.
- Teacher handbooks, induction programmes and documentation produced to help teachers align with curriculum and syllabus objectives.
- Schemes of Work, teaching development plans, lesson plans or similar which evidence regular engagement by all teachers with the syllabus document(s), and samples of teaching materials produced or selected by teachers to supplement the recommended teaching programme.
- Minutes of meetings, results of surveys, or evaluation criteria demonstrating the process followed when selecting any commercially available materials as common coursebooks.
- Minutes of meetings, summaries of focus group discussions or interviews, analysis of degree programme requirements, survey or corpus results, or similar to provide evidence of significant needs analysis activity, typically to set up or redesign a course, including recommendations of how findings were incorporated into syllabus documents.
- Minutes of meetings, summaries of focus group discussions or interviews, analysis of degree programme requirements, survey or corpus results, or similar to provide evidence of regular monitoring of relevance of current needs.
- Record of changes to curriculum, syllabus documents and/or coursebooks or teaching materials, with rationale.
- Timetables, attendance records, observation schedules and other documentation that demonstrate regular provision of syllabus.
- Minutes of meetings, forms, surveys, summaries of reviews or similar that demonstrate the collation of views of teachers and students, and associated action plans to evidence of curricular responses to student wants and teacher comments.
- Student handbooks, induction programmes, webpages and other materials designed to help students understand the philosophy, aims, methods and materials employed by the institution.
- Tracking data to measure success of preparatory school against success in university programmes.
- Statement of policy on research within institution, including ethical guidelines, and record of research activity carried out on curriculum, including indication of any funds provided and action taken as a result of research findings.

Appendix 4 - Timelines for Setting up Association & Implementing Accreditation Scheme

Proposed timeline for setting up association and preparing accreditation scheme within 1 year

DATE	ACTION	RESPONSIBLE	DURATION
April 2018	Elect provisional (1-year term) Chair of Association by email	Group of Directors	2 weeks
April 2018	Set up working parties: Staffing; Assessment; Curriculum; Managing; Learning Environment Set objectives for each group	Chair, Group of Directors	2 weeks
April 2018	Establish website	Chair	1 week
May 2018	Working parties develop & propose Principles	Working parties	3 weeks
June 2018	Working parties share association Principles All stakeholders offer feedback	Working parties Stakeholders	1 month
July 2018	Working parties finalise Principles Working parties develop & propose Standards	Working parties	1 month
August - September 2018	Working parties share association Standards All stakeholders offer feedback	Working parties Stakeholders	2 months
October 2018	Working parties finalise Standards Working parties develop & propose Evidence	Working parties	1 month
October 2018	Consultants / Volunteers prepare Handbook & Training Manual for Advisors, guiding verification visits	Chair	2 months
November 2018	Working parties share association Evidence All stakeholders offer feedback	Working parties Stakeholders	1 month
December 2018	Working parties finalise Evidence	Working parties	1 month
December 2018	Consultants / Volunteers train Advisors	Chair	2 Months
January 2019	Consultants / Volunteers prepare Accreditation Manual for all institutions, including Terms of Association, Principles, Standards and Guidelines	Chair	1 month
January 2019	Association appoints permanent Membership Secretary	Chair Group of Directors	1 month

FRAMEWORK FOR QA IN EMI IN TURKISH HE

DATE	ACTION	RESPONSIBLE	DURATION
January 2019	Complete description of Association & Handbook for the Board	Chair Group of Directors	1 month
February 2019	Association confirms legal status and accepts first applications	Chair	1 month
March 2019	First verification visits & granting of Full / Associate & Candidate membership	Chair Advisors	1 month
March 2019	Submission of Membership status to YOK for inclusion in 2019-20 catalogue of universities and courses	Chair Directors of Members	1 month
April 2019	Election of 1st (3-year term) Chair of Association & Board members	Group of Directors	2 months
May 2019	Board plans official launch of Association Board plans Annual Conference series, or similar, to encourage development of QA in EMI	Board of Association	1 month
June 2019	Board decide on logo, branding & other operational matters	Board of Association	1 month

Proposed timeline for setting up association and preparing accreditation scheme within 2 years

DATE	ACTION	RESPONSIBLE	DURATION
April 2018	Elect provisional (1-year term) Chair of Association by email	Group of Directors	1 month
May2018	Set up working parties: Staffing; Assessment; Curriculum; Managing; Learning Environment Set objectives for each group	Chair, Group of Directors	1 month
May 2018	Establish website	Chair	1 month
June 2018	Working parties develop & propose Principles	Working parties	2 months
August 2018	Working parties share association Principles All stakeholders offer feedback	Working parties Stakeholders	2 months
October 2018	Working parties finalise Principles Working parties develop & propose Standards	Working parties	2 months
December 2018	Working parties share association Standards All stakeholders offer feedback	Working parties Stakeholders	2 months

FRAMEWORK FOR QA IN EMI IN TURKISH HE

DATE	ACTION	RESPONSIBLE	DURATION
February 2019	Working parties finalise Standards Working parties develop & propose Evidence	Working parties	2 months
March 2019	Consultants / Volunteers prepare Handbook & Training Manual for Advisors, guiding verification visits	Chair	4 months
April 2019	Working parties share association Evidence All stakeholders offer feedback	Working parties Stakeholders	2 months
June 2019	Working parties finalise Evidence	Working parties	2 months
June 2019	Consultants / Volunteers train Advisors	Chair	4 Months
August 2019	Consultants / Volunteers prepare Accreditation Manual for all institutions, including Terms of Association, Principles, Standards and Guidelines	Chair	1 month
September 2019	Association appoints permanent Membership Secretary	Chair Group of Directors	1 month
October 2019	Complete description of Association & Handbook for the Board	Chair Group of Directors	1 month
November 2019	Association confirms legal status and accepts first applications	Chair	1 month
December 2019	First verification visits & granting of Full / Associate & Candidate membership	Chair Advisors	3 months
March 2020	Submission of Membership status to YOK for inclusion in 2019-20 catalogue of universities and courses	Chair Directors of Members	1 month
April 2020	Election of 1st (3-year term) Chair of Association & Board members	Group of Directors	2 months
May 2020	Board plans official launch of Association Board plans Annual Conference series, or similar, to encourage development of QA in EMI	Board of Association	1 month
June 2020	Board decide on logo, branding & other operational matters	Board of Association	1 month

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