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Research Notes

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Editorial Notes

Welcome to issue 39 of *Research Notes*, our quarterly publication reporting on matters relating to research, test development and validation.

The theme of this issue is quality assurance and its impact on language assessment, language and teaching. We open with an article by Cambridge ESOL's Quality and Evaluation Manager Dittany Rose who evaluates the history of quality management to further understand the role of quality assurance within assessment generally, and Cambridge ESOL in particular. Our next article, authored by Nick Beresford-Knox and Dittany Rose, focuses on the implementation of a Cambridge ESOL internal audit. This case study approach describes the internal audit system process using examples taken from three distinct audit reports. Glyn Hughes then presents an innovative application of conversation analysis to the spoken interaction of QMS (quality management system) audits. His article describes the relationship between auditor and auditee via conversational patterns taken from three internal audits and discusses the practical implications for quality managers. This is followed by Claire McCauley and David Collett who assess the Cambridge ESOL centre inspections programme that ensures all examination centres are regularly monitored and receive feedback on performance.

The next three articles examine the auditing process within the context of the Association of Language Testers in Europe (ALTE). ALTE membership involves 32 member organisations representing 27 European languages, and as such requires a (QMS) capable of meeting the requirements of such membership. Nick Saville provides an overview of auditing procedures with a particular focus on the outcomes from audits implemented in 2007 and 2008. Next Francesca Parizzi discusses the training of auditors within the ALTE auditing system. Her work focuses on the necessary competencies and knowledge needed for both new and experienced auditors throughout the audit cycle. This is followed by Sibylle Bolton who describes the audit process for Cambridge ESOL Main Suite and Business English exams using the ALTE *Code of Practice Procedures for Auditing*. The final article for this issue focuses on language learning and teaching. Maria Matheidesz describes the development of a new manual for the EAQUALS (European Association for Quality Language Services) inspection scheme and includes the organisation's charters, inspection and assessment methods to explain the basic principles behind EAQUALS accreditation.

We finish this issue with the winner of the IELTS Masters Award for 2009 and a conference report from the 37th ALTE meeting and conference held in Ireland from 11–13 November 2009.

Setting the standard: Quality management for language test providers

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Introduction

Test providers assess, and in turn are assessed by their customers. An exam board assesses candidates' level of language ability and they in turn assess whether the tests will help them to achieve their goals. In a true market, customers have a choice and can take the test they feel is of the greatest quality. However, in many language testing situations, for example with less widely taught languages, there is only one possible exam for candidates to take. This means that the emphasis is squarely on the test providers themselves to make sure quality is upheld. On the other hand, when competition exists between test providers, candidates must be able to distinguish between the quality profiles of different tests and the organisations that produce them.

Cambridge ESOL has a long history of providing language tests which are reliable, relevant and with a positive educational impact. We are also one of the few exam boards to be certified to the international quality management standard ISO 9001. Our commitment to quality is further evidenced by our founding membership of the Association of Language Testers in Europe (ALTE). In this article, we explain how certification to ISO 9001 helps us to be confident about our quality profile, and how this complements our long-standing commitment to test validity.

A distinction is often made between quality assurance (i.e. focus on quality of the product) and quality management¹ (i.e. a wider focus on process) and this article looks at the history of quality management to see how these two strands have developed. It then discusses some standards that test providers can be judged against or can self-assess against. There is also an attempt to define what 'quality' means in regard to assessment and to describe how quality management can help to ensure this is achieved and that processes are continually improved.

A history of quality management

In the last 50 years or so there has been a plethora of quality management (QM) approaches, standards and awards, including total quality management (TQM), ISO 9001, European Foundation for Quality Management (EFQM) Excellence model, Zero Defect approach, Statistical Process Control, Price of Non-conformance (PONC), Lean Manufacturing and Six Sigma. These names are baffling to

many people, who may also have heard stories of quality management failures, such as the company that thinks that using the word 'quality' in its title will fool customers into believing it embodies the said attribute. There are also stories of organisations where, at some point in the past, there has been a 'big push' for one of the above quality management approaches. Often, this 'push' is largely forgotten and unsupported by top management and staff are left with empty phrases and rhetoric but no real benefits. A further issue is the over-emphasis on standards and certification at the expense of quality and improvement in a wider sense. By their very nature standards can create standardisation, which can lead to lack of choice for the customer. It can also be argued that they lead to a lowering of quality across an industry because some organisations stop when they reach the standard, rather than attempting to surpass it. The other problem with the image of quality has been with its widespread use for external checking by government agencies and other bodies. This often turns into a 'checklist approach', and if used in a heavy handed manner can be seen as a stressful waste of time by those involved.

To the uninitiated (and some of the initiated), therefore, QM can seem like a closed club and a very modern form of madness. In fact the key concepts of quality management, such as consumer laws, standards and inspection, have been with us for millennia. If one goes back to the crafts workshops of the Western Zhou Dynasty in ancient China we find sophisticated rules for the quality assurance of products, including a 'department for formulating and executing standards' (Qiupeng, Meidong and Wenzhao 1995:12). As soon as the human race was able to write, documenting expected standards became a natural and essential activity for trade and commerce. Quality was, for thousands of years, controlled and maintained by inspection against these standards. Rejected items were scrapped or in some cases reworked.

In the last 300 or so years, however, the Western world has experienced an industrial and scientific revolution, and quality management has moved into a new cycle. It has moved from an activity with a focus on *maintaining* standards, to a defined field with a specific focus on *improving* standards. The founders of this field, such as Taylor (1911) and Shewhart (1931, 1939), saw management as a science and began to show how systems could be experimented with and improved. They, and others, began to describe manufacturing activities (and later services) in terms of processes with inputs and outputs, thus enabling the links between different parts of an organisation to be seen more clearly. They also demonstrated the costliness of relying solely on inspection and rework, and argued that the focus needed to move to

¹ In fact definitions in different sources are often blurred. Those in ISO 9000:2005 *Quality Management Systems – fundamentals and vocabulary*, are clear but distinctions are fine between 'quality management', 'quality control' and 'quality assurance'.

reducing the number of defective items that reach the final stage.² Another key figure was the consultant W Edwards Deming who built on these ideas to create one of the first coherent QM approaches, now known as total quality management (TQM). TQM, which Deming wrote about in 1986 in *Out of the Crisis*, is regarded as ‘the father of all the quality management methods and standards that have come since’ (Kemp 2006:177), and has had a huge influence on the development of modern management standards. Its greatest and most publicised success was in post-war Japan, where Deming’s approach was taken up whole heartedly by a nation who needed to change their reputation for producing cheap poor-quality products. The approach worked, and by the 1960s companies who had implemented TQM, such as Sony, Toyota and Hitachi, were household names in the West with a reputation for quality.

Despite the success of TQM, many people still equate quality management purely with compliance to standards. This is a misunderstanding, and as Simon Feary, CEO of the Chartered Quality Institute says on their website ‘Quality is not certification. It is not inspection. It is not a science, restricted to a department of experts ... It is an approach, a set of tools, a philosophy, the substance of which is no more than an articulation of what all good managers recognise to be good business practices’ (2009).

Therefore, it can be argued that if your organisation is performing functions that do not relate to quality (or to the customer’s perception of quality), it is wasting time, effort and resource. Quality is, by definition, about everything that an organisation does. An organisation that understands this will see that quality is not purely the domain of the ‘quality department’ but in fact relates to the work of each individual. In this sense QM covers the following activities:

- quality assurance: those activities related directly to product/service quality, e.g. monitoring and measurement of product/service
- cross-business quality management activities and tools, including document control, records management, risk management, internal audit, liaison with external auditors, conformance to relevant standards, business continuity planning, centrally led process improvement activities
- quality of other support processes used across organisations such as recruitment, finance, IT, purchasing, project management, sales and marketing.

Quality matters for customers

One of the key tenets of modern quality management is the importance of meeting customer requirements. In order for a test provider to be confident that they are able to do this, they need to first define who their customers are (i.e. stakeholders within the assessment community), and what their requirements are. Once that is done the tester can define their processes and see what improvements can be made.

Ultimately, in assessment, the end customer is the test taker. However, in many cases the candidate may not be the person who pays for, or makes the decision to enter for, a particular test. That may be a parent, teacher, school or employer. In some cases governments will make the decision to use a test, perhaps to increase language attainment throughout their country. There are also other stakeholders in testing, namely those who use the test results. These include university admissions staff, immigration departments, employers and publishers of test preparation books.

What each of these stakeholders wants from the same test will vary; sometimes their needs may conflict, and more importantly, sometimes their needs may be unstated. This could be because the end customer cannot, or does not, make their needs known. This can be due to a lack of direct contact with the provider, such as when school candidates are entered for a test by their school, or it could be because the customer does not know or understand what they need. This is particularly relevant when talking about technical aspects of testing, such as the concepts of validity and reliability. These will be discussed later in the article.

It is also useful to look again at what it is we think our customers are ‘buying’. Is it the exam paper or the results? Is it how they are treated whenever they need to use the results? In fact, the whole candidate experience is our ‘product’, and we impact on that at a number of stages as shown below:

- when they study for the exam
- when they enter for the exam
- when they take the exam
- when they get and use their results and/or language skills.

Building on the above, we can suggest that the following areas will be of importance to the stakeholder:

- **Impact** – What effect will studying for and taking the exam have on the skills and life goals of the candidate and also on wider society?
- **Accessibility** – Can the candidate take the exam when and where they want to?
- **Fairness** – Does the experience of taking the test feel fair to the candidate, both in terms of what is on the actual question paper and in terms of the administration of the test? Are results delivered in good time, and do they feel fair to the candidate and other stakeholders? Do good results ‘open doors’ for the right candidates?
- **Customer service** – If things don’t go to plan, how well are they dealt with? What customer service is in place to deal with complaints and appeals?

Based on the above points we can see that there are qualities relating to test items; those related to the administration of the test, and those related to customer service. Some aspects of administration and customer service will impact on test validity, others will impact on candidate experience but not necessarily have an impact on the validity of the test. To enable an organisation to deliver these areas, they will need an effective and efficient structure of management and administration as well as

² It has been shown that the earlier in a process that this can be tackled the better, as early errors are compounded and become more serious errors later in the process (Kemp 2006:79).

quality objectives focused on the products and services they are delivering.

ISO 9001 and its use at Cambridge ESOL

Cambridge ESOL has been certified to ISO 9001 since May 2007. A few years prior to that, top management took the decision to gain certification as they were confident that Cambridge ESOL's quality profile was strong. It was also felt that certification to a management standard would not only complement existing quality assurance procedures, but also actively contribute to the development of the validity argument. ISO 9001 was chosen above other standards and awards for a number of reasons. It is now the most well-known quality management standard worldwide, implemented by over a million organisations in 175 countries. This means that our global stakeholders are most likely to have an understanding of what compliance to this standard means to them. The fact that the standard is aimed at all types of organisations, whether manufacturing or service, profit or not-for-profit, was a further contributing factor in the decision.

The latest incarnation of the certification standard is ISO 9001:2008 *Quality Management System Requirements*, which specifies requirements to be met to achieve certification. Its sister standard is ISO 9004:2009 *Managing for the sustained success of an organisation – A quality management approach*. This 'provides a wider focus on quality management than ISO 9001 ... and provides guidance for the systematic and continual improvement of the organisation's overall performance' (2009:v). ISO 9004 is not designed to be used for certification purposes.

Both standards are based on a series of eight principles which fit within the goals of Cambridge ESOL as set out next:

Principle 1: Customer focus

Principle 2: Leadership

Principle 3: Involvement of people

Principle 4: Process approach

Principle 5: System approach to management

Principle 6: Continual improvement

Principle 7: Factual approach to decision making

Principle 8: Mutually beneficial supplier relationships

(Taken from ISO 9004:2009 *Managing for the sustained success of an organisation – A quality management approach* 2009:38)

Another key methodology underlying the ISO 9001 standard is the Plan, Do, Check, Act (PDCA) cycle shown next:

- Plan: establish the objectives and processes necessary to deliver results in accordance with customer requirements and the organisation's policies
- Do: implement the processes
- Check: monitor and measure processes and product against policies, objectives and requirements for the product and report the results
- Act: take actions to continually improve process performance.

(Taken from ISO 9001:2008 *Quality Management System Requirements* 2008:vi)

If one looks at the description of PDCA above, it can be seen that there are some key questions that need to be asked at the Check stage. These are as follows:

- Are policies, objectives and requirements defined?
Or in other words, do we 'say what we do'?
- If they are defined, are they being followed and met?
Or, in other words do we 'do what we say'?

Of course, simply doing what one says, namely complying with your own procedures, is not enough. An organisation must be sure that what it does is effective in meeting the requirements of customers and other stakeholders. Even where the organisation is both compliant and effective, it should ask itself 'Can we improve?'.

At Cambridge ESOL we incorporate such questions, both in terms of checks on our own processes at head office (see the article in this edition by Beresford-Knox and Rose on our internal audit process) and our centres network. In regard to the latter, we have a system of centre inspections which is discussed by McCauley and Collett in this issue. It is important to note that these inspections are complemented by extensive training, documentation and other support for centres and centre staff. In other words, we make sure that inspection is an important check on our processes, rather than the key method for assuring quality.

Table 1 provides selected clauses from ISO 9001 and shows how they are operationalised at Cambridge ESOL. In order to avoid the dangers inherent in QM being equated purely with compliance, top management at Cambridge ESOL emphasises the fact that compliance to the standard is a) a starting point for further improvement and b) complements our existing focus on quality assessment.

Quality assurance of tests

ISO 9001 and other quality management standards are also supported by other technical standards to provide quality assurance. The oldest and most established are the 1999 *Standards for Educational and Psychological Testing* (AERA/APA/NCME), the forerunner for which was first published in 1954. As the title states, these standards are intended to cover a range of test types. For language tests in particular we turn to the Association of Language Testers in Europe (ALTE) who first developed their *Code of Practice* in 1994. This, along with the 17 Minimum Standards for establishing quality profiles in ALTE examinations and the *Principles of Good Practice* (2001), form the ALTE quality assurance approach. For more information on ALTE quality management, see articles in this edition by Saville, Parizzi and Bolton.

None of the above standards currently operates as a requirement for certifying against. For this reason most awarding bodies will choose to use these standards for the purpose of internal benchmarking and improvement. In the UK, however, awarding bodies must comply with the regulatory monitoring and reporting rules of the Office of the Qualifications and Examinations Regulator (Ofqual),

Table 1: Interpretation of ISO 9001 standard in Cambridge ESOL

Selected clauses from ISO 9001:2008	Notes and comments on interpretation of standard in Cambridge ESOL	Selected clauses from ISO 9001:2008	Notes and comments on interpretation of standard in Cambridge ESOL
<p>Clause 4 Quality management system (including documentation requirements)</p> <p>4.1 General requirements <i>The organisation shall establish, document, implement and maintain a quality management system and continually improve its effectiveness in accordance with the requirements of this International Standard.</i></p> <p><i>The organisation shall:</i></p> <p>a) <i>determine the processes needed for the quality management system and their application throughout the organisation</i></p> <p>b) <i>determine the sequence and interaction of these processes.</i></p>	<ul style="list-style-type: none"> The standard requires that the organisation understands what it does as a series of processes and describes how these interact with each other. Cambridge ESOL has done this in the form of a Process Interactions Map with further layers of documentation beneath this describing individual processes. Processes in a testing organisation can be complex and technical, and a document such as this can help staff to get an overview of how what they do impacts on further stages. Where one part of the organisation wishes to make changes, it can see which other parts of the organisation those changes may impact on. 	<p>Clause 6 Resource management</p> <p>6.2.2 <i>Competence, awareness and training</i></p> <p><i>The organisation shall:</i></p> <p>a) <i>determine the necessary competence for personnel performing work affecting product quality</i></p> <p>b) <i>provide training or take other actions to satisfy these needs</i></p> <p>c) <i>evaluate the effectiveness of the actions taken</i></p> <p>d) <i>ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives, and</i></p> <p>e) <i>maintain appropriate records of education, training, skills and experience.</i></p>	<p>In effect this clause applies to most staff, temporary staff, outsourced staff or consultants, as '<i>Personnel performing work affecting product quality</i>' actually covers most of the activities we do. In an exam board, of course this clause also applies to examiners, and so at Cambridge ESOL we need to be able to show external auditors that training has taken place where necessary and that examiners' work is checked to show that they are marking to the correct standards.</p> <p>We also have in place a system of quality management training sessions, worksheets and guidance documents for internal staff, including:</p> <ul style="list-style-type: none"> general introduction to quality management concepts risk management self assessment and process improvement.
<p>4.2 Documentation requirements</p> <p>4.2.1 <i>General</i> <i>The quality management system documentation shall include:</i></p> <p>a) <i>documented statements of a quality policy and quality objectives</i></p> <p>b) <i>a quality manual</i></p> <p>c) <i>documented procedures and records required by this International Standard and</i></p> <p>d) <i>documents, including records, determined by the organisation to be necessary to ensure the effective planning, operation and control of its processes.</i></p>	<p>A criticism of ISO 9001 is that it can lead to 'over-documentation'. It is important to note therefore that the number of required documents in the current standard is very low:</p> <ul style="list-style-type: none"> Quality Manual including a Quality Policy Six documented procedures 18 types of record including '<i>appropriate records of education, training, skills and experience</i>'. <p>4.2.1 d allows the organisation to decide how many other documents it needs. In Cambridge ESOL those who work on the process decide if documents are needed, although internal audits may sometimes recommend creation or improvement of documentation where this has been shown to be a risk.</p> <p>A further point to note is that controlled documentation is crucial to the smooth running of a process. For example, many hours can be wasted if staff have to search for the right document to use. In Cambridge ESOL we have put in place a simple system of document registers which list all published documents.</p>	<p>Clause 7 Product realisation¹</p> <p>7.2 Customer-related processes</p> <p>7.2.1 <i>The organisation shall determine:</i></p> <p>a) <i>requirements specified by the customer, including the requirements for delivery and post-delivery activities</i></p> <p>b) <i>requirements not stated by the customer but necessary for specified or intended use, where known</i></p> <p>c) <i>statutory and regulatory requirements related to the product, and</i></p> <p>d) <i>any additional requirements determined by the organisation.</i></p>	<p>This is a key clause as it covers product development and provision of product and service including any product release, delivery and post-delivery activities. It includes a focus on the customer, looking both at the customer requirements (clause 7.2.1 as below) and also at the processes in place for customer communication.</p> <p>a) A candidate may for example, tell us that they want 'a fair test with fair administration, at a price I can afford'. However, in most cases exam boards do not have one-on-one relationships with individual candidates, so it tends to be centres, schools, commercial businesses and other organisations who mediate and specify requirements. In most cases this will be about choosing an existing product, but where the need is shown to be currently unfulfilled this process can lead to a product development process and the creation of a new or adapted test for a specific client.</p> <p>b) This includes elements of the validity argument that the testing provider knows are necessary but the stakeholder may not specify. To define these in more detail we need to look at specific industry 'product' standards and frameworks such as the ALTE Code of Practice and Minimum Standards, or the <i>Standards for Educational and Psychological Testing</i> (AERA/APA/NCME). See the following section for further information.</p> <p>c) There may be further regulations that awarding bodies need to take account of, for example, in the UK issues of access to tests for people with disabilities are covered in the Disability Discrimination Act. Issues regarding the information that we keep about our candidates is covered by the Data Protection Act.</p> <p>d) Then there are requirements that may not impact on individual stakeholders but that the test provider will want to consider in general and for the long term. For example, we could argue that impact studies designed to look at</p>
<p>Clause 5 Management responsibility</p> <p>5.1 Management commitment <i>Top management shall provide evidence of its commitment to the development and implementation of the quality management system and continually improve its effectiveness by:</i></p> <p>a) <i>communicating to the organisation the importance of meeting customer as well as statutory and regulatory requirements</i></p> <p>b) <i>establishing the quality policy</i></p> <p>c) <i>ensuring that quality objectives are established</i></p> <p>d) <i>conducting management reviews</i></p> <p>e) <i>ensuring the availability of resources.</i></p>	<p>In a successful organisation, management will support the implementation and improvement of the quality management system (QMS) far beyond achievement of certification.</p> <p>In Cambridge ESOL the Chief Executive and Group Directors work through the role of the Quality and Evaluation Manager to implement and improve the QMS. This role reports to the Director of Research and Validation, thus drawing together the principles of quality management of process, and technical evaluation of product.</p>	<p><i>continued overleaf</i></p>	<p>¹ A note in Clause 3 states that 'throughout the text of this international standard, wherever the term "product" occurs, it can also mean "service" (2008:1)'. </p>

Table 1: Interpretation of ISO 9001 standard in Cambridge ESOL – cont.

Selected clauses from ISO 9001:2008	Notes and comments on interpretation of standard in Cambridge ESOL
<p>7.2.3 Customer communication The organisation shall determine and implement effective arrangements for communicating with customers in relation to:</p> <p>a) product information b) enquiries, contracts or order handling, including amendments, and c) customer feedback, including customer complaints.</p>	<p>the effects of washback are not necessary for the intended use of the exam, but they are definitely necessary in terms of evaluation of and continual improvement of the exam.</p> <p>a) For a language test provider product information will refer to information about the test, made available so that users can decide if it is the right test for them and so that teachers can teach appropriate content.</p> <p>b) Cambridge ESOL does this in a number of ways including through our public websites, our programme of international seminars for teachers, and publication of exam handbooks and supporting materials.</p> <p>c) Enquiries that cannot be answered with the information supplied through the channels mentioned above are dealt with through our network of centres and also through our Centre Support Officers and Customer Service Desk.</p> <p>d) The Customer Service Desk also acts as a first port of call for any complaints we receive. In testing organisations complaints may be about quality of service but in some cases candidates will question the accuracy of the results they have received. When these cases go forward they are called appeals and are dealt with through a defined process as set out on our public website. The UK regulator Ofqual also specifies requirements for appeals processes.</p>
<p>Clause 8 Measurement, analysis and improvement</p> <p>8.2.2 Internal audit The organisation shall conduct internal audits at planned intervals to determine whether the quality management system:</p> <p>a) conforms to the planned arrangements, to the requirements of this International Standard and to the quality management system requirements established by the organisation b) is effectively implemented and maintained</p> <p>An internal audit programme shall be planned</p>	<p>This clause closes the loop in Shewhart's PDCA cycle by covering the Check and Act phases. It includes the requirements to have a system of internal audits, to measure customer satisfaction and to control non-conforming product².</p> <p>It also deals with the taking of 'preventive action' and at Cambridge ESOL we have a defined risk management process that deals with this.</p>
<p>8.2.4 Monitoring and measurement of product The organisation shall monitor and measure the characteristics of the product to verify that product requirements have been met ...</p>	<p>Tests and test items are monitored and measured at a number of stages throughout the test development and test production processes and there is a dedicated Research and Validation Group whose task it is to do this.</p>

² Non-conforming product is any product or service that does not conform to requirements, be they those as in 7.2.1, stated by the customer or unstated.

formerly the Qualifications and Curriculum Authority³ (QCA). The QCA published guidance for *Awarding Body Self-assessment* (2006) and *The Statutory Regulation of External Qualifications* (2004). These regulations remain in force and cover aspects of organisational effectiveness such as governance, as well as more technical exam related aspects. Various frameworks such as those developed by Bachman and Palmer (1996) and Weir (2005) attempt to define the full range of attributes at test development, test review and evaluation stages. Although these have not specifically been developed into standards or codes of practice, they have influenced the development of the standards mentioned in this article.

It could be argued that some testing situations are perhaps more straightforward to standardise than others. However, the *Standards for Educational and Psychological Testing* (1999) highlight that a tick box approach to quality management of tests and test items will, in most cases, not be appropriate (1999:4):

'Evaluating the acceptability of a test or test application does not rest on the literal satisfaction of every standard in this document, and acceptability cannot be determined by using a checklist. Specific circumstances affect the importance of individual standards, and individual standards should not be considered in isolation. Therefore, evaluating acceptability involves:

- Professional judgement that is based on a knowledge of behavioural science, psychometrics, and the community standards in the professional field to which the tests apply.
- The degree to which the intent of the standard has been satisfied by the test developer and user.
- The alternatives that are readily available.
- Research and experiential evidence regarding feasibility of meeting the standard⁴.

Language testing is one of the more complex types of testing. As Jones (2009:7) notes 'tests do not simply measure discrete atoms of knowledge, but attempt to tap hidden mental processes'. For this reason, the standards mentioned here focus on methods of evaluation and types of evidence required, rather than specific values recommended for evidence. They talk about building an 'argument' regarding validity, and emphasis is on the professional, educated judgement of the evaluator. However, evidence is needed. For example, as Weir (2005: 1) notes, 'test validation is the process of generating evidence to support the well-foundedness of inferences concerning trait from test scores'.

A key task, therefore, of all testing providers is to develop this validity argument for each assessment and to provide evidence that shows the argument is met. Evidence can be provided to staff internally so they fulfil the aim of continually improving assessment. Alternatively, it may be provided to auditors, as in the case of ALTE audits (see Saville, Parizzi and Bolton in this issue), or regulatory assessments by bodies such as Ofqual in the UK. Beyond this, the test provider will also have a responsibility to

³ In 2008 the QCA was split into two organisations: QCDA and Ofqual. In April 2010, pending an act of parliament, these changes become official.

communicate the argument appropriately to its stakeholders. This in turn helps them to make the right choices about which assessment to take. It is worth noting that certain stakeholders may be more sophisticated in their understanding of relevant concepts, however testing organisations can do much to educate stakeholders about these concepts.

This is not to say that each 'product', or exam, cannot have set standards: they can and should. However, awarding bodies will need to show how the specific context and use of each exam influences the standards that are met, for example in terms of values for reliability, or size of candidate samples for pretesting. In time, similar types of exams may be compared. However, in most cases contexts are unique to each exam and comparisons are difficult to make.

A method that most test providers use, to check standards have been met, is that of the Test Specification document. Checking against such a document is done at various stages of the test development and production cycle before the test is released and taken by candidates. There will also be further checks post live administration to check whether the test items worked as expected. Examples of the type of internal quality controls include training of item writers and test constructors, pretesting of test items, and additional vetting and checking of test items. The types of attributes checked at these stages include level of difficulty of items, presence of bias, content and format of items.

Conclusion

In terms of quality assurance of assessments and quality management of processes, many tools and approaches are now successfully embedded within testing organisations. Product and management standards are both useful as guides and one can complement the other to assure customers that a test provider understands the meaning of 'quality'. The aim should not only be maintenance of standards but also improvement. This can happen in many ways, including the use of internal and external audits and assessments. Inspection remains a useful tool if used appropriately, for example when looking at compliance with certain aspects of customer service. Where it is clear what the service level should be it is possible to operate a check box approach to inspection.

For quality of tests and test items a more nuanced approach is required, and an understanding of the need to clearly define the context and use of the exam. However, this should not preclude test providers from gathering relevant evidence and presenting this to stakeholders in an appropriate format and context. Within testing providers there is a growing understanding of the need to do so, whether there is a local need for accountability such as a move to a more regulated system, or whether the desire comes from within the organisation itself.

For quality management to work it requires continuing commitment; certification to a standard such as ISO 9001 or self assessment against the ALTE minimum standards is

only the beginning. It is important to put theory into practice and move to the 'act' phase of PDCA – to make change happen. The other attribute that is required is a willingness to admit when improvements can be made. This includes a degree of honesty about the value of quality management systems and practices themselves. They are, as in most human endeavours, flawed systems in need of their own continual improvement. That is why at Cambridge ESOL we work hard to continually improve the effectiveness of our QMS, including our internal audit system. See the articles in this issue by Beresford-Knox and Rose for evidence of how we do this, and by Hughes for an interesting study into the dynamics at play in an internal audit.

References and further reading

- AERA/APA/NCME (1985/1999) *Standards for Educational and Psychological Testing*, Washington: AERA.
- ALTE (2001) *Principles of Good Practice for ALTE Examinations*.
- ALTE *Code of Practice and Minimum Standards*, retrieved from www.alte.org
- Bachman, L and Palmer, A (1996), *Language Testing in Practice*, Oxford: Oxford University Press.
- BSI (2005) ISO 9000:2005 *Quality Management Systems – fundamentals and vocabulary*, British Standards Institution.
- BSI (2008) ISO 9001:2008 *Quality Management Systems – Requirements*, British Standards Institution.
- BSI (2009) ISO 9004:2009 *Managing for the sustained success of an organisation – A quality management approach*, British Standards Institution.
- Deming, W E (1986) *Out of the Crisis*, Cambridge: Cambridge University Press.
- Feary, S (2009) *Time for Quality*, retrieved from www.thecqi.org
- Jones, N (2009) A comparative approach to constructing a multilingual proficiency framework: constraining the role of standard setting, *Research Notes* 37, 6–9, Cambridge: Cambridge ESOL.
- Kemp, S (2006) *Quality Management Demystified*, New York, McGraw Hill.
- Oakland, J (2000) *TQM Text with Cases*, Oxford: Elsevier Butterworth Heinemann.
- QCA (2004) *The statutory regulation of external qualifications in England, Wales and Northern Ireland*, Qualifications and Curriculum Authority.
- QCA (2006) *Awarding body self-assessment. Guidance for evaluating and improving performance*, Qualifications and Curriculum Authority.
- Qiupeng, J, Meidong, C and Wenzhao, L (1995) Ancient China's history of managing for quality, in Juran, M (Ed.) *A History of Managing for Quality: The Evolution, Trends, and Future Directions of Managing for Quality*, ASQC Quality Press: Milwaukee, Wisconsin.
- Shewhart, W A (1931) *Economic Control of Quality of Manufactured Product*, New York: D Van Nostrand Company.
- Shewhart, W A (1939) *Statistical method from the viewpoint of quality control*. Washington: The Graduate School, the Department of Agriculture.
- Taylor, F W (1911) *The Principles of Scientific Management*, New York: Harper and Brothers Publishers.
- Weir, C J (2005) *Language Testing and Validation: An evidence-based approach*, Basingstoke: Palgrave Macmillan.

Implementing an internal audit process: A case study from Cambridge ESOL

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Introduction

Cambridge ESOL achieved certification to the internationally recognised quality standard ISO 9001 in May 2007. This standard outlines a set of requirements for a quality management system. Internal auditing is a core requirement of ISO 9001; the standard specifies that internal audits should be conducted at planned intervals. An internal audit system was implemented in August 2006 and at the request of the external assessment body all areas of the organisation were internally audited prior to the ISO 9001 external certification visit in May 2007.

Building up internal auditor skills

An internal audit team requires a wide variety of individuals, from varying levels of authority and professional backgrounds, to be capable of tackling different types of audit. The team must have sufficient resources to ensure that the internal auditor is independent of the process being audited. ISO 9001 provides us with guidance to this end, stating that: 'The selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work' (British Standards Institution 2008:12). This point is also highlighted in internal auditing training materials: 'Auditors should be independent of the activity being audited and free from bias and conflict of interest' (Abbassi 2009:10). The following could be considered as key competencies of an internal auditor: good timekeeping, impartiality, communication skills, diplomacy, sensitivity and politeness. Styles and techniques will vary between individuals and this variation creates a rounded team.

The UK implementation body of ISO 9001, the British Standards Institution, provides guidance on auditing of quality management systems in ISO 19011. With reference to the training of internal auditors the standard suggests: 'They should have completed auditor training that contributes to the development of knowledge and skills ... This training may be provided by the person's own organisation or by an external organisation' (British Standards Institution 2002:26). Cambridge ESOL internal auditor training involves classroom based training with an external training organisation and hands-on training in the workplace. An ISO 9001 introduction training session is first attended to gain a detailed understanding of the standard, followed by a 2-day internal Auditor Training course. Whereas the first focuses on the detail of the standard, the second looks at internal auditing techniques including the responsibilities of the internal auditor from pre-audit to

post-audit activities. Many training organisations suggest that having attended the two courses, the trainee is now ready to embark on their first internal audit. We, however, add a final stage to the training. To build confidence, and draw together skills, the shadowing of a more experienced internal auditor is arranged by the internal audit team. This could entail observing an entire internal audit from pre- to post-audit activities, or even actual participation if the trainee and internal auditor feel it is appropriate. Following this shadowing activity the trainee will undertake their first internal audit with guidance and shadowing from an experienced internal auditor.

Internal auditor training is a continual process at Cambridge ESOL and we aim to improve with regular internal sessions at internal auditor meetings and further external training such as Lead Auditor courses. For example, research by Hughes (2010), highlighted evidence that effective feedback to auditees during an audit is not often sufficiently fulfilled. This issue was subsequently raised and discussed at an internal auditor meeting, with techniques of effective feedback suggested.

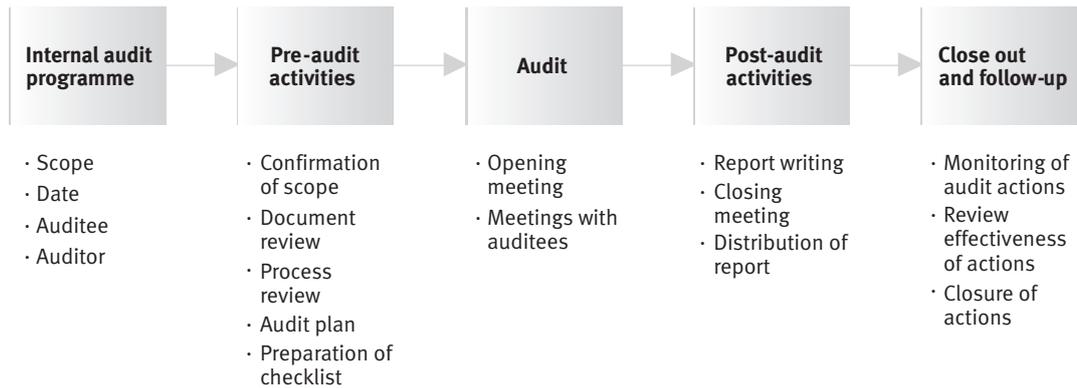
Internal auditing is a skill that is refined and developed over time, and as mentioned by Hughes (2010), a trainee internal auditor will initially be inexperienced in the core techniques. This is relevant to Cambridge ESOL and many other organisations, and so we attempt to assist internal auditor development through regular training, shadowing and close supervision by the management of the internal audit system.

Creating a system

The internal audit system was designed around a familiar model as illustrated in Figure 1. The first stage of the process is the planning of the internal audit schedule for the year. This details the internal audits for the coming year, including scope, internal auditor, auditee and date. Initially, for the first round of internal audits, this programme had the objective of internally auditing every area of the business as explained above. Over subsequent years this was refined to a smaller number of internal audits in key areas to avoid over-auditing of each department. Factors considered when highlighting areas for internal audit include areas of high risk, areas where problems have occurred in the past and new processes.

The internal audit programme consists of high level audits looking at the process as a whole, and more focused audits analysing a defined part of a process. These will all focus on compliance (conformance to requirements), effectiveness (process produces intended results/output)

Figure 1: The internal audit system



and efficiency (are there opportunities for improvement?), but some will focus more heavily on one than another.

The system outlined in Figure 1 was documented in a standard operating procedure with an additional set of guidelines detailing the interactions between parties involved. Templates were drawn up for the internal audit plan, checklist, internal audit and non-conformance report to ensure commonality between internal auditors. The auditees were also considered in the implementation of the process with a document produced to assist auditees in preparation for an internal audit called Frequently Asked Questions (FAQs). This was later followed by an additional document focusing on the process approach, with a background to the aims of process auditing and to serve as a self-assessment and preparation tool. In addition to the documents that assist auditees and internal auditors, a number of templates were issued for the administration of the system, again to ensure standardisation of communication in pre- and post-audit activities.

Alongside the implementation of ISO 9001 a web-based document management system was introduced in Cambridge ESOL. This document management system houses the internal audit records, including internal audit plans and internal audit reports, from implementation of the internal audit system in August 2006 to present. The document management system contains records, documents and templates that are mentioned in the previous paragraph. To track the current status of internal audits, a spreadsheet was designed highlighting key dates and outstanding actions.

The quality and evaluation manager takes overall responsibility for the internal audit system, with frequent input from senior management. All internal audit reports are reviewed by the quality steering group overseeing the process, and a 2-monthly report on the quality management system is sent to the senior management team.

Examples

Below are three examples of internal audits which have taken place over the last two years in the areas of recruitment, examination administration and confidential despatch. The examples provided are an overview of each

internal audit, with commentary from the writer of this article and using the report written by the internal auditor.

Examination administration

Scope: A high level process audit, from the processing of entries to the despatching of examination materials to centres, including Oral Examiner management and centre management.

Summary: The internal auditor reported that the process had three distinct sub-processes managed in different areas of the business.

Findings:

- The process consistently delivers the required outputs in all three areas.
- There is a clear culture of improvement across all three groups internally audited.
- The auditees were aware of areas where improvement was required and plans were in place to satisfy these needs.
- The process is monitored satisfactorily at various levels through reports to applicable meetings.
- Issues with administrative support meant that some documentation was not up-to-date and filed correctly.
- The internal auditor felt that further analysis could take place from the outcomes of the Team Leader system.

Confidential despatch

Scope: The process of despatching confidential materials from the Cambridge Assessment warehouse facility, including the cross-departmental interface.

Summary: The internal auditor felt the process worked well given the large number of despatches, but noted that there were some risks in the process which could be addressed.

Findings:

- A new group formed to overview the despatch process had been very successful, implementing a number of positive developments.
- A fortnightly report had recently been introduced to provide a summary of measures within the process (i.e. percentage of despatches sent).

- Risk assessments had been conducted.
- Several service level agreements were in place upon which it was suggested could be harmonised into fewer documents.

Recruitment

Scope: A high level process audit of the recruitment process for permanent staff.

Summary: The internal auditors found the process to be effective in appointing candidates to available posts and also reported that a future internal audit could cover the online recruitment system which was to be implemented.

Findings:

- Auditees have a sound knowledge of the process and associated procedures, and are committed to ensuring these are adhered to. The implementation of an online recruitment system should streamline the process.
- There are clear guidelines and flow charts for recruitment managers.
- Positive comments were received regarding the feedback from Human Resources to candidates.
- Some staff were unable to locate documentation relating to recruitment on the intranet, for example the recruitment criteria document.
- Suggestions were made regarding the updating of the recruitment manual for managers.
- It was suggested that a formal mechanism for feedback on the recruitment process should be introduced.

Communicating the benefits

The philosophy behind the Cambridge ESOL Internal Audit System is not one of box ticking or rubber stamping, to satisfy the criteria of ISO 9001, but to add value to the organisation and to promote continual improvement. This is achievable through the use of an experienced and well

trained internal audit team that identifies relevant and beneficial improvements to a process.

A recent staff message highlighted some of the benefits of internal auditing and also included testimonials from internal auditors. Comments on the benefits of being an internal auditor included gaining an insight into the work of different parts of the organisation, meeting and working with colleagues from other departments, and seeing how the processes in the organisation fit together. The focus of the message was to promote the potential improvements internal auditing can bring to a process, and the advantages of being an internal auditor. Further communication tools have included staff seminars on internal auditing and also coverage in induction of new staff through worksheets and presentations.

As well as communicating the benefits of internal auditing, it is also important to review the process itself and seek feedback from those involved in the system. Since implementation the process has been improved regularly, with simplified administration procedures and clearer documentation following feedback from internal auditors and auditees. Feedback is sought from auditees after each internal audit via a questionnaire, and internal auditors attend a post-audit meeting with the quality manager. The quality management team looks at best practice in other organisations and communicates with other quality managers. Conferences and training events are regularly attended to keep informed of the latest developments in the field.

References and further reading

- Abbassi, N (2009) *Internal Auditing of Quality Management Systems* (July 2009), Abbassi Ltd.
- British Standards Institution (2002) *Guidelines for quality and/or environmental management systems auditing (ISO 19011:2002)*.
- British Standards Institution (2008) *Quality Management System – Requirements (ISO 9001:2008)*.
- Hughes, G (2010) Using conversation analysis to investigate the interaction of QMS audits, *Research Notes 39*, 10–20, Cambridge: Cambridge ESOL.

Using conversation analysis to investigate the interaction of QMS audits

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Introduction

Internal quality audits are an integral part of most quality management systems (QMS), performing the function of verifying that a company's QMS is being implemented. They are designed to provide an opportunity for staff and management to assess and report on the effectiveness of processes in an organisation. Much of the literature on internal auditing focuses on the fact that there is a significant gap between what a QMS audit could be and

what it is; a particular problem is the relationship between the auditor and the auditee. This article explores this issue, using conversation analysis (CA) to carry out a detailed sequential analysis of transcriptions of three audit interviews undertaken at Cambridge ESOL¹.

In this article I analyse how the relationship between auditors and auditees develops in real time during a number

¹ This article is based on the author's MSc dissertation in Educational Management in TESOL, at the School of Languages and Social Sciences, Aston University, UK.

of audits. This analysis is contextualised in the literature on quality management and internal auditing, before summarising the principles behind CA and presenting the methodology. The conclusions focus on what lessons can be learned by internal auditors and discuss possibilities for future research in this area.

Quality management systems

In a competitive marketplace, all organisations seek to ensure and to publicise the quality of their products and services. A common way of doing both of these is by implementing a quality management system and obtaining certification to an externally recognised standard, most commonly ISO 9001 which is used by more than a million companies in over 170 countries around the world (Francis 2008:16). The advantages of such a system are clear: the implementation of a robust quality management system can ensure that a company operates effectively in pursuit of its business objectives and can allow it to manage risk.

As Pfannerstill writes, ‘The purpose of the internal audit is to investigate, analyse and report on activities related to the quality management system. Considering the potential for some inaccuracies in our procedures and inconsistencies in our activities, you would think this activity would have significant importance in the organisation ... Based on what I read in the literature and my personal experience, it does not’ (2005:67–8). This sums up a problem that lies at the heart of the quality audit – a general feeling that, in many organisations, there is a significant gap between what a QMS audit could be and what it is.

Central to the quality audit is the relationship between the auditor and the auditee (the individual being audited). In an ideal world, both auditor and auditee are working towards the common goal of reviewing processes and procedures in order to ensure that nothing is seriously wrong and to find opportunities for improvement. However, as Asbury and Ashwell report: ‘In many organisations ... auditors are still viewed with suspicion and even a degree of disdain by those who are likely to be audited’ (2007:174). Rather than a relationship of mutual trust built on the common goal of ensuring quality in an organisation, they refer to the ‘antipathy between the hunter and the hunted – the policeman and the offender’ (ibid).

Quality management and internal auditing

The internal quality audit traces its roots from two distinct places, both of which combine to give its current role. Firstly, the notion of auditing as a form of control has existed since Roman times. This original form of auditing focused on a company’s accounts and is still very common today. Companies regularly carry out audits of their finances. However, as Moeller and Witt (1999:22–3) explain, quality auditing is a distinct type of audit that has developed a very different focus. It retains the same overall purpose of ensuring that systems are under control, but here the systems being audited are operational and managerial instead of financial.

The other root of the internal quality audit is in the growth of quality management techniques and systems that have been applied worldwide since the Second World War. The pioneers in the field of quality management were Deming (1982) and Juran (1988, 1989), who developed new approaches to quality in Japan in the 1950s and then exported them to the US in later decades. Quality was also a focus during and after the war in the British and US military where errors in production had very obvious implications, such as warheads not exploding when intended. The British Military Standard became a British Standard (BS 5750) in 1970, and this British Standard evolved into the first international ISO standard in 1987. ISO 9001:2008 in turn is the most widely used successor to the 1987 ISO standard, and the standard used by Cambridge ESOL. Internal quality audits have become an established part of almost all quality management systems and are required by ISO 9001:2008 as outlined in section 8.2.2 of the ISO standard, which states that the organisation shall conduct internal audits at planned intervals to determine whether the quality management system:

- conforms to the planned arrangements, to the requirements of this International Standard and to the quality management system requirements established by the organisation, and
- is effectively implemented and maintained.

Quality management

A quality management system ‘defines all activities that are important and agreed upon to ensure the quality of the product or service’ (Pfannerstill 2005:40). W Edwards Deming is often referred to as the founder of modern quality management. His fundamental contributions to quality management were the notions of ‘systemic control’ and ‘continuous improvement’. The first of Deming’s 14 management principles that run throughout much of his writing is ‘Create constancy of purpose toward improvement of product and service’ (1982:23). Fundamental to Deming’s notion of improvement was the Shewhart cycle of ‘plan, do, check, act’ (1982:88). This has become axiomatic to many businesses today as the Deming Wheel (Asbury and Ashwell 2007:35).

Although Deming was instrumental in laying the foundations of modern quality management, he did not discuss auditing in detail. Juran (1989), however, viewed audits as a crucial means of quality control. To Juran, quality audits are an integral part of what he refers to as *strategic quality management* (SQM) (1989:203). Juran emphasises the strategic role of the quality audit in his list of questions that an audit is designed to answer, the first of which is: ‘Are our quality policies and goals appropriate to our company’s mission?’ (ibid:204). The notion of using a quality management system for the strategic purpose of ensuring that the broader objectives of the organisation are met is a recurrent theme in the literature on quality management. The evolution of the role of the QMS, and by extension the internal audit, from one of checking technical matters to one of dealing with management issues is dealt

with by many writers on quality management (see Asbury and Ashwell 2007, Juran 1988, Pfannerstill 2005).

The role of the internal auditor

Taormina and Brewer (2002:1–2) summarise the fundamental tenets of ISO 9001 as:

- document what you do
- do what you documented
- verify that you are doing it.

The job of the internal auditor is to perform the job of verification, a job that, as Pfannerstill's insights make clear, is both essential to a successful quality management system and at the same time fraught with difficulty. Pfannerstill describes an internal audit as 'a reoccurring activity, the purpose of which is to verify that systems and processes are implemented as intended and to identify variations so management can determine whether they should be incorporated or corrected' (2005:89). In other words, the goal of an internal audit is to review the effectiveness of procedures, and to verify that they are happening.

However, this process is not as straightforward as it may appear. Asbury and Ashwell allude to the complexities of the audit process when discussing their 'Audit Process Roller Coaster©' (2007:82–8). This illustrates how, on top of all the interpersonal matters that auditors need to consider, they also need to move between high-level analysis and detailed review and verification within an audit, while maintaining the link between the two. An audit plan is an ideal that is realised through the infinitely messier business of an actual audit.

Relationships between individuals, people and systems are at the heart of internal auditing. A point of conflict in an audit may be differing perceptions of organisational culture on the part of the participants. This can in turn lead to differing views on what the audit is for: whether it is primarily about detecting deviations or whether it is also about evaluating the effectiveness of processes.

Much of the literature on quality management and internal auditing focuses on the gap between the aspirations of internal auditing and the reality. The goal of much of the literature on auditing is to attempt to make the audit work more effectively, or to prevent it from deviating from the 'ideal' audit that exists in the minds of the authors. To do so, the authors provide charts such as those produced by Asbury and Ashwell (2007), or systems such as Pfannerstill's progressive audit with its scoring guide (2005:73–144).

Auditor training can also take a similar, and indeed, sometimes somewhat more extreme approach. An example of this is training material that asks trainee auditors to identify the shortcomings of a comically incompetent 'auditor from hell' (Meakin no date:4–10) who is rude and incompetent in a way that no real auditor would ever be.

This study follows a different approach from that used in most of the literature about quality management and internal auditing. It will use the emic perspective of CA to observe and discuss what is actually happening in internal audits as they occur. This will enable us to draw conclusions

about the audits on their own terms, rather than compared to an ideal audit. It will also ensure that any areas that cause difficulty in the area of auditor–auditee relationship are genuine, rather than contrived to prove a point.

Conversation analysis

Conversation Analysis, as defined initially by Sacks (1992), grew out of the sociological discipline of ethnomethodology pioneered by Garfinkel (1984). He rejected the sociological approach prevalent at the time that starts from a position of 'conceptual abstraction' and seeks evidence about how, and the extent to which, individuals successfully conform (Boden 1994:43). Ethnomethodology, by contrast, adopts an emic perspective (ten Have 2007:34–5) in which the researcher views the social action (such as a conversation) as the starting point, and uses how the participants demonstrably orientate themselves to their actions as the basis for analysis. In theory at least, the researcher does not bring prior categorisation to bear on the analysis but rather uses the analysis to create categories according to how the analyst believes the participants themselves view their actions.

Sacks (1992) applied the emic perspective of ethnomethodology to the study of spoken discourse, rejecting the idea of rule-governed behaviour and instead holding the view that conversation, like other behaviour, is both context-shaped and context-renewing and that context is 'both the project and the product of the participants' own actions and therefore inherently locally produced and transformable at any moment' (Drew and Heritage 1992:18).

The essential features that a conversation analyst will study are: turn taking organisation, sequence organisation, repair organisation and turn design (ten Have 1999:107). In addition, and in spite of its determinedly bottom-up approach, CA's focus on classifying sequences has produced a fixed terminology and also a number of generalisations, or 'regularities' (ten Have 2007:37), that occur in conversation. These include adjacency pairs, turn constructional units, pre-sequences, response tokens, accountable silences and many others. Practitioners of CA have been able to use patterns found in one piece of research to elucidate a very different situation. This research will attempt not to prejudge the motivations of the speakers, but where relevant, will refer to patterns found by other CA researchers to explain the actions of the participants.

Institutional interaction

A major use of CA is the analysis of institutional interaction as its tools seem especially appropriate in gaining a fresh perspective on a range of different institutional procedures. Boden in particular makes the case that the principles of ethnomethodology can reveal much about how processes within an organisation are, to use Weick's term, 'enacted' (Boden 1994:41). Boden's view is that 'what looks – from outside – like behaviour controlled by rules and norms is actually a delicate and dynamic series of interactionally located adjustments to a *continual* unfolding of "just what" is going on' (1994:41). She argues that organisations are not

best defined by their rules and procedures but by what people do and, by extension, what they say to each other; stating 'Talk is not just talk but rather the mode and medium through which the structure of the organisation is constituted and reconstituted' (ibid:202).

Research that is particularly relevant to this study illustrates how certain conversational norms can be analysed with the institutional context in mind and can reveal how the participants are orientating themselves to each other and why they may react in a particular way. Bergmann (1992:137–62), for example, discusses how attempts by psychiatrists to elicit problems from patients in fact carry 'a veiled morality' which can account for the hostile reaction they receive. Simply by mentioning an event, a psychiatrist turns it into something worth mentioning, or a 'reportable event'. Also relevant to this research is the study of questions and answers (see, for example, Bergmann 1992, Drew 1992, Heritage and Sefi 1992). The type of questioning ranges from hostile cross examinations (Drew 1992) to advice given by health visitors to first-time mothers (Heritage and Sefi 1992). A common thread running through these studies is the position of power that the 'questioner' is in, and the extent to which choices made by the person asking the questions, in terms of sequence organisation and of turn design, determine the manner in which the recipient responds and the tone of the proceedings in general.

Ten Have examines what can happen when questioners deviate from pre-planned and pre-scripted routines, for example when dealing with repair sequences in scripted interviews (1999:187–8). He draws a distinction that is not dissimilar to Asbury and Ashwell's earlier (2007) Audit Process Roller Coaster© mentioned earlier when he posits that a useful focus of what he calls 'applied CA' is to examine the 'tensions between local practices and any larger structure' – in this case the difference between the higher level script and the locally realised interview.

This research draws on CA to explore internal audits from the bottom up; rather than starting with what *should* be happening, the research generalises from what *is* happening. It is of course essential with any qualitative research, but especially so with CA, which by its nature focuses on a narrow sample and rejects broad notions of generalisation, to authenticate and legitimate any findings, as well as to aid their transferability to other contexts.

Analytical approach

The approach used here aimed to draw conclusions that can be used by quality professionals as well as CA specialists: it is therefore very much a piece of applied ethnomethodology. The early stages are best described, as they have been by Psathas, as 'unmotivated looking' (1995:45), meaning that an analyst should not, for example, start with the preconception that simply because we are analysing an audit the participants view themselves purely as 'auditor' and 'auditee'. It is essential to find features of the talk that show that this is how they are orientated towards the interaction. In fact, in the context of this research, auditor and auditee are only temporary roles, even in the institutional context. Other roles, such as senior

manager, junior staff member or even 'colleague with whom I disagreed in a meeting yesterday', may also play a role.

Any attempt to apply CA to institutional interaction and to draw conclusions from the research must retain the 'specimen perspective' essential to the approach. As ten Have points out, transcripts are 'to be considered as *specimens* of their kind and not ... as either *statements about or reflections* of a reality "out there"' (2007:36). This research therefore is an attempt to get at *what really happened* in a sample of audits. The hope is that using an emic perspective can reveal something about the process as it is realised, which can then be of use to those involved in planning and carrying out audits.

A common CA approach, often taken when analysing institutional interaction, is to focus on one interaction as a primary example of relevant features and to look to other interactions for examples of similarities and differences (Drew 1992, ten Have 1999); this is the approach taken here.

It can be argued that the context of the audits being analysed plays a role in determining the approach of the analyst. In some ways therefore, prior knowledge of the audit process, particularly some of the issues that arise with regard to the relationships between the participants, could almost be regarded as a disadvantage. The aim of this research has therefore been to, as ten Have writes, 'bracket conventional ideas during the actual analysis of the data' (1999:186–7). However, the second stage of CA is the elaboration of these sequences in order to come up with 'a set of formulated "rules" or "principles", which participants are demonstrably oriented to in their natural interactions' (2007:150). In this second stage, reference to the broader context is invaluable. A discussion of context is essential because, as a piece of applied CA research, this article hopes to draw broader conclusions about internal auditing, and offer tentative advice to auditors based on the findings. However, due to the very nature of CA, this piece of research does not and indeed cannot, make claims about the typicality of the audits it is using for its sample.

This research followed the conventions of CA as outlined above and started with an attempt at 'unmotivated looking' at the transcripts without, consciously, taking contextual features into account. Broader contextual features were only considered after the initial notes had been made, and were used to aid the elaboration of the analysis and to draw broader conclusions. However, analysis and explication have been combined below as is standard practice in CA research, to avoid repetition and to make it easier for non CA specialist readers to interpret the findings.

Context of research and audit procedures

Cambridge ESOL instituted a formal quality management system, complete with a system of internal audits, in 2006, as part of a project aimed at gaining ISO 9001 certification which was achieved in May 2007. The internal standard operating procedure for internal audits states that the purpose of internal audits is to evaluate whether: organisational procedures and policies are being followed;

the QMS meets the requirements of ISO 9001; the requirements of the organisation's Quality Policy and Key Business Objectives are being achieved; that processes are effectively managed and implemented so that they deliver the required output; and that there are opportunities for improvement (OFIs). Most internal audits will therefore check a process for conformance, for effectiveness and for OFIs, also reporting on evidence of good practice.

The audit programme for the organisation is determined by the quality manager, in consultation with senior management and other staff. A responsible auditee is identified for each audit; this is the person who is identified as being the owner of the process being audited (although in a complex organisation with processes that stretch across many parts of the organisation this person is often only nominally 'in charge' of the whole process). The audit begins with a pre-meeting, which takes place 2–3 weeks before the audit and at which the scope of the audit is discussed and names are put forward for people to be interviewed. Following the pre-meeting, the auditor will read documentation about the process and will formulate a checklist of questions to be asked during the audit.

The audit itself usually takes place on a single day, starting and ending with a meeting between the auditor and the responsible auditee. During the day, the auditor interviews a number of individuals involved in the process, asking questions from the checklist and asking to see evidence, where necessary, that procedures are being followed and that the process is effective. Following the audit, the auditor prepares a draft summary report containing details of strengths, opportunities for improvement and non-conformances. This report is discussed at a closing meeting that is held between the auditor and the responsible auditee within seven days of the audit interviews taking place. The report is then finalised and is circulated to all relevant parties. There are further procedures in place to ensure that all non-conformances are addressed.

Data collection and transcription

For this study, three internal audits were recorded in their entirety, a total of over 7 hours of recorded material. One interview was selected from each audit for transcription. All three interviews (A,B,C) are with people who have some form of supervisory role in their process and all interviews have two auditors: a lead auditor (OR) who planned the audit and took the lead in asking questions and a secondary auditor (O2) who occasionally asked follow-up questions. All lead auditors were relatively inexperienced at the time of the recording: 1.5 years (A), two years (B), and a first audit as lead auditor (C). None of the auditors had experience of auditing prior to becoming internal auditors in Cambridge ESOL. The lack of experience raises some issues of transferability with regard to organisations that have very experienced auditing teams; issues such as this can be addressed through further research.

Each auditee (EE) has either a supervisory or managerial role which enabled the analysis to focus on how auditors and auditees deal with the planning of processes and not merely their execution. The audits are of different processes

and the auditees are at different levels within the company. In Audit A the auditee has been working with this particular process for about 10 years within an area that was undergoing significant reorganisation at the time of the audit. Auditee A supervises administrative staff and plays a role in determining how the process is carried out. In Audit B the auditee is quite involved in policy-making and this audit attempts to take a high-level approach to the 'core' process being audited, whereas the other two audits concern sub-processes. Auditee C is at a similar level in the organisation to Auditee A, however she was recruited into this position a year before the audit took place, and had been instrumental in suggesting and implementing changes to procedures. Another difference manifested itself in the attitudes of the auditors and auditees; the dynamic between them was quite different in the three audits, something outside the scope of this article.

The data was transcribed using standard CA conventions developed by Jefferson (2004) with some minor amendments to make them readable to non-CA experts. The analysis focuses on the central information-gathering part of the audit, where the auditor asks questions of individuals involved in the process.

Analysis

The summary of the analysis presented below focuses on the role that auditors and auditees play in an audit. It demonstrates that all participants clearly orientate themselves to the role of auditor and auditee, and looks in more detail at similarities and differences in the way that different auditors and auditees perceive their role in the audit which is important, as these perceptions in turn reflect participants' beliefs about the purpose of the audit and of the quality management system. We look in turn at asymmetry, membership categorisation, reaching mutual understanding, pursuing the agenda through questioning, the use of 'sorry' to assert auditor authority, and explicit feedback. Further areas were described in the full study.

Asymmetry

All three data extracts are immediately identifiable as institutional through the asymmetry of the interaction (Heritage 1995:164). The vast majority of talking in all three extracts is done by the auditees. This is consistent with the fact that the auditee is describing the process. The auditor's (OR, O2) role is to ask questions; in fact, this is so much the auditors' role that auditees very rarely do it. In these extracts, auditees only ask questions for two reasons:

- to initiate repair:

OR and can you very briefly give me an overview of the [name]² process.
EE an overview of the whole process?

- to ask a question of a third party in order to give information to the auditor:

² Please note that information in square brackets [] is anonymised material.

- EE [E2]?
 E2 yeah
 EE [E2], remember the problem we had with, with er SYSTEM not working?

Audits A and C begin with auditor questions, prior to any description of the process by the auditee. This clearly indicates the auditor taking charge of the process and limiting the scope of the discussion. Audit B is slightly different in that the auditor does not ask his first question until line 76, by which time the auditee has spent several minutes explaining the process. However, the intervention in line 76 shows that the auditor is willing to interrupt quite assertively to direct the audit:

- OR Can I, sorry
 76 EE sorry
 OR um so do you::: (2) do you have um, do you have um targets, performance indicators? things to, to measure the process against

It is possible to account for the auditor's prior lack of questioning by arguing that the auditee was simply saying what the auditor wanted to hear. As soon as the auditee's turn became irrelevant to the auditor's perception of the goals of the audit, he interrupted. What is more, EE accepts the interruption without question and answers the question, thereby indicating that he understands this to be the prerogative of the auditor.

There is strong evidence that the participants are fulfilling the roles of 'auditor' and 'auditee' with a very high degree of uniformity. The person asking the questions is the person that tends to hold the power in an interaction. Further evidence of the extent to which the auditor retains this power throughout the audit will be examined below, as will the use the auditor makes of the advantage the institutional situation gives him/her.

Membership categorisation

Looking in more detail at how roles are established, the manner in which auditors use membership categorisation devices to introduce the audit varies across the audits. We will now look in more detail at what is said before the 'audit proper' starts, in order to examine how the auditor and auditee establish the nature of the process that they are about to enter into. The analysis will argue that although the manner of membership categorisation is quite different, what it does is essentially the same.

Audit A has the longest preparatory sequence prior to the start of the audit. It is not until line 36 that the first question is asked:

- OR =no not really, it's just, it's just kind of interesting because mm uhm obviously you're going to have a different uhm sort of outlook from [Manager] and a different outlook from from the subject officer or whatever so it's quite interesting to see the different um sort of facets. um the first question
 31 I have [EE] °was° oh sorry I should mention the timing shouldn't I (2) um (paper rustling)
 O2 (inaud) 10.50.
 EE I've got your timings according to that.
 36 OR 10.50 yeah
 OR is what planning activities go into the [name] process.

The main purpose of this introduction seems to be to set the context for the audit and to reassure the auditee. The auditor is very scrupulous about ensuring that the auditee is in full possession of the facts before the audit starts. The auditor's zeal in ensuring that all is correctly done leads to him interrupting his own question by initiating a repair sequence (line 31: 'oh sorry I should mention the timing shouldn't I'). Auditor A seems happiest working from an assumption that he and the auditee are starting from scratch and that EE has no prior knowledge of the audit procedure; this continues even when EE suggests that in fact he does have prior experience. The auditor's decisions to stick with his predefined script are a feature of this audit. There is also, however, a palpable sense of the auditor making sure that both participants are completely sure of, and comfortable in, their roles before the audit starts. Auditor C takes a very different approach to membership categorisation:

- OR OK (3) we're going to look at planning and day-to-day management of the [name] process. I'm sorry we're a bit late.
 EE That's alright.
 OR Umm can you just tell me briefly what planning activities you're involved in.
 EE Um, well really it's ...

The introduction is very cursory: there is a reminder of the purpose of the audit and an apology for running late, which is accepted. After that, OR asks the first question. Here, OR's use of 'OK' in line one serves as a membership categorisation device. Words such as 'OK', 'so' or even 'um' (as in the previous extract in line 31) act as a break in the conversation and signal a change of topic, signalling in this case to the other participants that the real business is about to start. It should be pointed out here that there may have been small talk going on before the recording started, but the switching on of the recording prompts the 'OK' and the start of the audit 'proper'. The explanation for the difference between these two audits can be explained by analysing the start of Audit B:

- OR OK (.) umm (3) now w, we talked a little bit about this before but as I mentioned this, the, the purpose of this audit is that it's (.) it's a high level process audit of the whole [process] system. so (.) um what we want what we what we I'm gonna try and stop myself from doing is going into too much detail about the nuts and bolts. but what I'm interested to talk to you about as the, the senior manager of the process is the reporting
 []
 EE mm hmm
 OR mechanisms of the process. so how you know about what's happening. u::m and about
 []
 EE Mm
 OR things like process improvements um and things like that.
 EE Yeah
 OR Um
 (2)
 EE OK, well, (2) I mean there are a number of means by which ...

As in Audit C, Auditor B starts with 'OK', to establish that the audit has started and that the appropriate roles should be adopted. Following this OR explicitly starts with a reference to a previous conversation. It is clear that all participants come with prior knowledge to these audits,

often as a result of prior conversations, and it is this prior knowledge that both this auditor and the auditor in Audit C are cueing with the 'OK'. Although the auditor in Audit B does go on to give background about the audit, crucially his explanation is based on the difference between a high level process audit and other types of audit in which he would go into detail about 'nuts and bolts' (line 6). What is clear here, therefore, is that OR in audit B assumes that EE has knowledge of what audits are normally like; this enables him to make the contrast that he makes.

Although done in very different ways, reflecting the differences in the approach of the auditors, there is evidence in all three audits of the auditor taking necessary steps to preface the start of the audit with devices for membership categorisation, ranging from the minimal 'OK' to a lengthy explanation.

Reaching mutual understanding

Both participants in an audit have to work towards mutual understanding of what is being said. On some occasions this requires the use of repair sequences; the most common repair type is 'other initiated self repair', where the auditor requests clarification from the auditee who then supplies it. This is sometimes brief:

EE =so they are created bank by bank.
 OR do you mean paper by paper or pr... paper by paper.
 []
 EE paper by paper.

These repair sequences can also be significantly longer, an example in Audit A lasted 26 lines.

The auditees in particular seem keen to ensure that they leave open the fact that what they are telling the auditor is either already known to the auditor, or doesn't need saying. The method used for this is the use of 'obviously' which is used in all three audits, occurring twice in Audit A and three times in Audit C. In Audit B in contrast, the auditee uses the word 'obviously' 25 times. The use of 'obviously' is very much the same as in other audits, although it is on two occasions repeated in the same turn, for example:

EE so that's obviously one indicator and obviously what what what we're looking at there is number of entries against you know the comparable session last year. and whether it's

This increased use may simply be a feature more commonly employed by this individual when explaining something.

In addition to reaching mutual understanding regarding the auditee's description of the process, there is also a need to reach mutual understanding of what it is that the auditor wants. On one level, this occurs through the auditor initiating repair sequences by rephrasing his questions if he feels that EE has not interpreted the question as it was meant. Interestingly, these repair sequences can also result in clarification of a point of fact rather than of the auditor's question, as occurs in Audit B:

EE so that's obviously one indicator and obviously what what what we're looking at there is number of entries against you know the comparable session last year. and whether it's
 []
 OR mm hmm
 EE more or less than we would ex, expect. y'know so that's a

102 []
 OR mm hmm
 OR so is that, that's the performance of the organisation as a whole I suppose.
 []
 EE it is, it is as a whole
 yeah but I mean it's also an indicator that we're actually getting the entries on the system as well you know, I mean if there's, if there's a shortfall for instance on [EXAM] you know we would ask (1) is this because we're failing to get the entries on the system or is it because we haven't got enough entries, I mean that's a bit crude, but
 []
 OR mm hmm
 EE that's, those are basically the two reasons why you haven't got enough entries

On this occasion OR indirectly initiates a repair sequence in line 102 by hinting that EE has misunderstood his initial question, asked in line 75 about targets and performance indicators to measure the process against. EE is able to clarify in his next turn that in fact, what he is describing, is an answer to OR's question. OR accepts EE's reinterpretation and continues with his questioning.

Pursuit of agenda through questions

Boden points out that it can also be valuable to isolate one person's turns, in order to shed light on their strategy and see what their agenda is and how they set about achieving it (1994:175-7). This section will look at how Auditor A tries to achieve his agenda through his questioning style. In his first six turns OR is focusing his question:

OR is what planning activities go into the [name] process.
 T2 OR =right= right
 T3 OR do you mean paper by paper or pr... paper by paper.
 T4 OR ok (6) um obviously there's, I gather there's quite a ha ha large volume of through put through this office. u:::m uhm is there any other planning
 T5 OR i, is there any other planning which goes into sort of um looking at that workload for the coming year
 T6 OR mm hm. I think I was thinking in in in terms of like, I gather that you know sometimes there'll be new products coming along, and how do you sort of plan for them, for those or or do you just deal with them when they appear

Turn 6 is dealing with an element of planning not previously mentioned; OR is using the question to focus EE's explanations in a different direction. OR's turn design in this section, namely the use of the past tense, 'I was thinking in terms of ...', indicates that he is pursuing a predefined agenda and that he is merely clarifying to EE what this is. Auditor A is essentially indicating that Auditee A's previous response was not what he wanted. If OR is pursuing an agenda that seems to be predefined, it is worth asking why he did not simply ask the question he wanted answered in the first place. This is a situation in which the auditor may have a preference for co-implicating the auditee in his judgements by giving the auditee the opportunity to spontaneously bring up the issues that the auditor would like raised. If the attempt to co-implicate fails, the auditor can pursue his agenda anyway.

In turns 7, 8 and 9 Auditor A follows up with questions about the impact of what EE has said, and further questions about how it is evaluated:

- AT7 OR mm hmm
 T8 OR and what sort of issues does that create for you.
 T9 OR and how is that sort of (.) erm the impact of those erm sort of short (2) the impact that those sort of late products have how is that evaluated. y'know cos it sounds as if that might erm imply a risk to

In turn 8 OR is asking EE to expand on any issues he may have. In his next turn, OR asks how the impact is evaluated. OR's question is complex, leading to his recapping it at the end: 'how is it evaluated'. Interestingly OR then goes on to justify his question: 'y'know cos it sounds as if that might erm imply a risk to'. EE then picks up on the follow up, rather than the initial question: 'it it it is there is a risk'. However, this creates some ambiguity regarding the question, as illustrated by EE's response:

- EE it it it is there is a risk. (1) um they all appear, because they are given tailored schedules to the need (.) to get them done in a short space of time they all then start appearing on late lists. (.) erm and late reports that we generate from [SYSTEM]. (.) and they have to just be watched and monitored as they go through. (.) aah (y'know) the only thing I would say p'raps is that fortunately we don't have lots of these all the time. nh they just appear occasionally. er but it it they just have to be managed with care.
- A85

EE has picked up on the last thing said. By giving the rationale for his question, OR has moved the focus onto the risk rather than the method of evaluation. EE's response reinforces the sense of ambiguity regarding OR's question. He does not feel it necessary to ask further questions about the risks involved, but he does not feel the need to rephrase his initial question either. This ambiguity is not resolved until turn 15. Instead OR seeks in turns 10–15 to clarify the different types of report produced by the department.

- AT10 OR can you show me um the obs of how how a late report from [SYSTEM] ...
 T11 OR uh huh
 T12 OR what's the two ha ha ha, ha ha, ha ha
 T13 OR so why isn't necessarily a paper which is overdue not late.
 T14 OR so there's sort of contingencies

In turns 15 to 20 OR returns to the topic of evaluation and presses the issue with very specific questions:

- AT15 OR and who, i i is it you who does this evaluation.
 T16 OR =who's we sorry. you and (inaud)
 T17 OR who, who's management.=
 T18 OR what about (.) [Director].
 T19 OR What about [Manager].
 T20 OR thank you.=

The technique of drilling down to get to the point in question, with some detours for clarification, is found throughout all three audits. It is possible, therefore, to discern a consistent technique that the auditors in these extracts use to achieve their agenda. Within this context, we will now examine what is revealed about the role of the auditor and auditee while this agenda is being achieved, as well as how the means the auditor chooses to achieve his agenda have an impact on the relationship between the auditor and the auditee.

'Sorry' to assert auditor authority

Auditors use 'sorry' to assert their authority as the controller of the agenda and to announce the fact that normal rules are suspended. Using a word normally associated with apology enables the auditor to do this in a manner that acknowledges that he is 'interrupting' something that might otherwise continue. A broader look at how the term is used supports this view. Across all three recordings, 'sorry' appears 16 times, used by the auditor on 13 occasions, making 'sorry' appear to be very much an auditor device. It is possible to categorise all auditor uses as apologies of a sort, often as a means for the auditor to manage deviations from the norm that are caused by the situation of the audit. In addition to examples of 'sorry' used in very conventional ways, such as when auditor A is rephrasing a question (line 218) or when auditor C is apologising (line 2), there are also several distinct uses of 'sorry' which perform interesting roles in terms of how the auditor exerts his authority. These include:

- asking for repetition due to making notes:

- OR =so what was the process sorry? I was still making my notes on the previous thing.

- making requests and asking questions, indicating a certain degree of awkwardness:

- B401 OR U::m , which is, which is, which is actually on my, on my list of things to ask you about. um can I have a look 'sorry'? close to but within [EXAM] closing dates (inaud – reading the document)

This is both a change of topic and could be seen as an 'interruption' example or could be seen as a request to see an important document, which is usually only seen by senior management within the organisation.

- interrupting to pursue agenda:

- EE that particular amount of problems. (2) ah::m so (2) so that's the sort of the conventional (1) issue reporting. In terms of []
 OR Can I,
 OR Can I, sorry
 EE Sorry
 OR um so do you:: (2) do you have um, do you have um targets, performance indicators? things to, to measure the process against

On this occasion, EE repeats OR's 'sorry', suggesting that he is aware that he has stepped outside what he should be doing in his role. He is essentially acknowledging OR's right to interrupt.

- abrupt change of topic to pursue agenda:

- EE obviously with other things that are being proposed by [Person] at the moment we are in a state of flux. (8)
 OR and (.) um (.) what's, sorry [EE] what's your responsibility with regard to the [name] process?
 EE awawa in in a nutshell I would say to ensure that all the papers are ultimately printed and checked and printed by the required date.

Here the auditor is shifting the topic away from an issue that EE has raised as a concern in order to pursue his own broader agenda, using 'sorry' to acknowledge the fact that he is doing this. The auditors' use of 'sorry' throughout the audits shows sensitivity to the issue of the auditees' 'face' (Goffman 1972). The use of a term usually used for

internal audit interview. It is clear that the participants bring certain expectations to the process and that these form the basis of the interaction. These are:

- Participants assume the role of ‘auditor’ and ‘auditee’, independent of other roles in the organisation. The taking on of these roles is marked at the beginning of the interaction.
- The auditor asks the questions, unless clarification is required, and therefore is in control of the interaction.
- The auditor controls the agenda and is free to follow up what they view as important (although the auditee’s ‘face’ must be considered). The auditee accepts that the auditor will choose what to follow up on, and that it is the auditor’s right not to follow up on concerns raised by the auditee.

Auditor–auditee relationship

This research was carried out with a view to gaining insights into the relationship between auditors and auditees and in particular why, ‘in many organisations ... auditors are still viewed with suspicion and even a degree of disdain by those who are likely to be audited’ (Asbury and Ashwell 2007:174). The audits analysed here flag up some pertinent issues in this area. In all three audits, auditors did not generally give feedback to auditees regarding the opinions they were forming of a process. Asbury and Ashwell refer to the ‘no surprises’ technique (2007:133). Their view is that keeping people informed of findings at the earliest possible opportunity, even during the interview stage, is the most effective way of ensuring buy-in from auditees. In the audits analysed here, this seems like something of an opportunity lost.

From the perspective of the auditor–auditee relationship, a number of issues were identified, mostly from Audit A. Firstly, analysis revealed that the auditor was primarily interested in management structure and systems within the process being audited. However, this was not made explicit to the auditee. This resulted in the auditor rather abruptly cutting off lines of questioning to the evident confusion of the auditee. Secondly, as a result of the auditor’s focus on management issues, he fails to follow up on issues raised by the auditee; the auditee raises many explicit problems with the process but these are generally dealt with fleetingly, if at all. This has obvious negative implications in terms of the auditee feeling he has a stake in the process.

Implications

As this is a piece of applied ethnomethodology, the present research has practical implications for quality managers rather than methodological implications for conversation analysts. The aim is to use these audits to hold a mirror up to some issues that may arise in the process of internal quality auditing in any organisation. Furthermore, this research does not seek to draw broad conclusions about auditor behaviour in general. Instead, it gives examples of auditor behaviour from a limited data sample. It is the job of the reader to determine the extent to which issues that arise in these audits may also arise in their own context.

The most apparent use for these findings would be as a training tool for quality managers and audit teams within and beyond Cambridge ESOL. For example, quality managers can use the research as a starting point for some ethnographic research into internal audits that focus on, for instance, whether there is evidence that auditees feel they are not given enough feedback during audits, or whether they feel that their own concerns are not given enough weight by the auditor. Quality managers could also use the issues identified as an awareness-raising exercise for trainee and practising auditors, who could discuss the decisions made by the auditors in the extracts and how it reflects on their notion of what an audit is. They could then compare this to what they believe they do, and what they believe they should be doing. This could lead to a rich discussion of what an auditor’s role ought to be and how this should be realised. Unlike the externally produced training material mentioned earlier, there is room for disagreement and ambiguity, and the potential for all participants to develop their views on internal auditing outside a prescribed norm by using extracts from real audits.

Finally, the issues that arise in the audits studied here bring up the issue of organisational culture. Although the auditors make an effort to establish the roles of auditor and auditee, there is evidence that, in spite of the auditor’s very thorough explanation of the audit process, auditor and auditee have different views about the broader purpose of the audit. These different views may be a result of differing perceptions of how the hierarchy of an organisation works. It may be instructive for quality managers to explore how explicit the quality manual is about the nature of decision making within an organisation and, within that framework, the precise role played by the internal auditor and auditee.

Conclusion

There are many possibilities for further research in this field. A broader ethnographic perspective may give more insights into the auditing process. Whilst this research has focused on the audit interactions themselves, there are other sources that could be used as a basis to compare findings from a CA approach with the views of the participants and the outcomes of the audits. For example, it may be possible to use the internal audit summary reports that detail the main findings of the audits to corroborate the findings of the research regarding the auditor’s agenda, and also the auditor’s views on what the auditee has said. It could also be fruitful to conduct post-hoc interviews with participants to discuss their attitudes towards the audit. This may provide more information about whether an auditee was genuinely frustrated by an auditor’s actions.

A broader piece of research may choose to use a larger number of recordings, possibly from a range of sources in different companies. In particular, as mentioned above, Cambridge ESOL auditors were all relatively inexperienced at the time of the study. Research that focused on more experienced auditors may yield information about whether the findings of this research are related to the inexperience of the auditor group. This would enable the researcher to draw broader conclusions about internal auditing and may

make the research more easily transferable. Although this research is limited in scope, it is hoped that the findings are robust and transferable enough to provide food for thought for those involved in internal auditing, and help to develop their ideas about how best to ride the ‘audit roller coaster’ in their own organisations (Asbury and Ashwell 2007:82–8).

References and further reading

- Asbury, A and Ashwell, P (2007) *Health and Safety, Environment and Quality Audits: A risk-based approach*, Oxford: Butterworth-Heinemann.
- Bergmann, J R (1992) Veiled morality: Notes on discretion in psychiatry, in Drew, P and Heritage, J (Eds) *Talk at Work: Interaction in Institutional Settings*, Cambridge: Cambridge University Press, 137–62.
- Boden, D (1994) *The Business of Talk*, Oxford: Blackwell.
- Boden, D and Zimmerman, D H (1991) Structure in action: An introduction, in Boden, D and Zimmerman, D H (Eds) *Talk and Social Structure: Studies in Ethnomethodology and Conversation Analysis*, Cambridge: Polity Press, 3–21.
- BSI (2008) *Quality management systems – Requirements: BS EN ISO 9001:2008*, London: British Standards Institution.
- Deming, W E (1982) *Out of the Crisis: Quality, Productivity and Competitive Position*, Cambridge, Mass: The Massachusetts Institute of Technology, Center for Advanced Engineering Study.
- Drew, P (1992) Contested evidence in courtroom cross-examination: the case of a rape trial, in Drew, P and Heritage, J (Eds) *Talk at Work: Interaction in Institutional Settings*, Cambridge: Cambridge University Press, 470–520.
- Drew, P and Heritage, J (1992) Analysing talk at work: An introduction, in Drew, P and Heritage, J (Eds) *Talk at Work: Interaction in Institutional Settings*, Cambridge: Cambridge University Press, 3–65.
- Francis, F (2008) ISO 9001: The history, in *Quality world*, October 2008, 16–20.
- Garfinkel, H (1984) *Studies in Ethnomethodology*, Cambridge: Polity Press.
- Goffman E (1972) *Interaction Ritual: Essays on Face-to-Face Behaviour*, London: Allen Lane.
- Heritage, J (1995) Conversation analysis: Methodological aspects, in Quasthoff, U M (Ed.) *Aspects of Oral Communication*, Berlin: de Gruyter, 391–418.
- Heritage, J and Sefi, S (1992) Dilemmas of advice: Aspects of the delivery and reception of advice in interactions between health visitors and first-time mothers, in Drew, P and Heritage, J (Eds) *Talk at Work: Interaction in institutional settings*, Cambridge: Cambridge University Press, 359–417.
- Jefferson, G (2004) Glossary of transcript symbols with an introduction, in Lerner, G H (Ed.) *Conversation analysis: Studies from the First Generation*, Amsterdam: John Benjamins, 13–34.
- Juran, J M (1988) *Juran on Planning for Quality*, New York: The Free Press.
- Juran, J M (1989) *Juran on Leadership for Quality*, New York: The Free Press.
- Meakin, S (no date) *Internal QMS Auditor Course, Case Study Manual – “The Auditor from Hell”*, Pera.
- Moeller, R and Witt, H N (1999) *Brink’s Modern Internal Auditing*, Somerset, NJ: John Wiley and Sons.
- Pfannerstill, R (2005) *The Progressive Audit: A Toolkit for Improving Your Organisational Quality Culture*, Milwaukee, Wisconsin: ASQ Quality Press.
- Psathas, G (1995) *Conversation Analysis: The Study of Talk in Interaction*, Thousand Oaks, CA: Sage.
- Sacks, H (1992) *Lectures on Conversation Vols 1 and 2*, Oxford: Basil Blackwell.
- Taormina, T and Brewer, K A (2002) *Implementing ISO9001:2000: The journey from conformance to performance*, Upper Saddle River, NJ: Prentice Hall PTR.
- ten Have, P (1999) *Doing Conversation Analysis: A Practical Guide*, London: Sage Publications.
- ten Have, P (2007) *Doing Conversation Analysis: A Practical Guide Second Edition*, London: Sage Publications.

Working with examination centres to encourage continuous high standards: The centre inspections programme

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Introduction

It is essential that Cambridge ESOL works closely with examination centres to ensure standardised examination experiences around the world maintain security of confidential materials, and allow candidates to have the opportunity to perform at their best in the examination.

Cambridge ESOL works closely with centres by running consultations for all major changes and developments and by encouraging continuous self improvement in centres. The inspection programme plays an important part in ensuring that all centres are regularly monitored and given feedback on their performance. Inspectors are given training to make

sure that ratings and feedback are standardised. The results of inspections are analysed and fed into the development of new documentation, regulations and training.

The purpose and scope of centre inspections

Inspections play an important part in Cambridge ESOL’s quality assurance. They help to assess the quality of the delivery of its examinations around the world. The visible process of an inspection provides public assurance that examination security and integrity is upheld and

encouragement to centres to maintain high standards. The centre inspections programme inspects live test administration sessions to ensure accordance with the regulations as set out in the *Handbook for Centres*, which is provided to all centres each year, and is available to download from CentreNet (Cambridge ESOL's extranet for centres). As such, an Inspector will evaluate:

- the security of confidential materials
- the examination administration, including the checking of candidates' photographic identification
- the examination rooms.

In addition to ensuring compliance with regulations, inspections promote improvement in centre performance. An inspection may include observing a written paper, or may focus on the delivery of the Listening test. An inspection may also cover the Speaking tests, in which case an Inspector cannot be in the examination room during the test, but checks the set up of the test room, the arrangements for marshalling candidates, the identity checks and the timetabling. Inspections may also include a computer-based test and involve checking that the conditions are appropriate, and there are sufficient PCs.

An inspection may survey all the rooms in a venue, or may concentrate on just one room, depending on the circumstances. Inspectors also request to see the secure storage facilities and arrangements. The Inspector observes the instructions given to candidates at the start of the paper, the identity checks and the invigilation of the examination. For written papers, the Inspector must stay for at least one paper, and often stays for subsequent ones, especially if non-compliances have been observed. For some non-compliances, it is possible for the centre to make changes to its examination administration immediately and therefore, where possible, the Inspector stays to observe the improvements and include these in their report. Each centre is inspected at least once every three years. More frequent inspections occur if a centre needs additional support such as advice on correct examination administration.

In 2009, Cambridge ESOL introduced a programme of giving centres advance notification of routine inspections. By working together with centres, Cambridge ESOL aims to encourage self-improvement. Although the date and time are not announced, centres may be advised that they will be inspected in the next examination session. Inspections are carried out by a cadre of Inspectors around the world. Some are external consultants who work with Cambridge ESOL in a number of roles, others are based at local offices or Cambridge itself. Each Inspector is given comprehensive training.

The centre is ultimately responsible for quality assurance at all its venues. This responsibility is laid out in the *Handbook for Centres* and the Centre Agreement. An Inspector may visit any venue run by any centre. Inspections of all venues should reveal the same degree of adherence to Cambridge ESOL standards.

In many regions, there is a local co-ordinator who manages the Inspectors in their region and who reports directly to Cambridge ESOL's Centre Inspections Unit.

Figure 1: The inspections cycle

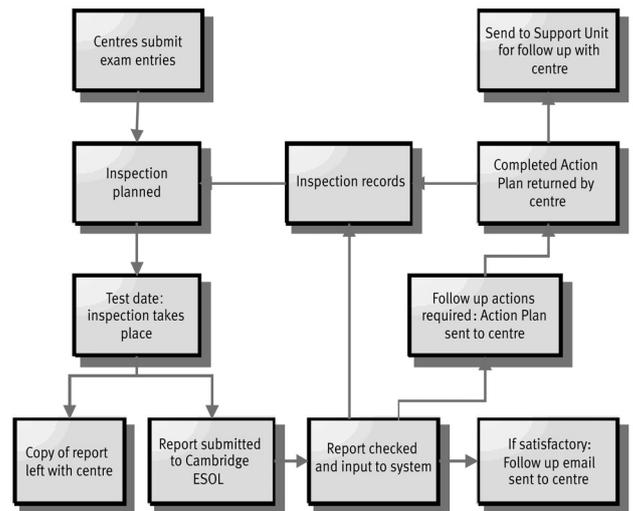


Figure 1 summarises the inspections process. When a centre submits entries, the inspections team reviews whether the centre is due for inspection, and contacts an Inspector to check availability and arrange a visit. The inspection planning involves matching the availability of an Inspector and the opportunities for inspection, and where possible co-ordinates visits to make best use of resources. After the inspection, a report is passed to the Centre Inspections Unit for review and inputting to the customer relationship management database. These records feed into the inspections planning process in terms of the next date a centre is due for its routine visit, and also in terms of whether a centre requires early reinspection. Follow up actions are also carried out; for example, writing to the centre and also following up with the Centre Support Unit. This process is a continuous cycle of examination entries, inspections and following up on the outcomes of inspection visits.

Helping centres to prepare for inspection

Centre documentation

Cambridge ESOL gives the regulations to centres in November of the preceding year. All examination centres receive a copy of the *Handbook for Centres*, and other relevant documents, including the *Examination Instructions* booklets, *Notice to Candidates* and *Regulations*. Centres also have access to a comprehensive range of Frequently Asked Questions (FAQs), and can call the Cambridge ESOL Helpdesk if they have any further queries about examination administration.

Training for centres

Cambridge ESOL offers a comprehensive training programme to centres, including:

- **Face-to-face training:** a number of training events are conducted each year. These are normally held in Cambridge, although they may be offered in other locations if required. Centres are trained on how to administer the examinations according to Cambridge ESOL regulations. For example, centres are shown how to

make entries, and how to ensure that venues meet requirements. Excellent feedback has been received from attendees at these events. The training gives new centres and new Centre Exams Managers (CEMs) confidence to start running the tests. Established centres also find it useful to attend training for updates and refreshers.

- Support is also offered via telephone or personal visits from Centre Support Officers, experienced CEMs from the same region, and also via web conferencing.
- Interactive training tutorials are available on Cambridge ESOL Online which explain how to use the site for examination administration.

In 2009/10 an online training site for centres and their staff will be launched. The site will contain modules and activities designed to help centres learn and practise their application of the knowledge gained.

Self assessment

Cambridge ESOL provides self assessment checklists on CentreNet. These checklists (one for written papers, one for Speaking tests) include all the points from the inspections form in a simple format. Centres can use these forms to train supervisors and invigilators and to check that a venue has been set up correctly on the day of the test. Feedback about these self assessment tools has been overwhelmingly positive.

Inspectors – recruitment and training

To ensure that standards are applied equally throughout the world, all Inspectors undergo RITME (Recruitment, Induction, Training, Monitoring and Evaluation). Inspectors

must meet minimum professional requirements, and are trained to record fair and accurate findings and to fulfil a supportive role towards centres; encouraging improvement where needed. All Inspectors are trained face-to-face initially and shadow an experienced Inspector before conducting an inspection. Improved global internet access means that Cambridge ESOL is planning to launch an online training site for Inspectors. This will enable Inspectors to receive the latest training and information and provide a platform for sharing ideas/experience across the globe as well as promoting a standardised approach worldwide. In addition to this, Inspectors are also monitored once every three years. The Inspector is shadowed as they undertake a live inspection and assessed according to a checklist of key criteria. Feedback is given following the inspection and additional training given if necessary.

On the day of the examination

The Inspector observes the administration of at least one examination paper as well as checking the arrangements for the storage of examination materials. During the inspection, the Inspector completes an inspection report form that promotes a standardised approach and provides feedback in a structured manner to both centres and Cambridge ESOL. The report form includes a checklist of 50 items that cover key Cambridge ESOL regulations, and is broken down into the following five sections:

- Security of materials
- Examination rooms
- Computer-based test arrangements
- Conduct and supervision
- Speaking tests.

Welcome to online training for Inspectors

This site supplements the Handbook for Inspectors and provides links to training for Centre Exams Managers and Centre Staff. This site will give you information and training to help you carry out the role of Inspector.

Click on the links on the right to take you to the training module or support area that you require.

Click on the links to the left to access the glossary (list of common definitions), FAQs (frequently asked questions) and to download copies of the Handbook for Inspectors.

Using this site

- [Before you start - checking your hardware and software set up](#)
- [How to use this site](#)
- [Technical FAQs](#)

Inspections: news, background and support

- [Changes and updates](#)
- [Inspections Glossary](#)
- [FAQs for Inspectors](#)
- [Contact us](#)

Training modules for Inspectors

- [RITME \(recruitment, induction, training, monitoring, evaluation\)](#)
- [Preparing for an inspection](#)
- [During an inspection](#)
- [After an inspection](#)
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Send feedback about this online training ESOL.inspections@CambridgeESOL.org

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Figure 2: Online training site for Inspectors (under development)

The report form has space for Inspectors to write additional information regarding each fault that occurs. For example, if the *Notice to Candidates* is out of date, the Inspector can note this and remind the centre to check they have a current version ready for examination day. At the end of the inspection the Inspector advises centre representatives of the findings. Feedback is positive and constructive. An inspection provides an opportunity for centres to raise queries and receive advice about examination security and administration. Many Centre Exams Managers use this face-to-face opportunity to comment on matters relating to examinations. They can note these comments on the report form. However, Inspectors are not required to make professional judgements relating to syllabus, paper-specific elements or teaching practices, and the Centre Inspections Unit passes such queries to the appropriate department.

A copy of the report form is left with the centre so that they have a written record of the outcome and any non-compliances found. A copy of the report form is also forwarded to Cambridge ESOL and the information is recorded and used for reporting.

Following an inspection

Written feedback

All centres receive written feedback from Cambridge ESOL about the outcome of their inspection. Centres awarded 'Satisfactory' receive an email congratulating them on their administration of the examinations, while centres awarded 'In need of improvement' are sent an email acknowledging that while the majority of regulations were met, there are some areas that need to be rectified.

Centres awarded 'Unsatisfactory' are sent an Action Plan that lists the regulations that were not met. The centre must write on the plan the actions it will take to put right the non-compliances identified. When the centre returns the Action Plan, it is passed to the Centre Support Unit who can offer further advice and/or training. A copy of the Action Plan is also sent to the Inspector to take with them at the follow-up inspection so they can check that these measures have been implemented.

Analysing inspection findings

Over 600 inspections take place each year, which represents about one third of centres. This performance is in line with Cambridge ESOL's aim to inspect all centres at least once every three years. The findings from each inspection are entered into a central database. This allows Cambridge ESOL to monitor trends, identify regulations or countries with a high frequency of non-compliance, and to identify patterns across regions and examinations. Reports can also show the ratings awarded by each Inspector, which examinations are inspected most frequently and so on. These reports are reviewed regularly by Cambridge ESOL's Centre Inspections Unit and also by senior management at Cambridge ESOL in order to monitor centre and Inspector performance, and to identify potential areas of

Table 1: Most common faults when monitoring centre performance

Regulation	Number of occurrences
Full instructions read out	92
Current <i>Notice to Candidates</i> visible outside examination room, not inside	81
Current and correct <i>Examination Instructions</i> booklet in examination room	70
Unauthorised material in designated area	70

improvement. An example of the most common faults are shown in Table 1.

Cambridge ESOL monitors these reports and consults centres and Inspectors about why non-compliances are occurring. This feedback is analysed and measures are put in place to prevent/discourage non-compliance in future.

The analysis of non-compliances and the reasons they occur feed into the development of new policies, redrafting of current policies, rewriting of centre documentation and the training of Centre Exams Managers. Reports can also show the effectiveness of the centre inspections programme. For example, reports have shown that centres who receive regular inspection visits perform better than those who are visited less often. This suggests that the inspections programme is successful in meeting its aim of encouraging continuous high performance among centres. The inspections team also works closely with other teams in Cambridge ESOL to give feedback about centre performance. For example, feedback about centre performance is given to business development teams.

Conclusion

Cambridge ESOL works closely with examination centres to ensure that the administration of examinations meets requirements, and to protect the security of confidential materials. As part of this, Cambridge ESOL aims for inspections to be a means of assessing whether centres are complying with regulations, and for providing feedback to centres on any improvements required to their administration of examinations. All centres are inspected at least once every three years, and they are given training and support in order to successfully run the examinations. This training can be face-to-face or via a website. Centre inspections play an important role in the development of policies, training and documentation to ensure that centres have the best support and guidance possible, and that candidates receive a high quality examination experience. Any non-compliances noted at inspection are listed on the report form which is left with the centre, thus allowing for immediate action. They may also be followed up in the form of an Action Plan which the centre submits to Cambridge ESOL. The inspections team can produce reports which show patterns and trends across regions and examinations, and can help identify areas for improvement.

Auditing the quality profile: From code of practice to standards

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Introduction

This paper reports on the work of the Association of Language Testers in Europe (ALTE) and in particular the *ALTE Procedures for Auditing* and the outcomes of audits conducted between 2007 and 2009. It summarises the background to the approach, presents data collected so far and reflects on the lessons to be learned in implementing this approach. The need to justify the use of language assessments to stakeholders using codes of practice and quality management systems (QMS) forms part of this discussion.

The *ALTE Procedures for Auditing* derive from ongoing work on the *ALTE Code of Practice* (1994) and draw on approaches to auditing adopted by other organisations such as ISO – the International Organisation for Standardisation.

The formal scrutiny of standards is the culmination of a long process of working towards establishing audited ‘quality profiles’ across the ALTE examinations. The aim of the process is to allow ALTE members to make a formal, ratified claim that a particular test, or suite of tests, has a quality profile appropriate to the context and use of the test, based on 17 parameters for establishing minimum standards. Ultimately, this is to ensure that the assessment is fair and meets the needs of the stakeholders in appropriate ways.

It is important to remember the context in which this work has been carried out and in particular the wide range and diversity of ALTE members, associates and affiliates:

- 32 full and associate members: these are organisations which include government departments, universities, consortia and examination boards which have a role in assessing their own language.
- 27 languages are currently represented, including many less widely taught languages.
- In addition, there are nearly 40 institutional affiliates with an interest in language education and language assessment. A list of members is shown in Table 1.

The description of the development and application of this system ties in with recent discussions in the language testing literature on the use of argumentation to support claims of validity. The system is also an example of another kind of theory, ‘a theory of action’ or change processes, (see Fullan 1993, 1999).

A theory of action, capable of bringing about positive and sustainable change, was needed by ALTE members in order to raise standards and improve the quality of their examinations. I would argue that the QMS approach and the auditing system have now provided such a theory.

Table 1: ALTE membership (2009)

27 languages	32 members organisations comprising government departments, universities, consortia and examination boards
Basque	Basque Government
Bulgarian	University of Sofia ‘St Kliment Ohridski’
Catalan	Generalitat de Catalunya
Czech	Charles University Prague
Danish	Danish Language Testing Consortium
Dutch	CITO Certificaat Nederlands als Vreemde Taal
English	University of Cambridge ESOL Examinations
Estonian	National Examination and Qualification Centre
Finnish	University of Jyväskylä and National Board of Education
French	Alliance Française Centre international d’études pédagogiques
Galician	Xunta de Galicia
German	Goethe-Institut, telc GmbH, TestDaF-Institut
Greek	University of Athens
Hungarian	Institute of the Eötvös Loránd University
Irish	National University of Ireland
Italian	Università per Stranieri di Perugia
Latvian	Naturalisation Board of Latvia
Lithuanian	University of Vilnius
Luxembourgish	Centre de Langues Luxembourg
Norwegian	University of Bergen
Polish	Jagiellonian University
Portuguese	University of Lisbon
Russian	Russian Language Testing Consortium
Slovenian	University of Ljubljana
Spanish	Instituto Cervantes and University of Salamanca
Swedish	Stockholm University
Welsh	Welsh Joint Education Committee

Ethics and principles of good practice

The early work of ALTE members in this area took place in the 1990s when they addressed the question of what a code of practice might be like and what the underlying principles should be.

This led to the publication of the *ALTE Code of Practice* in 1994, and at about the same time, the adoption of the *ALTE Principles of Good Practice*.

A Code of Practice Working Group was set up in 2000 to take the early work forward in light of changes to the ALTE membership, and advances in the field of language testing in the 1990s. Since then this group has met regularly and the main outcomes include the production of detailed documentation updating the *Principles of Good Practice*, proposals for minimum professional standards and the implementation of appropriate checklists and procedures for monitoring those standards. The most recent work, starting about three years ago, has focused on the development of the ALTE auditing system.

Methodological framework

The methodological framework which this work represents is shown in Figure 1, with relevant reference documents listed on the right:

The overriding aim can be summarised as follows:

'... to strive for overall fairness in the testing process, always acting in good faith and avoiding negative impact, in order to provide a high quality of service to the clients and other test users'.

However, the ALTE Code was an inspirational document and not designed to assist language testing practitioners in carrying out their day-to-day work of writing and administering tests, or in agreeing on what might be acceptable in terms of minimum standards for their work.

Having established the principles, and having provided some practical tools to help ALTE members improve their examination systems, the working group addressed the issue of *how to put the principles into practice*, how improvements could be monitored and whether adequate standards were in fact being met. In order to address this problem, and to seek consensus, it was decided that the appropriate paradigm for this activity would be that of quality management systems.

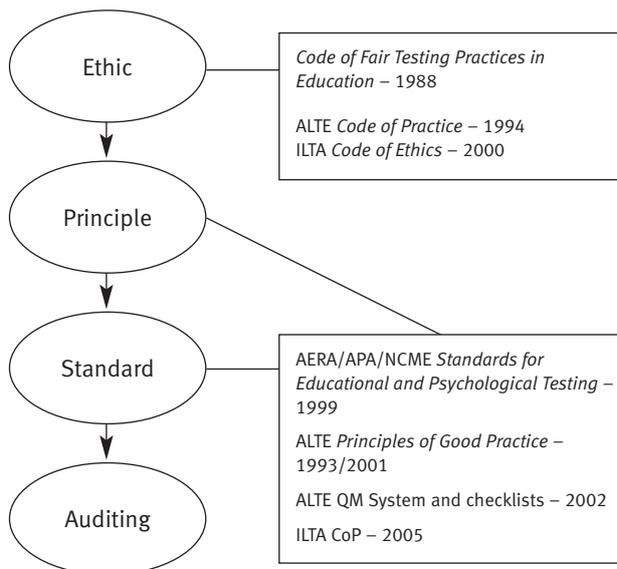


Figure 1: Methodological framework

A quality management system (QMS)

QM systems seek to improve the products and/or services of an organisation in order to meet the requirements of its customers in the most effective way, and they go about doing so in a well-planned and focused way. There are many examples of QM systems being used in educational contexts, and several of these were thoroughly reviewed by the working group. This was summarised and then extensively discussed by the full membership (for more details see van Avermaet, Kuijper and Saville 2004).

Effective QM systems usually involve a public statement in the form of a code of practice or charter, and an ongoing commitment to the *change process* (improvement) typically involving the following steps:

- define your mission, role of institution, future ambitions/aims
- assess what you currently do
- identify areas in need of improvement
- decide on measures of improvement and an action plan
- carry out action to bring about improvement
- review progress and revise the action plan
- carry out action to bring about improvement
- *and so on ...*

The ALTE Code set out the public position in terms of the aspirations and ambitions of the association, as explained above, but in adopting the QMS approach, members undertook:

- to understand the nature of their organisations better
- to involve their stakeholders in making improvements to the quality of their examination systems.

In effect, this involved an ongoing commitment to 'change management' (innovation processes). It is axiomatic in this approach that improvement is always possible, even where good practice may already exist.

In QM systems standards are not imposed from 'outside', but are initially established through the system itself and the procedures to monitor standards are based on awareness raising and *self-assessment* in the first instance. External monitoring is introduced at a later stage to confirm that the minimum standards are being met.

In order to provide a practical tool to raise awareness of those areas where change was necessary, the original *Code of Practice* was reworked to function as *Quality Management Checklists*; this re-designed format reflected the four aspects of the *testing cycle* with which test developers are very familiar:

- examination development
- administration of the examinations
- processing of the examinations including the marking, grading and issue of results
- analysis and post-examination review.

The revised format provided four checklists which were put into excel spreadsheets for ease of use and for members to use as evaluation tools. These excel checklists are available from the ALTE website (www.alte.org). In summary, the QMS approach provided a supportive tool and allowed those working with it:

- to enhance the quality of their examinations in the perspective of fairness for the candidates
- to engage in negotiations with their senior management and sponsors in a process of organisational change where necessary, and to ensure that resources are made available to support ongoing improvements
- to move from self-evaluation to external verification in order to agree and monitor acceptable standards.

By proceeding in this way ALTE members were made constantly aware of the different contexts in which they work and of the various backgrounds from which the

different members come. Extensive discussions have taken place around the question of how to achieve reconciliation between diversity and professional standards which are acceptable to all. Since 2007 this has continued through the implementation of the auditing system.

Monitoring standards – Auditing the quality profile

It was always envisaged that self-evaluation would need to be supplemented by an external 'auditing' system. This was developed and piloted starting in 2005/6 and continued with the first cycle from 2007/8 seeing audited 'quality profiles' established across a wide range of ALTE examinations.

Taking the *Code of Practice* and QMS checklists into account, 17 parameters for establishing *minimum standards* were agreed, with the aim of establishing a *Quality Profile* for each exam or suite of exams, shown in Table 1 in the article by Bolton in this issue (page 32).

The Quality Profile is created by explaining how the examination meets the minimum standards, and by providing adequate evidence.

The formal external scrutiny of these parameters in the auditing process is intended to ensure that adequate standards are being set and achieved.

ALTE members are required to make a formal, ratified claim that a particular test or suite of tests has a quality profile appropriate to the context and use of the test, bearing in mind the following points:

- Different tests are used in different contexts, by different groups of test users. There is no intention to impose a single set of uniform quality standards across all ALTE exams.
- Members requesting an audit of their quality systems and procedures are invited to *build an argument* that the quality standards within a test or suite of tests are sufficient and appropriate for that test or suite of tests.
- It is the *argument* which is the subject of the audit, rather than the organisation itself (which is often dealt with by other systems of regulation, e.g. ISO 9001, government regulators etc.).
- Each audit considers one test, suite of tests or testing system.
- The audit has both a consultancy and quality control role.
- The audit aims to establish that minimum quality standards are being met in a way that is appropriate to the context of a test, and also to offer recommendations towards best practice where, though quality standards are appropriate, there is still room for improvement.
- If quality standards are not being met, ALTE members will collaborate with the audited organisation to implement an action plan aimed at working towards and ultimately reaching the quality standards.

The argumentation structure is as follows. A claim is made about each of the 17 parameters; the claims support an argument that minimum standards are being met for the

test in question. Information is provided to support the claims; this information is provided in the form of explanations. A justification is also needed to provide legitimacy for this information; this must be based on the relevant language testing theory with reference to the *Code of Practice* and the *Principles of Good Practice*, and may also take into account prior experience and best practice models where appropriate. This justification, in turn, needs to be backed up with appropriate evidence which has been collected as part of the validation process. This approach is consistent with Toulmin's (2003) argument structure and Bachman's (2005) application of his work to language testing. In Toulmin, the justification is known as a *warrant*, and the evidence is known as the *backing*. Bachman (2005) suggests that the test developer must be prepared to deal with *rebuttals* (alternative explanations and counter claims) and to provide additional evidence to reject them (*rebuttal data*). The QM checklists provide a practical tool for structuring the explanations supporting the claims, and for collecting and presenting the necessary evidence.

The auditor and an elected standing committee scrutinise the claims and the evidence; they can challenge whether the claims adequately meet minimum standards, and if necessary can ask for additional information to be provided. An audit remains 'ongoing' or 'in progress' until such points have been clarified or alternative procedures have been put in place which are deemed acceptable.

In 2006/7 a manual setting out the 'procedures for auditing' was developed, a small group of auditors was recruited and appointed from within the ALTE membership and an initial induction and training programme was developed. All those eligible to conduct audits had to go through this training process. It was recognised, however, that the procedures would need to be improved and that better co-ordination and standardisation would be required in future as the system develops (i.e. an ongoing and iterative process in its own right – see Parizzi in this issue).

The membership as a whole is the arbiter of decisions arising from the auditing process; this takes place through the Council of Members as a whole and in particular through the smaller, elected Standing Committee which has delegated responsibility to oversee the auditing process. During the first cycle of auditing overall outcomes of audits were either stated as satisfactory or not satisfactory. When outcomes of an audit are considered *satisfactory*, the Standing Committee may recommend that an action plan be developed for that examination to improve practice on any weaker parameters. Members are asked to provide an action plan with a timescale and a rationale for addressing the issues in a particular way. Even in cases of good practice, *opportunities for improvement* (OFIs) can be identified and suggested.

Results of the auditing

After the initial piloting of the system, further refinements were made and implemented in the audits carried out to date.

The first cycle of auditing is still going on, this cycle aims

at having at least one examination of each member audited. This first cycle also provides the necessary experience for improving the audit procedures and the training system for the future. To summarise:

- 46 examinations of 23 members have been audited to date
- eight are still in a negotiation phase for setting up the audit
- three new member audits have recently been completed.

The outcomes of the completed audits (at the time of writing) are as follows:

- three remain in progress (not yet satisfactorily meeting minimum standards)
- satisfactory with an action plan
- satisfactory with suggestions for improvements (OFIs)
- two satisfactory
- four have been submitted but are still to be discussed by the Standing Committee.

Reflections on the auditing experience

After each audit the auditor has to write an audit report, which is first discussed with the auditee and then sent to the Standing Committee to be discussed and ratified. Despite the fact that all the auditors followed the guidelines as described in the 'procedures for auditing' each report differed from the others to a certain degree and in significant ways. This probably had to do with the following issues:

- differences in background of the auditors, leading to a different focus of attention
- a need for greater elaboration of the core elements within each minimum parameter to achieve better standardisation of the pre-audit, the audit and the reporting
- a need for more clarity in, and agreement on, which core elements have to be met in order to meet the minimum standard for each parameter.

Comparisons of the information in the different audit reports, and the way different auditors came to their judgments, have already resulted in a more accurate description of the core elements of each minimum parameter, as shown in Minimum Parameter 13:

'You collect and analyse data on an adequate and representative sample of candidates and can be confident that their achievement is a result of the skills measured in the examination and not influenced by factors like L1, country, gender, age and ethnic origin.'

Minimum Parameter 14 states:

'If you make a claim that the examination is linked to an external reference system (e.g. the Common European Framework) then you can provide evidence of alignment to this system.'

Working in this way it is possible to make audits more comparable and transparent and less dependent on individual interpretations of the different auditees and auditors.

The completed audits have also provided a useful 'snap shot' of the state of affairs across the examinations of ALTE members. The information now functions as an input for further training, and for organising well targeted workshops to help improve examinations.

Ways of improving the auditor training itself have also emerged, based on the experiences of the auditing described above. This process of improvement will continue in the future (see Parizzi in this issue), but so far it has already resulted in an improved training programme that is more firmly based on 'real life auditing data'.

Conclusion

In conclusion, the QMS and the auditing procedures provide a dynamic system which forms the necessary basis for action in establishing and monitoring standards. It is useful for:

- clarifying the quality demands of examinations in relation to their functions and purposes
- providing ALTE members with valuable information of the state of affairs in the examinations in their frameworks
- providing ALTE members with concrete possibilities or necessities for improving their own examinations
- setting priorities for training, workshops and mutual consultancy and support
- accounting for the validity of the examinations to stakeholders
- improving the system itself.

References and further reading

- AERA/APA/NCME (1985/1999) *Standards for Educational and Psychological Testing*, Washington: AERA.
- ALTE (1993/2001) *Principles of Good Practice for ALTE Examinations*.
- ALTE (1994) *Code of Practice*.
- ALTE (1998) *Handbook of Language Examinations and Examination Systems*.
- ALTE/Council of Europe (1997) *Users Guide for Examiners* Strasbourg.
- Bachman, L F (1990) *Fundamental Considerations in Language Testing*, Oxford: Oxford University Press.
- Bachman, L F (2005) Building and supporting a case for test use, *Language Assessment Quarterly* 2(1), 1–34.
- Bachman, L F and Palmer, A (1996) *Language Testing in Practice* Oxford: Oxford University Press.
- Fullan, M (1993) *Change Forces: Probing the Depths of Educational Reform*, London: Falmer Press.
- Fullan, M (1999) *Change Forces: The Sequel*, London: Falmer Press.
- ILTA (1995) Task Force on Testing Standards.
- ILTA (2000) Code of Ethics, Language Testing Update, Issue 27.
- Kane, M T (1992) An argument-based approach to validity, *Psychological Bulletin* 112, 527–535.
- Kunnan, A J (2000) (Ed.) *Fairness and Validation in Language Assessment*, Cambridge: UCLES/Cambridge University Press.
- Kunnan, A J (2004) Test fairness, in Milanovic, M and Weir, C (Eds), *Studies in Language Testing 18: European Language Testing in a Global Context*, 27–45.
- Messick, S A (1980) Test validity and the ethics of assessment, *American Psychologist* 35, 1,012–1,027.

Messick, S A (1989) Validity, in Linn (Ed.) *Educational Measurement*, New York: ACE/Macmillan.

Messick, S A (1994) The interplay of evidence and consequences in the validation of performance assessments. *Educational Researcher* 32(1), 13–23.

Mislevy, R J (1994) Evidence and inference in educational assessment, *Psychometrika* 59, 439–483.

Mislevy, R J, Steinberg, L and Almond, R (2003) On the structure of educational assessments, *Measurement: Interdisciplinary Research and Perspectives* 1(1) 3–62.

Saville, N, van Avermaet, P and Kuijper, H (2005) *Setting and Monitoring Professional Standards: A QMS approach*, paper presented at the 2nd EALTA Conference, Voss, June 2005.

Toulmin, S E (2003) *The Uses of Argument*. Cambridge: Cambridge University Press.

van Avermaet, P, Kuijper, H, and Saville, N (2004) A code of practice and quality management system for International examinations, *Language Assessment Quarterly* 1(2). Special Issue: The Ethics of Language Assessment, 137–150.

Training auditors: The ALTE system

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Introduction

This article outlines a training path which aims to develop knowledge and competencies auditors need in order to accomplish their task in accordance with the requirements of the ALTE procedures. Although training sessions for both auditors and auditees have been organised since 2006, the experiences gathered so far, including feedback from trainees and recent changes in the procedures for recruiting auditors, make the topic of training a very relevant one. What is presented here is the result of an ongoing discussion where all ALTE members are invited to take part. Although suggestions and descriptions included in this article relate to the ALTE auditing system in particular, they may also be applied in other auditing contexts.

The ALTE auditing system: an overview

A description of the ALTE auditing system, as well as the approach and the principles sustaining its implementation, has already been the object of several articles and presentations (see Saville, van Avermaet and Kuijper 2005; Saville 2008, van Avermaet, Kuijper and Saville; 2004 and Saville in this issue). The ALTE website offers a wide overview of the system and includes part of the documentation which forms its reference points. What will be described here is a brief history and outline of the main characteristics of the system to provide a general background, and to establish a conceptual context to what will follow this article.

The ALTE auditing system is the outcome of a process which dates back to the beginning of the 1990s. Since the association has been founded, establishing high standards in language assessment, as well as striving for fairness in respect of candidates, have been key issues and the main

focus of the debate among ALTE members. The first draft of the ALTE *Principles of Good Practice* (1993), as well as the publication of the ALTE *Code of Practice* (1994), represents important milestones in this process. In order to support organisations in applying those principles in their own contexts, practical tools have been developed. Among these, the ALTE check-lists give a detailed guidance to test providers in order to self-assess the extent to which acceptable standards are met throughout all phases of the testing cycle. The way towards the implementation of a system has gradually been put in place, leading to a formal definition of procedures and a common agreement about parameters. In 2006 the first version of Procedures for Auditing was released, along with a list of 17 parameters against which minimum standards are established. Far from representing a definitive outcome, these procedures have been the object of an ongoing process of revision which aims at giving to the various stakeholders involved a clear representation of the system, and guidance to its implementation. As usual in the ALTE *modus operandi*, the work conducted so far is the result of a joint effort where all members are invited to take part in the discussion and offer their own contribution. The ALTE Code of Practice (CoP) Working Group, which was formed in 2000, has met regularly since then, and co-ordinates the ALTE activities in this area.

The approach, which is at the basis of the ALTE auditing system, is derived from the paradigm of the quality management system (QMS), as exemplified by the standards of ISO 9000 series. Adopting a QMS for an organisation, whatever its mission and business area, implies a strategic decision which aims to guarantee and, where possible, improve customer satisfaction. This aim can be achieved by maintaining and improving the overall organisational performance.

For language exam providers such as ALTE members, ‘customer’ means a range of stakeholders, such as candidates, public institutions, schools and employers. Assuring their satisfaction, by meeting their expectations,

¹ The Centre for Evaluation and Language Certification of the Università per Stranieri di Perugia.

is principally a question of providing exams which are valid, reliable and practical: valid because scores must be an accurate reflection of the candidate's language ability; reliable, because they are stable, consistent and free of error; practical, because the resources necessary to produce and administer them must be appropriate to the context. Besides these characteristics which relate mainly to the nature of the exams, a transparent and exhaustive communication as well as efficiency and reliability in administrative and logistical operations, are also fundamental to guaranteeing quality.

In the ALTE auditing system, 17 parameters have been established which specifically refer to the above mentioned aspects. They are divided into five areas which are:

- test construction
- administration & logistics
- marking & grading
- test analysis
- communication with stakeholders

These parameters are the reference points against which ALTE members must establish a quality profile for each exam or suite of exams they intend to submit for an audit. This is accomplished by fixing standards that they consider as sufficient and appropriate to the context and the use of that particular exam or suite of exams. In other words, they refer back to standards that meet the expectations of all the stakeholders involved and guarantee their satisfaction. Taking into consideration the nature of an association like ALTE, in which members operate in different contexts and deal with different ranges of stakeholders, establishing fixed common standards and forcing all members to meet them would have been inappropriate.

Once the organisation has planned and put in place all the procedures considered as necessary to meet the fixed minimum standards, and has gone through a process of self-assessment², a formal request for an audit is submitted to the ALTE secretariat. In this phase the organisation builds an argument arguing that the exam or suite of exams have quality standards sufficient and appropriate according to the context in which they are administered. It is the argument, and not the exam or the organisation as itself, which is the object of the audit. This is a key issue in the ALTE auditing system and is outlined in more detail below.

In the first phase of experimenting with the ALTE procedures for auditing, a system of 'peer-review' was put in place, as auditors were recruited from ALTE members and consequently trained. In order to aim at standardisation in the system as a whole, ALTE is now developing new procedures of recruitment which will lead to the constitution of a permanent group of auditors who, after going through a programme of induction and training, will be involved in a system of co-ordinated activities including regular standardisation sessions. That is one of the reasons why auditor training is now an object of discussion among ALTE members.

The role of an auditor in the ALTE system includes a series of duties and responsibilities which can be summarised as follows:

- Reading and analysing the argument put forward by the auditee², judging its validity, checking all the documents and/or other material produced by the auditee as evidence to sustain the argument.
- Maintaining³ constant communication with the auditee in order to request further explanation or documentation before the audit visit.
- Conducting the audit visit.
- Writing a report to be submitted to the ALTE Standing Committee⁴ where it is stated whether and to what extent the minimum standards have been met by the auditee. The report must also include recommendations and suggestions in order to improve the auditee's system, even if standards are met. The audit is namely intended not only to have a control function, but also a consultancy role.

What competencies and knowledge auditors need

Some key issues have emerged from the outline of the ALTE auditing system which has been sketched above. They show characteristics which relate to the nature of ALTE. These are, among others:

- It is neither the organisation nor an exam, but the argument which is the object of the audit.
- No standards are imposed. Quality standards are considered as sufficient and acceptable according to the context where they are applied.
- The audit not only has a quality control function, but also one of consultancy.

Taking these three points as a reference, the focus now draws to the auditors and consideration of what knowledge and competencies are needed and what elements in general should characterise their behaviour and attitude when conducting an audit. This constitutes the basis for developing a training programme.

The three main issues listed above can be reformulated as three questions that auditors put to themselves throughout the entire audit process:

- is the argument put forward by the auditee valid?
- are the standards met sufficient and acceptable according to the context?
- how can I help the organisation improve its system and, where necessary, reach the minimum standards?

Finding suitable answers to these questions, which can be considered as the core of an auditor's responsibilities, represents a big challenge. In order to meet this challenge, knowledge and competencies are not the only attributes

² ALTE check-lists are the appropriate tool produced by ALTE to help members in this phase of self-assessment.

³ In order to gain standardisation in the way arguments are structured, new documentation has been developed by the ALTE CoP Group which provides the auditee with a guide to be followed to cover all aspects related to the test development cycle.

⁴ The Standing Committee is made up of ALTE members who are elected by the membership as a whole. It has the function of overseeing the auditing process and taking decisions about audit outcomes.

required. Good communication, and the ability to consider and balance a range of factors, are also fundamental.

As for knowledge required, it is clear that a deep understanding of theoretical principles and practical application in the field of language testing is vital. Being in the position to assess whether a certain method adopted by the auditee to guarantee consistency to their exams is suitable and appropriate to the context can mean applying a range of other methods to reach a better outcome. Or again, assessing the relevance of a theoretical model as the basis of a construct definition can be facilitated by knowing other similar examples of that model's application in order to weigh its appropriateness. A theoretical understanding of what a validity argument is, and how it can be evaluated, represents a fundamental competence an auditor should develop. Criteria and procedures for evaluating arguments have been discussed in the literature (Bachman 2005, Kane 1992, Kane, Crooks and Cohen 1999). In this phase of their job, auditors can be supported by instruments and methods to evaluate whether the argument put forward by the auditee has been stated clearly, whether it is coherent and plausible, and whether the evidence given is sufficient to support the assumptions.

Mentioning coherence and plausibility in the argument gives the chance to bridge the discussion to the second point to focus on. An auditor should be able to assess whether the standards met by the auditee are acceptable and sufficient for the context. This aspect can be seen as a very delicate one because of the constant risk of subjectivity in formulating judgements. One way to reduce this risk is to systematically review information related to the context where the exam has been developed and administered. As will be shown later, a benchmarking approach to standardisation, using concrete cases to establish a shared understanding of context, may also be a way forward.

The last of the three points outlined above is related to the ability of auditors to maintain a proactive and collaborative conduct throughout the whole auditing process. This kind of approach is exemplified by an open and transparent way in communicating with the auditee, an interest in detecting possible areas of improvement in the audited system, and in giving their opinion about possible action to be undertaken. In short, auditors should conduct the audit in such a way that it will not be perceived by the auditee as a kind of inspection but, on the contrary, as a way to improve through continuous interaction.

Training auditors

If the points listed above aim to focus on knowledge and competencies which should characterise auditors, the following are suggestions for a possible training path in order to develop these knowledge and competencies. As mentioned in the introduction, this is the result of an ongoing discussion among ALTE members in order to continuously improve auditor training, also taking into account some recent changes to the procedure for recruiting auditors.

A first proposal, currently under discussion, includes two

stages of training: a first basic one, where all new auditors and also auditees are invited to take part⁵, and advance training, which will involve experienced auditors only.

The basic training can be considered as a kind of induction into the ALTE system. Participants are provided with a complete picture of the ALTE auditing system. Each component is presented and analysed in order to detect their main function, and the way all components link together in the construction of the system is discussed. The purpose is to develop for auditors and auditees a clear idea of how the system works, and awareness about their duties and responsibilities. At this stage the 17 parameters represent a focus in the discussion. An explanation about what each one refers to and the areas of the examination cycle they cover is fundamental.

Once the picture of the system has been defined, a key issue must be addressed: the concept and the areas of application of a validity argument. Although a description of what a validity argument is, and an outline of its elements should be presented during training, it is clear that participants need to develop deeper understanding of this topic by referring to the available literature. This is why, before the training session, some useful reading on validity arguments will circulate. This allows trainees to take part actively in the discussion about possible models to be applied in the evaluation of a validity argument, and some practical activities can accordingly be organised. Concrete cases of construction of a validity argument can be presented at this stage. The ideal would be to provide participants with examples of validity arguments already submitted for an audit, taking care to preserve anonymity. Trainees will then be invited, by working in groups or pairs, to detect whether the argument has been structured in a coherent way, covering all the areas of the 17 parameters, and whether the evidence provided is sufficient to support the argument. Discussing the outcomes in plenary would complete the task by collecting different points of view and conveying the participants, where possible, towards a common conclusion.

Activities like the one just suggested above are to be considered in a stage of advanced training. One of the main responsibilities of the auditors, as already mentioned, is not only judging the validity of the argument *per se*, but also assessing whether, and to what extent, minimum standards have been met. Working on isolated concrete cases may not be sufficient. In order to develop this particular competence, auditors must be trained through a social moderation approach. Several concrete cases can be presented, which would refer to different contexts. Type of exam provider (universities, private companies, public institutions, etc.), use of exams (high-stake vs. low-stake exams), number of candidates (exams with thousands of candidates a year vs. exams with a few dozen) can be, among others, criteria to refer to when establishing the plausibility of the argument and the appropriateness of the standards met. Referring to a range of examples can make the task of auditors easier when making a decision about the final outcome of an audit. This can also be a possible

5 In the present article only auditor training will be considered.

way to improve standardisation among outcomes of audits conducted by different auditors.

Practical issues are also to be considered during training, and suggestions on how to maintain good communication with the auditee must also be part of the discussion. In order to make the audit visit as efficient as possible, auditors should be trained to plan by collecting in advance as much information as needed. Poor communication during the months preceding the visit⁶ could compromise its success. Providing participants with practical check-lists of all the aspects they should consider before the audit visit is important. Considering that the audit is accomplished by the auditor through the production of a report to be addressed to the Standing Committee, some training on how to write it is also necessary. In this case, good examples of previous reports can be the basis on which to open a discussion. Points such as how to state the positive and negative aspects detected throughout the audit, how to write the judgement clearly by providing the rationale, and how to formulate recommendations can be objectives for practical session training.

Conclusion

Auditors play a key role in the ALTE auditing system. The direction taken is the one to form a group which can develop competencies and expertise throughout a continuous exchange of opinions and sharing of experiences. Far from representing isolated occasions, training and standardisation sessions should frequently be repeated and all auditors are invited to attend. The

⁶ Three months elapse between the time when the auditor receives the auditee documentation and the audit visit.

strength of this approach is that auditors can be an important reference point to look at when improving the whole system.

References and further reading

- ALTE (1993) *Principles of Good Practice for ALTE Examinations*, draft manuscript.
- ALTE (1994) *Code of Practice*.
- Bachman, L F (2005) Building and supporting a case for test use, *Language Assessment Quarterly* 2(1), 1–34.
- ISO International Organisation for Standardisation (2000) *Quality management systems: Guidelines for performance improvements*.
- ISO (2009) *The ISO Standards collection – ISO 9000 Quality management on CD*.
- Kane, M T (1992) An argument-based approach to validity, *Psychological Bulletin* 112, 527–535.
- Kane, M T (2006) Validation, in Brennan, R L (Ed.) *Educational Measurement*, 4th Edition, Westport, CT: American Council on Education and Praeger Publishers, 17–64.
- Kane, M T, Crooks, T and Cohen, A (1999) Validating measures of performances, *Educational Measurement: Issues and Practice*, 517.
- Saville, N (2002) Striving for fairness: The ALTE Code of Practice and quality management systems, *Research Notes* 7, 12–14.
- Saville, N (2008) *From code of practice to standards: Auditing the quality profile*, paper presented at the 30th LTRC, Hangzhou, June 2008.
- Saville, N, van Avermaet, P and Kuijper, H (2005) *Setting and monitoring professional standards. A QMS approach*, paper presented at the 2nd EALTA Conference, Voss, June 2005.
- Sireci, S G (2007) On validity theory and test validation, *Educational Researcher* 36(8), 477–481.
- van Avermaet, P, Kuijper, H and Saville, N (2004) A code of practice and quality management system for international examinations, *Language Assessment Quarterly* 1(2/3) 137–50.

Auditing Cambridge ESOL's Main Suite and BEC examinations

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Introduction

The ALTE auditing system is based on ongoing work in the Code of Practice Working Group and in ALTE as a whole¹. The process of setting and monitoring standards for ALTE members' examinations began in the 1990s with the publication of the ALTE *Code of Practice* and the ALTE *Principles of Good Practice*. To help ALTE Members in improving their examination systems, the Code of Practice Working Group was set up in 2000. Since then, this working group has met regularly and has produced a number of working tools such as the Code of Practice and Quality Management checklists and the Minimum standards for establishing quality profiles in ALTE examinations, both of

which can be found on the ALTE website². Such documents allow ALTE members to reflect on and assess the aspects of the testing cycle: test construction, administration and logistics, marking, grading and results, test analysis and post-examination review.

Since 2005, the Code of Practice Working Group has focused on establishing the ALTE auditing system (i.e. the formal external scrutiny of ALTE members' examinations). All ALTE members, as well as ALTE affiliates wishing to become a full or associate member, need to apply to the

1 For more detailed information see Saville, van Avermaet and Kuijper (2005) and this issue.

2 For the Quality Management checklists see www.alte.org/cop/copcheck.php For the Minimum Standards go to www.alte.org/standards/index.php

ALTE Secretariat to have their examination(s) audited. The audit may consider one test, a suite of tests or a testing system. The ALTE Code of Practice Procedures for Auditing specify how the audit should be prepared and carried out by the audited organisation and the auditor. The audit is based on the 17 Minimum Standards shown in Table 1, which must all be covered in the audit. The auditing process has three phases: the pre-audit, which usually last three to four months and during which the audited organisation and the auditor prepare the audit, the audit visit and the post-audit, when the auditor writes the report. Testing bodies requesting an audit of their quality systems and procedures are invited to build an argument that shows the quality standards within a test or a suite of tests are sufficient and appropriate. It is this validity argument that is the subject of the audit, rather than the organisation itself.

The audit

In April 2007, the ALTE Secretariat asked me to audit the following Cambridge ESOL examinations: Lower Main Suite (KET, PET), Upper Main Suite (FCE, CAE, CPE), and the Business English Certificates (BEC Preliminary, BEC Vantage, BEC Higher). Cambridge ESOL appointed two members of staff to prepare the audit, write the report on the examinations to be audited (the validity argument) and put together the documentation. This information was then passed on to me. The report explained in detail the procedures followed and how the audited examinations meet the requirements for each of the 17 Minimum Standards. In addition, the following supporting documentation was sent:

- units 1–4 of the ALTE Quality Management checklists specifying the procedures for the different examinations
- handbooks (test specifications)
- item writer guidelines
- handbooks for candidates
- reports on research carried out
- examination reports
- sample tests
- mark schemes
- demographic data on candidature
- handbooks for examination centres
- information for candidates with special needs
- information on recognition of the examinations
- legal agreements for printing and despatch.

During the audit I was given the opportunity to study further documents that, for security reasons, could not be included in the documentation previously described.

The pre-audit phase and audit visit focused on whether the validity argument put forward in the report was clear and exhaustive for each of the 17 Minimum Standards. Specifically, it stated not only *how* Cambridge ESOL is dealing with all the aspects of the Minimum Standards but also *why* the procedures followed are appropriate, given their purpose and potential decisions based on the results.

Table 1: Minimum standards for establishing quality profiles in ALTE examinations

TEST CONSTRUCTION	
1	The examination is based on a theoretical construct, e.g. on a model of communicative competence.
2	You can describe the purpose and context of use of the examination, and the population for which the examination is appropriate.
3	You provide criteria for selection and training of test constructors and expert judgement is involved both in test construction, and in the review and revision of the examinations.
4	Parallel examinations are comparable across different administrations in terms of content, stability, consistency and grade boundaries.
5	If you make a claim that the examination is linked to an external reference system (e.g. Common European Framework), then you can provide evidence of alignment to this system.
ADMINISTRATION & LOGISTICS	
6	All centres are selected to administer your examination according to clear, transparent, established procedures, and have access to regulations about how to do so.
7	Examination papers are delivered in excellent condition and by secure means of transport to the authorised examination centres, your examination administration system provides for secure and traceable handling of all examination documents, and confidentiality of all system procedures can be guaranteed.
8	The examination administration system has appropriate support systems (e.g. phone hotline, web services etc.).
9	You adequately protect the security and confidentiality of results and certificates, and data relating to them, in line with current data protection legislation, and candidates are informed of their rights to access this data.
10	The examination system provides support for candidates with special needs.
MARKING & GRADING	
11	Marking is sufficiently accurate and reliable for purpose and type of examination.
12	You can document and explain how marking is carried out and reliability estimated, and how data regarding achievement of raters of writing and speaking performances is collected and analysed.
TEST ANALYSIS	
13	You collect and analyse data on an adequate and representative sample of candidates and can be confident that their achievement is a result of the skills measured in the examination and not influenced by factors like L1, country of origin, gender, age and ethnic origin.
14	Item-level data (e.g. for computing the difficulty, discrimination, reliability and standard errors of measurement of the examination) is collected from an adequate sample of candidates and analysed.
COMMUNICATION WITH STAKEHOLDERS	
15	The examination administration system communicates the results of the examinations to candidates and to examination centres (e.g. schools) promptly and clearly.
16	You provide information to stakeholders on the appropriate context, purpose and use of the examination, on its content, and on the overall reliability of the results of the examination.
17	You provide suitable information to stakeholders to help them interpret results and use them appropriately.

I also focused on the interdependence of the separate Minimum Standards (MS). All Minimum Standards contribute to an overall argument for the test or suite of tests. For example, if it is claimed in MS2 (purpose and context of use) that a particular test score may be taken to mean that the candidate can study at a university, this has an impact on other MSs, for example on the theoretical construct (MS1), the stability of parallel examinations (MS4), the reliability of the marking (MS11 and MS12), and so on.

The audit visit took place on 27 and 28 September 2007. A time-table was established beforehand specifying when I could speak to members of staff responsible for test development, training (internal staff, item writers, raters and examiners) and statistics (analyses and setting of grade boundaries). The audit ran very smoothly due to the excellent preparation by Cambridge ESOL, and members of staff involved in the audit who provided all the necessary information.

Outcomes

The audit report stated the outcome for each Minimum Standard. For the examinations audited, most outcomes were reported as 'Good practice'. Examples of good practice are as follows:

- The theoretical construct underpinning the examinations (MS1) is well documented in books and in articles and the test tasks reflect this construct in an appropriate manner. Ongoing research is carried out and the tests tasks are revised accordingly.
- MS1 impacts on MS2, and the purpose and context of use stated for the audited examinations supports the argument put forward in MS1. And purpose and context of use are well documented in handbooks and on the Cambridge ESOL website.
- The arguments put forward in MS1 and MS2 impact on MS4 (comparability of parallel versions) and MS5

(alignment to an external reference system) and support the arguments put forward in both. All tests are constructed to set specifications in terms of content, text types, tasks and statistical properties. Test linkage to the CEFR is well documented, and ongoing research programmes provide validity evidence in support of alignment claims.

- The arguments put forward in MS4 and MS5 also impact on and support the arguments put forward in MS14 (item-level data). All objectively scored and clerically marked papers are pretested and analysed (Classical and Rasch analyses). Analyses are double-checked. In addition, post-testing is carried out.

Besides stating the outcome for each Minimum Standard, the audit report also stated the overall outcome. In 2007, the overall outcome of an ALTE audit was reported in two ways: satisfactory or unsatisfactory. For Main Suite examinations and Business English Certificates, the outcome of the audit was 'satisfactory' due to the comprehensive and clear validity argument and supporting documentation.

References and further reading

- ALTE (1994) *Code of Practice*.
- ALTE (1998) *Handbook of Language Examinations and Examination Systems*.
- Bachman, L F (2005) Building and supporting a case for test use, *Language Assessment Quarterly* 2(1), 1–34.
- Saville, N, van Avermaet, P, and Kuijper, H (2005) *Setting and monitoring professional standards: a QMS approach*, paper presented at the 2nd EALTA Conference, Voss, June 2005.
- van Avermaet, P, Kuijper, H and Saville, N (2004) A code of practice and quality management system for international examinations, *Language Assessment Quarterly* 1(2/3), 137–50. Special issue: The Ethics of Language Assessment. Guest Editor, Alan Davies, 137–150.

International accreditation of quality in language learning and teaching

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What is EAQUALS?

Founded in 1991, EAQUALS (European Association for Quality Language Services) is an association that fosters 'excellence through accreditation of quality in language services'. It is a not-for-profit international association of language training providers who aim to attain and guarantee high quality in language teaching. The primary aim of EAQUALS is to encourage and accredit language teaching and learning in any type of institution, in any language being taught, and whatever the national context.

EAQUALS is internationally recognised for its quality standards in language education and training and for its accreditation services. The main purposes of EAQUALS are:

- through its Charters and accreditation scheme, to provide guarantees of high quality for language learners, as well as for the learners' sponsors, employers, parents, or the funding agencies which finance their study
- to bring together providers of language education services, whether they are privately or publicly funded, and wherever they are located

- to seek to encourage greater awareness of consumer rights and quality issues in language learning, both among those providing language education services and among those using them
- to assist national and international bodies to develop accreditation schemes for those providers that may not yet be ready to meet EAQUALS standards
- to provide support through self-assessment, management training and consultancy for any language teaching institution which has a genuine desire to raise its standards
- to provide information on leading-edge developments in the field and create a lively network of professionals involved in language education.

To support these aims, EAQUALS has established and published a demanding set of accreditation criteria. These are laid out in the form of four charters – a General Charter, a Charter for Course Participants, a Staff Charter and an Information Charter. These are displayed in EAQUALS-accredited schools, and are also used as a basis for EAQUALS' rigorous inspection scheme. The complete text of the EAQUALS Charters can be found on the EAQUALS website: www.eaquals.org

In this article I will outline the basic principles behind EAQUALS accreditation. I will refer to the challenges involved in developing an international scheme for accrediting quality, the ways in which EAQUALS has addressed these challenges, and also describe the methods and means of assessment and the process of EAQUALS accreditation.

EAQUALS in the international context

EAQUALS is recognised as an international non-governmental organisation and has been granted participatory status by the Council of Europe. It subscribes to the Council of Europe's principles on language learning for European citizenship:

- to facilitate the free movement of people and ideas across Europe
- to increase mutual knowledge and understanding among all European people
- to increase the quantity and quality of international co-operation
- to combat prejudice and intolerance towards people of different languages and cultures.

EAQUALS contributes to Council of Europe language projects, and is consulted by the European Commission on matters related to language education. It has memoranda of co-operation with the European Centre for Modern Languages (ECML) and with the Association of Language Testers in Europe (ALTE). EAQUALS has many common features with other quality control schemes, but it is unique in being the only accreditation designed for language learning and teaching.

ISO (International Organisation for Standardisation) for example, has standards for quality management in any

organisation (ISO 9001:2000), which mainly refer to management processes. EAQUALS, on the other hand, includes all elements of the management of language service provision. In addition to checking on documents and procedures, it also requires teaching and the support services provided for course participants to be observed, and looks at the 'institution in action'. EAQUALS has liaison status with two ISO committees, one of which has developed a set of requirements for 'learning service providers' (ISO DIS 29990), and continuously contributes to the further work on the standards overseen by these committees. EAQUALS was also actively involved in developing a standard for 'Language Study Tour Providers', under the auspices of CEN (Comité Européen de Normalisation), the European subgroup of ISO member organisations.

EFQM (The European Foundation for Quality Management) was founded in 1988 by leaders from 14 companies who were convinced that a new membership organisation based in Europe was necessary to promote higher standards of management through shared knowledge and mutual recognition. EFQM has developed an excellence model specifying five fundamental concepts, which EAQUALS also shares:

- result orientation
- customer focus
- leadership and constancy of purpose
- management by processes and facts
- people development and involvement.

Challenges of an international scheme for accrediting quality in language education

The EAQUALS inspection scheme looks at all aspects of language teaching services. This includes all processes of course design, which means that EAQUALS accreditation refers to the institution as a whole. At the same time the body also guarantees that:

- courses are based on written course outlines stating the objectives, content, materials and assessment procedures
- course design is sound and professional, and teaching is well-planned and effective
- there is systematic needs analysis – learners' priorities for use of the language are considered
- courses are related to the levels of the Common European Framework of Reference (CEFR)
- course participants' progress is regularly checked and regular feedback is given
- the teachers used are qualified in foreign language teaching
- the performance of teachers is monitored through regular observation.

In the context of quality control schemes, the EAQUALS scheme has the following unique features. It is:

- **sector specific:** it has been specifically developed for language education purposes.

- **inclusive:** the standards can be applied to institutions of different types, operating in different market and national contexts and offering different languages.
- **comprehensive and complete:** it includes all areas of academic and general management.
- **evidence-based:** it focuses on evidence that is gathered by looking at the performance of the institution in action, as well as at systems and documentation.
- **tangible:** quality is assessed by applying specific indicators relevant to the activity of language service providers.
- **non-prescriptive:** although the basic requirements are clearly established, EAQUALS requirements can be applied in different contexts, and it is the institution's task to provide evidence which demonstrates they meet the standards.
- **reliable:** inspector teams consist of two independent inspectors with international professional backgrounds, and inspection reports are moderated by an expert committee to maintain consistency and impartiality. In addition, inspectors attend regular standardisation workshops.
- **developmental:** the inspection report has a strong consultative element due to the recommendations that are provided for the institution to consider, thus helping them to maintain the momentum of continuous development.
- **flexible:** if institutions are 'referred' in one or more areas, they have the opportunity to take action and prove at a later stage that they meet EAQUALS standards.

The above features have inherent controversies in them, which EAQUALS has had to address with innovative solutions in its inspection scheme. Some basic questions had to be answered:

- how can standards be applied consistently across all languages offered, and in different kinds of institutions in different national and market contexts?
- how can established standards be non-prescriptive and specific at the same time?
- how can assessment be reliable if standards are not prescriptive?

Inspection methods and standards

The inspectors seek evidence from different sources to verify that EAQUALS standards are being met. This is done mainly through a visit to the institution, lasting between two and four days depending on the size of the institution. It includes assessment of all activities, using such means as observation of teaching, meetings with key staff and teachers, clients and partners, studying documents, inspecting premises, and student accommodation if applicable.

The EAQUALS assessment of institutions focuses on the global picture. For example, it does not inspect the performance of individual teachers but looks at the general level of teaching and support for learning being carried out

at the institution. Inspectors collect evidence from as many sources as possible before and during the inspection to arrive at a global judgement of the institution's performance. The evidence collected by the inspectors for each main area is then examined for coherence and the way in which the different aspects and areas interrelate in the context of the institution being inspected.

The international teams of inspectors consist of language teaching professionals who have extensive experience both in academic and general management, as well as quality assurance. The inspectors are selected through a rigorous process and have to go through a specifically designed training process which includes attending training sessions and carrying out inspections with an experienced mentor inspector as part of on-the-job training.

Guidelines on how to apply requirements are laid out transparently in the EAQUALS Inspection Scheme Manual, and guidance on how to apply these in the various country-specific contexts are summarised in the individual Country Notes, which include local regulations on legal requirements, teachers' qualifications, labour law, etc. The scheme is transparent and the Inspection Scheme Manual has been designed to meet the needs of institutions, including members of EAQUALS and prospective members, as well as to assist EAQUALS inspectors in their work.

For the purposes of the EAQUALS inspection, the complex activities of language teaching institutions are divided into 12 main areas, for each of which transparent and tangible quality indicators have been formulated. These 12 main areas contain altogether 50 key assessment criteria, which constitute the main requirements of the scheme. The more specific focus points listed under the key assessment criteria are quality indicators, which are not to be interpreted either as comprehensive or as obligatory checklists, but as definitions of various tangible elements that are susceptible to assessment.

The assessment criteria are not absolute: provided that basic requirements are complied with, it is accepted that there may be room for further development, even in areas of excellence. Areas of excellence are identified and grade 1 is awarded by the inspectors if quality indicators demonstrate innovative and creative ways of good practice.

The findings of the inspections are summarised in an inspection report. Each assessment category is evaluated by a verbal description and given a grade on a 3-point scale where 1 signifies excellence, 2 is awarded for compliance with the relevant EAQUALS quality criteria, and 3 indicates non-compliance. For areas in which an institution does not meet EAQUALS standards, 'requirements' are specified, which the institution has to act on in order to later gain accreditation. The inspection report also includes several non-mandatory recommendations made by the inspectors, which adds a strong consultative element to the inspection.

Coherence between verbal assessment, grade and relevant requirements and recommendations ensures that the inspection report gives transparent and detailed feedback to the institution about the level of quality it is attaining as related to EAQUALS standards.

The 12 main areas and 50 key criteria are outlined in Table 1 below.

Table 1: Overview of EAQUALS assessment criteria and standards (Taken from the EAQUALS Inspection Scheme Manual, released in January 2010.)

Main categories and assessment criteria in the Inspection Scheme	What inspectors will look for
1. Teaching <ul style="list-style-type: none"> • approach and content • teaching methods • course participants' needs and learning 	Inspectors aim to get evidence that effective learning is taking place in classes, and to form an overall picture of the quality of teaching. They do not inspect the performance of individual teachers.
2. Academic management – Curriculum and Syllabus <ul style="list-style-type: none"> • a structured course of study • levels that refer to the CEFR • learning objectives that are adapted to learners' needs • statements of content to be covered in a course and during a certain period 	Inspectors seek evidence that there is coherence between what is laid out in the publicity materials and academic management documents and what is going on in the classrooms. e.g. if a school claims that it provides teaching based on a communicative approach, evidence of this needs to be shown both in supporting documents and in the teaching.
3. Academic management – Assessment and Certification <ul style="list-style-type: none"> • placement testing • assessment of progress and achievement • external exams and tests • reports, certificates and diplomas 	The inspectors check whether the assessment procedures and methods are valid and reliable, and are in line with the general approach to teaching. e.g. if learning aims are defined by 'can do' statements, is assessment designed to assess what course participants can do with the language?
4. Academic management – Quality assurance <ul style="list-style-type: none"> • system and procedures for lesson observation • support and guidance for teachers • coherence between outcomes of class observations and internal training • professional development review of teaching staff • other procedures for quality assurance 	The inspectors seek evidence that the standards of teaching are monitored by well qualified and experienced academic managers, and that appropriate action is taken to continuously improve standards where and when needed. The professional development opportunities for staff and systematic assessment of teachers' work are also checked.
5. Academic resources Availability and organisation of: <ul style="list-style-type: none"> • course books, software, reference materials and/or student library • supplementary materials produced in-house • hardware: OHPs, audio & video/DVD equipment, computers, access to the internet etc. 	The quality, appropriacy, availability and use of teaching resources are checked, and also whether they correspond to the needs of learners and are in line with the statements on teaching philosophy in the institution's curriculum and syllabus documents.
6. Other services to course participants <ul style="list-style-type: none"> • fair dealing between the institution and course participants • advice and consultation • leisure and social programme • course participants' welfare • accommodation services: residential and home-stay 	The nature and number of other services offered to course participants may vary considerably from institution to institution. Inspectors check what is offered, whether the services are high quality and whether systems and procedures for quality assurance and continuous improvement are in place.
7. Staff contracts, terms and conditions <ul style="list-style-type: none"> • contracts • terms and conditions 	Aspects of the EAQUALS Staff Charter are checked, based on local conditions as laid out in the Country Notes, and terms and conditions are verified for their fairness within the local context.
8. Qualifications, experience and training <ul style="list-style-type: none"> • competence, experience and qualifications of teachers • administrative and academic staff profile • training and professional development 	Inspectors look at the qualifications profile of the teaching staff. The qualifications and competence of all staff are checked, as well as the training opportunities available to them.
9. Communications <ul style="list-style-type: none"> • clear academic management systems • procedures for internal communication between staff and managers • information available to staff about the institution • grievance and disciplinary procedures • performance review for managers and admin staff 	Channels of communication and the balance between formal and informal communication are checked, as well as awareness of basic company information among staff. Inspectors also look at the institution's systems for managing staff performance.
10. Information Completeness and accuracy; clarity and accessibility of: <ul style="list-style-type: none"> • all promotional materials • all contractual information • information about EAQUALS and the correct use of the EAQUALS logo and Charters 	Adherence to the EAQUALS Information Charter is checked. Publicity materials, websites, contracts and information about EAQUALS should be accurate, clear, comprehensive and easy to access.
11. Premises <ul style="list-style-type: none"> • teaching and study facilities • other facilities • hygiene • health and safety • welfare 	All teaching and learning premises and facilities used by the institution are checked to see whether their condition corresponds to what is stated in the institution's publicity materials and whether they offer a safe and pleasant learning environment. Safety features are checked for compliance with European directives and local requirements.
12. Management and administration <ul style="list-style-type: none"> • legality and integrity • fair dealing between the institution and its clients • management processes • course organisation and administration • enrolment and placement administration • quality assurance procedures • complaints • client feedback 	<p>This complex area comprises all elements of general management, organisational and administrative procedures.</p> <p>Requirements with reference to legality are preconditions of EAQUALS accreditation, and these are checked very thoroughly during an inspection.</p>

Applying the EAQUALS assessment methods: An example

In the following simple case study a brief illustration is given on how the assessment criteria are applied in a concrete situation. The rather complex category of internal quality assurance, a key area for external quality control, has been selected for this purpose.

The example below demonstrates that the quality indicators do not prescribe the ways in which procedures and systems are set up or carried out – this should depend on the institution's size, management structure and culture. However, coherence between the systems and their effectiveness is checked by the inspectors, e.g. the role of co-ordinators in the example was not fully clarified and thus the system did not fully meet staff expectations.

Table 2: Sample extract from an EAQUALS inspection report

4. Academic management – Quality assurance		
Key assessment criteria and quality indicators	Description of the case – findings of the inspectors	
<p>System & procedures for lesson observation</p> <ul style="list-style-type: none"> • an appropriate mix of some, or all, of the different types of lesson observation for different purposes: <ul style="list-style-type: none"> – quality control (buzz observations) – individual professional development (by academic management, peer) – institutional development • criteria and procedures for setting up observations • feedback and follow up systems 	<ul style="list-style-type: none"> • The academic manager observes each teacher at least once a year • A feedback session, based on self-review (supported by a well designed template) is held and this is appropriately documented and filed for further reference • Level co-ordinators carry out systematic lesson observations (1–2 a term) in their group of teachers and written feedback is given on this • The DOSs carry out buzz observations in the third week of the course to check on placement and group composition • Peer observation is encouraged and the AM and DOSs are available for cover if requested 	
<p>Support and guidance for teachers</p> <ul style="list-style-type: none"> • induction of new teachers • professional support for teachers (mentoring, consultation, etc.) 	<ul style="list-style-type: none"> • New teachers are selected on the basis of their applications and CVs by the DOSs • New teachers are given a Staff Handbook, which includes all the necessary information on curriculum and syllabus, as well as on administrative duties for teachers • Level co-ordinators provide personal guidance and support to new teachers • New teachers are observed and detailed feedback is given in the first month of their teaching • If individual support is required a support scheme is set up by the DOS and involving the level co-ordinators in the first three months of employment 	
<p>Coherence between outcomes of class observations and internal training</p> <ul style="list-style-type: none"> • identifying and acting on areas of weakness 	<ul style="list-style-type: none"> • The AM organises a meeting with the DOSs every month and discusses the finding of lesson observations • The common weakness areas are selected for inclusion in the internal training programme • Individual support is provided by the level co-ordinators to new teachers or to those who need it 	
<p>Professional development review of teaching staff</p> <ul style="list-style-type: none"> • a formal and regular system is in place • professional development interviews are held on a regular basis and these are recorded in writing • the system includes: <ul style="list-style-type: none"> – feedback on lesson observation(s) – a self-assessment element – agreed self-development aims – the signature of interviewer and interviewee 	<ul style="list-style-type: none"> • The lesson observation carried out by the AM forms the basis of the annual professional development review for all permanent staff • The interview includes feedback on teaching, on other work done by the teacher (e.g. syllabus, test development) and agreed development aims are set • The nearly 30% of hourly paid staff has no professional development review and they are observed by the level co-ordinators only 	
<p>Other procedures for quality assurance</p> <ul style="list-style-type: none"> • internal assessment processes • feedback and consultation opportunities for staff 	<ul style="list-style-type: none"> • There are regular co-ordinators' meetings in which students' progress and weaknesses are discussed and actions are planned on these • The AM and DOSs have a monthly meeting in which staff requests and needs are discussed • The level co-ordinators do not attend these meetings and no formal forum is available for them to relate staff requests to academic management. This was confirmed in the staff focus group as a source of communication problems between teaching staff and academic management. 	
<p>Assessment of this area: Academic management – Quality assurance</p>		
Overall assessment	Grade	Requirements/Recommendations
It is obvious from the collected evidence that the institution has good systems in place for quality management and these are organised and implemented systematically and consistently. The systems and their implementation meet EAQUALS standards.	2	<p>As the institution meets EAQUALS standards, no requirement is set.</p> <p>The inspectors recommend the following for the institution to consider for further development:</p> <ul style="list-style-type: none"> • Gradually include all teachers in the professional development interview system • Set up a system for peer observation so that all teachers are involved • Create a forum for level co-ordinators to communicate staff requests to academic management

Basic principles of the EAQUALS inspection scheme

As the above example shows, the EAQUALS inspection scheme is more than just a coherent and effective system for accrediting institutions; it seeks to make a constructive, consultative contribution to the improvement of the institutions inspected and to language learning and teaching in general.

Pre-inspection advisory visits and EAQUALS consultancies (as well as a comprehensive self-assessment pack and a great variety of resource materials available to members on the EAQUALS website) are all designed specifically to help institutions reach the required standards. Some of the above materials are also available to potential members through the EAQUALS Secretariat.

The aims and ethos of EAQUALS govern the way in which inspections are managed and carried out. The following fundamental principles are respected by all EAQUALS inspectors:

Confidentiality

It is imperative for the integrity of EAQUALS that all written and orally communicated information about institutions undergoing accreditation is kept confidential.

Professional collegueship and supportiveness

At all times inspectors need to remember that those they are dealing with are colleagues, with experience, qualifications and know-how similar to their own. On the other hand, friendliness and misleading helpfulness and informality are also to be avoided in the interests of impartiality.

Absolute impartiality and fairness

While a spirit of collegueship is essential, if the aim of support and advice is to be achieved, impartiality is essential for a fair report and result. It is important to take into account all relevant information about the history, context and 'special circumstances' of the institution when evaluating whether or not the requirements of the EAQUALS Charters are being met. EAQUALS rules forbid hospitality between staff and inspectors before, during or at the end of inspections.

Comprehensiveness

The EAQUALS Charters cover every aspect of the institution's work. All the basic criteria specified in the inspection scheme manual need to be inspected and assessed with equal thoroughness.

Consistency

Inspectors must apply the same standards from inspection to inspection. It is crucial that institutions undergoing inspection feel that the standards being applied are consistent with those laid down in the current inspection scheme manual and do not differ from those applied in their previous inspection. When doing re-inspections, inspectors receive the previous report. Any significant changes in the Charters, and subsequently in the

inspection scheme or in the inspection scheme manual, are approved by EAQUALS membership at the annual general meeting.

Clarity

The oral feedback given to managers at the end of the inspection, and the written report submitted to the inspections sub-committee, include clear information about the institution and a straightforward evaluation of each area of its work. Shortcomings in relation to EAQUALS standards are identified and exemplified as requirements. Suggestions for further improvement are listed as recommendations, the implementation of which is not mandatory for the institution.

The EAQUALS accreditation process

The EAQUALS accreditation process goes beyond the inspection itself. It includes considerable preparation by the institution and by the inspectors, and the follow-up on inspections can also take some considerable time, especially if the inspections sub-committee requires further evidence to prove that EAQUALS standards have been met. In some cases, even accredited institutions are asked to send in evidence of steps they have taken to maintain continuous improvement.

Accredited members of EAQUALS are re-inspected every three years. In the case of institutions which run seasonal activities (e.g. junior and/or summer courses, teacher training, specialised courses, etc.), it is a requirement that every second inspection takes place at a time when these activities can also be observed. If these seasonal activities are not run at the time of the inspection, the inspectors may deem it necessary to inspect these areas during a follow-up visit, involving an additional fee. This depends on the volume, infrastructure and general management of these activities.

It is an EAQUALS requirement that all activities within an organisation that are eligible for inspection by EAQUALS (i.e. are related to the provision of language learning services) are included in EAQUALS accreditation. These include off-site courses and activities run at branches, annexes, or satellite schools which operate as part of the same company or under the same trading name, and are not separately accredited by EAQUALS. The organisation of the inspections of complex operations with different branches is prepared in consultation with the institution and the most cost effective solutions are sought.

The inspection report written by one of the inspectors, in consultation with the other, gives a full account of the evidence gathered and the 'verdict' proposed by the inspectors globally and in each main area. However, the result of the inspection is confirmed in a verdict letter issued by the Chair of the inspection sub-committee after the moderation process within the inspection sub-committee has been completed. This involves three members of the committee, who read the report for coherence and consistency, and double check information with the inspectors if needed and who may even propose changes to the statements in the report and grades.

The verdict letter confirms that the institution meets EAQUALS standards in all areas specified by the inspection scheme, and indicates the expiry date of accreditation or re-accreditation. In cases where there is a referral in one or more areas, the verdict letter makes it clear what action is required in order to attain accreditation, and within what time frame.

The verdict letter also summarises the result of the inspection in a standard format. This paragraph of the verdict letter can be used by the institution as reference in publicity materials and on the website.

International certification of language learners' achievement

Accredited members may (from 2010) issue certificates of achievement indicating the CEFR level attained by each student at the end of their course. This will involve a simple additional accreditation process, in which institutions will have to prove that their systems and procedures for assessing their students' language levels are valid and reliable. Applications will be evaluated by an expert team from an assessment panel. A rich set of resources has already been developed by EAQUALS experts to assist member institutions in developing good quality internal systems for assessing language competence.

EAQUALS membership

Membership is open to any institution that is a provider of high quality language training or is, in some other way, committed to the achievement of excellence in this area.

There are three types of members:

Accredited members:

To become an accredited member, language training institutions prove their full adherence to the Charters by submitting themselves to a full and rigorous inspection, which is repeated every three years. Only institutions that

fully comply with EAQUALS standards can be accredited and display the EAQUALS 'accredited member' logo. Accredited members of EAQUALS are recognised as centres of excellence, which offer a consistently high standard of language education that meets the world's language learning needs.

Associate members:

This category of membership is for organisations with considerable involvement and professional achievement in language education. Associate membership is by invitation only. The essential criterion is a commitment to quality.

Inspector members:

These are individuals who are trained and appointed EAQUALS inspectors but are not affiliated to any EAQUALS institution. Through their membership they become part of networking and collaborate on EAQUALS internal projects, as well as do their work as EAQUALS inspectors and advisors.

At the time of writing, EAQUALS has 102 accredited members, 20 associate members in 22 countries, as well as two project partners. (The current list of members and project partners can be found on the EAQUALS website: www.eaquals.org)

Conclusion

Accreditation by EAQUALS is the primary means by which a provider of language courses can demonstrate their compliance with international standards designed specifically for language education services. Accreditation and full membership is achieved after a rigorous quality assessment process. The main element of this process is an EAQUALS inspection based on transparent assessment criteria, reflecting the content of the EAQUALS Charters. Inspections also provide professional consultancy to help maintain the momentum of continuous improvement.

IELTS Masters Award

Winner of the IELTS Masters Award 2009

The IELTS Research Committee, which comprises members of the three partner organisations, met in October 2009 to review the shortlisted submissions. After careful consideration, the Committee decided to announce Ruslan Suvorov as the winner for his thesis entitled 'Context visuals in L2 listening tests: The effectiveness of photographs and video vs. audio-only format'. Ruslan completed his thesis at the Department of English, Iowa State University, USA and his supervisor was Associate Professor Volker Hegelheimer.

Ruslan's full abstract appears below:

Although visual support in the form of pictures and video

has been widely used in language teaching, there appears to be a dearth of research on the role of visual aids in L2 listening tests (Buck 2000, Ockey 2007) and the absence of sound theoretical perspectives on this issue (Ginther 2001, Gruba 1999). The existing studies of the role of visual support in L2 listening tests yielded inconclusive results. While some studies showed that visuals can improve test-takers' performance on L2 listening tests (e.g., Ginther 2002), others revealed no facilitative effect of visuals on listening comprehension of test takers (e.g., Coniam 2001, Gruba 1993, Ockey 2007).

The given study, conducted at Iowa State University in Spring 2008, investigated the influence of context visuals, namely a single photograph and video, on test-takers'

performance on a computer-based listening test developed specifically for this study. The listening test, consisting of six listening passages and 30 multiple-choice questions, was administered to 34 international students from three English listening classes. In particular, the study examined whether test takers perform differently on three types of listening passages: passages with a single photograph, video-mediated listening passages, and audio-only listening passages. In addition, participants' responses on the post-test questionnaire were analysed to determine whether their preferences of visual stimuli in listening tests corresponded with their actual performance on different types of visuals.

The results indicated that while no difference was found between the scores for photo-mediated and audio-only listening passages, participants' performance on video-mediated listening passages was significantly lower.

The Research Committee agreed the Ruslan's research project skilfully tackled a poorly researched area and makes a significant contribution to further work investigating the use of context visuals within online listening tests.

Ruslan will be presented with his award (a cheque and certificate) at the Annual Language Testing Research Conference (LTRC) to be held in Cambridge from 14–16 April 2010. For further information about LTRC please visit www.CambridgeESOL.org/LTRC2010/

37th ALTE meeting and conference, Maynooth, Ireland

The 37th ALTE meeting and conference took place in Maynooth, Ireland from 11–13 November 2009 and was hosted by the National University of Ireland, Maynooth. The first two days included a number of Special Interest group meetings and workshops, for ALTE members and affiliates, and the third day was an open conference day for anyone with an interest in language testing.

Michael Corrigan from the ALTE Validation Unit ran a workshop with Beate Zeidler (telc GmbH) on *Linking Existing Examinations to the CEFR* with a particular focus on writing tests. The workshop discussed the establishment of a relationship between a local rating scale and the Common Reference levels of the CEFR, and clarified what the points on the former mean when interpreted in terms of the CEFR. The presenters demonstrated a method to establish this link using ranking and rating techniques and also provided a platform for discussion about using this method; and more generally of linking pre-existing examinations to the CEFR.

In addition, Professor Jim Purpura from Columbia University led a workshop on *Assessing Grammar for Learning* in which he questioned the assumptions underlying traditional grammar assessment and assessment practices, and argued for a learning-oriented model of language assessment. Dr Tony Green from the University of Bedfordshire ran a workshop on *CEFR Linking and Standard Setting for Reading and Listening* which looked at procedures advocated in the Council of Europe's manual for relating tests to the CEFR levels but also discussed alternative procedures that have been used by test providers but which are not covered by the manual. Dr Lynda Taylor, a Consultant to Cambridge ESOL, ran a workshop entitled *Working with Oral Examiners – issues of professional training, standardisation and monitoring* in which she explored a number of questions such as 'What makes a good examiner?', 'What sort of training should they receive?' and 'How might we monitor their performance for purposes of quality assurance and professional development?'

Plenary sessions were given by Dr Neil Jones from Cambridge ESOL who gave an update on *The Work of SurveyLang*, Professor Barry O'Sullivan from the University

of Roehampton who talked about *Testing less widely-spoken languages in a multilingual context*, Joanna McPake from the University of Strathclyde who spoke about *Valuing all languages in a multi-lingual Europe*, Dr Steve Coleman from NUI Maynooth who talked about *The Gaeltacht as a type of community*, Siuan Ni Mhaonaigh from NUI Maynooth who discussed *The Development of Irish Tests for Adults* (Teastas Eorpach na Gaeilge), and Professor David Little from Trinity College, Dublin, who spoke about *Learning, teaching, assessment: how should national education systems respond to the challenges of the CEFR?*

Seán Ó Cuirreáin, Ireland's first Language Commissioner also gave a very informative presentation on the current state of the Irish language and the challenges to be met in securing the language's future, and Paul Caffrey, a senior inspector at the Department of Education and Science in Ireland reported on the challenges of Ireland's shift from a bilingual to a plurilingual society.

Prior to the meeting and conference, Dr Lynda Taylor ran a 2-day introductory course on the assessment of speaking which was attended by 24 participants including two from Cambridge ESOL. Other participants came from Brazil, Bulgaria, Canada, the Czech Republic, Denmark, Estonia, Germany, Hungary, Ireland, Israel, Japan, Sweden and Wales. On the Saturday following the conference, ALTE launched its first foundation course in Testing Writing, which is part of a new series of short, half-day courses in language testing aimed at new delegates from ALTE members and affiliates, and those with little or no experience and a limited technical knowledge of assessment. This first session was run by Jacky Newbrook and Annie Broadhead, Consultants to Cambridge ESOL.

ALTE's next meeting and conference will take place in Rome from 12–14 May 2010 where the theme of the conference day will be on Assessment and Reference Level Descriptions. The conference will be preceded by a 2-day testing course (topic to be confirmed) on 10–11 May, and a 1-day seminar on Language and Migration and Integration on 11 May, and will be followed by one or more foundation courses on 15 May 2010.