



## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	Galway Language Centre
Address:	Bridge Mills Galway Language Centre The Bridge Mills, Bridge Street, Galway H91R1WF
Date of Application:	25 <sup>th</sup> March 2019
Date of resubmission of application:	18 <sup>th</sup> March 2020
Date of site visit (if applicable):	24 <sup>th</sup> May 2019
Date of reconvene meeting (if applicable)	7 <sup>th</sup> May 2020 and 12 <sup>th</sup> June 2020
Date of recommendation to the Programmes and Awards Executive Committee:	16 <sup>th</sup> July 2020



## 1.2 Profile of provider

Galway Language Centre, known as Bridge Mills Galway Language Centre, is an adult English Language School. The school has been in operation since 1987 teaching English as a foreign language, which is its main business; teaching foreign languages including Spanish, German, Italian, Portuguese, Polish and Japanese; and as an English language teacher training centre. It first had its QA approved by FETAC in 2011. The school provides a range of courses including:

- General English – full-time and part-time
- Cambridge Examination Preparation (all levels)
- TOEIC, TOEFL & IELTS Preparation
- English for Business & Professional Use
- English for Specialist Subjects
- Part-time Courses
- TEFL Teacher Training Courses

The school has about 200 students per week studying full-time and about 50 part-time.

The school offers language learning programmes and TEFL teacher training. Its main business is teaching English as a foreign language to international students and, to a lesser degree, foreign languages to local residents and teacher training (TEFL CELT) to those wishing to learn to teach English as a foreign language.

Its TEFL training history started in 1989 (before recognition was available) with self-certified teacher training courses and then it gained RELSA (Recognised Language Schools Association) certification in 1991 for the TEFL course. This lasted until 2004 when ACELS began to provide recognition via the CELT (Certificate in English Language Teaching) award, which has continued until now. The foreign language programme ran uncertified until it gained accreditation from FETAC in 2011. It has had approximately 100 TEFL graduates per year on average since courses began and has about 50 people studying foreign languages in any one term (it offers 3 terms per year).

Learners are aged 16, minimum, and are studying English as a foreign language from as little as 1 week up to a 25-week stay. Foreign languages tend to be studied by adults (40+) in evening part-time courses, and TEFL courses by students aged 20+ who wish to teach in Ireland or abroad.

Most of the certification taking place is non QQI related and includes Cambridge Examinations, Test of Interactive English examinations as well as TEFL certification accredited by ACELS until now.



## Part 2 Panel Membership

Name	Role of panel member	Organisation
Professor Fiona Farr	Chairperson	Applied Linguistics and TESOL University of Limerick
Ms Kieranne Hogg	Subject Matter Expert	Director of Studies Dorset College Dublin
Mr Michael Shannon	Learner Representative	TEFL Cert from Swan English Language Training, Dublin
Mrs Diane Schmitt	Subject Matter Expert	Senior Lecturer (Retired) in EFL/TESOL Nottingham Trent University, UK
Mr John Vickery	Secretary	Retired Registrar, Institute of Technology Tallaght

\*Mr. Walter Balfe, Head of QA (QQI Awards) at Quality and Qualifications Ireland (QQI) attended the site visit on 24<sup>th</sup> May 2019 as an observer.

\*\*Ms Deirdre Stritch, Manager of approval and monitoring at QQI, attended the Microsoft Team meeting on the 7<sup>th</sup> May 2020 and 12<sup>th</sup> June 2020 as an observer.

\*\*\*Ms Liliana O'Reilly, Senior Quality Officer at QQI, attended the Microsoft Team meeting on the 7<sup>th</sup> May 2020 and 12<sup>th</sup> June 2020 as an observer.

\*\*\*\* Mr Michael Shannon, learner representative, withdrew from the panel due to unavailability in 2020.



## Part 3 Findings of the Panel

### 3.1 Summary Findings

The purpose of the re-engagement process is to evaluate institutional capacity and the quality assurance procedures of the provider against QQI statutory QA guidelines with a view to a QQI decision on whether the provider's QA procedures should be approved.

The panel would like to commend Bridge Mills Galway Language Centre management and staff for their openness and proactive engagement during the panel visit and subsequent online discussions. A significant amount of work was undertaken involving self-assessment and reflection in producing the substantial amount of documentation submitted.

The panel found that the provider has an excellent reputation and long-standing experience of delivering courses. It has external accreditation from several bodies, including ACELS. The management and staff are experienced and very enthusiastic. The panel also found some areas of good practice.

On the 24<sup>th</sup> May 2019, based on the information provided via the application, capacity documentation, quality assurance procedures 2019 document, other supporting documentation and the site visit, the panel was not in a position to recommend approval of the provider's QA procedures to QQI. The panel identified a list of mandatory changes outlined in Part 6.1 of this report to be addressed by Bridge Mills Galway Language Centre within six months. Specific advice was also provided outlined in Part 6.2 of this report to be considered by Bridge Mills Galway Language Centre. The panel was also of the view that the evaluation would require an in-person evaluation meeting with the provider.

Following resubmission of revised quality assurance policies and procedures, the panel met with the provider (virtually) on the 7<sup>th</sup> May 2020. At the conclusion of the meeting the panel sought further clarification on discrete matters and allowed the provider three weeks to provide these clarifications. Following clarifications and updated documentation, the panel met with the provider (virtually) on the 12<sup>th</sup> June 2020.

The panel is satisfied that Bridge Mills Galway Language Centre has undertaken a comprehensive and successful review of its quality assurance policies and procedures. The panel's recommendation to QQI is to approve the draft QA policies and procedures of Bridge Mills Galway Language Centre.



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

### 3.2 Recommendation of the panel to Programmes and Awards Executive Committee of QQI

	Tick <u>one</u> as appropriate
Approve Bridge Mills Galway Language Centre draft QA procedures	<input checked="" type="checkbox"/>
Refuse approval of Galway Language Centre known as Bridge Mills Galway Language Centre draft QA procedures <b>pending mandatory changes</b> set out in Section 6.1  (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	<input type="checkbox"/>
Refuse to approve [the provider's – insert name] draft QA procedures	<input type="checkbox"/>



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.1.1(a)</b>	<b>Criterion:</b> <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	<b>Yes</b>	The documentation provided to support this was the annual return from the Companies Registration Office. The updated version of the return was submitted to QQI.
<b>4.1.2(a)</b>	<b>Criterion:</b> <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	<b>Yes</b>	The school only delivers programmes in Ireland. It has a substantial presence in Galway.
<b>4.1.3(a)</b>	<b>Criterion:</b> <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	<b>Yes</b>	It was confirmed at the evaluation meeting that Bridge Mills Galway Language Centre that it is in good standing with External Authentication/Awarding Bodies.
<b>4.1.4(a)</b>	<b>Criterion:</b> <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	<b>Yes</b>	The Provider has stated in Section 1.4 of the Capacity Document that there are no third-party relationships involved in running courses.
<b>4.1.5(a)</b>	<b>Criterion:</b> <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	<b>Yes</b>	The applicant in Section 3.4 of the application included a compliance statement in relation to all relevant legislation and regulatory requirements applicable to the provision of education and training in Ireland.
<b>on4.1.6(a)</b>	<b>Criterion:</b> <i>Is the applicant in good standing in the qualifications systems and education and training systems</i>	<b>Yes</b>	The school was established in Galway in 1987 and has a history and good reputation of successfully dealing with the



	<i>in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>		provision of English language programmes. The school is accredited by ACELS as a language school and has been accredited for more than 20 years. The Provider submitted a copy of the ACELS Certificate for 2018.
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## Findings

At the first site meeting on the 24<sup>th</sup> May 2019, the panel was satisfied overall that the legal and compliance requirements outlined in Section 4.1 had been broadly addressed. However, the provider needed to amend the documentation to ensure that the number and specific identity of beneficial owners was consistent throughout the submitted documents.

The panel was informed that there was an updated annual return available from the Companies Registration Office which would be submitted to QQI.

The documentation showed no reporting by the School Director to the Board of Directors or the Board's terms of reference.

There were inconsistencies throughout the documentation in relation to beneficial owners.

The role and responsibilities assigned to all units of governance were unclear including the role and responsibilities of the Board of Directors and the reporting structure of the School Director to the Board.

Following a review of the revised, resubmitted quality assurance policies and procedures, the panel is satisfied that Bridge Mills Galway Language Centre has addressed each of these issues. The panel recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has met the criterion.

**4.2 Resource, governance and structural requirements:**

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
4.2.1(a)	<b>Criterion:</b> <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	<b>Yes</b>	A letter from the provider's chartered accountants was provided confirming that the company's corporation tax liability has been processed by the inspector of taxes for all years up to and including the year ended 31st January 2018. The 2018 Financial statement of Bridge Mills Galway Language Centre Limited (slight difference in wording in the application) was provided.
4.2.2(a)	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	<b>Yes</b>	At the time of application, the school had 200 full-time students and 50 part-time students enrolled studying languages. Teacher training courses were run on a full- and part-time basis throughout the year (8 full-time and 2 part-time course per year). Currently, due to the COVID-19 crisis, the provider is offering online courses only.
4.2.3(a)	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision-making structures in place?</i>	<b>Yes</b>	The updated QA policies and procedures has an independent chairperson for the Academic Committee which consists mainly of academics.
4.2.4(a)	<b>Criterion:</b> <i>Are there arrangements in place for providing required information to QQI?</i>	<b>Yes</b>	The School Director was identified as the person responsible for providing information to QQI.





## Findings

### **Governance structure**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel did not consider the governance structure adequate in meeting QQI requirements in relation to “a system of governance that protects the integrity of academic processes and standards” (Reference Section 2 1.1c QQI *Core Statutory Quality Assurance Guidelines*, April 2016). In particular, in relation to “overall corporate decision-makers within the provider, whether trustees, owners, shareholders or others, do not exercise exclusive authority or undue influence over academic decision-making.” The arrangements at that time did not demonstrate adequate independence. The committee structure was also fragmented.

### **Management of Risk**

The development of a risk register had begun but the school did not identify potential high-level threats to the on-going operation of the school and the mitigation measures that need to be put in place to minimise the likely occurrence of these threats.

The Quality Officer appeared on the organisational chart but there was no section dealing with their role and responsibilities.

Following a review of the revised, resubmitted quality assurance policies and procedures in 2020, the panel is satisfied that these issues have been satisfactorily addressed and recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has met the criterion.

### **4.3 Programme development and provision requirements:**

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.3.1(a)</b>	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	<b>Yes</b>	The school has delivered programmes in Galway since 1987.
<b>4.3.2(a)</b>	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	<b>Yes</b>	At the time of application, the school had 22 full-time staff and 6 part-time staff. Some of the teachers have worked at the school for 20 years or more.
<b>4.3.3(a)</b>	<b>Criterion:</b> <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality</i>	<b>Yes</b>	Section 3 of Bridge Mills Galway Language Centre QA Manual provided information for the protection of learners.



	<i>Assurance (Education and Training) Act (2012) (the Act)?</i>		The school has learner protection in place as a member of Marketing English in Ireland (MEI).
<b>4.3.4(a)</b>	<b>Criterion:</b> <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	<b>Yes</b>	The school has a lease on the building. ACELS-accredited programmes have been running at the premises. The premises are not accessible to wheelchairs. Bridge Mills Galway Language Centre informed the panel that the premises are a listed building and structural changes to the building are not possible. The application did indicate that another premises could be used but no further information was provided.
<b>4.3.5(a)</b>	<b>Criterion:</b> <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	<b>Yes</b>	The panel recommends that QQI can be satisfied that access, transfer and progression arrangements in place meet QQI's criteria for approval.
<b>4.3.6(a)</b>	<b>Criterion:</b> <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	<b>Yes</b>	Up to now, the school has depended on external assessment bodies to fulfil this criterion. The sector in conjunction with QQI has agreed on a moderation process.
<b>4.3.7(a)</b>	<b>Criterion:</b> <i>Are arrangements for the protection of enrolled learners</i>	<b>Yes</b>	It is a member of MEI. See 4.3.3 (a) above. See findings below.



	<i>to meet the statutory obligations in place (where applicable)?</i>		
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**Findings**

The school has a very good reputation in delivering English language programmes, including ACELS accredited programmes. They have been in operation since 1987. At the time of application, the school had 22 full-time staff and 6 part-time staff. Some of the teachers have worked at the school for 20 years or more. The school has always been able to recruit teachers from its own teacher training programmes. The staff qualifications were provided and all except one person have a Level 8 qualification on the NFQ. All teaching staff meet the employment standards required to teach English as a foreign language as set out by ACELS. It was confirmed at the evaluation meeting that the student-teacher ratio will be the same as is currently operated to comply with ACELS requirements.

The quality manual provided information on the protection of enrolled learners. In the event of a programme being terminated early, the provider will provide information to students which may lead to an alternative learning opportunity to learners. The school has learner protection in place as a member of MEI. The School Director also outlined at the evaluation meeting the refund arrangements that were in place to refund full fees paid by students who could not attend a programme or unable to attend a subsequent programme offered by the school.

At the time of the original 2019 site visit, the panel had a number of concerns, including that the entry requirements for all cohorts of potential students were not documented explicitly in the documentation and on the website. An age limit was stated as a requirement for entry onto the TEFL course but the justification for such a requirement was not provided. If ACELS sets the age limit this should be stated. The requirement in relation to the English language ability of those wishing to enrol was not explicitly stated on the website and other documentation provided to applicants prior to enrolling.

The documentation was not clear where decisions were made, on what basis and by whom. The provider did provide information in relation to the requirements for teaching in recognised schools in Ireland. There were no policies provided on Fitness to Study and Fitness to Practice.

The RPL requirements were not fully developed and explicitly stated in the documentation.

There was a misunderstanding of what was meant by progression. The documentation discussed student performance/retention.

The entry requirements did not state that those wishing to teach will normally have to be Garda vetted prior to taking up any teaching position.

Up to now, the school has depended on external assessment bodies to fulfil this criterion. The provider has good practices in relation to the assessment of learners, such as double marking.



No Examinations Committee was proposed where results will be ratified prior to submission to QQI. The agreed moderation process between the sector and QQI was discussed.

Examinations Appeals Committee. The processes of recheck, review, appeal were not fully developed. No criteria were provided in the documentation on the grounds for an appeal.

Following a review of the revised, resubmitted quality assurance policies and procedures, the panel is satisfied that these issues have been satisfactorily addressed and recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has met the criterion.

#### **4.4 Overall findings in respect of provider capacity to provide sustainable education and training**

Bridge Mills Galway Language Centre is a long-established provider in Galway and has a strong commitment to quality assurance. The school demonstrated a learner-centred approach focusing on the needs of the learners.

Staff are well-qualified and there is evidence of well-resourced staff development opportunities. Succession planning arrangements were outlined during the 1<sup>st</sup> evaluation meeting on the 24<sup>th</sup> May 2019.

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019 following an examination of the re-engagement documentation provided by Bridge Mills Galway Language Centre, including its quality assurance handbook, capacity documentation, other supporting documentation and having met with the provider, the panel identified mandatory changes for the provider. Of the specified criteria to indicate capacity above, and notwithstanding advised changes below relating to some of these criteria, the panel was reasonably satisfied in all but 4.2.3(a). The panel was not satisfied that the College was operating fit-for-purpose governance, management and decision-making structures.

Following resubmission of an updated quality assurance policies and procedure, review of the revised documentation the panel recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has met the criteria.



## Part 5 Evaluation of draft QA Procedures submitted by <Provider Name>

The following is the panel's findings following evaluation of **Bridge Mills Galway Language Centre** quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

### 1 GOVERNANCE AND MANAGEMENT OF QUALITY

#### **Panel Findings:**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019 the panel found that the committee structure was not fit for purpose for a small organisation. The Programme Board appeared to be the main academic committee as shown on the organisation chart. It had responsibility for monitoring and dealing with issues with programme delivery. It was stated that the programme leader was normally the chairperson of the Programme Board. There was a separate QA committee with responsibility for agreeing operating procedures in consultation with the School Director. Its purpose was stated as monitoring, but the terms of reference referred to development of the curriculum. There was no reference to teaching, learning and assessment (TLA) strategies or reviewing and enhancing these as one of its responsibilities.

The panel did not consider the governance structure adequate in meeting QQI requirements in relation to "a system of governance that protects the integrity of academic processes and standards" (Reference Section 2 1.1c QQI *Core Statutory Quality Assurance Guidelines*, April 2016). In particular, in relation to "overall corporate decision-makers within the provider, whether trustees, owners, shareholders or others, do not exercise exclusive authority or undue influence over academic decision-making." The current arrangements at the time did not demonstrate adequate independence. The committee structure was also fragmented.

The role and responsibilities of the Board of Directors were not included in the quality manual and the reporting of the School Director to the Board.

Following a review of revised documentation submitted in 2020, the panel recommends that QQI can be satisfied that fit-for-purpose governance, management of quality structures are in place. The issues outlined above have been addressed with the establishment of an Academic Committee with an independent chairperson.



## 2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

### **Panel Findings:**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel was of the view that the school had made very good progress in documenting its procedures. There were anomalies, inconsistencies, omissions, or lack of detail in the quality assurance procedures that needed to be addressed by the provider. For example, reference was made to a Registrar, but no such position exists within the organisation. There were no roles and responsibilities provided for the Quality Officer.

The following sections did not meet requirements at the 1<sup>st</sup> meeting in 2019:

- (i) Governance and Management
- (ii) Access, transfer and progression
- (iii) Fair and consistent assessment of learners

The documentation did not provide policies and procedures in relation to the on-going monitoring and programme review processes

The representation and role of students on committees needed to be strengthened.

The provider also adheres to other external accreditation requirements. There was no section in the quality assurance manual at that time that referenced and provided links to the appropriate documents.

Following a review of revised documentation submitted in 2020, the panel is satisfied that the issues outlined above have been addressed. Bridge Mills Galway Language Centre has clearly documented and organised quality assurance policies and procedures with a good format in place.



### 3 PROGRAMMES OF EDUCATION AND TRAINING

#### **Panel Findings:**

At the first site meeting on the 24<sup>th</sup> May 2019, it was evident that Bridge Mills Galway Language Centre had experience of delivering programmes as its programmes led to ACELS recognition. It has less experience of designing its own programmes to meet QQI requirements. The panel were of the view that staff training and development was required in this area.

The panel considered the programme development and approval procedures included in the *QA Policies and Procedures 2019* document to be light on (1) detail, (2) who had responsibility for programme design and development, and (3) who approved the submission prior to submitting to QQI or other awarding body for validation/accreditation.

It was not evident if there is a template for programme proposals and how financial and resource decisions were made and when.

There are changes that can be made to a programme but there are limits. Examples are provided in Section 8 of QQI procedures for the validation of programmes. The quality assurance manual did not document how the provider will monitor and fulfil this requirement. This may depend on the scope of the provider's quality assurance procedures.

The policy and procedures for the recruitment of foreign students and the agreements that were in place for agents, including procedures for monitoring the information they provide to applicants, was not documented.

Following a review of revised documentation submitted in 2020, the panel is satisfied that Bridge Mills Galway Language Centre has satisfactorily addressed these issues.

### 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

#### **Panel Findings:**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel commended the provider on the high number of full-time staff employed. The expertise and commitment of the staff the panel met was evident.

The information provided on staff and their qualifications met requirements. Staff development was evident and there was a budget allocation for appropriate training.

The staff development for managers was outlined, as well as the arrangements for succession planning.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for staff recruitment, management and development.

**5 TEACHING AND LEARNING****Panel Findings:**

At the 1<sup>st</sup> site meeting on 24<sup>th</sup> May 2019, it was noted that the policy of the Bridge Mills Galway Language Centre is to ensure the quality of the learning experience is monitored and improved on an ongoing basis. It commits to fostering professional development for learners and staff in teaching and learning. The learning environment will;

- (i) Respect the needs of learners
- (ii) Consider different modes of delivery as appropriate
- (iii) Encourage learner autonomy
- (iv) Promote mutual respect between staff and learners
- (iv) Have a learner complaints and appeals procedure in place.

Information was requested at the meeting in relation to copyright which was provided.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for teaching and learning.

**6 ASSESSMENT OF LEARNERS**

Currently, students take language tests for certification from several language certification bodies as stated in Section 4 above.

Findings in relation to assessment were stated in Section 4.

At the 1<sup>st</sup> meeting on the 24<sup>th</sup> May 2019 there was no overall assessment strategy for its own programmes. The evaluation of the Bridge Mills Galway Language Centre for validation is scheduled for July 2020.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for the assessment of learners.



**7 SUPPORT FOR LEARNERS****Panel Findings:**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel were of the view that the supports for students were adequate. There is a Student Support Officer in place. Students are asked to provide feedback not only on the quality of learning available to them but also on the extra services provided such as accommodation placement, extracurricular activities, and the performance of the administration staff.

The section dealing with counselling was not clear that the advice was in relation to academic counselling only.

The provider does refer students to professional counsellors as appropriate. There was a lack of information on notice boards throughout the centre in relation to who to contact in such cases.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate supports for learners.

**8 INFORMATION AND DATA MANAGEMENT**

At the first site meeting on the 24<sup>th</sup> May 2019, the provider confirmed that data is stored to enable compliance with data protection legislation including controls on access to student data, backup and storage. Learners are informed that data is collected and stored and for what purposes. The School Director confirmed that they comply with Data Protection Legislation and the School Director is the Data Protection Officer. Data is backed up remotely.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for information and data management.

**9 PUBLIC INFORMATION AND COMMUNICATION****Panel Findings:**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel were of the view that the information on the provider's website is informative. The provider stated that websites of overseas recruitments agencies are monitored to ensure that the correct information is provided to potential students.

It was not evident that specific procedures were in place to ensure that the appropriate and correct information is provided on agent websites and that this is actively monitored by the school.

Following a review of revised documentation submitted in 2020, the panel recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for public information and communication.

**10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING (incl. Apprenticeships)**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel were of the view that the provider had developed procedures for the following:

- (i) Peer relationships with the broader education and training community
- (ii) External partnerships and second providers
- (iii) Expert panellists, examiners and authenticators.

The QA manual stated that where expert panellists were hired, they would not have any conflict of interest in relation to Bridge Mills Galway Language Centre. The school committed to review these panellists on each engagement and maintain a list of all panellists used to authenticate programmes. No form was provided in the documentation for signing by external panellists covering conflict of interest.

The panel can recommend that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for other parties involved in education and training.

**11 SELF-EVALUATION, MONITORING AND REVIEW****Panel Findings:**

At the 1<sup>st</sup> meeting on the 24<sup>th</sup> May 2019, the panel were of the view that the school had developed procedures for the following:

- (i) School internal reviews, self-evaluation and monitoring
- (ii) Internal self-monitoring
- (ii) Self-evaluation, improvement and enhancement.

At the time there were no obvious controls in place.

Following a review of revised documentation submitted in 2020, the panel recommends that QQI can be satisfied that Bridge Mills Galway Language Centre has appropriate procedures for self-evaluation, monitoring and review. The provider has developed a procedure for on-going review of the quality assurance framework documentation.

**Evaluation of draft QA Procedures - Overall panel findings**

At the 1<sup>st</sup> site meeting on the 24<sup>th</sup> May 2019, the panel acknowledged the work undertaken by the provider in developing provider-owned quality assurance procedures to comply with QQI requirements. However, the quality assurance procedures required further development by the provider. The panel also felt that there may be a benefit to the provider from working with other ELE providers to develop sector-appropriate procedures that can be modified on a provider-by-provider basis.

The panel was of the view that the establishment of an academic committee with overall responsibility for decision making in relation to all academic matters with an independent chairperson with relevant experience in higher education and training in Ireland would provide the catalyst for the development and implementation of provider-owned quality assurance policies and procedures that meet QQI requirements. The panel identified a number of mandatory changes to be addressed by the provider (set out in Section 6.1 of this report), to be addressed within six months of QQI decision by Bridge Mills.

Following a review of revised documentation submitted by Bridge Mills in 2020, the panel confirms that Bridge Mills Galway Language Centre has in place an academic committee with the minutes of meetings on its website. It has submitted a revised quality assurance policies and procedures, which address each of the mandatory changes identified by the panel in 2019

The panel can recommend that QQI approve Bridge Mills Galway Language Centre's quality assurance policy and procedures.



## Part 6 Mandatory Changes to QA Procedures and Specific Advice

### 6.1 Mandatory Changes

Following the initial evaluation on the 24<sup>th</sup> May 2019 the panel found that in order to progress with its application, Bridge Mills Galway Language Centre would need to make the mandatory changes listed below:

1. Governance and management. The provider must submit its updated return from the Companies Registration Office to QQI. The provider must review its governance structure and the number of committees currently outlined in the documentation. The provider must establish an academic committee with overall responsibility for decision-making in relation to all academic matters. This committee must have an independent chairperson with relevant experience of higher education and training in Ireland. This is to ensure that the academic decision making is independent of commercial considerations or the undue influence of the business owners. The terms of reference for the academic committee, its membership, schedule of meetings and minimum quorum must be established and documented. The minutes of meetings must be published on school's website. The provider must split the diagram in the quality assurance manual showing the governance and management structures to show the committees and management reporting structures separately. All of the documentation must be consistent in relation to beneficial owners. The role and responsibilities of the Board of Directors must be included in the quality manual and the reporting of the School Director to the Board. The role and responsibilities assigned to all units of governance must be fit for purpose, transparent and clearly delineated. The school must identify high level threats to the on-going operation of the school and the mitigation measures in place to minimise the likely occurrence of these threats. The school must identify risks, where applicable, in relation to reputation, financial, strategy and operations. The ownership of each risk must be assigned to ensure an individual can develop and track mitigation strategies. The procedures for the identification, assessment and management of risk must be developed. The position and responsibilities of the Quality Officer must be identified and documented in the quality assurance manual.
2. Access, transfer and progression. The school must document explicitly its entry requirements for all cohorts of potential students. An age limit was stated as a requirement for entry onto the TEFL course but the justification for such a requirement must be provided (make it clear that it is ACELS that sets the age limit). The requirement in relation to English language ability of those wishing to enrol must be explicitly stated. All documentation including the web site must state that an interview may be part of the admission procedure. The provider must further clarify where decisions are made, on what basis and by whom. A Fitness to Study Policy and a Fitness to Practice Policy, or similar organisationally and contextually appropriate measures, must be developed. The RPL requirements must be developed further and explicitly stated in the documentation. There is a misunderstanding of what is meant by progression. This must be rectified in the documentation. The information provision in relation to entry onto the



- programme must also state that those wishing to teach will normally have to be Garda vetted prior to taking up any teaching position.
3. Fair and consistent assessment of learners. An Examinations Committee must be established where results will be ratified prior to submission to QQI. Those assessing students must be members of the committee. An implementation plan for the system of moderation which has been agreed between the sector and QQI must be put in place for the school.
  4. Examinations appeals committee. The provider must further develop its processes of recheck, review and appeal. The composition of this committee must be independent of those involved in earlier parts of a student recheck, review etc. The provider must ensure that there is an external senior academic as a member of the committee. The outcomes of appeals, without providing personal information, must be made known to the Academic Committee. The criteria for an appeal must be clearly stated in the QA manual.
  5. Teaching and learning. The provider must ensure that user guidelines in relation to copyright are adhered to and that a process is in place to ensure compliance.
  6. Assessment. The provider must develop an overall assessment strategy for its own programmes taking account of best practices in HEIs.
  7. Supports for students. The section dealing in the QA manual with counselling must make it clear that the advice is in relation to academic counselling only.
  8. Information provision and data management. The information in relation to rechecks, reviews and appeals must be clearly stated and made available to each cohort of students.
  9. Public information and communication. The provider must develop specific procedures to ensure that the appropriate and correct information is provided on agent websites and that this is actively monitored. The website and other promotional information must make the criteria for teaching English in a recognised school in Ireland explicitly clear and recommend that those intending to teach elsewhere need to check the specific requirements for the specific context/country. Potential applicants also must be made aware that they will normally need to be Garda vetted prior to taking up a teaching position.
  10. Self-evaluation, monitoring and review. Further development is required in relation to self-evaluation, monitoring and review. These are quality assurance processes that must take account of QQI policies and criteria for the validation of programmes of education and training November 2017. The proposed academic committee must have oversight of any proposed changes to validated programmes.

Following a review of the resubmitted quality assurance policies and procedures, the panel can confirm to QQI that all of the mandatory changes have been addressed satisfactorily.



## 6.2 Specific Advice

Following the initial evaluation on the 24<sup>th</sup> May 2019, the panel provided the following specific advice to the provider:

1. Governance and management of quality. The panel advises that the establishment of the academic committee be the starting point for the development of an updated quality assurance manual. It further advises that the updated quality assurance manual be approved by the academic committee. The panel advises that the role of the School Director include strategic planning.
2. Quality assurance policies and procedures. The panel advises that there needs to be policies and procedures developed for the on-going monitoring and programme review process. The panel advises that the student representation on committees needs to be strengthened. The panel advises that the quality assurance manual have a section where reference is made to external accreditation requirements and links to the appropriate documents.
3. Staff development. The panel advises that staff development is required in writing minimum intended programme learning outcomes.
4. Teaching and learning. The panel advises that a teaching and learning strategy be developed and that the proposed academic committee would be a means of highlighting good practice in teaching and learning and in identifying themes and trends that may indicate, for example, student and staff support requirements and/or training.
5. Support for students. The panel advises that further information be provided on notice boards throughout the centre in relation to who to contact for external professional counselling services.
6. External panellists. The panel advises that a form be developed for signing by external panellists covering conflict of interest.

The panel can confirm that Bridge Mills Galway Language Centre took account of the advice provided.

Further specific advice following the meeting (virtual) of the panel on the 12<sup>th</sup> June 2020 is provided:

1. Ensure consistency in specifying whether it is working days or not throughout the quality assurance policies and procedures documentation e.g section 4.2 consider working days rather than days.
2. Appendix 6. Plagiarism policy: Suggest broadening the definition of plagiarism and revising some of the procedure. Suggest examining the recent information provided on academic integrity on QQI website.
3. When notifying students regarding dates for appeals etc. consider date of receipt rather than date of issue e.g. section 4.7. Consider following up that notifications have been received.
4. Review documentation to ensure shall is used where appropriate rather than should.
5. Section 4.4, Eligibility and entry requirements suggest removing reference to CPE certificate and list the others (IELTS and TOEFL) as examples only.
6. Clarify what happens to student fee and later enrolment if a student is suspended under one of the Fitness to Practice or Fitness to Study policies.



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 3	Minor	Languages and ELT
Level 7	Special Purpose Certificate	Teaching English as a Second or Other Language



**QQI**

Quality and Qualifications Ireland  
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## **Part 8      Approval by Chair of the Panel**

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of Bridge Mills Galway Language Centre.

Name: \_\_\_\_\_

Date: 23<sup>rd</sup> June 2020





## **Annexe 1: Documentation provided to the Panel in the course of the Evaluation**

Document	Related to
Galway Language Centre Application form for Re-Engagement	Re-engagement
Galway Language Centre Capacity Documentation 2019	Re-engagement
Galway Language Centre Quality Assurance Policy and Procedures 2019	Re-engagement
Letter from insurance broker	Insurance
Letter from chartered accountants	Financial standing
ACELS certificate 2018	Compliance
Licence Certificate (Language Schools) issued by the Irish Copyright Licensing Agency CLG.	Copyright
User Guidelines	Copyright
MPLC (Motion Picture Licensing Company) Umbrella Licence Agreement	Copyright

**Annexe 2: Provider staff met in the course of the Evaluation**

Name	Role/Position
Mr Patrick Creed	School Director
Mr Alan O Connor (1 <sup>st</sup> meeting in 2019 only)	Academic Manager
Ms Julie Cuttance	Senior Tutor
Mr Shane Callinan (1 <sup>st</sup> meeting in 2019 only)	Student Support Office
Ms Mairead O Connor	TEFL Tutor
Ms Niamh McElwaine (1 <sup>st</sup> meeting in 2019 only)	TEFL Tutor
Matthew Hurley (7 <sup>th</sup> May 2020 meeting only)	QA Officer

*Appendix: Provider response to the Reengagement Panel Report*



**BRIDGE MILLS GALWAY LANGUAGE CENTRE, Ltd**

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Registration No. 450520

30.06.2020

Formal response Reengagement Panel Report (reconvened meetings 07.05.20 and 12.06.2020)

To whom it concerns,

We would like to express our thanks to the panel and QQI for its hard work in this final report on our QA, and our approval of QA pending final QQI internal processes (Programme and Awards Executive Committee Meeting 16.07.2020).

We sent yesterday our factual accuracy reply to the report – noting 2 minor points

We accept the report and its findings, and we look forward to continuing to work with QQI.

Best and thanks

Patrick Creed  
School Director  
Bridge Mills Galway Language Centre