



Reengagement Panel Final Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Galway Business School
Address:	GCI House, Lower Salthill, Galway
Date of Application:	20 November 2019
Date of resubmission of application:	
Date of evaluation:	
Date of site visit (if applicable):	7 February 2020
Date of recommendation to the Programmes and Awards Executive Committee:	11 June 2020

1.2 Profile of provider

Galway Business School (GBS) was incorporated in 2002 to focus on satisfying demand in the West of Ireland for the provision of accredited business and professional studies programmes which are flexible in nature, and accessible to a broad range of learners. GBS has offered programmes recognised by the Business and Technology Education Council (BTEC/EDXCEL) and the Institute of Commercial Management (ICM) since 2003. The school received accreditation from the University of Wales in 2005 to run a Level 8 top-up BA in Business Management degree programme. In 2006, GBS agreed its quality assurance procedures with FETAC and offered a number of programmes leading to FETAC awards. GBS first had a programme validated by QQI in April 2014 and admitted first year learners onto a validated Level 7 Bachelor of Business programme in September 2014.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Danny Brennan	Chair	Principal, DNB Education Consultants and Former Registrar LYIT
Tara Ryan	QA Expert	Registrar, Irish Management Institute
Michael Kennedy	QA Expert	Senior Quality Officer, University College Dublin
Achint Atri	Learner Representative	Business Management Postgraduate Student, DCU
Amanda Russell	Secretary	QA Officer, CCT College Dublin

Part 3 Findings of the Panel

3.1 Summary Findings

The panel acknowledges Galway Business School's track record and good standing in the Irish education sector. The process of reengagement involved a thorough review by the panel of the GBS's QA documentation and other materials deemed relevant by the provider and a site visit, to meet with management and academic staff.

It was evident during the visit that the learner experience is the central focus for the development of all policy, procedures and activities within the institution. GBS academic staff are mainly part time employees; however, the panel noted their enthusiasm for the college, the staff and management and their high level of commitment to adhering to and promoting the quality structure within the college.

Nonetheless, at the conclusion of the site visit, the panel had concerns around the governance structure of the college. A clear separation of the commercial and academic aspects of the college was required. The panel also identified other deficiencies in the documentation presented and sought amendments and further clarity on a number of points to ensure alignment with the requirements of the Core Statutory Quality Assurance Guidelines. These were identified as proposed mandatory changes and are outlined in detail in Section 6.1 of this report. However, given that these issues were discrete, and in the panel's view could be addressed quickly by the provider, the panel availed of the option to defer its overall decision for a period of six weeks, and allowed Galway Business School this time to submit evidence to the panel that the issues identified had been satisfactorily addressed.

The panel reconvened on 9 April 2020 to undertake a desk review of the evidence subsequently submitted by GBS. It is the panel's view that GBS has satisfactorily addressed the proposed mandatory



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changes and has responded appropriately to the panel's initial specific advice. The panel consequently recommends that QQI approve GBS's QA procedures.

The panel has also taken the opportunity to issue a number of items of specific advices to GBS, outlined also in Section 6.2 of this report. The panel is of the view that implementing this advice will support GBS in its ongoing quality enhancement process, and also help prepare it well for participation in QQI's annual reporting programme for providers.

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

	Tick <u>one</u> as appropriate
Approve Galway Business School's draft QA procedures	v
Refuse approval of Galway Business School's draft QA procedures pending mandatory changes 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)	
Refuse to approve Galway Business School's draft QA procedures	



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	<i>GBS provided a Cert. of Incorporation & Cert. of Registration, showing the College was incorporated in 2002.</i>
4.1.2(a)	Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	<i>GBS is a legal entity in the EU, with a presence in Galway.</i>
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	<i>Galway Cultural Institute is the sister company of GBS. In addition, GBS has collaborative relationships with Georgian College of Applied Arts & Technology ESCO Wesford.</i>
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	<i>GBS has an MOU for student exchange with Georgian College of Applied Arts & Technology, and ESCO Wesford, College de Paris, with GBS being the first provider</i>
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	<i>The evidence provided in support of GBS's application is indicative of compliance with Irish/EU legislation.</i>
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding</i>	Yes	<i>GBS is a long term QQI (formerly FETAC / HETAC) provider -, there has been no issues identified with this provider.</i>



	<i>bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>		
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Findings

The panel is satisfied that the legal and compliance requirements outlined in Section 4.1 are currently being met by GBS.

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

	Criteria	Yes/No/ Partially	Comments
4.2.1(a)	Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	<i>GBS provided evidence of current tax compliance, public liability insurance, a letter of confirmation from accountants stating GBS's conformance with Irish Company Law of the last 3 years and income-expense projections.</i>
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	<i>GBS is a well-established provider, and provided income-expenditure projections for the next 5 years, which is in line with the proposed expansion of its current provision.</i>
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	<i>At the site visit the panel was not satisfied that GBS's structures had met this criterion. The panel's concerns in relation to this were addressed by GBS in the six week interim period, and its revised governance structure has subsequently been evaluated as fit-for-purpose.</i>
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	<i>There is evidence of processes in place to provide QQI with information as required.</i>

Findings

Following the site visit, the panel was satisfied that GBS met the majority of the sub-criteria in 4.2, with the exception of 4.2.3(a). The Panel had concerns regarding the current governance structure.

At the time, the panel was not satisfied that the governance structure clearly demonstrated the separation between commercial and academic decision making and had concerns that the governance structure was not reflective of the actual decision-making practice in GBS. These concerns have now been satisfactorily addressed by the evidence provided during the six week period, which demonstrates the delegation of authority from the Board of Directors to the Governing Body. Additionally, the panel required GBS to review the Terms of Reference of the Governing Body and the Academic Council to ensure they demonstrate the required separation and to update the membership of the Academic Council, Programme Board and Board of Examiners to exclude the Managing Director. GBS was further required to include the active Management Committee within its governance structure.



These concerns were articulated in proposed mandatory changes identified by the panel in Section 6.1, and have all now been addressed satisfactorily.

4.3 Programme development and provision requirements:

	Criteria	Yes/No/ Partially	Comments
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	<i>GBS has been a registered provider in FET with FETAC/QQI since 2006 and for HET since 2014, successfully delivering programmes since this time. GBS also has experience of delivering non QQI accredited programmes.</i>
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	<i>Lecturing staff at GBS are mainly contracted, part time employees; however, the majority have been with the college for an extended period of time. GBS is committed to further recruitment for additional programmes should the need arise.</i>
4.3.3(a)	Criterion: <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 Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	<i>The QA Handbook (Section 7) demonstrates GBS's commitment to the fair and consistent assessment of learners. As part of its application, GBS provided confirmation that it is fully compliant with the HECA PEL arrangements</i>
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the</i>	Yes	<i>GBS has fit for purpose premises with adequate facilities and resources</i>



	<i>requirements of the provision proposed in place?</i>		<i>for the provision proposed.</i>
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	<i>GBS's ATP procedures are outlined in Policy 4.3 "Learner Admission, Progression and Recognition of Prior Learning".</i>
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	<i>The QA Handbook, Section 7 – Assessment Policy - demonstrates GBS's commitment to the fair and consistent assessment of learners.</i>
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	Yes	<i>GBS provided evidence of its HECA PEL arrangements</i>

Findings

The panel is satisfied that GBS's Programme Development and Provision requirements meet criteria 4.3.



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

The panel is satisfied that GBS has the capacity to provide sustainable education and training within its current scope of provision.

Following the site visit, the panel identified an area of potential vulnerability, 4.2.3(a), which is detailed in section 6.1.

This has now been satisfactorily addressed by the evidence provided which demonstrates the delegation of authority from the Board of Directors to the Governing Body. Additionally, the revised Terms of Reference for the Governing Body and the Academic Council demonstrate the required separation and membership of the Academic Council, Programme Board and Board of Examiners has been updated to exclude the Managing Director. GBS also included the active Management Committee within its Governance structure as required.



Part 5 Evaluation of draft QA Procedures submitted by Galway Business School

The following is the panel's findings following evaluation of Galway Business School 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:

Section 2 *Governance & Management of Quality Policy*, in the GBS QA Handbook sets out the governance and committee structure of GBS.

The QQI Core Statutory Quality Assurance Guidelines detail the importance of academic decision making which reflects the interests of the learners and the maintenance of standards and which must be entirely separate from any actual or perceived influence from commercial considerations. The panel felt further clarity was required within the Terms of Reference for the Governing Body and Academic Council to ensure this was the case, while the role and visibility of the Board of Directors in the structure should be made clear.

Following the site visit, the panel issued proposed mandatory changes, outlined in Section 6.1 (6.1.3, 6.1.1, 6.1.4, 6.1.5), which would ensure that GBS's quality assurance procedures demonstrate fully this separation.

Section 6.2 (6.2.2) offered specific advice from the panel regarding expanding the membership of the Governing Body, to further support externality in the governance structures.

Through its GAP analysis, conducted in preparation for reengagement, GBS identified the need for a Risk Management Committee to assure that there are effective systems of control and risk management in place. Section 13, *Risk Management Policy*, of the QA Handbook was developed, and the Committee formed with the CEO and the Governing Body, having overall responsibility for risk management.

GBS outlined several boards and committees which support its activities. In discussion during the site visit the Panel noted the omission of the Management Team from the details provided of the governance structure, although it exercises influence in several areas.

Following the site visit, the panel had issued proposed mandatory changes outlined in Section 6.1 (6.1.2) to reflect the role of the Management Team in the governance structure.

Following a review of amended documentation provided by GBS, the panel is satisfied that the provider has satisfactorily addressed the proposed mandatory changes and specific advices set out in Section 6 of this report.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

GBS developed its QA Handbook to reflect QQI Core Statutory Quality Assurance Guidelines. The QA Committee has responsibility for the development and review of the QA Handbook, under direction from the Registrar, with final sign off from the MD and final approval from the Governing Body.

To ensure a QA embedded culture, GBS makes the QA Handbook available to both staff and students through its virtual learning environment (VLE) and introduces it to students during the induction process. GBS has committed to publishing the QA Handbook on its website on successful completion of the reengagement process. GBS advised that policies are reviewed annually, and changes are reviewed at the staff induction and at the start of each semester. As policies are annually reviewed, the panel noted the importance of tracking version history and sign off-of policy approval by the relevant governing committee, rather than the current practice of the MD signing / approving policies.

A general requirement in this regard was identified as a proposed mandatory change in Section 6.1.8.

The Panel had noted some areas for further development in relation to some policies, ensuring they present an accurate reflection of GBS's current procedures and, where applicable, policies must reflect current Irish legalisation. The panel also advised GBS to introduce an external person in the application of certain policies, such as appeals, which may be escalated beyond the initial stages.

The panel had set a proposed mandatory change in this regard in Section 6.1.7, with specific advice offered in 6.2 (6.2.1).

Following a review of amended documentation provided by GBS, the panel is satisfied that the provider has satisfactorily addressed these proposed mandatory changes and specific advice.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

Section 4, *Programmes of Education & Training*, in the QA Handbook documents GBS's policy on the development of new programmes. This includes:

4.2 Programme Development

4.3 Learner Admission, Progression and Recognition of Prior Learning

4.4 Programme Monitoring & Review

This section provides the life cycle of programme development from proposal, through development with the creation of a Programme Development Team, to the submission of a Programme Validation Manual & Programme and finally approval / refusal. New programme proposals can be submitted from management, lecturers and / or the administration team. Academic staff discussed the inclusive nature of programme development in GBS during the site visit, with the emphasis placed on the learner experience and their engagement.

GBS policy 4.3 outlines GBS's admission, progression and RPL policy and is aligned to QQI guidelines.

Programme monitoring and review is collected and disseminated through several channels in GBS, as outlined in the policy. This stakeholder engagement ensures ongoing enhancement of programmes. An Annual Programme Monitoring Report is produced with the collated feedback to create an action plan and drive any change required and, ultimately, provide information for periodic programme review.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

Section 5, *Staff Recruitment, Management and Development*, of the QA Handbook clearly documents GBS's approach to the recruitment and management of both academic and administrative staff.

The panel met with a number of academic staff who noted GBS's commitment to their continued professional development, allowing them both the time and funding, if required, to attend relevant courses and / or conferences, join appropriate professional bodies and attend inhouse training sessions.

Section 5.6 – *Staff Appraisal and Development System* - outlines the formal approach to GBS's commitment to supporting its staff. Academic staff also informed the panel of the open-door policy which is adopted by the management team should any needs arise outside the formal process.

Sections 5.9 and 5.10 provide thorough details concerning grievances and the disciplinary process.



5 TEACHING AND LEARNING

Panel Findings:

Section 6, *Teaching and Learning Policy*, in the QA Handbook outlines GBS's commitment to ensuring a quality learning experience.

Panel discussion during the site visit demonstrated academic staff's engagement with GBS's learner-centred approach to teaching and learning. Accommodated by the Head of Teaching and Learning, CPD is encouraged through inhouse sessions to share ideas and discuss practises around effective teaching strategies. Ongoing evaluation of T&L is sought through stakeholder feedback. Academic staff referred to the proactive response of GBS in dealing with matters which arise or changes which are required.

GBS has a well-equipped building with the appropriate resources to support learning. This includes library resources with both physical and virtual resources. Academic staff are requested to recommend relevant textbooks annually. GBS utilises an open source virtual learning environment (Moodle), and following recent upgrades, offers significant training and learner induction sessions to maximise its use.

As GBS's future plans include providing programmes which offer an optional work placement, it has developed a Work Experience Project Handbook.

6 ASSESSMENT OF LEARNERS

Panel Findings:

Section 7, *Assessment Policy*, in the QA Handbook refers to the broad range of assessment strategies utilised within GBS. The assessment policy was developed in line with QQI Assessment & Standards Guidelines, revised 2013.

Academic staff demonstrated a thorough understanding of the regulations governing assessment and discussed the importance of variety in assessment methods to enhance the learner experience. It was noted that GBS works closely with its external examiner(s) to ensure clarity and transparency in its assessment methods and grading, with a policy for double marking on borderline cases. Academic staff emphasised the importance for timely feedback, which is provided through the VLE and one-on-one should the student request it.

As previously noted, the panel advised GBS to revise its review and appeal policy to include an external person in the process, should a review be escalated. The panel strongly advised that in order to ensure the policy and procedure is water-tight and fully understood by staff concerned, GBS should run a mock process to tease out all aspects of it. The panel also noted lecturers are currently involved in the review process for work which they marked. In order to ensure transparency and impartiality, the panel proposed that the college seek a second opinion from a suitable subject matter expert.



The panel issued a proposed mandatory change (section 6.1.7 below) regarding changes required in this regard.

Following a review of the evidence submitted, the panel is satisfied that issues identified have been addressed in full.

7 SUPPORT FOR LEARNERS

Panel Findings:

Section 8, *Support for Learners Policy*, of the QA Handbook provides details of the range of supports offered by GBS for its learners.

GBS provides learners with clear information on the supports it offers, such as learner protection arrangements, refunds and cancellation policy, attendance requirements, counselling, career guidance, accommodation and disability services. Information is provided during induction sessions for new learners in the first week of their programme. Additionally, academic staff and the Registrar will schedule appointments with learners to meet one on one to discuss their concerns or requirements.

GBS's policies and procedures adhere to QQI's Code of Practice for Provision of Programmes of Education and Training to International Learners. With its sister company, GCI, GBS has very significant experience dealing with international learners and their requirements.

The Academic Co-ordinator is responsible for the management of the Disability Support Service at GBS and learners who consider they have a disability are encouraged to advise the college at the beginning of their programme.

GBS gathers student feedback through Learner Module Feedback Forms and representation on the Student Staff Liaison Committee.

At the time of the site visit in February 2020, the membership of the Programme Board(s) did not include a learner representative and the panel proposed that membership be amended to rectify this. The panel issued a proposed mandatory change (section 6.1.5 below) in this regard.

Following a review of amended documentation provided by GBS, the panel is satisfied that the provider has satisfactorily addressed this proposed mandatory change.



8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

Section 9, *Information & Data Management Policy*, of the QA Handbook provides details of how GBS manages and maintains data for the development and improvement of the college, while ensuring compliance with the relevant legislation. The panel raised some concerns regarding compliance with legislation, with regards to the 9.5 *Data Classification* and 9.6 *Data Privacy*.

GBS uses two systems, the CRM system, Schoolworks (SW) and the VLE system, Moodle, to gather and store recorded data. For the purposes of evaluation and reporting, generated data may be extracted into other formats and maintained locally. GBS is currently creating a dedicated secure Exam Server with an external IT consultancy company.

The panel noted the current QA documentation reference to Freedom of Information, which is not applicable to GBS. Also, the panel believed that GBS's GDPR policy should be incorporated in the Data Protection Policy, and issued a proposed mandatory change (section 6.1.7 below) in this regard.

Following a review of amended documentation provided by GBS, the panel is satisfied that the provider has satisfactorily addressed this proposed mandatory change.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

Section 10, *Public Information & Communication Policy*, of the QA Handbook provides information regarding GBS's procedures for ensuring the validity of information publicly shared.

GBS advised the panel that information which is publicly available must be approved by the Marketing Manager and the Managing Director, with advice sought from the relevant departments, where appropriate.

As noted, GBS uses Schoolworks to communicate with students in addition to using the VLE for academic purposes.

Section 14, *Social Media Policy*, in the QA Handbook also provides information to staff and students regarding the appropriate use of social media to minimise the potential for reputational damage to the college. Breaches of the policy may result in disciplinary action. GBS advised that this is a recently introduced policy.



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

Panel Findings:

Section 11, *Other parties involved in Education & Training policy*, in the QA Handbook notes that GBS does not currently utilise external partnerships or second providers for delivery.

GBS does have an MOU for student exchange with two providers; Georgian College of Applied Arts & Technology and ESCO Wesford, College de Paris, however GBS acts as first provider, therefore the quality assurance of GBS applies.

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11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings

Section 12, *Self-Evaluation, Monitoring and Review*, of the QA Handbook outlines the college's internal review processes.

GBS has a comprehensive system for collecting data through internal stakeholders with Module Reports, Programme Reports, Learner Feedback and external engagement, External Examiner Reports, Graduate Employability Report and Marketing Analysis. This information is used to complete the Annual Monitoring Report, which is compiled by the Registrar, and which is discussed in detail at Academic Council. In follow up, GBS develops an improvement plan to put actions in place to inform decision making going forward.

Academic staff discussed their ongoing interaction with management through module reports, feedback and informal meetings. It was also noted improvements which have been developed following learner and lecturer feedback. Learner experience drives the process of evaluation and review in GBS.



Evaluation of draft QA Procedures - Overall panel findings

The panel thanks the staff of GBS for their constructive dialogue during the site visit. The commitment of GBS to ensuring a positive learner experience was evident. Its desire to promote and maintain a quality embedded culture is of paramount importance to all involved in the delivery and management of the college and its programmes.

Following the site visit, the panel was of the view that a number of proposed mandatory changes required implementation prior to a recommendation for approval of GBS's QA, and these are listed in the following sections of this report. The panel reconvened on 9 April 2020 and is happy to confirm that GBS has effectively addressed the proposed mandatory changes outlined in Section 6.1, and provided evidence to this effect. As a consequence, the panel recommends that QQI approve GBS's QA procedures.

Section 6.2 list the specific advices issued by the panel following the original site visit. Following its desk review of material submitted after the 6 week period, the panel notes that GBS has addressed the specific advices in a satisfactory manner.

The panel took the opportunity at this stage to issue a number of additional specific advices, listed in section 6.2. The panel is of the view that implementing this advice will support GBS in its ongoing quality enhancement process, and also help prepare it well for participation in QQI's provider annual reporting programme.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes were identified at the conclusion of the site visit on Friday, 7 February 2020 by the panel. The panel availed of the option to defer its decision to allow Galway Business School an opportunity to address these issues within a six-week period.

The panel reconvened on 9 April 2020 to evaluate evidence submitted by GBS in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that GBS has adequately addressed the issues set out in Section 6.1 below

6.1 Proposed Mandatory Changes 7 February 2020

1. The visibility of the Board of Directors within the governance structure needs to be made clear within the documentation, and the delegation of authority to the Governing Body from the Board of Directors needs to be formalised.
2. GBS must review the Governance Structure to include details of the Management Team including Terms of Reference, Membership, Frequency of Meetings, etc.
3. Terms of Reference and Operating Procedures of the Governing Body and Academic Council must be reviewed to ensure that no undue influence can be exercised by the commercial side of the operation over the academic decision making .
4. GBS must review the appropriateness of the inclusion of the Managing Director on subunits of governance, in particular the Board of Examiners.
5. GBS should ensure there is a student representative on their Programme Board(s).
6. The panel advises that GBS reconsider its current process in relation to appeals, taking into account that standard practise in the sector is to only entertain appeals on the ground of procedural irregularities and not on the basis of dissatisfaction of grades.
7. Review and revise policies below to reflect panel discussion, incorporating the following
 - Policies need to be developed to reflect current procedures.
 - Ensure escalation in review and appeals policy involves external consultation.
 - Lecturers involved in assessments should not be involved in review process.
 - Review Data Protection to reflect Irish Law (FOI is not applicable to GBS)
 - Benchmark policies against others in the sector.
 - Discipline
 - Recheck Review
 - Appeals



- Data Protection
 - Moderation
 - Double Marking
8. GBS must review its QA documentation to ensure accuracy and consistency of terminology and include appropriate version and tracking history of policies to reflect the development, consultation and approval process. A move away from descriptive content in places and toward a more procedural tone in the document would facilitate this.

6.2 Specific Advices 7 February 2020

1. GBS should review documentation to ensure it is reflective of current legal requirements, for example
 - Data Protection, must include GDPR (May 2018) and ensure 8.4 appropriately addresses Human Rights legislation and 9.5.2 reference to FOI
2. Consider expanding the membership of the Governing Body

Specific Advices 9 April 2020

1. The panel notes the updates to the organisational chart to reflect the governance structure, but the panel believes to visually reflect the clear separation between commercial and academic decision making, the organisational chart should place the Academic Council at the same level as the Governing Body.
2. The panel advises GBS that it might review, with a view to its deletion, the particular Term of Reference regarding the duties and responsibilities of the Board of Directors 'to govern Galway Business School based on the strategic direction of the school set by the Governing Body'.
3. The panel acknowledges the development of the recheck review appeals policy, but advises a rewording of the ground for appeal that states "*The regulations do not adequately relate to the candidate in question*".
4. The panel further advises that GBS might consider the establishment of an Appeals Board, with appropriate membership, by the Academic Council to consider the final stage of an academic appeal.

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Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 – 8	Major, Minor, Special Purpose Awards	Business, Early Childhood & Education

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 Galway Business School.

Name:

Date: 22 April 2020



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

Document	Related to
GBS Quality Assurance Handbook	Section 6, 7
Allianz Insurance Policy	Section 3.2
Certificate of Registration GBS	Section 1.2
Certificate of Incorporation	Section 1.2
GBS Accounts Letter	Section 3.1
GBS Tax Clearance	Section 3.1
Income-Expense Projections	Section 3.1
GBS Confirmation of HECA PEL	Section 1.6
GBS Lecturer Handbook	Section 7
Sample Student Handbook	Section 7
Professional Experience Project Handbook	Section 7
MOU Georgian College of Applied & Technology	Section 2.4
MOU ESCO Wesford, Ecole de Commerce Et De Management	Section 2.4

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

Name	Role/Position
David Niland	CEO
Celestine Rowland	Managing Director
Dr Adele Smyth	External Academic Advisor
Eva McMorrow	Registrar
Padraig Hynes	Academic Coordinator
Cosmina Talos	Marketing Manager
Rose O'Loughlin	Head of Teaching & Learning
Cian Twomey	Programme Leader
Orla Colleran Diane Nevin Tony O'Gorman Colin Callinan Jacinta Doyle Seona Joyce Olwyn Sherry Fergal Conry Dr Riad Cheikh El Ghanama Dr Robert Loughnane	Academic Staff

Appendix: Provider response to the Reengagement Panel Report



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Response to the report of the independent review panel convened to consider Galway Business School's reengagement with Quality and Qualifications Ireland

Appendix: Provider response to the Reengagement Panel Report

Overall Comment

Galway Business School welcomes the report of the independent panel convened to consider the school's reengagement with QQI. It greatly appreciates the time and commitment given by the panel members to the review process and the constructive and professional manner in which this comprehensive review was undertaken.

Galway Business School welcomes the panel's advice throughout the report and its overall recommendation to QQI's Programmes and Awards Executive Committee to approve the school's QA policies and procedures. In addition, the school welcomes and supports the panel's recommendations in respect of mandatory changes and specific advices.

The school's response is presented below under the following headings:

- Response in respect of mandatory changes
- Response in respect of special advices
- Concluding comments from Galway Business School

Response in respect of Proposed Mandatory Changes

The panel report identified three proposed mandatory changes. These are presented below, followed in each case by the college's response.

Mandatory Change 1

The visibility of the Board of Directors within the governance structure needs to be made clear within the documentation, and the delegation of authority to the Governing Body from the Board of Directors needs to be formalised.

Response

The school welcomes and supports Mandatory Change 1 above and the Board of Directors has been made visible and included in the QA Handbook. Its role is outlined as well as its Terms of Reference and Duties & Responsibilities.

Mandatory Change 2

GBS must review the Governance Structure to include details of the Management Team including Terms of Reference, Membership, Frequency of Meetings, etc.

Response

The school welcomes and supports Mandatory Change 2 above and the Governance Structure has been reviewed and the QA Handbook now includes details of the Management Committee including its Role, Terms of Reference, Membership and Meeting Frequency.

Mandatory Change 3

Terms of Reference and Operating Procedures of the Governing Body and Academic Council must be reviewed to ensure that no undue influence can be exercised by the commercial side of the operation over the academic decision making.

Response

The school welcomes and supports Mandatory Change 3 above and the Terms of Reference, Operating Procedures & Membership of the Governing Body and Academic Council have been reviewed to ensure that in the first instance that there is no overlap in Terms of Reference, and, secondly, that undue influence cannot be exercised by the commercial side of the operation over academic decision making.

Mandatory Change 4

GBS must review the appropriateness of the inclusion of the Managing Director on subunits of governance, in particular the Board of Examiners

Response

The school welcomes and supports Mandatory Change 4 above and The Managing Director's membership on various subunits of governance has been reviewed and the MD no longer sits on the Board of Examiners or the Programme Boards.

Mandatory Change 5

GBS should ensure there is a student representative on their Programme Board(s).

Response

The school welcomes and supports Mandatory Change 5 above and a learner representative has been included in the membership of the Programme Board(s).

Mandatory Change 6

The panel advises that GBS reconsider its current process in relation to appeals, taking into account that standard practise in the sector is to only entertain appeals on the ground of procedural irregularities and not on the basis of dissatisfaction of grades.

Response

The school welcomes and supports Mandatory Change 6 above and the Policy on Appeals, Re-checks and Reviews has been reviewed and benchmarked its appeal process to best practise in the sector.

Mandatory Change 7

Review and revise policies below to reflect panel discussion, incorporating the following

- **Policies need to be developed to reflect current procedures.**
- **Ensure escalation in review and appeals policy involves external consultation.**
- **Lecturers involved in assessments should not be involved in review process.**
- **Review Data Protection to reflect Irish Law (FOI is not applicable to GBS)**
- **Benchmark policies against others in the sector.**
 - **Discipline**
 - **Recheck Review**

- Appeals
- Data Protection
- Moderation
- Double Marking

Response

The school welcomes and supports Mandatory Change 7 above and all relevant policies have been reviewed and benchmarked to other providers and ensure that they reflect current best practice and procedures have been changed accordingly. The External Academic Advisor chairs the Academic Council meetings where appeals are considered, hence the external consultation during the appeals process is ensured. The Reviews and the Data Protection policies have been reviewed and amended.

Mandatory Change 8

GBS must review its QA documentation to ensure accuracy and consistency of terminology and include appropriate version and tracking history of policies to reflect the development, consultation and approval process. A move away from descriptive content in places and toward a more procedural tone in the document would facilitate this.

Response

The school welcomes and supports Mandatory Change 8 above and each Policy now has a cover sheet which reflects the development of the policy. This cover sheet will enable the school to track the historical policy development but also to record that relevant consultation has taken place.

GBS also commits to develop more process maps in the future to further illustrate the policy process and make them more reader friendly and accessible.

Response to Specific Advices

The panel's first report offered two specific advices. These are presented below as specific advice 1 and 2, followed in each case by the school's response. The panel's final report offered four specific advices, presented below a specific advice 3-6 together with the school's responses.

Specific Advice 1

1. GBS should review documentation to ensure it is reflective of current legal requirements, for example

- ***Data Protection, must include GDPR (May 2018) and ensure section 8.4 appropriately addresses Human Rights legalisation and 9.5.2 reference to FOI***

Response

The school welcomes and supports Specific Advice 1 above and documentation has been reviewed to ensure it is reflective of current legal requirements and has implemented the Panel's advices.

Specific Advice 2

Consider expanding the membership of the Governing Body

Response

The school welcomes and supports Specific Advice 2 above and the membership of the Governing Body has been expanded by the inclusion of a Public Interest Advisor.



Specific Advice 3

The panel notes the updates to the organisational chart to reflect the governance structure, but the panel believes to visually reflect the clear separation between commercial and academic decision making, the organisational chart should place the Academic Council at the same level as the Governing Body.

Response

The school welcomes and supports Specific Advice 3 and the Academic Council is now placed at the same level as the Governing Body on the organisational chart.

Specific Advice 4

The panel advises GBS that it might review, with a view to its deletion, the particular Term of Reference regarding the duties and responsibilities of the Board of Directors 'to govern Galway Business School based on the strategic direction of the school set by the Governing Body'.

Response

The school welcomes and supports Specific Advice 4 and the Board of Directors' Terms of Reference to govern Galway Business School will be deleted.

Specific Advice 5

The panel acknowledges the development of the recheck review appeals policy, but advises a rewording of the ground for appeal that states "The regulations do not adequately relate to the candidate in question".

Response

The school welcomes and supports Specific Advice 5 and the specific ground for appeal will be reworded.

Specific Advice 6

The panel further advises that GBS might consider the establishment of an Appeals Board, with appropriate membership, by the Academic Council to consider the final stage of an academic appeal.

Response

The school welcomes and supports Specific Advice 6 and it will establish an Appeals Board.

Concluding comments from Galway Business School

The school appreciated the opportunity provided by the reengagement process to reflect at length on its quality assurance policies and procedures. This internal process was conducted openly, enthusiastically and comprehensively benefiting all the school's stakeholders including learners and employees.

Galway Business School welcomes the panel's overall recommendation to QQI to approve the school's QA Handbook and recognises the value of QQI reengagement.

The school would like to thank QQI and the external panel members for the constructive, professional and respectful manner in which the reengagement review process was conducted from start to finish. It welcomes the panel's detailed insights and suggestions and looks forward to implementing their recommendations to benefit the school's future learners and staff.