



Galway Language Centre

Bridge Mills Galway Language Centre

Quality Assurance Manual

June 2021



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1. Introduction

This document outlines the Quality Assurance Framework (QAF) of the Bridge Mills Galway Language Centre (BMGLC). The policies and procedures in this document have been developed to meet the requirements established in the following:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Assessment and Standards, Revised 2013 (QQI).

The BMGLC QAF therefore takes account of the core statutory guidelines for quality assurance that are applicable to all providers. In keeping with QQI's guidelines, this framework has been further developed to take account of BMGLC's specific "*context, overall goals and scope of provision*"¹. These policies and procedures additionally meet the requirements of:

- Employment Equality Acts 1998 – 2015
- Disability Act 2005
- Data Protection Act 2018

The policies and procedures in this document also align to the guidance provided by the following:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

Within this document, the following definitions apply:

- **Policy:** A policy sets out a principle or an intended course of action. Policies guide decision-making. Policies therefore establish the 'what to' in given situations.
- **Procedure:** A procedure describes the specific actions undertaken to implement a policy. Procedures therefore guide the 'how to', not the 'what to'.
- **Resources:** A resource is a functional document that supports the implementation of policies and procedures. For example, application forms, checklists or handbooks.

Within BMGLC, all policies and procedures are approved by either the Board of Directors or the Academic Committee. In some cases, policies may require approval by both.

• ¹ QQI *Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016*, p.1

2. Governance and Management of Quality

The BMGLC is committed to the development and maintenance of a governance structure that is effective and fit for purpose, and protects the integrity of academic standards and processes. This chapter outlines (in sections 2.1 – 2.3) the current governance and management structures, established at the school following a restructuring of the organisation in late 2019.

The BMGLC is controlled by a Board of Directors. The Board of Directors provides strategic direction and corporate governance to the school. The Board of Directors appoints an Academic Committee to protect, maintain and develop the academic standards of the school. Responsibility for academic decision-making, and for overseeing and developing academic standards at the BMGLC, is therefore delegated to the Academic Committee by the Board of Directors. The Board of Directors appoints an independent chairperson to the Academic Committee, and there is a clear delineation of responsibility between the Board of Directors and the Academic Committee. This ensures:

“Academic decision-making reflects the interests of learners and the maintenance of standards. It is independent of commercial considerations”².

Specific responsibilities of the Academic Committee are discharged by subcommittees, including Programme Boards, the Examination Board and the Appeals Board. Each of these subcommittees has clearly defined terms of reference and reports to the Academic Committee.

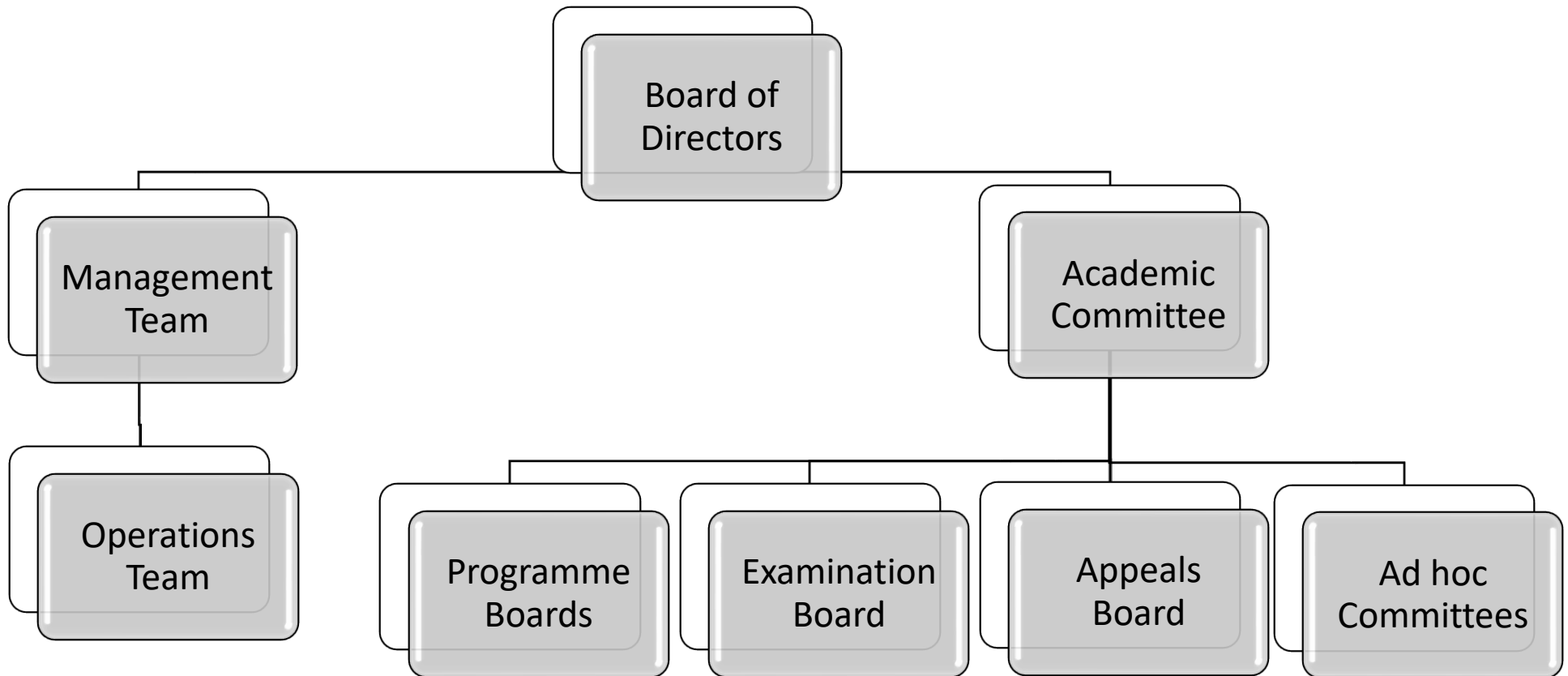
Where appropriate, the BMGLC invites external input to its decision-making through engagement with consultants, accrediting bodies and sector specific organisations. Advice may be sought on specific areas of the school’s development or operations, for example, quality assurance or marketing activities.

The executive management of BMGLC is provided by the Managing Director, who reports to, and is a member of, the Board of Directors. The day to day running of the BMGLC rests with the school’s management team, under the direction of the Managing Director. Some operational functions of the BMGLC are outsourced to appropriately expert external service providers, as represented in Figure 2.

Figure 1 (p. 6) represents the governance structure of the BMGLC diagrammatically. The organisation chart is represented in Figure 2 (p.19).

² QQI Core Statutory Quality Assurance Guidelines 2016, p.6

2.1 Governance Structure [Figure 1]



2.1.1 Terms of Reference - Board of Directors

Purpose

The Bridge Mills Galway Language Centre is a private limited company incorporated in Ireland. The Board of Directors is the ultimate governing authority of Bridge Mills Galway Language Centre, and has ultimate responsibility for compliance with the legal and statutory obligations of the company. The Board is tasked with providing financial governance, risk management and strategic direction to the Bridge Mills Galway Language Centre.

Composition and Membership

- i. Managing Director
 - a. The Managing Director is the ex officio chairperson
- ii. 2 x Non-executive Directors

Functions and Responsibilities

The Board of Directors:

- i. Determines the mission and vision of the Bridge Mills Galway Language Centre
- ii. Reviews and approves strategic planning proposals for the company
- iii. Upholds the ethics, values and culture of the company
- iv. Identifies and evaluates risks to the company; monitors the company's risk management
- v. Provides oversight of financial governance and budgetary decision-making
- vi. Has ultimate responsibility for compliance with legal and statutory obligations

Meetings

- i. Meetings of the Board of Directors are held two times per year and scheduled in advance.
- ii. The quorum for a Board of Directors meeting is 50% of the membership
- iii. Meetings are held face to face, by telephone, videoconference or other electronic means.
- iv. Decisions are made, insofar as is practicable, by consensus. In the absence of consensus, decisions are made by open ballot.
 - i. Decisions may be made at a scheduled or extraordinary meeting, or by a resolution in writing to all members which is physically or electronically signed by a quorum of members.

Delegation of Authority to the Academic Committee

The Board of Directors delegates authority for academic decision-making to the Academic Committee. The scope and nature of academic decision-making is outlined in the terms of reference for the Academic Committee, which are approved by the Board.



2.1.2 Terms of Reference - Academic Committee

Purpose

The Academic Committee's role is to protect, maintain and develop the academic standards of the Bridge Mills Galway Language Centre. In this capacity, the Academic Committee is tasked with ensuring academic decision-making reflects the interests of learners and the maintenance of standards and is independent of commercial considerations. The Academic Committee has delegated authority from the Board of Directors to carry out its function.

Composition and Membership

- a) Chairperson
 - i. The Chairperson is an appropriately qualified and independent person, appointed by the Board of Directors.
- b) Ex Officio Members (* also are teachers)
 - i. Academic Coordinator *.
 - ii. Academic Adviser.
 - iii. Quality Officer*.
 - iv. Student Services Officer*.
 - v. Programme Leaders*.
 - vi. Teachers
- c) Nominated Members
 - i. One learner representative nominated through class representation processes.
- d) In attendance – by invitation
 - i. The Chairperson may invite external parties to attend as required, where relevant to the business of a specific meeting.
 - ii. A nominated member of staff, to act as secretary.

Functions and Responsibilities

The Academic Committee:

- i. General**
- vii. Provides an annual report to the Board of Directors, encompassing all aspects of the Academic Committee's functions and responsibilities.
- ii. Academic Oversight**
- i. Provides advice and makes recommendations to the Board of Directors on academic planning proposals, and advises the Board of Directors on resource requirements.
- ii. Ensures that systems of academic administration are in place, which are fit for purpose and encompass the entirety of the student experience.



- iii. Maintains the threshold academic standards of the higher education awards conferred on the programmes delivered by Bridge Mills Galway Language Centre on behalf of QQI or other awarding bodies.
- iv. Establishes and manages the activities of its subcommittees, including their terms of reference.
- v. Establishes and manages ad hoc committees as appropriate to deal with specific academic issues (for example, appeals).
- vi. Delegates responsibility and, where appropriate, decision-making authority to subcommittees.
- vii. Ensures that learners receive a high-quality academic experience.
- viii. Approves and implements policies relating to admissions, accreditation of prior learning and entry standards.
- ix. Reviews the operation and effectiveness of policies for the selection, admission, retention, progression and exclusion of learners.
- x. Ensures only programmes approved by the AC and where applicable relevant accreditation bodies may be offered by the School.
- xi. Assures and oversees the quality of published and public information.
- xii. Ensures validation programme conditions are adhered to and recommendations considered.

iii. Quality Assurance

- i. Reviews and approves all academic policies and procedures of the Bridge Mills Galway Language Centre, including updates or amendments to these, subject to the requirements of QQI and other accrediting bodies.
- ii. Approves implementation plans for amendments to quality assurance procedures subsequent to regulatory changes and quality assurance engagement activities.
- iii. Monitors the implementation of quality assurance procedures and associated improvement activities.
- iv. Approves External Examiners prior to submitting nominations to QQI.
- v. Ensures that feedback from learners, academic staff and support staff and external examiners are considered in a timely manner
- vi. Monitors ongoing compliance with the requirements of QQI and other accrediting bodies.
- vii. Approves applications and reports prior to submission to QQI and other accrediting bodies.

iv. Teaching, Learning and Assessment

- i. Approves the Teaching, Learning and Assessment Strategy of the Bridge Mills Galway Language Centre, and monitors its implementation.
- ii. Reviews Examination results for QQI and other accredited programmes.
- iii. Reviews reports from External Examiners and takes appropriate actions where necessary.
- iv. Approves learner results prior to submission for approval as qualifications/awards and for certification

v. Programme Monitoring and Development

- i. Reviews and approves proposals for programme development.

- II. Monitor learners' academic performance.
- III. Formally assesses and approves programmatic and institutional (cyclical) review documentation.
- IV. Monitors new programme development, and approves programmes subject to their validation by QQI and other accrediting bodies.
- V. Reviews annual reports from programme boards, and approves any proposed amendments to programmes prior to their submission to QQI and other accrediting bodies.
- VI. Reviews the reports of external review panels for the validation of new programmes or revalidation of existing programmes.

Meetings

- i. Meetings of the Academic Committee are held three times per year and scheduled in advance. In exceptional circumstances, an extraordinary meeting may also be called.
- ii. The quorum for an Academic Committee meeting is 50% of the membership, plus one.
- iii. Meetings are held face to face, by telephone, videoconference or other electronic means. Committee members are required to make reasonable efforts to attend meetings.
- iv. Committee members are required to prepare for meetings by reading documentation in advance.
- v. Decisions are made, insofar as is practicable, by consensus.
- ii. In the absence of consensus, decisions are made by open ballot.
- iii. The Chairperson will not vote, except where the vote is tied. In such instances, the Chairperson has a casting vote.
- iv. Decisions may be made at a scheduled or extraordinary meeting, or by a resolution in writing to all members which is physically or electronically signed by a quorum of members.
- v. Only in exceptional cases should the meeting of the Academic Committee take place without the Independent Chairperson present.

Subcommittees of the Academic Committee

- i. The subcommittees of the Academic Committee will have terms of reference approved by the Academic Committee.
- ii. The terms of reference will clearly identify delegated authority and responsibilities.

Independent Chair – Roles and Responsibilities:

The Independent Chair shall ensure that the academic decision-making at BMGLC is independent of commercial considerations or the undue influence of business owners. The Chair will have independence of relationship with BMGLC, its Directors and other staff and students to fully guide Academic developments at the school, independent of financial considerations. Their term of office will be 3 years. The Chair ideally should have relevant experience of higher education in Ireland and knowledge and experience of quality assurance at a senior level at third level, possibly in a public institution.

Responsibilities:

- Chairing all meetings of the Academic Committee (AC).
- Assist BMGLC in developing further its own quality assurance system and quality enhancement initiatives further embedding a quality culture within the organisation
- Providing leadership to the AC to enhance the AC's effectiveness
- Ensuring that the responsibilities of the AC are well understood by both the Board and management, and that the boundaries between Board and AC responsibilities are clearly understood and respected
- Providing leadership to enable the AC to work as a cohesive team and building unity, consensus and solidarity
- Demonstrating integrity and ethical leadership by encouraging a climate of trust and openness
- Assessing the adequacy and timelines of the resources available to the AC (in particular timely and relevant information) necessary to support its work
- Preparing the agenda of the AC meetings
- Adopting procedures to enable the AC to conduct its work effectively and efficiently, including committee structure and composition, scheduling, and management of meetings
- Verifying that, where functions are delegated to appropriate committees, the functions are carried out and results are reported to the AC

2.1.3 Terms of Reference - Programme Boards

Purpose

A Programme Board is appointed for every category of programme at the Bridge Mills Galway Language Centre. The role of the Programme Board is to monitor and review provision of the programme, and to ensure that academic standards and quality are maintained. The Programme Board is tasked with ensuring that learning environments are appropriate, assessment is fair and consistent, and programme related services are adequate and effective. Programme Boards are subcommittees of the Academic Committee.

Composition and Membership

- a) Chairperson
 - i. The Programme Leader is the ex officio chairperson
- b) Ex Officio Members
 - i. Programme Leader
 - ii. Academic Coordinator
 - iii. Quality Officer
- c) Nominated Members
 - i. A minimum of three teaching staff involved in learning, teaching or assessment on the programme



- ii. All learner representatives nominated through class representation processes.
- d) In attendance – by invitation
 - i. Student Services Officer
 - ii. A nominated member of staff to act as Secretary

Functions and Responsibilities

The Programme Boards:

- i. Monitor the implementation of the programme in alignment with approved programme documentation and schedules.
- ii. Monitors the feedback collected from learners to support the continuous improvement of the programme and responds, where appropriate.
- iii. Monitors the feedback collected from teaching staff to support the continuous improvement of the programme and responds, where appropriate.
- iv. Monitors the effectiveness of teaching, learning and assessment methods and adjusts, where appropriate.
- v. Monitors the implementation of quality assurance procedures and associated improvement activities.
- vi. Monitors learner attendance, progression and performance.
- vii. Make recommendations in relation to library resources
- viii. Reviews reports from External Examiners, where applicable.
- ix. Provides an annual report to the Academic Committee, including data and information pertaining to:
 - Teaching, Learning and assessment
 - Learning environment, learning resources and curriculum
 - Learner registration, completion and achievement
 - Feedback from learners, teachers and other stakeholders
 - Quality management
- x. Makes recommendations to the Academic Committee concerning further development, amendment or other significant changes to the programme.

Meetings

- i. Meetings of Programme Boards are held two times per year and scheduled in advance.
- ii. The quorum for a Programme Board meeting is 50% of the membership, plus one, including the Programme Leader and Academic Coordinator.
- iii. Meetings are held face to face, by telephone, videoconference or other electronic means. Programme Board members are required to make reasonable efforts to attend meetings.



- iv. Decisions are made, insofar as is practicable, by consensus. In the absence of consensus, decisions are made by open ballot.
- v. Where there is a tied vote, the Chairperson has the casting vote.
- vi. Decisions may be made at a scheduled or extraordinary meeting, or by a resolution in writing to all members which is physically or electronically signed by a quorum of members.

2.1.4 Terms of Reference - Examination Board

Purpose

The role of the Board of Examiners is to “make summative assessment (and related) decisions based on the recommendations of assessors”³, and to ensure that student assessment procedures do not rely, where possible, on the judgement of single examiners. The Board of Examiners is a subcommittee of the Academic Committee.

Composition and Membership

- a) Chairperson
The Academic Coordinator is the ex officio chairperson

- b) Ex Officio Members
 - i. Programme Leader
 - ii. Quality Officer
 - iii. All assessors involved in determining student grades for the programme
 - iv. All moderators involved in moderating provisional marks for the programme
 - v. All teaching staff involved in the delivery of the programme
 - vi. All external examiners for the programme

Functions and Responsibilities

The Examination Board:

- i. Reviews preceding External Examiner reports and actions completed.
- ii. Reviews and considers the grade recommendations of all assessors, moderators, external examiners and teaching staff for the programme.
- iii. Considers borderline cases.
- iv. Makes decisions concerning applications submitted by students for mitigation due to extenuating circumstances in relation to their assessments.
- v. Decides and ratifies assessment results.
- vi. Functions in accordance with the requirements of Section 4.8 of Assessment and Standards, Revised 2013 (QQI).

³ Assessment and Standards, Revised 2013, Section 2.2.8 (QQI).

Meetings

- i. Meetings of the Board of Examiners are scheduled in advance in consultation with external examiners. Meetings are held when necessary⁴, at progression or award stages of a programme.
- ii. The quorum for a Board of Examiners meeting is 50% of the membership, plus one, including the External Examiner and the Programme Leader.
- iii. Meetings are held face to face, by telephone, videoconference or other electronic means.
- iv. Decisions are made, insofar as is practicable, by consensus. In the absence of consensus, decisions are made by open ballot.
- v. The deliberations of meetings of the Board of Examiners are strictly confidential, and may not be disclosed to persons who did not attend the meeting, excepting legitimate reporting requirements⁵.

2.1.5 Terms of Reference – Appeals Board

Purpose

The role of the Appeals Board is to consider cases where a learner or member of staff has provided legitimate grounds to appeal the decision of the school, and where the learner has formally requested that the decision of a lower authority (e.g. Board of Examiners) is referred to a higher authority. The Appeals Board is a subcommittee of the Academic Board.

Composition and Membership

An Appeals Board consists of three members, including the chairperson.

a) Chairperson

- i. The Chairperson is an appropriately qualified and independent person, appointed by the Board of Directors. (The Chairperson of the Appeals Board should be appointed by the Independent Chairperson of the Academic Committee where the appeal is in relation to an academic matter initiated by a student)

b) Nominated Members

- i. Two additional internal members are nominated by the chair from a panel of potential Appeals Board members, which is approved annually by the Academic Committee.

⁴ Assessment and Standards, Revised 2013, Section 4.8.4 (QQI).

⁵ Assessment and Standards, Revised 2013, Section 4.8.3 (QQI)

- ii. These members are nominated by the chair on the basis of:
 - a. Independence from the matter being appealed.
 - b. Competence to make a decision on the matter.

- c) In attendance – by invitation
 - i. A nominated member of staff to act as Secretary

Functions and Responsibilities

The Appeals Board:

- i. Considers appeals made with valid grounds⁶ by learners and members of staff.
- ii. Investigates relevant considerations or information submitted with the appeal.
- iii. Investigates the factual accuracy of assertions made by the appellant, considering input from the previous decision-making body or individual.
- iv. Determines if an appeal is to be upheld or rejected
- v. Determines appropriate actions to be taken if an appeal is upheld.
- vi. Reports the outcomes of appeals to the Academic Committee.
- vii. Recommends appropriate actions to the Academic Committee in light of information provided to

Meetings

- i. Meetings are scheduled as required, on an ad hoc basis.
 - ii. The quorum for an Appeals Board meeting is 100%
 - iii. Meetings are held face to face, by telephone, videoconference or other electronic means.
 - iv. Decisions are made insofar as is practicable, by consensus. In the absence of consensus, decisions are made by open ballot.
-

2.1.6 Management Team

Purpose

The Management team provides leadership to staff at the Bridge Mills Galway Language Centre, and ensures effective coordination between the academic and administrative functions of the school.

Composition and Membership

- I. Managing Director
- II. Academic Coordinator
- III. Office Manager

Functions and Responsibilities

The Management Team:

- I. Manages the school's day to day academic and administrative activities
- II. Manages budgets and the allocation of the school's resources
- III. Is responsible for the recruitment, induction and line management of staff
- IV. Provides advice to the Managing Director on all areas of responsibility

Meetings

The team meets formally once per month, and convenes informal meetings as necessary.

2.1.7 Operations Team

Purpose

The Operations Team provides an open forum for administrative staff and the management team of the Bridge Mills Galway Language Centre to review performance, communicate plans and activities and address any improvements needed in the day to day running of the school.

Composition and Membership

- i. Managing Director
- ii. Training and Quality Manager
- iii. Academic Coordinator
- iv. Student Services Officer
- v. Office Manager
- vi. Host Family Coordinator
- vii. Evening Administrator
- viii. Financial Administrator
- ix. Intern

Functions and Responsibilities

The Operations Team:

- i. Reviews, plans and monitors day to day operations.
- ii. Makes recommendations to Boards and Committees as appropriate.
- iii. Reviews sales and marketing activity.
- iv. Reviews quality assurance and accreditation related services.

Meetings

The team meets formally once per month, and convenes informal meetings as necessary.

2.2 Learner Representation in Governance

BMGLC is committed to developing and maintaining learner representation in governance and decision-making at the school. Currently, learner representation is present on the Academic Committee and Programme Boards.

However, learner representation is acknowledged to pose a challenge to providers operating in the sector, due to the short-term duration of average enrolment. BMGLC's courses vary between 1 week and 25 weeks in duration. Some learners, who are resident or hold work & study visas are able to enrol in multiple, sequential courses at the school. However, these learners typically maintain up to 20 hours of employment alongside their studies. Therefore, compared to learners undertaking Further Education and Higher Education courses in Ireland, learners at the school are typically less available to participate in the school's governance processes.

To address this, the school has developed multiple channels for eliciting feedback from learners on the academic, administrative and social aspects of their experience at the school and in Ireland. Collated feedback is formally reviewed at meetings of the Operations Team, Programme Boards, the Academic Committee and the Board of Directors. This ensures that the learner voice is consistently considered by those units of governance. The relevant policies and procedures pertaining to collection and collation of learner feedback are outlined in Section 12 of this document.

In addition, the school's complaints procedure provides learners with an alternative mechanism to make representations to the school about matters of general concern. The complaints policy and procedure is outlined in Section 3 of this document and available on the school website.

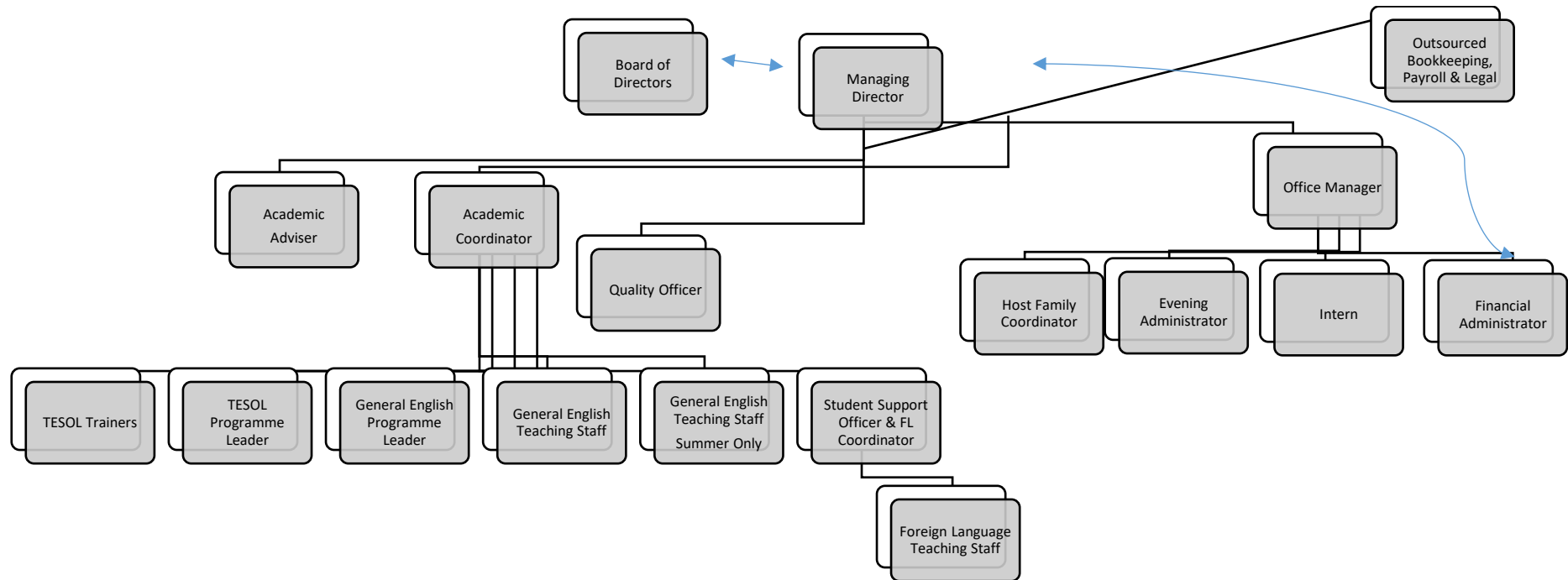
2.3 Individual Roles and Responsibilities

This section outlines the roles and responsibilities of individual personnel within BMGLC. All individuals within the school are responsible for contributing to the school's quality assurance through implementation of the policies and procedures outlined within the quality assurance framework.

- Figure 2 (p.19) presents BMGLC's organisational chart. The current organisational structure was established at the school following a restructuring of the organisation in late 2019.
- Figure 3 (p.20) summarizes the membership of individual personnel in the organisation's units of governance.
- A list of current staff at BMGLC is available in the QA Resources folder, and kept up to date by the Office Manager. Curriculum vitae are maintained in a Staff CVs folder.



2.3.1 Organisation Chart [Figure 2]





2.3.2 Membership of Individuals within Governance Units [Figure 3]

Governance Unit	Frequency	Managing Director	Academic Coordinator	Academic Adviser	Quality Officer	Student Support Officer & FL Coordinator	Programme Leaders	TESOL Trainers	Teaching Staff	Office Manager	Host Family Coordinator	Evening Administrator	Financial Administrator	Intern
Board of Directors	2 x per year	X												
Academic Committee	3 x per year		X	X	X	X	X		X					
Programme Board	2 x per year		X		X	X	X	X	X					
Examination Board	As Required		X		X		X	X	X					
Appeals Board	Ad Hoc													
Management Team	Monthly	X	X							X				
Operations Team	Monthly	X	X			X				X	X	X	X	X
	Not all are members					Membership is programme specific								

2.3.3 Managing Director

The Managing Director has oversight of strategic planning, and is responsible for controlling and directing the school. The Managing Director has overall responsibility for the executive management of the Bridge Mills Galway Language Centre.

Responsibilities Include:

- Providing strategic leadership to the Bridge Mills Galway Language Centre, inclusive of strategic planning.
- Ensuring that corporate policies and procedures are effectively implemented and comply with statutory and legal requirements (e.g. data protection; risk management; human resources).
- Having oversight of administrative functions.
- Implementing financial planning and financial management of the school
- Providing oversight to management of administrative and teaching staff in collaboration with the Office Manager and Academic Coordinator.
- Managing external relations; establishing and maintaining strategic collaborations, partnerships or relationships.
- Providing oversight of sales, marketing, public relations and communications functions.
- Providing oversight of the school's IT framework and IT support systems.
- Ensuring Health & Safety systems are in place.
- Ensuring the school's systems are GDPR compliant and acting as the GDPR officer.
- Keeping under review the academic management of the organisation provided by the Academic Coordinator and the Academic Committee.

Reporting

- The Managing Director reports to the Board of Directors.
- The Managing Director provides direct line management to the Office Manager and the Academic Coordinator

2.3.4 Academic Coordinator

The Academic Coordinator has overall responsibility for managing academic affairs at the school. In this capacity, they are responsible for working with the Academic Adviser to promote excellence in teaching, teacher training, student support and curriculum development. The Academic Coordinator also works closely with the Quality Officer to ensure that all academic aspects of quality assurance at the school are effectively implemented.

Responsibilities Include:

- Managing the development and implementation of the Teaching & Learning Strategy & Assessment Strategies of the Bridge Mills Galway Language Centre.
- Maintaining currency in the field of TESOL; managing the implementation of innovations appropriate to the organisation.
- Identifying staff development needs in relation to teaching and learning; establishing a plan for ongoing professional development of teaching staff and overseeing its implementation.
- Providing guidance to programme leaders, nominated staff or ad hoc committees engaged in curriculum review and development activities.
- In close cooperation with the Quality Officer, developing and managing effective processes for collecting, reporting and acting upon student and teacher feedback; make regular and timely reports on student and teacher feedback to the Academic Council.
- Working closely with the Student Support Officer and other key staff in ensuring the learner experience at the school is optimal.
- Dealing directly with student queries, problems and issues relating to their course of study.
- Reviewing student feedback and developing action plans where appropriate to address issues in consultation with Programme Leaders.
- Conducting and overseeing placement testing
- Monitoring student progress in consultation with academic staff, and, where appropriate, with individual teachers.
- Overseeing the appropriate recruitment, vetting and induction of new teaching and teacher training staff.
- Providing direct line management to the Student Support Officer, Programme Leaders, TESOL Trainers and Teaching Staff.
- Guiding, supporting and developing Programme Leaders in their roles.
- Ensuring staff performance and development procedures, including routine observation of teaching staff, are followed. As required, undertaking observations of teaching staff or leading staff development activities.
- Representing the College at appropriate events.
- Maintaining an external profile through engagement with appropriate bodies and organisations.
- Performing any other reasonable duty, for example, marketing activity, commensurate with the level of the role.

Reporting

- The Academic Coordinator reports to the Managing Director.
- The Academic Coordinator provides direct line management to: Student Support Officer, Programme Leaders, TESOL Trainers and Teaching Staff. The post holder holds ultimate responsibility for the day to day management of all teaching staff.

2.3.5 Training and Quality Manager

The Training and Quality manager is responsible for ensuring quality assurance policies and procedures are effectively implemented and integrated throughout all levels of the organisation, and that all staff have a clear understanding of their roles and responsibilities in relation to these. The Training and Quality Manager is the primary point of contact between the Bridge Mills Galway Language Centre and QQI, as well as other accrediting bodies.

To ensure the effective implementation of these quality assurance policies and procedures they also contribute in an advisory capacity to matters related to teaching quality, teacher training, development of continuous professional development programmes, and curriculum development.

Responsibilities Include:

- Proactively initiating quality assurance activity within the school; implementing and monitoring quality assurance policies and procedures; reporting to the Academic Committee in relation to all academic dimensions of quality assurance at the school, including:
 - Student recruitment, retention, and achievement
 - Indicators of teaching quality and teaching staff performance
 - Delivery of curriculum, including resource and materials development
 - Student, staff, and stakeholder feedback
 - Programme review and development
- Ensuring the dissemination of information pertaining to quality assurance across all academic & teaching staff; leading staff development activities to embed quality assurance in staff practice.
- Overseeing the authorship, maintenance, and review of all documentation relevant to the Bridge Mills Galway Language Centre's Engagement with QQI, ACELS, EAQUALS and other accreditation bodies.
- Supporting programme leaders in programme validation and programmatic review activity and overseeing the implementation of the approval process.
- Monitoring and reporting on implementation of externally imposed improvement plans.
- In close cooperation with the Academic Coordinator, developing and managing effective processes for collecting, reporting, and acting upon student and teacher feedback; make regular and timely reports on student and teacher feedback to the Academic Committee.
- Representing the College at appropriate events.



- Maintaining an external profile through engagement with appropriate bodies and organisations.
- Proactively contributing to the development and evolution of the Teaching & Learning Strategy & Assessment Strategies of the Bridge Mills Galway Language Centre.
- Maintaining currency in the field of TESOL; identifying opportunities for innovation and development appropriate to the organisation.
- Proactively contributing to staff development through mentoring, facilitation of workshops and seminars and dissemination of ideas, learning materials and teaching tools.
- Providing advice to programme leaders, nominated staff or ad hoc committees engaged in curriculum review and development activities.
- Performing any other reasonable duty, for example, marketing activity, commensurate with the level of the role.

Reporting

- The Training and Quality Manager reports to the Managing Director.
- The Training and Quality Manager does not provide direct line management to other staff, but may at times assume a team leadership role in the course of specific activities, for example, programmatic review or policy development.

2.3.6 Student Services Officer & Foreign Language Programme Coordinator

The Student Services Officer has responsibility for the coordination and delivery of high quality student support at the Bridge Mills Galway Language Centre. They are an important point of contact for learners on a day to day basis, and take functional responsibility for coordinating the collection of learner feedback and the logging of learner complaints.

Responsibilities Include:

- Proactively contributing to the development and evolution of learner support services of the Bridge Mills Galway Language Centre.
- Maintaining currency with quality assurance guidelines and codes of practice pertaining to learner support and provision of education and training to international learners; proactively working to align and maintain services at the school with these.
- Dealing directly with student queries, problems and issues unrelated to their course of study.
- Coordinating the collection and collation of student feedback; preparing regular reports on student feedback for the Operations Team, Academic Committee and Managing Director as appropriate.
- Coordinating logging and reporting of student complaints.
- Providing referrals to professional health, welfare and counselling services to learners as appropriate; ensuring that information pertaining to these is readily available throughout the school to all learners.
- Coordinating, maintaining and collating on-going lesson & attendance records kept by teachers.
- Coordinate the greeting of new students; coordinate and deliver new student induction
- Assisting in learner placement testing as required.
- Conducting the *Welcome Meeting & City Walk* for new students.
- Coordinating, reviewing and developing the school social programme and activities.
- Preparing documents for Student Visa holders as needed.
- Attending professional meetings and undertaking other reasonable duties as required.

Reporting

- The Student Services Officer reports to the Academic Coordinator.



2.3.7 Programme Leaders

The programme leaders are responsible for leading the academic development of a specified programme, under the guidance of the Academic Coordinator and in close consultation with the Quality Officer.

Responsibilities Include:

- Proactively contributing to general academic planning, management and on-going development of the programme.
- Maintaining, collating and reporting on records of learner achievement.
- Ongoing review of assessment; ensuring assessment is fit for purpose and compliant with relevant policies, procedures and standards (where applicable).
- Liaising with the Academic Coordinator & Quality Officer to ensure programme delivery adheres to quality assurance policies and procedures.
- Facilitating programme meetings with programme staff as required; chairing the Programme Board.
- Providing general assistance, support and guidance to learners in close cooperation with the Academic Coordinator and Student Support Officer.
- Developing, and working to continuously improve, curriculum materials.
- Producing programme review documentation, as required, under the guidance of the Academic Coordinator and with the support of the Quality Officer.
- Participating in the Examination Board, where applicable.

Reporting

- The Programme Leaders report to the Academic Coordinator.



2.3.8 TESOL Trainers & Teaching Staff

TESOL Trainers and Teaching Staff are responsible for the delivery and assessment of programmes.

Responsibilities Include:

- Delivery of programmes and teaching aligned to the learner-centred, communicative and humanistic orientation of teaching and learning at the Bridge Mills Galway Language Centre.
- Assessing learners, grading and moderating assessments, where applicable.
- Contributing to the development, planning and implementation of curriculum.
- Where appropriate, providing additional academic support to learners.
- Attending scheduled meetings; liaising with administration and line managers as necessary.
- Participating in Programme Board meetings and other meetings or ad hoc committees, as necessary.
- Adhering to quality assurance procedures.
- Representing the ethos and values of the Bridge Mills Galway Language Centre, and behaving professionally and courteously in all dealings with learners, colleagues, management and other stakeholders.

Reporting

- The TESOL Trainers & Teaching Staff report to the Academic Manager.



3. Overarching Quality Assurance Policies and Procedures

<p>The Bridge Mills Galway Language Centre</p> <p>3.1 Policy for Complaints</p>	
QA Area (s)	<ul style="list-style-type: none"> This policy is relevant to all dimensions of the Quality Assurance Framework
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
<p>Purpose</p> <p>The purpose of this policy is to recognize the right of learners and staff at BMGLC to make a formal complaint if they feel they have been treated inappropriately or unfairly by the school or a member of the school community, or if they feel they have been disadvantaged by the actions or behaviours of others within BMGLC.</p>	
<p>Scope</p> <p>This policy applies to all staff and learners, and encompasses academic and administrative domains of BMGLC programmes and services. The policy is distinct from the school's Policy for Appeals.</p>	
<p>Policy</p> <p>BMGLC is committed to facilitating a safe, fair working environment for all staff, and providing a high quality educational service for learners. The school recognizes the right of learners or staff to make a complaint if these conditions have not been met to a reasonable standard. Learners or staff who make a complaint will not be treated differently or unfairly. However, it is important to note that the right to complain does not extend to:</p> <ul style="list-style-type: none"> Complaints that are of a frivolous or vexatious nature Complaints that are made for the purpose of personal gain Complaints that are made anonymously <p>Complaints are taken seriously by the school, and reviewed by decision-making bodies as an important source of information regarding the school's performance and potential for improvement in relevant areas of operation. BMGLC will endeavour to respond to and, where possible, resolve complaints within a two week period.</p> <p><i>Complainants</i> (the persons making the complaint) are encouraged to first seek informal and prompt resolution of any issues of concern though communicating directly with the person(s) responsible</p>	



for the matter. For example, a learner is encouraged to raise issues related to classroom learning directly with their teacher.

Where this is not possible, informal complaints are handled following the principle of subsidiarity⁷. Complaints are therefore handled as much as possible at the nearest level to the issue of concern. For example, a learner may raise issues with a programme with the Programme leader, or issues with a teacher with the Academic Coordinator. Informal complaints may be escalated to higher levels only where there is no resolution possible at a lower level.

Learners or staff making an informal or formal complaint are expected to comply with the policies, procedures and rules of the school, and the BMGLC Code of Conduct. They have the right to be accompanied by a friend, family member or colleague acting in a supportive capacity during any interactions with BMGLC regarding their complaint. However, if the person accompanying the complainant is a member of the legal profession, they cannot act in that capacity.

The *subject of a complaint* (the person who is being complained about OR is responsible for the matter being complained about) has the right to be notified of the nature of the complaint, and provided with a copy of the complaint and the complainant’s details. The subject of a complaint has the right to respond.

Responsibility

- The **Academic Coordinator** has responsibility for ensuring learners and staff are aware of the school’s complaints policy and procedure.
- **All staff and students** at the BMGLC have responsibility for adhering to the policy and procedure for complaints, whether they are the complainant, the subject of a complaint or the person to which the complaint is escalated for potential resolution.

Version 1.0

Date Approved:

Approved by:

September 2019

Board of Directors
Academic Committee

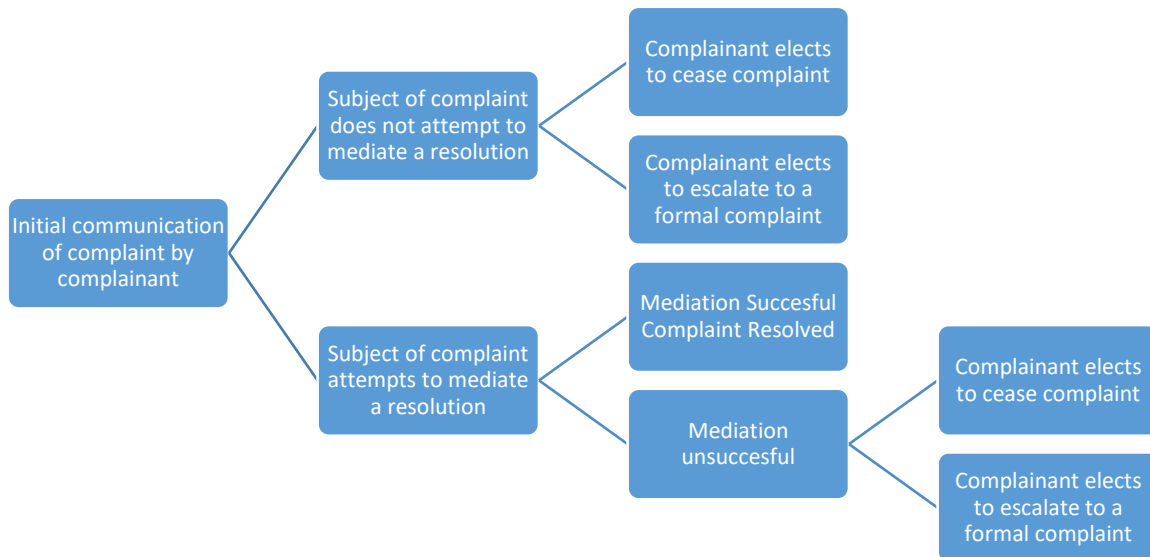
Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

⁷ The principle of subsidiarity dictates that functions that can be carried out efficiently by smaller or lesser bodies within the school will not be exercised by larger or greater bodies.



<p>The Bridge Mills Galway Language Centre</p> <p>3.2 Procedure for Complaints</p>	
QA Area (s)	<ul style="list-style-type: none"> This procedure is relevant to all dimensions of the Quality Assurance Framework
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Complaints
<p>Procedure</p> <p>Informal Complaints</p> <p><i>Note:</i> Informal complaints should normally be made within 3 working days of the incident, matter or concern being complained about.</p> <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. Initial communication is made orally or in writing by the <i>complainant</i> (the person making the complaint) to the person who is the <i>subject of the complaint</i> (the person who is being complained about OR is responsible for the matter being complained about). 2. The subject of the complaint has three working days to acknowledge the complaint and attempt to mediate a satisfactory resolution. Other persons at the nearest level to the issue of concern (for example, team leaders or teachers) may be called upon to assist in this mediation if necessary. 3. If mediation is successful, the complaint is considered resolved. 4. If mediation is unsuccessful, or the complaint is unaddressed, the complainant may choose to (i) escalate to a formal complaint OR (ii) cease the complaint. 	



Formal Complaints

Note:

Complaints should normally be submitted within 5 working days of the incident, matter or concern being complained about. If the submission of a complaint is delayed, a rationale for this must be provided (for example, due to an informal complaints procedure being followed but unsatisfactorily resolved). If a complaint is made after a period of 4 weeks or more and no informal complaints procedure was followed in the interim, the complaint will not be accepted.

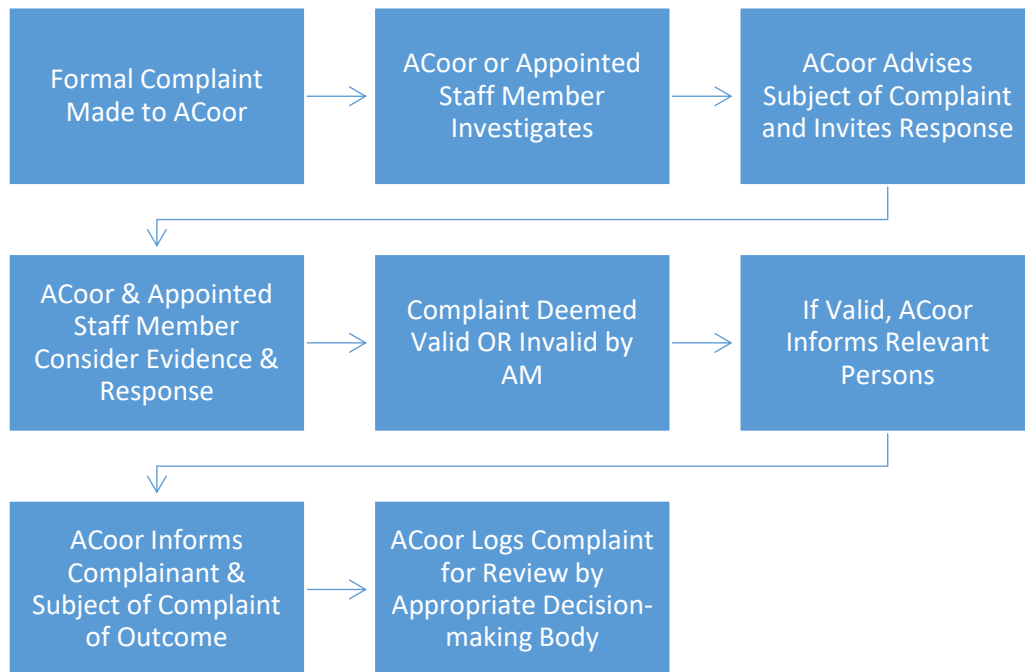
Steps:

1. A formal complaint is made in writing by the complainant to the Academic Coordinator. Complaints should be specific and where possible supported by appropriate evidence. (In cases where the complainant is the Academic Coordinator or the Academic Coordinator is the subject of the complaint it will be dealt with by The Office Manager who follows the procedure below. In cases where a student complaint concerns another student the matter may be dealt with by the Student Services Officer following the procedures below)
2. The Academic Coordinator investigates OR (where appropriate) appoints a competent staff member to investigate the complaint.
3. The Academic Coordinator advises the subject of the complaint of the details and nature of the complaint, and invites them to respond.
4. The Academic Coordinator, where appropriate assisted by a competent staff member, considers the complaint, associated evidence and response from the subject of complaint.
5. Where the complaint is not considered valid, the process concludes.
6. Where the complaint leads to recommendations or actions taken as a consequence of the complaint, the Academic Coordinator informs all relevant persons/bodies within the school.
7. The Academic Coordinator informs all parties in writing (complainant, subject of complaint and any other relevant persons) of the outcome of the investigation of



the complaint, the findings, any decisions made or actions arising from those decisions.

8. The Academic Coordinator logs the details of the complaint for review by the appropriate body (Academic Committee, Operations Team, Board of Directors or any combination of these).



Version 1.0

Date Approved:

Approved by:

September 2019

Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).



<p>The Bridge Mills Galway Language Centre</p> <p>3.3 Policy for Appeals</p>	
QA Area (s)	<ul style="list-style-type: none"> • This policy is relevant to all dimensions of the Quality Assurance Framework
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
<p>Purpose</p> <p>The purpose of this policy is to set out the grounds for, principles and possible outcomes of appeals by students or staff against decisions made by BMGLC.</p>	
<p>Scope</p> <p>The policy applies to students and staff wishing to appeal decisions made by the school related to administrative, operational, academic or other matters. For example, <i>where grounds exist</i> an appeal can be made in relation to any of the following: (i) the % refund of fees in the event of student withdrawal from a programme, (ii) non-admission to a programme of study, (iii) decisions on summative assessment outcomes ratified by the Board of Examiners, (iv) decisions pertaining to staff professional development opportunities.</p> <p>This policy does not apply to matters that are specifically governed by labour law. In such matters, BMGLC policy and procedures reflect legislative requirements and processes. BMGLC is directly guided in such matters by the school's legal counsel.</p>	
<p>Policy</p> <p>BMGLC recognizes the right of learners or staff to appeal decisions made by the school <i>where grounds exist</i>. Grounds for an appeal are as follows:</p> <ol style="list-style-type: none"> 1. Evidence that BMGLC did not follow an established procedure in the making of a decision. 2. Circumstances or information of which the original decision-making body was not aware when its decision was taken, and a valid, substantiated reason why that information was not made available by the <i>appellant</i> (the person making the appeal). 3. Evidence of substantive bias by one or more of the decision-makers in arriving at a decision. <p>The following exclusions <i>do not</i> constitute grounds for an appeal:</p> <ol style="list-style-type: none"> 1. Disagreement with a decision. 2. Disappointment with the result of an assessment or an opinion that a higher mark should have been obtained. 	



3. Complaints about persons or procedures, which must be addressed in the first instance under the school’s complaints policy and procedure.
4. Reopening of a matter that has already been decided on in a previous appeals process.

Appeals must be made within three working days of the issue of a decision, subject to extenuating circumstances (for example, serious illness). Appeals will consider evidence supplied by the appellant and evidence supplied against the grounds for appeal. This entails investigation of relevant information and investigation of the factual accuracy of the appellant’s assertions.

In all instances, appeals must be evidence based. Hearsay and opinion will not be considered as evidence. If a staff member or student appellant wishes to present in person to the Appeals Board, they must indicate this at the point of instigating an appeal, and explain the purpose of appearing in person. The External Chairperson of the Appeals Board will decide whether there is merit or usefulness in the appellant appearing in person. An appellant appearing in person may be accompanied by a friend, colleague or family member acting in a supporting capacity. If the person accompanying the appellant is a member of the legal profession, they cannot act in that capacity.

Appeals will be considered by an Appeals Board chaired by an appropriately qualified, independent, external person. Appeals Boards will be comprised of the chair and an additional two members with competence to make a decision on the matter. No individual sitting on an Appeals Board may have had any previous involvement in the case being appealed. Persons asked to sit on an Appeals Board will be asked to first declare any conflicts of interest.

An Appeals Board may reject an appeal (the original decision stands) or uphold an appeal. If an appeal is upheld, a reconsideration of the original decision is made by the Appeals Board, and a new decision is issued to place the appellant in the position where they would have been had the original decision not occurred.

Responsibility

- The **Academic Coordinator** has responsibility for ensuring learners and staff are aware of the school’s Appeals policy and procedure.
- **All staff and students** at the BMGLC have responsibility for adhering to the policy and procedure for Appeals.

Version 1.0

Date Approved:

Approved by:

September 2019

Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
- Assessment and Standards, Revised 2013 (QQI).



The Bridge Mills Galway Language Centre 3.4 Procedure for Appeals	
QA Area (s)	This procedure is relevant to all dimensions of the Quality Assurance Framework
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Appeals
<p>Procedure</p> <p><i>Note:</i> Appeals should be initiated within 3 working days of the issue of the decision being appealed, subject to extenuating circumstances (for example, serious illness).</p> <p>Steps:</p> <ol style="list-style-type: none"> 1. The appellant (person making the appeal) submits the appeal to the Academic Coordinator using the appropriate form. The appeal submission should include: <ul style="list-style-type: none"> • A completed application for appeal form • Verifiable evidence which addresses the appeal criteria 2. If the appellant seeks to present in person to the Appeals Board this must be indicated on the application for appeal form, alongside a rationale for presenting in person. The External Chairperson of the Appeals Board will decide if there is merit in the appellant attending in person. 3. The Academic Coordinator assesses the application for appeal to establish if it is complete and meets the grounds for an appeal as per the BMGLC Policy for Appeals. 4. If the Academic Coordinator deems that there are no valid grounds for appeal, the appeal is rejected, and the appellant notified. 5. If the Academic Coordinator deems that the grounds for appeal are valid and the application is complete, an Appeals Board is convened, and the appellant notified. 	



6. Where an Appeals Board is convened, the External Chairperson of the Appeals Board draws two persons from a panel established by the Academic Committee for this purpose. These two persons are asked to confirm they have no previous involvement with the matter being appealed, and to declare any conflicts of interest.
7. The appellant is notified that the Appeals Board will meet, post receipt of notification (which may require follow up correspondence to ensure receipt of notification and relevant documentation by the appellant), a minimum of three working days in advance of the meeting of the Appeals Board, and is provided with a copy of all material provided to the Appeals Board by the External Chairperson. This communication also responds to any requests by the appellant to present in person to the Appeals Board.
8. The Appeals Board meets to review evidence, agree findings and determine fair resolution. The Appeals Board may, at its discretion, invite persons who may have evidence or information relevant to the matter being appealed to attend. The appellant is advised of any person the Appeals Board meets by the External Chairperson.
9. If the Appeals Board upholds the appeal, consideration is given to the implications of this. The Appeals Board may adjourn to consult with the Board of Directors or take legal advice as required. Following a final decision (and any associated recommendations), the External Chairperson will communicate the decision and the rationale for its decision.
10. If an appeal pertains to assessment or academic matters, the External Chairperson will communicate the decision to the Academic Committee (without providing personal information), the Academic Coordinator and the appellant.
11. If an appeal pertains to non-academic matters, the External Chairperson will communicate the decision to the Academic Coordinator, the Managing Director and the appellant.
12. Following notification of the decision, the process concludes. No further appeals process is available.

N.B. Please refer to page 38 for a flow chart summary of the Appeals Procedure.

Version 1.0	Date Approved:	Approved by: Board of Directors Academic Committee
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- Related legislation, regulation or guidelines:**
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
 - Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
 - Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
 - Assessment and Standards, Revised 2013 (QQI).



<p>Bridge Mills Galway Language Centre 3.5 Policy Fitness to Practise</p>	
QA Area (s)	<ul style="list-style-type: none"> • This policy is relevant to TESOL trainees
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator and Managing Director
<p>Purpose The purpose of this policy is to set out the grounds for decisions made on students' Fitness to Practise on TESOL courses.</p>	
<p>Scope</p> <p>To describe an individual as 'Fit to Practise' is to say he or she possesses the attributes considered necessary in an individual to allow that individual to complete the TESOL course and associated assessments.</p> <p>PRINCIPLES UNDERLYING FITNESS TO PRACTISE</p> <p><i>Core Competencies</i> The TESOL course involves more than the possession of knowledge about a subject or area of practise. It also involves the possession of skills and the ability to complete specific tasks.</p> <p><i>Health Matter</i> Good health in the context of Fitness to Practise means that an individual's health status is such that they are well enough to undertake safe and effective teaching practise under supervision. Good health does not necessarily mean the absence of any disability/specific learning difficulty or health condition. Individuals may be rendered incapable of being safe and effective as a result of a health matter, either on a temporary or (rarely) a permanent basis. To ensure that, where possible, BMGLC can make reasonable accommodation to support students with a health and/or disability issue, BMGLC shall require all students subject to this Policy to make a declaration as to any concerns the Trainee may have as to their own fitness to practise that arises from a health concern at first registration</p> <p><i>Conduct Matter</i> Certain acts of misconduct and behaviour have the potential to directly harm. Misconduct and poor behaviour also has the potential to harm the reputation of BMGLC. A pattern of behaviour/misconduct, a series or sequence of events or a single act of serious misconduct or misbehaviour may be considered as causing concern as to an individual's Fitness to Practise, and so be subject to assessment under this Policy.</p>	



Criminal Convictions

If a student has a criminal conviction (or prosecution pending) prior to or during their enrolment at BMGLC and/or a disciplinary sanction from other relevant external organisation, this will not necessarily give rise to Fitness to Practise proceedings, but it may do so. BMGLC shall require students to declare if they have any criminal conviction (or prosecutions pending), at first registration. Failure to do so may be sufficient grounds to cause concern as to their Fitness to Practise.

Policy

As part of the TESOL programme students are required to undertake teaching practice that involves dealing directly with students. Since it is of over-riding importance to protect members of the school from harm and to maintain the trust and confidence of the students, it is vital that Trainees are deemed fit to practise. Fitness to practise policies and procedures have been implemented to ensure that, in addition to having achieved the required academic standard, individuals also:

- Have the capacity to perform key skills and tasks
- Are healthy of body and mind so as to be able to practise in the classroom
- Conduct and behave themselves so as not to harm others
- Conduct and behave themselves in a manner likely not to harm the reputation of BMGLC

Responsibility

- The **Academic Coordinator** has responsibility for ensuring TESOL Trainees are aware of the school’s fitness to Practise Policy and procedures.
- **All TESOL students** at the BMGLC have responsibility for adhering to the policy and procedure.

Version 1.0

Date Approved:

May 2020

Approved by:

Board of Directors

Academic Committee

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
- Policy and Procedures on Fitness to Study
- Student Code of Conduct



<p>Bridge Mills Galway Language Centre 3.6 Procedure Fitness to Practise</p>	
QA Area (s)	This procedure is relevant to TESOL trainees
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Fitness to Practice
<p>Procedure</p> <p>The behaviour and actions of a student may be a cause of concern for the safety of the student and/or the safety of others during the TESOL course (e.g. Teaching Practice), prompting consideration of the need to exclude the student from BMGLC temporarily, pending further investigation and/or management of the situation under this Policy.</p> <p>If the Academic Coordinator /School Director is satisfied that the matter is a Fitness to Practise issue and that the circumstances are such that it is in BMGLC's or the student's wider interest then the student will be suspended on the basis that suspension is temporary and necessary to protect the BMGLC community.</p> <p>1 A suspension may be verbal and to take effect as the Academic Coordinator/School Director deems appropriate and shall be confirmed in writing as soon as is practicable including the reason for suspension. Any suspension shall not be regarded as an indication as to whether or not the grounds for concern are proven</p> <p>2. Any suspension is reported to the Academic Committee by the Academic Coordinator and an Academic Committee meeting will be called as soon as is possible to discuss and investigate the suspension (Any members of the Academic Committee involved in the claim will not be involved in its investigation).</p> <p>3. Relevant parties should be given the opportunity to provide evidence (oral or written) to substantiate their version of the issues of concern. All information provided regarding issues of concern shall remain confidential for use within the process and subject to the requirements of the data protection laws. Only persons directly involved with the matter will be given access to confidential information.</p> <p>4. The Committee will:</p> <ul style="list-style-type: none"> • Detail the events/circumstances in chronological order. • Cross-refer any relevant documents which support the account of the issues of concern. 	



The Committee may seek relevant professional advice where needed before reaching a decision.

5. The student involved should also be given a reasonable period in which to seek advice and prepare their response but normally this shall be no more than 5 working days.

6. The Committee shall reach a decision and impose outcomes and/or make recommendations based upon all the available evidence - which will be communicated to the student.

Where the Committee recommends suspension from study or exclusion from the programme a rationale will be provided. The suspension shall be for no longer than is unduly necessary. In cases of suspension due to mental health issues, the suspension may be for a longer period and in such cases should be reviewed by the School Director/Academic Coordinator and reported to the Academic Committee at each scheduled meeting of the Academic Committee while the suspension remains in place. The School Director the Academic Coordinator shall be accountable to the Academic Committee in respect of the exercise of his/her power of suspension

7. Every reasonable effort is made to continue to support the student’s academic studies so that, in so far as possible, the student is not disadvantaged academically during the investigation. In the case of suspension due to mental health, continuation of support for the student’s academic studies during the temporary suspension may not be possible.

8. The student will be permitted to return to study once appropriate evidence is submitted by the student regarding the suspension, and that evidence is accepted as resolution of the issue by the Academic Committee.

9. The student may appeal the process at any time using BMGLC’s Appeals process.

Version 1.0

**Date Approved:
May 2020**

Approved by:
Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
- Policy and Procedures on Fitness to Study
- Student Code of Conduct



<p>Bridge Mills Galway Language Centre 3.7 Policy Fitness to Study (addition to Code of Conduct)</p>	
QA Area (s)	<ul style="list-style-type: none"> • This policy is relevant to all students
Applies to	<input type="checkbox"/> Staff only X Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator and Student Services Officer
<p>Purpose To provide clear guidelines and fair procedures to follow when concerns arise regarding registered students' fitness to study that need to be addressed</p>	
<p>Scope</p> <p>The Fitness to Study Policy will not be used under policies and procedures already dealing with:</p> <ol style="list-style-type: none"> i) Academic grades ii) Fitness to Practise iii) Code of Conduct <p>Students need to conform to certain standards of behaviour. This policy addresses situations where a students' behaviour is perceived to be of a serious nature and is disrupting their own studies or those of others or placing unreasonable demands on staff or other students. The cause of these actions may be related to a student's health and wellbeing and therefore it would not be appropriate to deal with under the Code of Conduct.</p> <p>PRINCIPLES UNDERLYING FITNESS TO STUDY</p> <p>The issue of a student's fitness to study may be brought into question as a result of a wide range of circumstances. These include (but are not restricted to):</p> <ul style="list-style-type: none"> • The student has told a member of Staff that they have a problem and/or provide information which indicates that there is a need to address their fitness to study. • The student's behaviour is such that it indicates that there may be a need to address an underlying health problem. • Behaviour, which would otherwise be dealt with as a disciplinary matter, which it is considered may be the result of an underlying physical or mental health problem. • The student's academic performance or behaviour is not acceptable, and this is thought to be the result of an underlying physical or mental health problem. • The student's behaviour is severely disrupting their own studies or the studies of others, or results in unreasonable demands being placed on staff or other students. 	



- Concerns about the student are communicated by a third party (e.g. friend, colleague, host family, member of the public, medical professional) which indicate that there is a need to address their fitness to study.

Policy

The Fitness to Study Policy is a supportive process that recognises the individual needs of a student. The intention is to work with and help students that are displaying concerning behavioural traits that may be directly or partially attributed to an illness, concern, or psychological condition that is challenging to themselves, other students or staff.

Responsibility

- The **Academic Coordinator and Student Services Officer** have responsibility for ensuring TESOL Trainees are aware of the school's fitness to Study and procedures.
- **All students** at the BMGLC have responsibility for adhering to the policy and procedure.

Version 1.0

Date Approved:

May 2020

Approved by:

Board of Directors

Academic Committee

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Equality Status Act (2000 – 2015)
- BMGLC Code of Conduct
- Policy and Procedures on Fitness to Practise



Bridge Mills Galway Language Centre 3.8 Procedure Fitness to Study	
QA Area (s)	This procedure is relevant to all students
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Fitness to Study
<p>Procedure</p> <p>1. Initial Action – Engage with support services Students with a mental- or physical-health difficulty or struggling with issues affecting their general fitness to study encouraged to consult the relevant support services to discuss issues and to seek solutions. Students may also speak to staff who can direct them to appropriate services.</p> <p>Information on these services are on posters in the school and further information on these services can be found by visiting https://www.samaritans.org/ireland/branches/galway/ or https://www.jigsaw.ie/jigsaw_galway/</p> <p>Follow on:</p> <p>2. Step 1 - Consultation: Staff with further or unresolved concerns about a student’s fitness to study should subsequently address them by invoking the use of this policy. Should initial action be unsuccessful, the member of staff who has raised the concern should consult the Academic Coordinator (AC) or Student Services Officer (SO). Staff may review the Student Code of Conduct or Fitness to Practise before progressing the matter under this policy.</p> <p>The student should be made aware of the precise nature of the behaviour that has caused the concerns to be raised and that it is their responsibility to maintain their fitness to study. The AC or SO will attempt to resolve the matter by informal discussions with the student. The student should be given the opportunity to explain their own views on the matter. The student may be accompanied by a friend/family member if they wish.</p> <p>The student will be given a written report of the conclusions and a follow up meeting will</p>	



be arranged, to take place normally a week after the initial meeting, to allow the student to consider their own behaviour and seek advice from the support services available. This meeting will focus on any steps taken by the student to address the concerns. If the concerns have been addressed satisfactorily, this will conclude the matter.

If, however the concerns have not been addressed, a further review period may be agreed, or the case will move to the next step.

3. Step 2 -Review:

If a student is unable to co-operate with the above process or modify their behaviour, they should be informed that a formal action below may be considered appropriate. A Review Meeting will be conducted with the Managing Director, Academic Coordinator, Student Services Officer, Staff involved and when appropriate, other professional services.

The outcomes of the meeting may include any of the following:

- Decide no further action is necessary
- Support a student who wishes to withdraw voluntarily without the need for a further response
 - Proceed to the next stage of consideration

The student will be informed in writing of the outcome of this meeting.

4. Step 3 -Student suspension / Period of Leave:

This stage of the procedure will only be implemented following a referral from a Step Two or if, in the opinion of the Managing Director (having consulted as appropriate), initial concerns are raised which are sufficiently serious as to warrant the consideration of the student's suspension, expulsion or a period of leave (e.g., if they pose a potential threat to the health and safety of themselves or others, or disruption to the working of BMGLC pending further investigation). The student will be informed in writing of the decisions taken.

In urgent/emergency situations Step 3 may need to be taken immediately. In cases of Emergency this should be reported immediately to Emergency services on 999.

Return to BMGLC:

After a period of suspension or leave of absence on health grounds, the decision as to whether to permit the student to return to study will be made by Managing Director seeking advice from the AC and/or SO and professionals as needed. Students will only be permitted to return if BMGLC is satisfied that the individual is able to maintain satisfactory progress and comply with any conditions imposed on their return.

Where BMGLC has any continuing concerns about the individual's ability to maintain satisfactory progress, it may require a second medical opinion. In this case a student may be asked to submit themselves for medical examinations by doctors/specialists nominated by BMGLC, to allow the situation to be properly evaluated.



Appeal:

A student has the right to appeal decisions using the school Appeals procedure at any stage.

Version 1.0

**Date Approved:
May 2020**

Approved by:
Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Equality Status Act (2000 – 2015)
- BMGLC Code of Conduct
- Policy and Procedures on Fitness to Practise

4. Documented Approach to Quality Assurance

<p>The Bridge Mills Galway Language Centre</p> <p>4.1 Policy for the Quality Assurance Framework at BMGLC</p>	
QA Area (s)	<ul style="list-style-type: none"> • Governance and Management of Quality • Documented Approach to Quality Assurance
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Managing Director
<p>Purpose The purpose of this policy is to outline the principles governing the creation and maintenance of quality assurance policies and procedures at BMGLC.</p>	
<p>Scope This is an overarching policy. It therefore has relevance to the activities of all staff (academic, administrative, operations) and students within BMGLC.</p>	
<p>Policy The Quality Assurance Framework at BMGLC is comprised of a set of quality assurance policies and associated procedures. Policies and procedures are supported functionally by a set of quality assurance resources. These are defined as follows:</p> <ol style="list-style-type: none"> a) Quality Assurance Policy: This sets out a principle or an intended course of action. Policies guide decision-making. Policies therefore establish the ‘what to’ in given situations. b) Quality Assurance Procedure: This describes the specific actions undertaken to implement a policy. Procedures therefore guide the ‘how to’, not the ‘what to’. c) Quality Assurance Resource: This is a functional document that supports the implementation of policies and procedures. For example, an application form, checklist or handbook. 	



The development, monitoring and review of the Quality Assurance Framework at BMGLC will be:

- i. Consultative (the opinions of students, staff and other stakeholders will be sought and appropriately considered).
- ii. Undertaken based on the subsidiarity principle (functions that can be carried out efficiently by smaller or lesser bodies within the school will not be exercised by larger or greater bodies; delegation of functions to the former will be accompanied by support from the latter)⁸.
- iii. Based on evidence and expertise, both internal and external.
- iv. Presented in usable formats, written in plain English and available to staff and the public as required⁹.
- v. Consistent, i.e. policies and procedures will not contradict each other.

Policies will be:

- vi. Accompanied by a clear statement of purpose alongside who the policy applies to, responsibility for its implementation and the approving body.
- vii. Based on clear and specific criterion, designed to guide how decisions are taken.
- viii. Approved by the Board of Directors (if relevant to administrative or operational domains), the Academic Committee (if relevant to academic standards) or both (if relevant to both domains).
- ix. Reviewed regularly on a two year cycle to ensure they remain implementable, aligned to the legislative and regulatory context, and are fit for purpose¹⁰.

Procedures will be:

- x. Developed to assist in the implementation of a parent policy; procedures cannot be developed in isolation.
- xi. Designed for efficient and effective implementation.
- xii. Approved by the Managing Director (if relevant to administrative or operational domains), the Academic Committee or its delegated subcommittee (if relevant to academic standards) or both (if relevant to both domains).
- xiii. Regularly reviewed on a two year cycle (or more frequently as required) to ensure they do not entail unnecessary administrative requirements¹¹.

⁸ See Section 1.3 of Core Statutory Quality Assurance Guidelines 2016 (QQI).

⁹ See Section 2.1 of Core Statutory Quality Assurance Guidelines 2016 (QQI).

¹⁰ See Section 2.1 of Core Statutory Quality Assurance Guidelines 2016 (QQI).

¹¹ See Section 1.3 of Core Statutory Quality Assurance Guidelines 2016 (QQI).



Responsibility

- **The Board of Directors** is ultimate responsible for the development, approval, monitoring and review of quality assurance policies and procedures at the BMGLC.
- **The Academic Committee** is delegated responsibility by the Board of Directors for the development, approval, monitoring and review of all academic quality assurance policies and procedures.
- The **Academic Manager, Quality Officer** and relevant **Programme Leaders** have responsibility for the day to day management and implementation of the quality assurance policies and procedures within academic programmes.
- The **Operations Team** have responsibility for the implementation of the quality assurance policies and procedures within all operational and administrative activities.
- **All staff and students** at the BMGLC have responsibility for implementation of the quality assurance policies and procedures in the course of their work and studies.

Version:	Date Approved:	Approved by:
1.0	September 2019	Academic Committee Board of Directors

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Assessment and Standards, Revised 2013 (QQI).
- Employment Equality Acts 1998 – 2015
- Disability Act 2005
- Data Protection Act 2018
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

**The Bridge Mills
Galway Language Centre**

4.2 Procedure for Development of New Policies and Procedures
(and/or Amendment to Existing Policies and Procedures)

QA Area (s)	<ul style="list-style-type: none"> • Governance and Management of Quality • Documented Approach to Quality Assurance
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy 1: The Quality Assurance Framework at BMGLC
Procedure	
<p><i>Responsibilities:</i></p> <ul style="list-style-type: none"> • The Quality Officer is responsible for the overall management of the Quality Assurance Framework at BMGLC. This includes editing and updating policies and procedures as required, and communicating about the Quality Assurance Framework to all relevant stakeholders. • All staff (academic, operational, administrative) are responsible for making input to (i.e. commenting/giving feedback on) draft policies and procedures when invited/requested by the Quality Officer. • Responsibility for the approval of new policies and procedures or amendments to existing procedures is set out in 3.1: Policy for Quality Assurance Framework at BMGLC. <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. The need for a new policy/procedure or amendment to an existing policy/procedure is identified. This may be identified in the course of cyclical review of the Quality Assurance Framework or in response to other events, for example: <ul style="list-style-type: none"> • Issues raised by internal stakeholders relating to any policy and procedure • A change in the regulatory environment • The outcome of an internal or external Quality Assurance event • Developments within BMGLC 	



2. The Quality Officer consults with key staff members to develop a draft of the new policy/procedure, or the amendment to an existing policy/procedure, and invites consultation and feedback on the draft from staff within the school as appropriate. This step may be repeated until the draft is considered ready. The final draft is prepared using the BMGLC policy or procedure template (QAR 1; QAR 2) as appropriate.
3. The Quality Officer submits the final draft to the approving body (Academic policies and procedures approved by the Academic Committee, Policies and Procedures in relation to finance approved by the Director)
4. of Directors accompanied by a statement that outlines the following in relation to the new policy/procedure, or amendment to an existing policy/procedure:
 - The reason for the draft's development and submission for approval.
 - The consistency of the draft with the overall Quality Assurance Framework.
 - Any regulatory considerations.
 - Any resource requirements, including implications for staff training.
 - Any implications for individual roles/responsibilities in the school.
 - A plan for the implementation and communication of the contents of the draft that is appropriate to its scale and impact, which may be minor or major.
5. The final draft is considered by the approving body, the outcome of which may be a decision to approve, propose changes or not approve. If approved, the & Quality Officer moves forward with the implementation/communication plan as outlined in step 3. If the approving body proposes changes, these are undertaken by the Quality Officer, and steps 2 & 3 are repeated.

Version: 1.0	Date Approved: September 2019	Approved by: Board of Directors Academic Committee
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Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Assessment and Standards, Revised 2013 (QQI).
- Employment Equality Acts 1998 – 2015
- Disability Act 2005
- Data Protection Act 2018
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

<p>The Bridge Mills Galway Language Centre</p> <p>4.3 Policy for Ongoing Review of QAF Documentation</p>		
QA Area (s)	<ul style="list-style-type: none"> • Documented Approach to Quality Assurance 	
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners	
Policy Owner	Quality Officer	
<p>Purpose The purpose of this policy is to set out the framework for the development, maintenance and review of BMGLC's policies and procedures.</p>		
<p>Scope This policy applies to all staff involved in the development and review of the policies and procedures within the BMGLC QAF.</p>		
<p>Policy BMGLC is committed to ensuring that policies and procedures within the QAF remain effective, relevant, fit for purpose and compliant with changes to statutory, legal and accrediting body requirements. To ensure this, internal quality reviews are conducted on a cyclical basis by the Quality Officer, with each area of the QAF reviewed at least once in every two year cycle. Each policy within the QAF is assigned to a policy owner, and where this is not the Quality Officer review of that policy and associated procedures will be undertaken in communication with the policy owner.</p>		
<p>Responsibility</p> <ul style="list-style-type: none"> • The Quality Officer is responsible for developing an internal quality review schedule for approval by both the Academic Committee and the Board of Directors, and for executing and reporting on the outcomes of review activities to both bodies. • All staff across BMGLC may be involved in monitoring and reviewing policies and procedures as they relate to their roles, and providing feedback on these to the Quality Officer. 		
Version 1.0	Date Approved: September 2019	Approved by: Board of Directors Academic Committee
<p>Related legislation, regulation or guidelines:</p> <ul style="list-style-type: none"> • Core Statutory Quality Assurance Guidelines 2016 (QQI). • Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI). 		



The Bridge Mills Galway Language Centre

4.4 Procedure for Ongoing Review of QAF Documentation

- Documented Approach to Quality Assurance

Staff only

Learners only

Staff and learners

Policy for Ongoing Review of QAF Documentation and other policies which form part of the QA system including the Child Protection Policy and GDPR Policy

Procedure

Steps:

1. The Quality Officer develops an internal quality review schedule that is appropriate to the school calendar and ensures each area within the QAF is reviewed yearly and a review of the effectiveness of the quality Management System which may present opportunities for quality enhancement activities.
2. The schedule is submitted for approval by the Board of Directors and Academic Committee.
3. Provision is included in the schedule for policies and procedures to be reviewed in advance of the nominated time period as a result of any of the following:
 - Changes to relevant regulation, accreditation requirements or legislation.
 - The outcomes of external QA events (for example, QQI QA or Validation panels).
 - Issues raised by staff or students in the BMGLC community in relation to a particular policy or procedure.
4. The Quality Officer implements the review schedule, engaging staff from across the organisation (teaching, administrative, operations and student support) as appropriate to assist in monitoring and review of policies and procedures that relate to their roles. The process of review encompasses the following:
 - Ensuring the text is up to date and aligned to the current regulatory context.
 - Analysing whether the policy or procedure is implemented as written.
 - Considering whether the policy or procedure is of ongoing relevance and use to the school.
 - Evaluating whether improvements or edits could improve the policy or procedure and its implementation.

If changes are proposed, these are submitted to the relevant approving body for consideration and decision following the *Policy for the QAF at BMGLC* and the *Procedure for Development of New Policies and Procedures and/or Amendment to Existing Policies and Procedures*. Approval processes and approving bodies are identified in those documents.

Approved by:

Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- BMGLC Child Protection Policy

5. Programmes of Education and Training

<p>The Bridge Mills Galway Language Centre</p> <p>5.1 Policy for Development & Approval of Programmes</p>	
QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training • Governance and Management of Quality • Documented Approach to QA
Applies to	<p><input checked="" type="checkbox"/> Staff only</p> <p><input type="checkbox"/> Learners only</p> <p><input type="checkbox"/> Staff and learners</p>
Policy Owner	Academic Coordinator
Purpose	
<p>The purpose of this policy is to set out the principles for the development and approval of all programmes at BMGLC.</p>	
Scope	
<p>This policy applies to non QQI programmes as well as those that will be proposed for validation to QQI. It therefore applies to all staff involved in the development and approval of programmes within BMGLC.</p>	
Policy	
<p>BMGLC is committed to the systematic development of new programmes, through a process that allows sufficient time for appropriate internal and external stakeholder consultation. The development of new programmes at BMGLC must align to the school's overall strategy and respond to evidence of demand from a target market. Therefore, proposed new programmes must meet a social need and provide educational opportunities for learners. New programmes must be sufficiently differentiated from existing programmes to avoid unnecessary duplication, and be compliant with the requirements of all regulatory and professional bodies.</p> <p>The process of development for all new programmes at BMGLC must ensure a separation of responsibilities between those who produce/develop the material and those who approve it. The internal process for new programme approvals must also ensure that academic decision-making is distinct from corporate decision-making.</p>	



Responsibility

- The **Management Team** is responsible for reviewing the rationale and business case for the development of all new programmes proposed. The SMT is responsible for completing this review prior to the submission of a new programme proposal for approval to BMGLC's decision-making bodies.
- The **Board of Directors** is responsible for approving any significant financial investment required by a new programme proposal, prior to its submission to the Academic Committee.
- The **Academic Committee** is responsible for approving new programme proposals, making recommendations to the Board of Directors regarding academic resource requirements as needed, appointing Programme Development Subcommittees, monitoring the work of these subcommittees and approving all programme documentation prior to their commencement (non QQI programmes) or submission for validation (QQI programmes).
- For QQI programmes, the **Quality Officer** is responsible for assisting Programme Development Subcommittees in preparing programme documentation for submission.

Version 1.0

Date Approved:

Approved by:

December 2019

Board of Directors

Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Policies and criteria for the validation of programmes of education and training 2017 (QQI)
- Policy and Criteria for Making Awards 2014 (QQI)
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
- Assessment and Standards, Revised 2013 (QQI).



The Bridge Mills Galway Language Centre 5.2 Procedure for Development & Approval of Programmes	
QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training • Governance and Management of Quality • Documented Approach to QA
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Development & Approval of Programmes
<p>Procedure</p> <p><i>Note:</i> An idea or proposal for a new programme may be initiated by any member of staff at BMGLC. In the event that a new programme is developed by BMGLC, BMGLC retains all Intellectual Property in relation to the programme.</p> <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. The staff member/s proposing a new programme discuss the proposal with the Academic Coordinator, and obtain approval to complete a new programme proposal. The Academic Coordinator may elect to undertake an initial, informal discussion of the proposal with the Management Team prior to granting approval to the proposer/s. 2. If approval to complete a proposal is not granted, the process ceases. 3. If approval is granted, the Management Team review the completed proposal and make a determination as to whether or not the rationale and business case for the proposed programme is sound. This entails, but is not limited to, consideration of the following criteria: <ul style="list-style-type: none"> • The relevance of the proposed programme to the BMGLC strategy. • Whether there is demand for the proposed programme. • Whether the proposed programme duplicates current programme offerings at BMGLC. • The implications of regulatory requirements that would be relevant to implementation of proposed programme. 4. If the Management Team determine the proposal does not merit further consideration on the basis of these criteria, the process ceases. 5. If the Management Team determine the proposal merits further consideration, it is submitted to the Board of Directors for approval. The proposal must be accompanied by estimated costs for both programme development and programme delivery, identification of the physical resources required (facilities, support services) and an indicative programme fee. 6. If approval is not granted by the Board of Directors, the process ceases. 7. If the Board of Directors grant approval, the programme proposal is presented to the Academic Committee for advice and approval. 8. The Academic Committee review the proposal to determine whether it is aligned to BMGLC's academic profile, and whether the programme meets a legitimate educational need. The Academic Committee may formulate advice for the Board of Directors with regard to additional resource implications arising from the programme, for example, specific implications for the training and qualifications of teaching staff or the need to engage external expertise. 	



9. If the Academic Committee grants approval, pending any additional resource approval by the Board of Directors, the Academic Committee will move to appoint a suitably qualified Programme Development Subcommittee (PDS) in consultation with the Academic Coordinator. The appointment of individuals to the PDS is made on the basis of the following considerations:
 - Suitable qualifications and experience.
 - Subject matter or learning design expertise.
 - Availability to complete the work required within a specified timeline.
 - Ongoing availability to teach on the programme and contribute to its ongoing development.
 - Where possible, these will be internal members of staff. Where necessary, external expertise will also be engaged.
10. The PDS works to develop and document the programme systematically, informed where appropriate by the structure of QQI validation documentation. This process is informed by learner and stakeholder feedback, and acknowledged to be iterative.
11. The PDS provides updates to the Academic Committee as required during the process of development, and seeks advice as needed.
12. For QQI programmes, the PDS is assisted by the Quality Officer in compiling the completed programme documentation (and any associated materials) for approval by the Academic Committee.
13. The completed programme documentation is submitted to the Academic Committee for review and as an agenda item for decision/approval. If members of the PDS are also members of the Academic Committee, those members are required to absent themselves during discussion and decision-making related to the agenda item.
14. If the programme documentation submitted to the Academic Committee is not approved, the Academic Committee will provide feedback outlining areas of the submission where improvement is required, and steps 10, 11, 12 & 13 are repeated.
15. If the programme documentation submitted to the Academic Committee is approved:
 - For QQI programmes, the Quality Officer moves forward with submission of the documentation to QQI.
 - For non-QQI Programmes, the Academic Coordinator moves forward with implementation of the programme.
16. Post validation any conditions and/ or recommendations added to the programme will be reviewed and implemented by the Academic Committee as appropriate. Approval to offer a programme following validation is subject to the approval of the Managing Director.

Version 1.0	Date Approved: December 2019	Approved by: Academic Committee
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- Related legislation, regulation or guidelines:**
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
 - Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
 - Policies and criteria for the validation of programmes of education and training 2017 (QQI)
 - Policy and Criteria for Making Awards 2014 (QQI)
 - Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
 - Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).
 - Assessment and Standards, Revised 2013 (QQI).
 - Awards Standards for Teaching English as a Second or Other Language at NFQ levels 6 -9

**The Bridge Mills
Galway Language Centre**

5.3 Policy for the Update of Programmes of Education and Training

QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Programme Leaders
<p>Purpose The purpose of this policy is to set out clear principles for what modifications can be made in the process of updating programmes, and reviewing or creating programme learning materials.</p>	
<p>Scope This policy applies to non QQI programmes as well as those that will be proposed for validation to QQI. It therefore applies to all staff involved in the update and review of programmes within BMGLC.</p>	
<p>Policy BMGLC is committed to ongoing and periodic monitoring and review of its programmes, and recognizes that the social contexts in which its programmes are delivered are constantly evolving. BMGLC therefore recognizes that programme teams may from time to time identify changes that are needed to ensure the ongoing currency and relevance of its programmes.</p> <p>BMGLC allows programme teams to make minor modifications to programmes. Minor modifications are implemented by the Programme leader, with the approval of the Academic Coordinator.</p> <p>Minor modifications are defined as follows:</p> <ul style="list-style-type: none"> • Changes to content of a programme that do not impact on the module or programme learning outcomes. • Adjustments to an assessment task/method that are consistent with the approved assessment strategy and learning outcomes, and consistent with the approved programme schedule. • Other minor changes that do not affect the learning outcomes of modules or programmes. 	



BMGLC does not allow programme teams to make **major modifications** to existing programmes. Where major modifications are requested, programme teams are advised to follow the Policy and Procedure for Development & Approval of Programmes.

Major modifications are defined as follows:

- Changes to programme titles or approved programme schedules.
- Changes to module or programme learning outcomes.
- Changes to NFQ level.
- Addition of new modules or awards.

Responsibility

- The **Academic Coordinator** has responsibility for evaluating whether a requested modification to a programme is minor or major, and, where appropriate, approving minor modifications to programmes requested by Programme Leaders.
- The **Programme Leader** is responsible for presenting requests for minor modifications to programmes to the Academic Coordinator, following consultation with programme teams and relevant stakeholders. The programme leader is responsible for overseeing the implementation of approved minor modifications.
- The **Quality Officer** is responsible for assisting the Programme Leader to update, as necessary, programme documents or records.

Version 1.0

Date Approved:

December 2019

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Policies and criteria for the validation of programmes of education and training 2017 (QQI).
- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.

**The Bridge Mills
Galway Language Centre**

5.4 Procedure for the Update of Programmes of Education and Training

QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for the Update of Programmes of Education and Training
<p>Procedure</p> <p><i>Notes:</i> An update to a programme can be proposed through the formal activities of Programme Boards or through informal communications between the programme staff and Programme Leader at any time.</p> <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. The Programme Leader reviews a proposed update against the criteria outlining minor modifications in the <i>Policy for Update of Programmes of Education and Training</i> to ensure it represents a minor modification. 2. The Programme Leader brings the proposed update, and the rationale for the update, to the attention of the Academic Coordinator. 3. If the Academic Coordinator disagrees with the Programme Leader's judgement that the proposed update is a minor modification, or holds other concerns regarding the proposed update, the Academic Coordinator may exercise their judgement to reject the proposal. The Academic Coordinator may also elect to refer the matter to the Academic Committee for further discussion and decision. 4. If the Academic Coordinator agrees with the Programme Leader's judgement that the proposed update is a minor modification, and holds no other concerns regarding the proposed update, the Academic Coordinator may grant approval. 5. If approval is granted, the Programme Leader takes responsibility for implementation of the proposed update. 6. If the proposed update is referred to the Academic Committee, which then, upon review, deems the update to be major rather than minor, there are two primary processes which may follow: <ol style="list-style-type: none"> a. The Academic Committee may submit a recommendation to the Board of Directors that a major process be initiated. This would redirect the proposal to the Policy and Procedure for the Development and Approval of Programmes. 	



- b. The Programme Leader, in close collaboration with the Academic Committee who would act as advisors, may look at alternative changes which would not require a major process.

Version 1.0

Date Approved:

December 2019

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Policies and criteria for the validation of programmes of education and training 2017 (QQI)
- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.



The Bridge Mills Galway Language Centre

5.5 Policy for Access, Transfer and Progression

- Programmes of Education and Training

Staff only

Learners only

Staff and learners

Academic Coordinator

Purpose

The purpose of this policy is to set out the principles underpinning Access, Transfer and Progression at BMGLC, in alignment with the requirements of the Qualifications and Quality Assurance Act (2012), as per QQI's 2015 policy restatement.

Scope

This is an overarching policy that establishes principles applied to all programmes of education and training at BMGLC. Within that scope, procedures are programme specific.

Policy

Definitions

Access – refers to the process by which learners may commence a programme of education and training, having received recognition for the knowledge, skill or competence required.

- **Initial Access** – refers to a learner commencing at the initial stage of a programme.
- **Advanced Access** – refers to a learner commencing at a post-initial stage of a programme.
N.B. Currently, advance access is not permitted on the 10 ECT SPA TESOL programme, as its structure is a singular module, and the programme is too short in duration for advanced access to be considered practicable.

Transfer – refers to the process by which learners may transfer from one programme of education and training to another programme, having received recognition for knowledge, skill and competence acquired.

Progression – refers to the process by which learners may progress from one programme of education and training to another programme of a higher level.

Policy statement



Access

BMGLC is committed to providing fair, equitable and consistent access to all applicants to its programmes, and will ensure the following:

- Entry arrangements for all programmes will be clear.
- Decisions on allocation of places on programmes will be transparent.
- Appropriate arrangements will be in place to facilitate an appeals process.
- Statements of the knowledge, skill and competence needed as a basis for successful participation will be made for all programmes.
- If an award in the National Framework of Qualifications is recognised as a demonstration of eligibility for entry to a programme, a clear definition of that award will be provided. If required, specific levels of attainment required in that award will also be provided.
- In the context of QQI programmes, mechanisms will be in place to facilitate Recognition of Prior Learning.

Transfer and Progression

BMGLC is committed to identifying, where available, any transfer and progression routes into and onwards from all programmes leading to awards in the framework. Where these are found to exist, any particular attainments required to facilitate access to a programme leading to an award at the next level will be specified. Where appropriate and feasible, necessary adaptations will be made to programmes to facilitate participants in making successful transitions.

Responsibility

- The **Academic Committee** is responsible for approving the Access, Transfer and Progression opportunities set out in programme specific procedures by Programme Development Teams.
- The **Academic Coordinator** has ultimate responsibility for the implementation of policy and procedure pertaining to Access Transfer and Progression.
- The **Programme Leader** is responsible for assisting the Academic Coordinator in the implementation of policy and procedure specific to the programme they are responsible for.
- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Access, Transfer and Progression to QQI's guidelines and policy statements.

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Policies and criteria for the validation of programmes of education and training 2017 (QQI)
- Awards Standards for Teaching English as a Second or Other Language at NFQ levels 6 -9

<p>The Bridge Mills Galway Language Centre</p> <p>5.6 Procedure for Admission to English Language Programmes</p>	
QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Access, Transfer and Progression
<p>Procedure:</p> <p><u>1 Purpose</u></p> <p>This procedure details the steps taken by BMGLC staff to collect, store and review applications from Prospective Learners for English Language Programmes in a fair, equal and consistent manner¹.</p> <p><u>2 Responsible Persons</u></p> <p>A. The Applicant or Agency is responsible for initial contact to BMGLC about the school’s English Language Programmes.</p> <p>B. The Applicant is responsible for ensuring all submitted documentation is both factual and verifiable.</p> <p>C. The Office Manager is the primary point of contact for the Applicant and Agency. However, general queries from Applicants and Agencies are delegated to members of office staff. In the event an issue arises, the Office Manager steps in.</p> <p>D. Members of Office Staff, overseen by the Office Manager, are responsible for the collection and storage of the Applicant’s details and documentation, ensuring GDPR compliance. They have delegated responsibility for dealing with Applicant and Agency queries, and handling/processing documentation.</p> <p>E. The Academic Coordinator and/or Programme Leader are responsible for addressing any programme-specific queries an Applicant may have prior to the commencement of their course.</p> <p>F. The Student Support Officer is responsible for assisting learners with banking or immigration issues prior to the commencement of their course, where applicable.</p> <p>G. The Accommodation Officer is responsible for assigning learners with host families, where applicable.</p> <p><u>3 Definitions</u></p>	



Prospective Student/Learner – refers to any person who has communicated with BMGLC or its agents with regard to becoming a student at the school, but who has not submitted an application or made a fee payment.

Applicant – refers to a person who has submitted an application for enrolment and may or may not have made a fee payment.

Registered Student/Learner – refers to a person who has submitted an application for enrolment, is in compliance with all conditions and regulations for enrolment to a programme and has made payment of fees due.

4 Procedures for Applications and Admission to English Language Programmes:

1. Learners enrolling via international agents (EEA Passport Holders)

- 1.1. On receipt of an email from an agency containing a Prospective Student's completed registration form, the Prospective Student's details, along with relevant course details, are entered into the school's booking administration system "Fidelo" by a Member of Office Staff.
- 1.2. A Member of Office Staff checks the documentation to ensure all relevant information has been submitted.
- 1.3. In the event of unclear or incomplete documentation, the Member of Office Staff may request further information.
- 1.4. Upon verification of the Applicant's details, a booking confirmation and invoice (gross or net where relevant) are generated.
- 1.5. The invoice and confirmation are printed and attached to a hard copy of the Applicant's registration form by a Member of Office Staff.
- 1.6. The invoice and confirmation are sent, along with pre-arrival information, student handbook and payment form, to the Applicant via the agency.
 - Please refer to 'Policy [XX] - Policy on Information to Learners' for specifics regarding the pre-course information which learners receive.
 - Applicants are advised that course fees must be paid in full no later than two weeks prior to the commencement of their course, and that their place on the course cannot be guaranteed without payment.
- 1.7. Host family accommodation and bus transfer are reserved with the host family (if applicable) by the Accommodation Officer.
- 1.8. On receipt of payment, host family details and bus tickets are sent to the now Registered Student by a Member of Office Staff. (If applicable)
- 1.9. If not already provided by the agent, the Member of Office Staff requests the Registered Student's planned arrival time.

2. Learners enrolling via international agents (Non-EEA Passport Holders)

- 2.1. On receipt of an email from an agency containing a Prospective Student's completed registration form, the Prospective Student's details, along with relevant course details, are entered into the school's booking administration system "Fidelo" by a Member of Office Staff.
- 2.2. A Member of Office Staff checks the documentation to ensure all relevant information has been submitted.
- 2.3. In the event of unclear or incomplete documentation, the Member of Office Staff may request further information.



- 2.4. Upon verification of the Applicant's details, a booking confirmation and invoice (gross or net where relevant) are generated by a Member of Staff.
- 2.5. The invoice and confirmation are printed and attached to a hard copy of the Applicant's registration form by the Member of Office Staff.
- 2.6. The invoice and confirmation are sent, along with pre-arrival information, student handbook and payment form, to the Applicant via the Agency by the Member of Staff.
 - Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the pre-arrival information which Applicants receive.
 - Applicants are advised that course fees must be paid in full no later than two weeks prior to the commencement of their course, and that their place on the course cannot be guaranteed without payment. For Non-EEA Passport Holders, the letter of acceptance to BMGLC will not be issued without receipt of payment.
- 2.7. Host family accommodation and bus transfer are reserved with the host family (if applicable) by the Accommodation Officer.
- 2.8. On receipt of payment, a letter of acceptance to BMGLC is sent to the Applicant via the agency by the Member of Office Staff, which the Applicant can use in their visa application.
- 2.9. On receipt of payment, host family details and bus tickets are sent to the now Registered Student by a Member of Office Staff. (If applicable)
- 2.10.** If not already provided by the agent, the Member of Office Staff requests the Registered Student's planned arrival time.

3. *Learners enrolled directly (EEA Passport Holders)*

- 3.1. On receipt of an enquiry from a Prospective Learner, a designated Member of Office Staff sends the Prospective Learner the relevant course information and documentation.
 - Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the course information and documentation which learners receive.
- 3.2. On receipt of a completed registration form, the Applicant's details, along with the relevant course details, are entered into the school's booking administration system "Fidelo" by the Member of Office Staff.
- 3.3. The Member of Office Staff checks the documentation to ensure all relevant information has been submitted.
- 3.4. In the event of unclear or incomplete documentation, the Member of Office Staff may request further information.
- 3.5. Upon verification of the Applicant's details, a booking confirmation and invoice (gross or net where relevant) are generated by the Member of Office Staff.
- 3.6. The invoice and confirmation are printed and attached to a hard copy of the Applicant's registration form by the Member of Office Staff.
- 3.7. The invoice and confirmation are sent, along with pre-arrival information, student handbook and payment form, to the Prospective Student by a Member of Office Staff.
 - Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the pre-arrival information which learners receive.



- Applicants are advised that course fees must be paid in full no later than two weeks prior to the commencement of their course, and that their place on the course cannot be guaranteed without payment.
- 3.8. Host family accommodation and bus transfer are reserved with the host family (if applicable) by the Accommodation Officer.
- 3.9. On receipt of payment, host family details and bus tickets are sent to the now Registered Student. (If applicable)
- 3.10.** If not previously given, the Member of Office Staff requests the Registered Student's planned arrival time.

4. Learners enrolled directly (Non-EEA Passport Holders)

- 4.1. On receipt of an enquiry from a Prospective Learner, a designated Member of Office staff sends the Prospective Learner the relevant course information and documentation.
- Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the course information and documentation which learners receive.
- 4.2. On receipt of a completed registration form, the Applicant's details, along with the relevant course details, are entered into the school's booking administration system "Fidelo" by the Member of Office Staff.
- 4.3. The Member of Office Staff checks the documentation to ensure all relevant information has been submitted.
- 4.4. In the event of unclear or incomplete documentation, the Member of Office Staff may request further information.
- 4.5. Upon verification of the Applicant's details, a booking confirmation and invoice (gross or net where relevant) are generated by the Member of Office Staff.
- 4.6. The invoice and confirmation are printed and attached to a hard copy of the Applicant's registration form by the Member of Office Staff.
- 4.7. The invoice and confirmation are sent, along with pre-arrival information, student handbook and payment form, to the Prospective Student by the Member of Office Staff.
- Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the pre-arrival information which learners receive.
 - Applicants are advised that course fees must be paid in full no later than two weeks prior to the commencement of their course., and that their place on the course cannot be guaranteed without payment. For Non-EEA Passport Holders, the letter of acceptance to BMGLC will not be issued without receipt of payment.
- 4.8. Host family accommodation and bus transfer are reserved with the host family (if applicable) by the Accommodation Officer.
- 4.9. On receipt of payment, a letter of acceptance to BMGLC is sent to the applicant by Member of Office Staff, which they can use in their visa application.
- The school provides Applicants with an information document on immigration matters to assist them with their visa applications. Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the document on immigration information.
- 4.10.** On receipt of payment, host family details and bus tickets are sent to the now Registered Student. (If applicable)



4.11. If not previously given, a Member of Office Staff requests the Registered Student's planned arrival time.

5. Learners enrolled via Cultural Bureau (Saudi)

5.1. On receipt of a request from Cultural Bureau students, the school checks with the student as to whether they are receiving a Saudi Government Scholarship (this is called a "Financial Guarantee")

5.2. If the student is receiving a Saudi Government Scholarship, then the student is sent an Offer Letter.

- The Offer Letter is signed, stamped with the school stamp, and a scanned copy is sent to the student via email.
- When the student confirms, they must forward the letter of Financial Guarantee (which they request from the relevant Cultural Bureau). Students may not begin their studies at BMGLC unless the Financial Guarantee has been given to the school.
- The school then produces a Confirmation and Invoice for the student's programme of study. These documents, along with the Offer Letter and Financial Guarantee, are stamped with the school stamp and emailed to the Saudi Cultural Agency. Hard copies are also posted to the Agency.

5.3. If the student is not receiving a Saudi Government Scholarship, then Procedure 2 - *Learners enrolling via international agents (Non-EEA Passport Holders)*, or Procedure 4 - *Learners enrolled directly (Non-EEA Passport Holders)* apply.

6. Walk-ins

6.1. Prospect Students who enter the office and express interest in studying at BMGLC are given the relevant information regarding their requested course.

- Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the course information and documentation which learners receive.

6.2. When the student is ready to book, they are asked to complete the relevant registration form with their details.

6.3. A Member of Office Staff ensures the registration form is signed and dated, and photo identification is requested for verification purposes.

6.4. Upon verification of an Applicant's details, payment is then taken for the booking by a Member of Office Staff.

6.5. The Registered Student is then given a Placement Test to assess their level.

- Please refer to Placement Testing below for further details.

6.6. The Learner's completed Placement Test is attached to their registration form, and they are given a Student Card and Welcome Pack.

- Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the 'Welcome Pack' information which learners receive.

6.7. The Learner is put on the appropriate Daytime or Evening Class Register.

Note: BMGLC aims to reply to all Prospective Learners/Applicants/Registered Students within 48 hours.

5 Placement Procedure:



1. *Registration*

- 1.1. Students arrive at the school reception for registration and testing.
- 1.2. Students who have already booked will have their booking details checked. Following this, they are given a Student Card and Welcome Pack.
- 1.3. Students who have not booked will fill in a registration form and pay for the requested course in full before joining any class. (please refer to *Procedures for Applications and Admission to English Language Programmes*). Upon process of payment, the student is given a Student Card and Welcome Pack.
 - Please refer to '*Policy [XX] - Policy on Information to Learners*' for specifics regarding the 'Welcome Pack' information which learners receive.
- 1.4. If not already obtained, a photocopy of the student's picture (from their Passport, Driving Licence, Student I.D.) is taken and attached to their registration form.

2. *Testing*

- 2.1. Students are given a written Placement Test to complete. This test takes 25 minutes. For Private Lessons, students are also asked to complete a Needs Analysis.
- 2.2. When a student has completed the written test (and Needs Analysis, if applicable), it is corrected (to indicate level) and reviewed by appropriately trained staff, and an oral interview (scripted) is carried out with the student.
- 2.3. The results of both the oral and written exams are then assessed (by the aforementioned appropriately trained member of staff) and a decision is made as to the student's level.

3. *Placement on Class List*

- 3.1. Upon completion of testing, students are then put on a class list at the appropriate level and students are given a timetable of their course which includes the names of their teachers and room numbers.

4. *Class*

- 4.1. Students are then taken to the appropriate classroom by a member of staff.

Version 1.0

Date Approved:

January 2020

Approved by:

Academic Committee
Board of Directors

Related legislation, regulation or guidelines:

- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.
- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).



The Bridge Mills Galway Language Centre	
5.7 Procedure for Access to QQI TESOL Programme	
QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Access, Transfer and Progression
<p>Procedure:</p> <p><u>1 Purpose</u></p> <p>This procedure details the steps taken by BMGLC staff to collect, store, review and assess applications from Prospective Learners for its QQI-validated TESOL programme in a fair, equal and consistent manner¹.</p> <p><u>2 Responsible Persons</u></p> <p>A. The Applicant is responsible for initial contact to BMGLC about the school’s TESOL programme, and for ensuring all subsequently submitted documentation is both factual and verifiable.</p> <p>B. Members of Office Staff, overseen by the Office Manager, are responsible for the collection and storage of the Applicant’s details and documentation, ensuring GDPR compliance.</p> <p>C. The Academic Coordinator and/or Programme Leader are responsible for liaising with the Applicant prior to programme commencement, and are responsible for assessing all relevant documentation to make a fair determination of eligibility against programme eligibility criteria.</p> <p><u>3 Definitions</u></p> <p><u>Prospective Student/Learner</u> – refers to any person who has communicated with BMGLC or its agents with regard to becoming a student at the school, but who has not submitted an application or made a fee payment.</p> <p>Applicant – refers to a person who has submitted an application for enrolment, and may or may not have made a fee payment.</p>	



Registered Student/Learner – refers to a person who has submitted an application for enrolment, is in compliance with all conditions and regulations for enrolment to a programme and has made payment of fees due.

4 Eligibility and Entry Requirements

BMGLC welcomes applicants of all backgrounds to apply for its QQI TESOL Programme, and each applicant's eligibility is assessed by trained staff in a fair, transparent and consistent manner. Notwithstanding, certain eligibility criteria and entry requirements must be met by all Applicants who wish to be considered for a place on the programme.

- 4.1 The minimum age of applicants for the QQI TESOL programme is 18 years old. Any applicant submitting documentation below this minimum age will, regrettably, be unsuccessful.
- 4.2 Applicants must hold a minimum education standard to enter 3rd level education or Equivalent .
- 4.3 Applicants in possession of a third-level qualification should provide details of this in their application, along with a photocopy of their degree. (Applicants are advised that a third-level degree (NFQ Level 7 or higher) is required, along with a QQI TESOL qualification, for teaching in an ACELS-accredited school in Ireland.
- 4.4 In the case of Applicants whose mother tongue is not English, evidence of English language ability at a CEFR C1 level or above is required. This can be demonstrated via an IELTS, TOEFL, or CPE certificate, or with evidence that they have undertaken a third-level course through English in an English-speaking country.
- 4.5 Applicants are required to write a short Personal Statement outlining why they wish to participate in the programme. This Personal Statement forms part of the assessment of eligibility carried out by the Academic Coordinator and/or Programme Leader.
- 4.6 Prior to enrolment onto the course, applicants will be required to make themselves available for either a face-to-face or a phone interview with the Academic Coordinator (AC) or the Programme Leader. This interview allows both parties (staff and applicant) to ask questions, address concerns and provide further information, where necessary. It also provides learners with the opportunity to disclose learning disabilities or differences which may require additional support or reasonable accommodation.

5 Access for candidates to the TESOL programme, not holding certificate qualifications proving education standard to enter 3rd level education:

BMGLC is committed to recognising the achievements and attainments of Prospective Learners, and the knowledge and skills they may have gained from prior studies as well as professional or life experience. BMGLC encourages applications from mature learners or learners returning to study after a prolonged period in non-educational settings.

Please refer to BMGLC's *Policy and Procedure for the Recognition of Prior Learning and Access to programmes (5.8 and 5.9 of the QA Manual)* for specific details.

6 Procedure for Applications and Admission to BMGLC's QQI TESOL Programme

- 6.1. On receipt of an enquiry from a Prospective Learner, a Member of Office Staff sends the Prospective Learner: (1) programme information and (2) relevant documentation.



6.1.1. Programme information:

- Aim of the course
- Accreditation of Programme (QQI)
- Overview of Course Content
- Entry requirements
- A list of course dates for the given year
- Course fees
- Required input hours
- Minimum/Maximum number of students per course
- Post-completion certification details (awarding body, title of award, award-type and framework level designation of the award)

6.1.2. Relevant Documentation:

- Booking Form (for personal details, previous qualifications and experience, personal statement, et al)
- Trainee Agreement
- Transcripts/Copies of third-level qualifications

6.2. On receipt of a completed Booking Form, Trainee Agreement, and transcripts/copies of relevant Qualifications, the applicant's details and the relevant programme details are entered into the school's booking administration system, "Fidelo", by a Member of Office Staff.

6.3. The Applicant's documentation is assessed by a trained member of staff (i.e. the Academic Coordinator or Programme Leader) against the eligibility criteria. In the case of doubt, the Academic Coordinator and Programme Leader may consult with one another to reach a fair conclusion.

6.4 If the application is unsuccessful, the process ceases. In the case of an Applicant's appeal against this decision, the Policy and Procedure for Appeals is referred to.

6.5 If the application is approved, the Academic Coordinator or Programme Leader relays the decision to a Member of Office Staff, who then requests payment of the deposit from the Applicant.

6.6 Once the Applicant has paid the deposit, a receipt of payment is issued by Member of Office Staff, along with the Applicant's account overview and the mandatory pre-course task.

Applicants are informed that while the Pre-Course Task is compulsory, it is not assessed. The Pre-Course task is not reviewed in advance. Rather, the Applicant will bring it with them on their first day of the course. Review of this Pre-Course Task is timetabled for day one of the course.

6.7 Applicants are advised that the balance of the fees is due in full one week before the first day of the course. When the Applicant pays the remainder of their course fees, they are asked to send a payment confirmation or bank transfer receipt along with it so that the payment can be tracked. Once the balance of the fees has been paid, a receipt of



payment is issued by a Member of Office Staff and the Registered Student / Trainee is now fully enrolled in the programme.

6.8. The Trainee is sent initial Course Materials by a Member of Office Staff. This packet includes observation forms, lesson plan templates, and course booklets, among others.

6.9 Prior to the commencement of each TESOL course, Trainees are contacted or interviewed either by the Academic Coordinator or Programme Leader to address any questions or concerns, and/or to provide further information. This also provides the opportunity for the learner to disclose learning disabilities or differences which may require additional support or reasonable accommodation.

6.10 When Trainees arrive at the school on their first day, they are asked to report in at reception, where they are then given their class details and the remainder of the Course Material (i.e. Handbook, Timetable, Booklets).

Note: BMGLC aims to reply to all Prospective Learners/Applicants/Registered Students within 48 hours.

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- ¹“Entry Arrangements”, QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.

Version 1.0

Date Approved:

January 2020

Approved by:

Academic Committee
Board of Directors

Related legislation, regulation or guidelines:

- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Awards Standards for Teaching English as a Second or Other Language at NFQ levels 6 -9



The Bridge Mills Galway Language Centre

5.8 Policy for Access (and Recognition of Prior Learning where appropriate)

QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
Purpose	
The purpose of this policy is to guide processes for Access (and Recognition of Prior Learning where appropriate) at BMGLC.	
Scope	
This policy applied to QQI programmes leading to awards recognized in the National Framework of Qualifications.	
Policy	
<i>Definition</i>	
<p><u>"The recognition of prior learning (RPL) describes a process used to evaluate skills and knowledge gained through life outside of formal education and training, for the purpose of recognising life achievements against a given set of standards or learning outcomes"</u> (retrieved from QQI Website 24th November, 2019).</p>	
<i>Policy statement</i>	
<p>In the context of BMGLC - due to the singular module structure and the short duration of BMGLC's QQI TESOL programme, it is not practicable to implement RPL for advanced access/entry. The short programme has specific learning outcomes that are met by the programme. It would not be possible to assign RLP to this singular module course of 10 ECT credits.</p>	
<p>BMGLC is committed to recognising the achievements and attainments of prospective learners, and the knowledge and skills they may have gained from prior studies as well as professional or life experience regarding Programme Access to the TESOL Programme. BMGLC encourages applications from mature learners or learners returning to study after a prolonged period in non-educational settings.</p>	
<p>To facilitate Access to The TESOL Programme by candidates not holding Leaving certificate qualifications or equivalent, the prior knowledge and experience required to participate in and successfully complete the QQI TESOL programme is set out in the programme documentation and information to prospective students. Guidance is provided to prospective students in completing course applications, and these are assessed by appropriately qualified and trained persons against specific criteria. Applications for Access will be assessed in a timely manner, and prospective students are able to utilise the mechanisms for appeal established in BMGLC's QA. (In other</p>	



BMGLC programmes where RPL exists, applications for RPL will be assessed in a timely manner and students are able to utilise the mechanism for appeal established in BMGLC's QA)

Responsibility

- The **Academic Coordinator** is responsible for ensuring that prospective students are made aware of procedures and individuals with responsibility for Programme Access are appropriately trained and informed (and RPL if relevant to other BMGLC programmes).
- The **Programme Leader** is responsible for ensuring that information relating to Programme Access is available to prospective students. The Programme leader handles queries and applications, and notifies applicants of the outcome of an assessment (and RPL if relevant to other BMGLC programmes).
- The **Programme Leader** or a **trained, appropriately qualified nominated Teacher Trainer** will carry out the assessment of an application for Access, supported by the Academic Coordinator as required (and RPL if relevant to other BMGLC programmes).

Version 1.0

Date Approved:

January 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training 2005 (QQI)
- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Awards Standards for Teaching English as a Second or Other Language at NFQ levels 6 -9



The Bridge Mills Galway Language Centre	
5.9 Procedure for Access– QQI TESOL Programme	
QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy on Access (and Recognition of Prior Learning where appropriate)
<p>Procedure</p> <p><u>1 Purpose</u> This procedure details the steps taken by staff at BMGLC to review and assess a request from a Prospective Learner to be considered in relation to Access to the school’s QQI TESOL Programme.</p> <p><u>2 Responsible Persons</u></p> <p>A. The Academic Coordinator is responsible for ensuring that Access Procedures are duly followed and individuals with responsibility for Access are appropriately trained and informed.</p> <p>B. The Programme Leader is responsible for ensuring that information relating to Access is available to Prospective Students and handles any queries that may be submitted.</p> <p>C. The Programme Leader or a trained, appropriately qualified nominated Teacher Trainer conducts interviews with Applicants requesting to be considered for Access, and reviews / assesses an Applicant’s documentation. They are supported by the Academic Coordinator as required.</p> <p>D. The Applicant is responsible for submission of appropriate Access documentation, and ensuring all information contained therein is factual and verifiable. They are also asked to make themselves available for an interview with the Programme Leader or a trained, appropriately qualified nominated Teacher Trainer.</p> <p><u>3 Scope of Access</u> As noted in BMGLC’s <i>Policy Statement for the Recognition of Prior Learning</i>, it is not practicable to implement RPL for advanced access/entry due to the singular module structure and short duration of the programme. For this reason, only Access is considered.</p> <p>BMGLC is committed to recognizing the achievements and attainments of Prospective Learners, and the knowledge and skills they may have gained from prior studies as well as professional or life experience.</p> <p>With this in mind, Prior Learning can be either certified or experiential, and encompasses¹:</p>	



- **Formal Learning:** takes place through the programmes of study or training that are delivered by education or training providers, and which attract awards.

Note: In the context of BMGLC, *Formal Learning* forms an integral part of the QQI TESOL Programme eligibility criteria. (Please refer to the *Procedure for Access to QQI TESOL Programme*)

- **Non-formal Learning:** takes place alongside the mainstream systems of education and training. It may be assessed but does not normally lead to formal certification. Examples of non-formal learning are: learning and training activities undertaken in the workplace, voluntary sector or trade union and in community-based learning.
- **Informal Learning:** takes place through life and work experience (and is sometimes referred to as experiential learning). Often, it is learning that is unintentional and the learner may not recognize at the time of the experience that it contributed to his or her knowledge, skills and competences.

4 Procedure for Recognition for Access

4.1. Should the situation arise where an Applicant does not meet the eligibility criteria for access to the TESOL Programme, they can submit a request to the school to be considered for Access. As no two Applicants are alike, BMGLC addresses Access requests on a case-by-case basis.

4.2. Upon receipt of an Access request, an interview is arranged between the Applicant and the Programme Leader or a trained, appropriately qualified nominated Teacher Trainer. This interview consists of three primary parts:

4.2.1. In Part One, the Programme Leader ensures the Applicant is fully informed on the course content and its associated workload, the assessment structure, the necessary skills and competences needed to successfully complete the programme, and the Access Procedure and its potential outcomes. It is at this point in the interview that the Applicant is reminded a third-level qualification is required in conjunction with a TESOL certificate to teach in a QQI-accredited school in Ireland.

4.2.2. In Part Two, Applicants are asked why they believe they may qualify for Access. This includes a discussion on potential formal, non-formal or informal learning they may have (certified or experiential), and how they can demonstrate certain skills and abilities which they may have acquired through this learning / experience. (e.g. a demonstration of literacy skills in the case of an Applicant who may not have a Leaving Certificate, but may instead have acquired similar skills elsewhere in life or work).

4.2.3. In Part Three, Applicants are informed of the options available to them, which may offer help prior to, or indeed during, their commencement of the programme. These options include:

- Taking the TESOL Programme part-time, rather than doing the intensive full-time programme. This may allow them more time to digest the workload and work on assessments.



- Postponing their commencement of the TESOL Programme until such time as they have been able to read some of the books and documents relevant to the programme. These can be provided by the Programme Leader upon request.

4.5. Once the interview has been completed, the information given by the Applicant is reviewed and assessed (in the case of a demonstration of ability) by the Programme Leader and/or a trained, appropriately qualified nominated Teacher Trainer. The Academic Coordinator may also be consulted.

4.6. If there is agreement that the Applicant’s prior learning and/or experience aligns with that of the Programme requirements, the application may be considered successful.

4.7. The Programme Leader contacts successful Applicants to inform them that their prior learning is such that they may be allowed access the QQI TESOL Programme.

4.8. If it is believed that, despite prior learning and/or experience, the Applicant is missing key skills or competences that would result in them being unable to attempt, manage or complete the programme workload, the Programme Leader will inform the Applicant that their entry to the TESOL Programme will not be possible at the given time. Should this situation arise, the Programme Leader may offer the Applicant advice on how to attain the necessary skills and competences.

4.9. In the event an Applicant disputes the findings of the Access Process, the *Policy and Procedure for Appeals* may be referred to.

¹ *Sourced from Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training 2005 (QQI), it being adapted from: Commission of European Union, 2000, Memorandum of Lifelong Learning, Commission Staff working Paper, Brussels.*

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Related legislation, regulation or guidelines:

- Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training 2005 (QQI).
- QQI Policy Restatement: Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training 2015.
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI)
- Awards Standards for Teaching English as a Second or Other Language at NFQ levels 6 -9

6. Staff Recruitment, Management and Development

<p>The Bridge Mills Galway Language Centre</p> <p>6.1 Policy for Staff Recruitment & Management</p>	
QA Area (s)	<ul style="list-style-type: none"> • Staff Recruitment, Management and Development
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and Learners
Policy Owner	Academic Coordinator
<p>Policy</p> <p>Effective, equitable and transparent practices in regard to staff recruitment, management and development are crucial in appointing suitably qualified staff, and for sustaining a high-quality and supportive working environment.</p> <p>Issues affecting all staff throughout the organisation are announced during monthly staff meetings and on staff noticeboards.</p> <p><u>Recruitment of Staff</u></p> <p>BMGLC is committed to hiring and appointing the most suitable candidate for a given role. The job specifications/criteria for a given role, along with the school's approach to the selection process, are to be clearly stated on all occasions. All new staff are provided with induction training, and support systems for new and long-term staff are in place and operational.</p> <p><u>Staff Management and Monitoring</u></p> <p>Through ongoing and routine observations, review of learner feedback, and biannual reviews, BMGLC takes an active, hands-on approach to performance management. The school provides staff with, and acts upon, regular feedback in order to ensure the maintenance and enhancement of standards.</p> <p><u>Staff Development</u></p>	



The school provides all staff with opportunities for continuing professional development (CPD) and further training, and maintains records of these as part of each employee’s biannual review. The needs of staff in relation to CPD and further training are identified on an ongoing basis through performance reviews, staff and learner feedback, and active engagement with, and routine review of, programmes of education and training.

Responsibility

- The **Academic Coordinator** oversees the appropriate recruitment, vetting and induction of new teaching and teacher-training staff, promotes excellence in teaching and teacher-training, and identifies staff development needs in relation to teaching and learning, establishing a plan for ongoing professional development of teaching staff and overseeing its implementation.
- The **Managing Director** oversees the appropriate recruitment, vetting and induction of new Operations Staff, maintains oversight of administrative functions, conducts staff performance reviews, and identifies staff development needs, establishing a plan for ongoing professional development and overseeing its implementation.

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**Academic Committee
Board of Directors**

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines, 2016 (QQI) - Section 9
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Statutory Employment legislation including Organisation of Working Time Act 1987, Minimum Wage Act 2000, Minimum Notice and Terms of Employment Act (1973 – 2001), Industrial Relations (Amendments) Act 2015, Employment (Miscellaneous Provisions) Act 2018, and other related employment legislation as appropriate.

The Bridge Mills
Galway Language Centre

6.2 Procedure for Staff Recruitment

QA Area (s)	<ul style="list-style-type: none"> • Staff Recruitment, Management and Development
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Staff Recruitment, Management and Development
<p>Purpose:</p> <p>To have fair, clear and consistent recruitment criteria and a recruitment process in place in line which is compliant with all relevant employment legislation and upholds BMGLC’s commitment to hiring the best candidate for a given position.</p> <p>Procedure:</p> <ol style="list-style-type: none"> 1. When, for whatever reason, it is deemed necessary to undergo a recruitment process for a given position or positions, it is the responsibility of the relevant member of Management to produce a job specification. This job specification should, at a minimum, include: <ol style="list-style-type: none"> a. The job title and its place within the school’s organisational structure b. A broad description of the role and a list of duties and responsibilities c. Specific skills, qualifications or expertise needed to effectively carry out of the responsibilities of the role 2. The job specification is then advertised both internally and externally. 3. The relevant member of Management reviews all CVs and applications submitted for a given position, assessing them fairly and justifiably against the listed criteria. 4. After reviewing all CV and application submissions, the relevant member of Management creates a short-list of candidates. The short-listing of candidates should be conducted in a fair, unbiased, and non-discriminatory manner. 5. In the unlikely event that no candidate fulfils the criteria, a review will be taken of the job specification before it is advertised again. 6. All short-listed candidates will be contacted prior to their interview to inform them of what to expect in the interview. 7. All interviews should be conducted in a fair and consistent manner, taking consideration of the school’s Interview Guidelines and Employment and Equality Legislation. 8. Upon completion of interviews, candidates are reviewed and their referees contacted. 	



9. Where a candidate is successful in their application, they shall be contacted and notified by the relevant member of Management, with a request to complete Garda vetting of the candidate -a process which is initiated by BMGLC (a requirement of the School’s Child Protection Policy). If a candidate refuses to allow BMGLC vet them the application cannot be processed further.
10. Where a candidate is unsuccessful in their application, they shall be contacted and notified by the relevant member of Management.
11. Following successful vetting all new staff are given a letter of acceptance and the Staff Handbook and go through induction training specific to their role. This is conducted by the relevant member of Management.
12. A contract of employment is issued to the staff member within 5 working days of acceptance of the position by the candidate.

Responsibility

1. **Members of Management**, in the context of Staff Recruitment, can refer to either the **Managing Director** or the **Academic Coordinator**.
 - The **Managing Director** is responsible for recruitment and appointment of staff in the Operations branch of the school. This includes Administrative Staff.
 - The **Academic Coordinator** is responsible for the recruitment and appointment of staff and in the Academic branch of the school. This includes teachers and teacher-trainers.
2. The **Candidate** is responsible for ensuring all information submitted to the school in their CV and Application is up to date, accurate and verifiable.

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Board of Directors

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

The Bridge Mills
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6.3 Procedure for Monitoring Teaching Staff Performance

QA Area (s)	<ul style="list-style-type: none"> • Staff Recruitment, Management and Development
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Staff Recruitment, Management and Development

Procedure:

This document details the internal processes taken by the school to effectively and consistently monitor the performance of teachers and teacher-trainers.

In the context of BMGLC, staff performance is monitored and reviewed in two primary ways:

1. Observations
2. Staff and Learner Feedback

Observations

These occur twice yearly and include:

- Drop-in Observations
wherein a senior member of academic staff (e.g. the Academic Coordinator *or teacher trainer*) sits on a teacher's lesson and provides immediate feedback
 - Peer Observation
wherein teachers sit in on the lessons of *their peers*
1. The Academic Coordinator is responsible for organising drop-in observation dates with teaching staff.
 2. In the case of drop-in observations, the Academic Coordinator requests the appropriate documentation (i.e. a lesson plan) from teachers for the lesson to be observed.
 3. The Academic Coordinator or teacher trainer sits in on the given lesson and completes an observation form with notes about the lesson (e.g. overview, key points, positive aspects, areas for improvement, questions, etc.)



4. Upon completion of the lesson (and observation), the teacher and observer engage in a follow-up discussion. Once the outcomes have been discussed and agreed upon, both parties sign the observation sheet.
5. In the case of peer observations, the Academic Coordinator provides the observing teacher with the appropriate documentation (i.e. observation sheets).
6. The observing teacher sits in on the given lesson and completes an observation form with notes about the lesson.
7. Upon completion of the lesson (and observation), the teacher and observer engage in a follow-up discussion. Once the outcomes have been discussed and agreed upon, both parties sign the observation sheet.

Staff and Learner Feedback

Both staff and learner feedback are collected and reviewed on an ongoing basis. The information gained through feedback provides invaluable insight which aids the enhancement of standards throughout all aspects of the organisation.

1. Learner Feedback may be collected in the following ways:
 - a. New students are asked to provide feedback on the first Wednesday of their stay. This collection of feedback is carried out by the Student Support Officer.
 - b. The Academic Coordinator and Student Support Officer conduct a school-wide survey every quarter. Feedback is subsequently recorded and appropriate actions are taken to address them.
 - c. Students can provide feedback by speaking with the Academic Coordinator or Student Support Officer in the office. Issues raised are recorded and appropriate actions are taken, where necessary, to address them.
 - d. In each classroom there is a QR code that students can scan. This leads to a feedback form which they can fill in and submit at any time.
 - e. At the end of their course of study, all learners are provided with an exit questionnaire where they can provide comments and feedback on their experience in the school and their programme of education. (There are separate feedback documents for learners on ELE Programmes and learners on the QQI TESOL Programme)
 - f. Where learner feedback refers directly to staff performance, appropriate actions may be taken by the Academic Coordinator to ensure the relevant member(s) of staff is/are both aware of an existing issue (although specific, identifying details will remain confidential) and that action must be taken to address the issue.
 - g. If actions are initiated to address an issue, a further review is taken after a reasonable amount of time has passed to verify whether or not the actions taken are successful.
2. Staff Feedback may be collected in the following ways:
 - a. Staff meetings which are held every four weeks provide teachers with an open channel for feedback and to raise concerns or issues. The meetings are chaired by the Academic Coordinator and all feedback is recorded. This means of feedback can provide a good indication of consensus, as more than one teacher may be experiencing a particular issue.



- b. Annual staff performance reviews give all staff the option to raise concerns. As these meetings are with the Managing Director, any feedback which falls under the remit of the Academic Coordinator may be referred as appropriate.
- c. Staff can provide feedback and raise concerns or issue by speaking with the Academic Coordinator. This feedback is recorded and appropriate actions are taken, where necessary, to address them.

Responsibility

1. The **Academic Coordinator** and/or **Student Support Officer** are responsible for the collection, review and monitoring of staff and learner feedback, and initiating any necessary actions to address issues/concerns/problems arising from feedback.
2. All **Staff** and **Learners** are responsible for providing, when requested or by choice, honest and relevant feedback.

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Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

<p>The Bridge Mills Galway Language Centre</p> <p>6.4 Policy for Staff Development</p>	
QA Area (s)	Assessment of Learners
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
<p>Purpose The purpose of this policy is to set out the principles for Staff Development at BMGLC, in alignment with QQI's Assessment and Standards, 2013 and the Core Statutory QA Guidelines.</p>	
<p>Scope This policy applies to all part-time and full-time staff at BMGLC, inclusive of those holding teaching, administrative, management or support roles.</p>	
<p>Policy</p> <p>BMGLC is committed to the provision of opportunities for Continuing Professional Development (CPD) of all staff. Opportunities for CPD may occur internally or externally, and are enhancement-focused. Although indicative activities may overlap, CPD is understood as distinct from Management of Staff Performance, which takes place within a more supervisory and potentially remedial context.</p> <p>CPD for all staff is actively promoted by BMGLC leadership and management. Examples of CPD activities that BMGLC may support include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Attendance at in-house workshops and seminars; • Attendance at externally facilitated workshops, conferences or industry events; • Membership or affiliation of the school community to professional bodies in the sector; • Mentoring and coaching of junior staff; • Observation of teaching by a senior colleague; • Peer observation schemes; • Accredited and non-accredited learning. <p>Support for CPD may entail:</p> <ul style="list-style-type: none"> • Time release; • Payment for hours spent engaged in CPD activities; • Full/partial financial support as appropriate. 	



To ensure that the allocation of BMGLC's resources to CPD remains closely aligned to the school's strategy and mission, and that decision-making is conducted in a fair, transparent and appropriate manner, staff are required to follow the associated *Procedure for Staff Applications for Continuing Professional Development Support*.

As BMGLC's resources are not unlimited, the allocation of support for CPD funding always entails a consideration of factors including:

- The strategic value of the proposed activity to the school;
- The cost of the proposed activity;
- The potential impact of the proposed activity on the quality of learning and teaching, student learning and the student experience;
- The appropriateness of the proposed activity to career stage of the relevant staff member(s);
- The potential for benefits/learning from the proposed activity to be shared/disseminated within the school community by the relevant staff member(s);
- The workplace behaviour and performance of the relevant staff members(s);
- The length of time the relevant staff member has been employed by the school.

Responsibility

- The **Academic Committee** is responsible for approving this policy and associated procedures pertaining to staff development, making recommendations to the **Board of Directors** on staff development, and delegating appropriate functional responsibility for managing staff development to the **Academic Coordinator**.
- The **Academic Coordinator** is responsible for making recommendations to the **Academic Committee** pertaining to staff development, and obtaining approval from the **Managing Director** for staff development activities that have funding or resource requirements.
- The **Managing Director** is responsible for approving the allocation of funding and other resources for the purpose of staff development.
- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Staff Development to QQI's guidelines and policy statements.

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Approved by:

Academic Committee
Board of Directors

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

<p>The Bridge Mills Galway Language Centre</p> <p>6.5 Procedure for Staff Applications for Continuing Professional Development Support</p>	
QA Area (s)	<ul style="list-style-type: none"> • Staff Recruitment, Management and Development
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Staff Development
<p>Purpose: To ensure that the allocation of BMGLC's resources to CPD remains closely aligned to the school's strategy and mission, and that decision-making is conducted in a fair, transparent and appropriate manner</p> <p>Procedure:</p> <ol style="list-style-type: none"> 1. The staff member/s applying for CPD support are encouraged to seek advice and input on their proposed application informally with both peers and managers prior to submitting a formal application if they wish. 2. The staff member applying for CPD sends an email to their manager outlining the following: <ol style="list-style-type: none"> I. The specific nature of the CPD they wish to engage with (e.g. formal study or conference attendance; dates, locations and other practical information) II. The specific nature of the support requested from BMGLC (e.g. allocated time, financial support, mentoring) III. The potential value/benefit of the CPD to the staff member as an individual IV. The potential value/benefit to BMGLC as a community 3. The staff member's manager considers the application, referring to the criteria outlined in the <i>Policy for Staff Development</i>. 4. Where the request has <i>no or negligible</i> resource implications the relevant manager (usually the Academic Coordinator or Office Manager) may approve the request as they deem appropriately, and communicate the outcome directly to the staff member. 5. Where the request has resource implications, the relevant manager brings the request to the Managing Director along with a recommendation to approve or not approve the request. 6. Following discussion between the relevant manager and the Managing Director, a decision is reached and the outcome communicated to the staff member by their manager. 7. Where an application is approved, this may be conditional. Any conditions will be communicated to the staff member at the time at the same time the outcome is communicated. <i>An example of a condition would be: attendance at a conference being</i> 	



sponsored by the school conditional to the staff member facilitating a CPD session for peers based on learning from that conference after their return.

Responsibility

- The **Relevant Manager**, is responsible for evaluating applications for CPD in line with the Policy for Staff Development, and bringing applications with resource implications to the Managing Director for discussion.
- The **Managing Director** is responsible for evaluating applications brought to their attention, taking into account the recommendation of the relevant manager and the cost/resource implications.
- The **Staff Member** is responsible for providing relevant, truthful and specific information regarding the CPD application.

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Board of Directors

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

7. Teaching and Learning

BMGLC have developed a Learning and Teaching Strategy that articulates and guides best practice within the school. The strategy is aligned to the school’s mission statement:

“Our goal is to be a leading language solutions provider and promote excellence in language education. We aim to provide the highest quality of language learning and to promote innovation and standard setting in language teaching, learning and teacher training.”

The BMGLC Learning and Teaching Strategy rests on three key pillars of activity. These are: curriculum development, staff development and programme monitoring & review. Each of these areas of activity is guided by specific policies and procedures within the school’s Quality Assurance Framework (QAF).

7.1 Visual Representation of BMGLC Learning and Teaching Strategy



7.2 Integration of the Quality Assurance Framework to the Learning and Teaching Strategy at BMGLC

The QAF provides a foundation for the effective realization of the Learning and Teaching Strategy in day to day practices at the school. Three key pillars of activity support this:

Pillar 1: Curriculum Development

This encompasses all activity pertaining to ongoing review and enhancement of the curriculum, including both learning materials and pedagogic approaches. Curriculum review and enhancement activities at BMGLC are responsive to the changing needs of learners, the evolution of practices in TESOL, and technological developments in the education sector.

Relevant Documents:

- [Policy & Procedure for Development & Approval of Programmes](#)
- [Policy & Procedure for the Update of Programmes of Education & Training](#)
- [Terms of Reference – Programme Boards](#)
- [Policy & Procedure on Assessment](#)

Pillar 2: Staff Recruitment and Development

This includes the recruitment of high calibre teaching staff, and provision of strategically aligned Continuing Professional Development (CPD) for all staff engaged in teaching or academic support. Opportunities for CPD are facilitated internally under the direction of the Academic Coordinator and the Academic Committee. Staff are additionally supported to pursue external CPD opportunities, such as attendance at conferences or further studies, on a case by case basis.

Relevant Documents:

- [Policy & Procedure for Recruitment and Induction of Teaching Staff](#)
- [Policy for Professional Development of Teaching Staff](#)

Pillar 3: Programme Monitoring & Review

This encompasses all ongoing monitoring and review activities that provide insights to the learner experience within BMGLC programmes, including those related to the quality of teaching. Feedback is routinely collected from learners on both in class and out of class aspects of their experience at BMGLC. This is supplemented by the collection of feedback from teaching staff and other stakeholders in relation to programme delivery, and data on student outcomes and completion. All of these indicators are reviewed by Programme

Boards, the Academic Coordinator, the Quality Officer and the Academic Committee, and decisions may be taken in relation to areas identified for improvement. Teaching staff are also routinely observed by team leaders or the Academic Coordinator, and provided with feedback and guidance on teaching performance as necessary.

Relevant policies and procedures:

- [Chapter 2 - Governance and Management of Quality](#)
- [Policy and Procedure for Ongoing Review of QAF Documentation](#)
- [Policy for Monitoring Effectiveness of Teaching Staff](#)
- [Policy & Procedure for Ongoing Monitoring & Periodic Review of Programmes](#)

7.3 Dimensions of Learning and Teaching at BMGLC

7.3.1 Modes of Learning and Teaching

Programmes at BMGLC are delivered in face to face ‘attendance’ mode, and are highly interactive. Class sizes are small, limited to 15 maximum for English or foreign language proficiency courses and 16 maximum for TESOL teacher training programmes. Small class sizes enable teaching staff to work responsively with each class group, taking account where possible of learners’ particular needs, interests and preferences. Learning technologies are supplemental rather than core to programme delivery. Where online or digital technologies are employed, they are used to support or enhance the face to face learning experience.

7.3.2 Approaches to Learning and Teaching

All learning and teaching practices at BMGLC are firmly grounded in a **humanistic approach** to learning. Humanistic approaches are **learner-centred**, aiming to engage individuals emotionally and socially, as well as cognitively, in the learning journey. Learner-centred instruction emphasizes the facilitative role of teachers and the uniqueness of learners. It encourages the fostering of successful interpersonal relationships between teachers and learners, and an appreciation and respect for diversity and difference¹².

English and foreign language proficiency courses at BMGLC are mapped to the **Common European Framework of Reference for Languages (CEFR¹³)**, and pedagogy is therefore heavily influenced by **Competency-Based Language Teaching (CBLT)**. CBLT is “built around the notion of communicative competence and seeks to develop functional communication

¹² Cornelius-White, J.H.D. & Harbaugh, A.P. (2010) *Learner-centred Instruction: Building Relationships for Student Success*, Sage

¹³ Council of Europe, (2001) *Common European Framework of Reference for Languages: Learning, teaching, assessment*, CUP

skills in learners¹⁴". Learning resources and materials, including published textbooks, are selected on the basis of their alignment to this goal.

All language learning and teaching at BMGLC reflects a **communicative approach**, which aims to develop learners' **communicative competence**¹⁵ by facilitating opportunities for interaction and authentic, meaningful communication. Within a communicative approach, "language learning may be seen as a process which grows out of the interaction between learners, teachers, texts and activities¹⁶". Through careful recruitment and continuous professional development opportunities, BMGLC aims to equip teaching staff with the knowledge and skills they need to make informed methodological choices that reflect communicative approaches. As they deliver courses and programmes, teachers are expected to draw from a repertoire of strategies in responding to learning challenges they encounter. Teaching staff are therefore encouraged to adopt **principled eclecticism**¹⁷ in their practice.

Notably, language proficiency courses at BMGLC are typically delivered to multinational class groups, meaning learners do not share a first language. Teaching staff are trained to value and leverage cultural diversity, fostering an **intercultural** learning environment in which difference is respected¹⁸.

7.3.3 Learning Environments

BMGLC are committed to ensuring a consistently high standard of learning environment is provided for all learners.

Classroom facilities are equipped with free Wi-Fi, and are carefully monitored to ensure lighting, ventilation, heating and furnishings are conducive to learning. Classrooms have sufficient breakout space to facilitate pair and group work. Projection equipment and teacher laptops are available in classrooms to facilitate use of multimedia and digital tools.

In addition, informal learning and social spaces are made available to all enrolled learners. These include the student library, listening lab and student common room. The school social programme further supports language students by providing opportunities for them to engage in authentic interactions and informal learning opportunities within the wider community.

¹⁴ Richards, J.C. & Rogers, T.S. (2001) *Approaches and Methods in Language Teaching*, 2nd edition, CUP, p.143

¹⁵ Hymes, D.H. (1972) *On Communicative Competence*, in Pride, J.B. & Holmes, J. (Eds) *Sociolinguistics*, pp. 269-293. Penguin. Canale, M. & Swain, M. (1980) *Theoretical Bases of Communicative Approaches to Second Language Teaching and Testing*, *Applied Linguistics* 1, pp. 1-47.

¹⁶ Breen, M.P. & Candlin, C.N. (1980) *The essentials of a communicative curriculum in language teaching*, in *Applied Linguistics* 1, pp. 89 – 112, OUP.

¹⁷ Larsen-Freeman, D. (2000) *Techniques and Principles in Language Teaching*, OUP.

¹⁸ QQI (2015) *Code of Practice for Provision of Programmes to International Learners*, Section 3.4.3

**The Bridge Mills
Galway Language Centre**

7.4 Policy for Copyright Compliance

QA Area (s)	<ul style="list-style-type: none"> ● Teaching and Learning
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Quality Officer
<p>Purpose The purpose of this policy is to establish and detail the school's copyright compliance measures in relation to the reproduction, distribution and exhibition of copyrighted material.</p>	
<p>Scope This policy applies to all students and staff (academic, operational, administrative) at BMGLC.</p>	
<p>Policy</p> <p>Given its nature, the reproduction, distribution and exhibition of materials is inevitable within BMGLC. With this in mind, BMGLC will:</p> <ol style="list-style-type: none"> 1. Comply with Irish copyright legislation and purchase all necessary copyright licences and comply with the terms of these licences. <p style="margin-left: 40px;"><i>The Licence Certificate issued by the Irish Copyright Licensing Agency GLC. (ICLA) grants BMGLC a licence to copy certain material protected by copyright, as long as this copying is done on the premises and does not breach the ICLA's excluded works list. The excluded works list is available next to the Licence Certificate.</i></p> <p style="margin-left: 40px;"><i>Similarly, the Umbrella Licence Certificate issued by the Motion Picture Licensing Company (MPLC) ensures copyright compliance for the legal use of all DVD/Bluray, streaming, downloads or broadcast produced and/or distributed by MPLC-affiliated producers.</i></p> <ol style="list-style-type: none"> 2. Display these licences and associated guidelines in areas where the reproduction, distribution and exhibition of materials may occur. This includes staff notice boards, next to the staffroom and photocopier, and near or around staff computers. 	



3. Educate all staff on copyright use and legislation, including, but not limited to, referencing/crediting authors, photocopying allowances/restrictions, and the proper use of digital material.
4. Respect all creator rights, including the rights of third-party material owners, and the rights of teachers or students who have developed material during or prior to their tenure in the school.

The Quality Officer is responsible for ensuring staff and students are given all relevant information in relation to copyright use and copyright legislation.

Responsibility

- The **Academic Coordinator** and **Quality Officer** are responsible for ensuring staff and students are aware of and comply with the school's policy on the Reproduction, Distribution and Exhibition of Copyrighted Material.
- All **staff** and **students** at the BMGLC are responsible for adhering to the policy and procedure for the Reproduction, Distribution and Exhibition of Copyrighted Material.

Version 1.0

Date Approved:

January 2020

Approved by:

Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Irish Copyright Licensing Agency CLG. Terms and Conditions of Language Schools License (2014) and User Guidelines (2016).
- Motion Picture Licensing Company DAC. Umbrella Licence Agreement Terms and Conditions (2017).



**The Bridge Mills
Galway Language Centre**

7.5 Procedure for Copyright Compliance

QA Area (s)	● Teaching and Learning	
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners	
Policies this Procedure relates to	Policy for Copyright Compliance	
<p>Procedure</p> <ol style="list-style-type: none"> 1. Each respective licence issued to BMGLC must be displayed in areas where the reproduction, distribution and exhibition of materials may occur (e.g. next to every photocopier in the school, as well as on notice boards near or around a computer). 2. Current staff must be informed on Copyright policies and procedures. This is done via an information workshop given by the Quality Officer which will establish copyright legislation and day-to-day guidelines. 3. New teachers are informed on the school's Photocopying Policies and Procedures during Induction. 4. All students, current and future, must be informed on copyright policies and procedures. This is done via in-class announcements, with reference to Copyright guidelines and where they can be found in the school. 5. When an item of Copyright Material is reproduced, distributed or exhibited, the onus is on the individual student or member of staff to ensure the author/owner of the work is given due credit. 6. When an item of Copyright Material is reproduced, distributed or exhibited, the onus is on the individual student or member of staff to ensure the work, or the amount of this work, does not breach copyright (e.g. ICLA or MPLC Terms and Conditions). <p style="text-align: center;"><i>The Terms and Conditions for both ICLA and MPLC licences are on-display in the school and should be referenced in the event of uncertainty to ensure adherence.</i></p>		
Version 1.0	Date Approved: January 2020	Approved by: Board of Directors Academic Committee
<p>Related legislation, regulation or guidelines:</p> <ul style="list-style-type: none"> ● Irish Copyright Licensing Agency CLG. Terms and Conditions of Language Schools License (2014) and User Guidelines (2016). ● Motion Picture Licensing Company DAC. Umbrella Licence Agreement Terms and Conditions (2017). 		

8. Assessment of Learners

<p>The Bridge Mills Galway Language Centre</p> <p>8.1 Policy for Assessment</p>	
QA Area (s)	Assessment of Learners
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
<p>Purpose The purpose of this policy is to set out the principles underpinning Assessment of Learners at BMGLC, in alignment with QQI's Assessment and Standards, 2013 and the Core Statutory QA.</p>	
<p>Scope This policy applies specifically to QQI validated programmes. Therefore, it is intended to interface with the programme specific assessment strategy of the QQI Level 7 SPA TESOL Certificate Programme.</p>	
<p>Policy</p> <p>Assessment The assessment of learning is understood at BMGLC as a complex process. In the context of BMGLC programmes, assessment of learners entails appropriately and experienced qualified persons making inferences about a learner's knowledge, skills or competence. This is always based on appropriate evidence, and evaluations are criterion-referenced, meaning they are made with reference to pre-defined standards.</p> <p>BMGLC is committed to carrying out assessment in a fair, transparent and consistent manner. The principles underpinning assessment of learners enrolled on QQI programmes at BMGLC are designed to reflect QQI policy, and are as follows:</p> <p>Learners are responsible for</p> <ul style="list-style-type: none"> • demonstrating their achievement of the learning outcomes • undertaking assessment in a fair and honest manner <p>Assessment methods</p> <ul style="list-style-type: none"> • support credible evaluations of the achievement of learning outcomes • support effective teaching and learning • are regularly reviewed and improved • are valid, fit for purpose and reliable 	



- incorporate reasonable accommodations
- are completed in a timely manner and results communicated to the learner

Assessment processes

- Are transparent and easily accessed by learners and other stakeholders
- Are clearly communicated to learners within a programme
- Are equitable, and reflect QQI's guidelines
- Are subject to internal moderation and external authentication
- Include procedures to facilitate learners seeking a recheck, review or appeal of an assessment decision

Responsibility

- The **Academic Committee** is responsible for approving this policy and associated procedures pertaining to assessment, and delegating appropriate responsibility to the Exam Board.
- The **Academic Coordinator** with the help of the **Programme Leader** has ultimate responsibility for the implementation of policy and procedure pertaining to Assessment in the context of a specific programme.
- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Assessment to QQI's guidelines and policy statements.

Version 1.0

Date Approved:

December 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).



**Bridge Mills
Galway Language Centre**

8.2 Policy Plagiarism

QA Area (s)	<ul style="list-style-type: none"> • This policy is relevant to the student body
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator and Managing Director
Purpose	
The purpose of this policy is to set out BMGLC's policy on plagiarism	
Scope	
<p>It is the policy of BMGLC to provide students with a clear definition of what plagiarism is; give guidelines as to how it can be avoided; inform students about the steps that will be taken should they be suspected of, or found to have plagiarised material in their assessments; and the resulting sanctions and penalties that may be applied.</p> <p>We believe that the procedures relating to suspected acts of plagiarism must be clearly understood by all stakeholders and must be applied consistently, taking into account the responsibility to be fair and equitable to all learners. Consistent with best academic practice, plagiarism is viewed seriously.</p> <p>All investigations into suspected plagiarism, including initial discussions, are recorded and a student has the right to request access to all documentation and reports arising from investigation into suspected plagiarism in their work.</p> <p><u>Definition:</u> Plagiarism is the act of submitting another person's work as one's own. Plagiarism can include'</p> <ul style="list-style-type: none"> • Photocopying, without acknowledging the source, of whole sections of published works • Use of text from unpublished works e.g. other student's work. • Cheating in exam situations 	
Policy	
<p>As part of the TESOL programme students are required to produce assignment work and prepare for teaching practices. When a student submits any piece of work for academic assessment, that act makes the implicit statement that the work is his or her own. When a student submits work as their own, without adequately acknowledging its source, they are in breach of professional and academic good practice.</p> <p>Information on how to avoid plagiarism and how to reference correctly in assignments is covered in the TESOL handbook.</p>	



Responsibility <ul style="list-style-type: none"> The Academic Coordinator and Programme Leader for TESOL have responsibility for ensuring TESOL Trainees are aware of the school's Policy and procedures. All TESOL students at the BMGLC have responsibility for adhering to the policy and procedure. 		
Version 1.0	Date Approved: May 2020	Approved by: Board of Directors Academic Committee
Related legislation, regulation or guidelines: <ul style="list-style-type: none"> Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI). Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015). 		

Bridge Mills Galway Language Centre 8.3 Procedure Plagiarism	
QA Area (s)	This procedure is relevant to TESOL trainees
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Plagiarism
Procedure Where possible, the process will be completed as quickly as possible and within the timeframe of 7 days. Incidents of plagiarism will be maintained on a student's record, and the process described below will apply for the full period of their registration. Reasons a tutor might suspect plagiarism:	



1. Un-cited text copied from materials.
2. Incongruity in style of writing e.g. deviation from student's own voice
3. Inconsistency of fluency and spelling.
4. Change in formatting e.g. font, headings, margins
5. Lack of flow and/or development of topic.
6. Work that is very similar or the same as another student's work or previously assessed work
7. Suspicion that the student may have had assignment written for them by another person
8. In a situation where two current students have presented the same/similar work both students will be subject to the plagiarism policy and procedures and both may have penalties applied as appropriate. In the case of a current student presenting work which seriously overlaps with that of a previous student, the current student will be dealt with through these procedures, and the previous student will be informed of the situation.

This list is not exhaustive, and the tutor may commence an investigation based on any reasonable suspicion. Following initial analysis, the tutor may decide that there is no case of plagiarism to be answered. If the tutor confirms that a possible case of plagiarism has occurred the investigation continues as follows.

Stage 1

(Pre - Plagiarism)

Tutor identifies issues to student e.g. lack of referencing skills and an initial exploratory discussion is developed with the student. The student is directed to appropriate study supports.

Stage 2

The tutor notifies the student of the situation and has an initial exploratory discussion. Following this, the tutor commences the information gathering process. Information gathering may include but is not limited to review of previous work, discussion with other tutor(s), and consideration of any explanation/comments offered by the student in the initial conversation. Students are made aware that their previous work may be reviewed as part of an investigation to provide background information about their standard of work.

On completion of the information gathering stage, and based on the evidence, the tutor makes a decision as to whether or not there is a case of plagiarism to be answered. In making the decision, in addition to the information gathered the tutor will also consider:

1. The Declaration of Authorship submitted by the student stating that the work they submitted was their own.
2. Was the information about plagiarism made clear?
3. Has the student misunderstood the above?
4. Is this a first incident?
5. Previous performance and assessment results from completed assignments.
6. Has the issue arisen due to any oversight by BMGLC?

If the tutor decides that yes, there is a case to be answered they will notify the student of this outcome in writing and refer the case for consideration to the Academic Coordinator with a written record of the data gathered. The student may exercise their right to appeal at this stage, and will be informed of this by the tutor.



If the tutor decides that there is no case of plagiarism to be answered they will also notify the student of this outcome in writing.

The Academic Coordinator commences the information gathering process, which will include but is not limited to a review of the information from the tutor meeting with the student. On completion of the information gathering stage the Academic Coordinator compiles a written report and, based on the evidence, makes a decision as to whether or not there is a case of plagiarism to be answered.

If the Academic Coordinator decides that yes, there is a case to be answered they will then decide to either;

1. Make the student resubmit the assignment using their own work in cases such as Basic referencing error, too many direct quotes, no evidence of deliberate attempt by student (this is not an exhaustive list)
2. Fail the student on the work submitted and student can follow the procedures on resubmission as appropriate in cases such as repeat offence, deliberate attempt by student, no evidence of formative engagement with supports and materials (this is not an exhaustive list)

The Academic Coordinator will notify the student of this outcome in writing. The student may exercise their right to appeal at this stage.

If the Academic Coordinator decides that there is no case of plagiarism to be answered the student and tutor will be notified of this outcome in writing.

Version 1.0

**Date Approved:
May 2020**

Approved by:
Board of Directors
Academic Committee

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of Education and Training to International Learners 2015 (QQI).
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

**The Bridge Mills
Galway Language Centre**

8.4 Procedure for Internal Moderation – Written Work

QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Assessment
<p>Procedure</p> <p>Internal moderation ensures consistency of standards and transparent, fair and valid grading practices are applied across QQI programmes.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • All teacher training staff involved in assessing and grading learners on the the QQI Level 7 SPA TESOL Certificate Programme may be required to contribute to the process of internal moderation. • All teacher training staff involved in assessing and grading learners on the QQI Level 7 SPA TESOL Certificate Programme must have a sample of their assessments moderated on each programme. • Additional internal moderation may be carried out in borderline pass/fail cases (+/- 5%). <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. Under normal circumstances, the Programme Leader manages the administrative process of internal moderation of written assessment (i.e. sampling of assessment, issuing of samples to be moderated with new marking sheets). This duty may also be undertaken by the Academic Coordinator. 2. Internal moderation is undertaken by a member of the teacher training staff who was not involved in the original assessment. Within this role, this person is referred to as the internal moderator. 3. The marking sheet/grades allocated by the original assessor are not provided to the internal moderator in the first instance. The internal moderator reviews the assessment material and completes a new marking sheet/allocation of grades. 4. Upon completion, the internal moderator is provided with the original assessors marking sheet/grades, and reviews these. 5. The original assessor and internal moderator may discuss any variance to reach agreement. 6. If agreement is reached, marks/grades may be adjusted if required. 	



7. If agreement is not reached, the matter is referred to the Academic Coordinator, who may determine the final grade, or may refer the matter to the external examiner to adjudicate.
8. In all cases, a record of internal moderation is kept and made available to the external examiner.

Version 1.0

Date Approved:

February 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

<p>The Bridge Mills Galway Language Centre</p> <p>8.5 Procedure for Internal Moderation – Teaching Practice</p>	
QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Assessment
<p>Procedure</p> <p>Procedure</p> <p>Internal moderation ensures consistency of standards and transparent, fair and valid grading practices are applied across QQI programmes.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • All teacher training staff involved in assessing and grading learners on the QQI Level 7 SPA TESOL Certificate Programme may be required to contribute to the process of internal moderation. • All teacher training staff involved in assessing and grading learners in teaching practice (in. 3 members of staff) on the QQI Level 7 SPA TESOL Certificate Programme must have a sample of their TPs moderated on every 3rd programme at a minimum. • Additional internal moderation may be carried out in borderline pass/fail cases (+/- 5%) <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. Under normal circumstances, the Programme Leader manages the administrative process of internal moderation of TP assessment. This duty may also be undertaken by the Academic Coordinator. 2. Internal moderation is undertaken by a member of the teacher training staff who concurrently observes a trainee's TP and confers with the primary assessor. Within this role, this person is referred to as the internal moderator. 3. The internal moderator reviews the assessment material and ensures grades are recorded as accurate. 4. The original assessor and internal moderator may discuss any variance to reach agreement. 5. If agreement is reached, marks/grades may be adjusted if required. 	



6. If agreement is not reached, the matter is referred to the Academic Coordinator, who may determine the final grade, or may refer the matter to the external examiner to adjudicate.
7. In all cases, a record of internal moderation is kept and made available to the external examiner.

Version 1.0

Date Approved:

February 2020

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Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

The Bridge Mills Galway Language Centre 8.6 Procedure for Internal Verification		
QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners 	
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners	
Policies this Procedure relates to	Policy for Assessment	
Procedure <p>Internal verification ensures that the policies and procedures relating to all aspects of assessment practice are internally monitored by BMGLC. Internal verification checks that assessment procedures and administrative processes have been applied, and that marks have been correctly computed and recorded.</p> <ol style="list-style-type: none"> 1. For each iteration of the QQI Level 7 SPA TESOL Certificate Programme, the Academic Coordinator checks on a random sample of learners that: <ol style="list-style-type: none"> (i) Marks are totalled and percentage marks calculated correctly (ii) Marks are transferred correctly from learner evidence to learner marking sheet/record (iii) Percentage marks and grades allocated are consistent with the award band 2. The Academic Coordinator maintains a record of each instance of internal verification. 		
Version 1.0	Date Approved: February 2020	Approved by: Academic Committee
Related legislation, regulation or guidelines: <ul style="list-style-type: none"> • Assessment and Standards, Revised 2013 (QQI). • Core Statutory Quality Assurance Guidelines 2016 (QQI). • Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI). 		



**The Bridge Mills
Galway Language Centre**

8.7 Procedure for the Recruitment & Selection of External Examiners

QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners • Self-evaluation, Monitoring and Review
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Assessment
<p>Definitions</p> <ol style="list-style-type: none"> 1. Moderation Body: An independent body which connects Providers to independent subject-matter experts who externally examine/moderate a given programme. 2. Nominee: An independent subject-matter expert assigned to a Provider by a Moderation Body, but who has yet to be approved by the Provider's Academic Committee. 3. External Examiner: An independent subject-matter expert assigned to a Provider by a Moderation Body who has been approved by the Provider's Academic Committee and undergone a formal induction process. <p>Overview</p> <p>Considering the key role External Examiners play in ensuring that assessment procedures are fit-for-purpose, valid, reliable, fair and consistent, it is pivotal for the External Examiner to be, as described by QQI, "an independent expert who is a member of the broader community of practice within the programme's field."¹</p> <p>For this reason, the nomination and appointment of External Examiners is assessed carefully and thoroughly by the Academic Coordinator with the approval of the Academic Committee. In the context of BMGLC, External Examiners are required only for the QQI TESOL Programme.</p> <p>Procedure</p> <ol style="list-style-type: none"> 1. It is the responsibility of the Academic Coordinator to recruit External Examiners for the QQI TESOL programme. This is done via contact with an independent Moderation Body, which connects providers to independent, subject-matter experts. 	



2. External Examiners are appointed by the Moderation Body for a maximum period of two years, after which the Moderation Body is responsible for appointing a new independent, subject-matter expert.
3. Once an External Examiner has been selected by the Moderation Body, the Nominee must sign a declaration that no conflict of interest exists between them and the Provider, and declaring any interests that might appear to conflict with the proposed role and responsibilities.
4. The Provider’s Academic Committee must review and approve the nomination.
5. If the Academic Committee does not approve, the nomination of the External Examiner is considered unsuccessful. Should this event arise, the process may proceed in a number of given ways:
 - a. Where, for whatever reason, a minor issue exists, the Provider or Moderation body (whoever is better equipped to deal with the issue) may be afforded time to rectify the problem. If, following this, the Committee is happy that the issue has been resolved, the nomination may be considered successful.
 - b. Where, for whatever reason, a major issue exists, the Academic Coordinator, Academic Committee and Moderation Body should take the relevant course of action. This is determined on a case-by-case basis.
6. If the Academic Committee approves, the nomination of the External Examiner is considered successful, the induction of the External Examiner may commence, and they are provided with information and documentation by the Academic Coordinator relevant to the given programme.
7. The Academic Coordinator, through consultation with the Managing Director, arranges remuneration for the services of the External Examiner.

Responsibility

1. The **Academic Coordinator** is responsible for the recruitment of External Examiners for the QQI TESOL Programme via contact with an external Moderation Body.
2. The **Moderation Body** is responsible for assigning Providers with External Subject-Matter Experts. The Moderation Body is also responsible for all administrative aspects of external moderation.
3. The **Academic Committee** is responsible for approving the nominated External Examiner.
4. The **External Examiner (or ‘Nominee’, prior to approval)**, is responsible for verifying and maintaining absolute impartiality as long as they remain in appointment to a Provider.

Version 1.0

Date Approved:

February 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).



The Bridge Mills Galway Language Centre 8.8 Procedure for External Examining		
QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners • Self-evaluation, Monitoring and Review 	
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners	
Policies this Procedure relates to	Policy for Assessment	
<p>Procedure</p> <p>The external examiner plays a key role in ensuring that assessment procedures are fit-for-purpose, valid, reliable, fair and consistent. External examination ensures the quality of the overall programme and learner performance, and highlights areas to be addressed or enhanced. The external examiner is also involved in the consideration of borderline cases. BMGLC welcomes recommendations and feedback from external examiners. The reports of external examiners are considered by the Exam Board, Programme Boards and the Academic Committee, and contribute to BMGLC's self-monitoring and review processes.</p> <p><i>Steps:</i></p> <ol style="list-style-type: none"> 1. In every instance, the external examiner is provided with the following: the module descriptor and MIPLOs, learner results, a record of internal moderation outcomes, assessment briefs, marking schemes & the internal verification report. 2. The external examiner randomly samples assessments from each band of attainment, and is additionally provided with any assessments which were problematic during internal moderation. 3. The external examiner determines if the learners' attainment is sufficient to meet the standards required for the relevant award in the discipline, and is appropriate to the marks/grades allocated. 4. The external examiner returns a report summarising the above and making any recommendations to the Programme Leader, for review and discussion at the subsequent meeting of the Exam Board. <p>N.B. The external examiner may additionally observe students undertaking teaching practice on a semi-regular basis. In those instances, the external examiner observes a live assessment process.</p>		
Version 1.0	Date Approved: February 2020	Approved by: Academic Committee
<p>Related legislation, regulation or guidelines:</p> <ul style="list-style-type: none"> • Assessment and Standards, Revised 2013 (QQI). • Core Statutory Quality Assurance Guidelines 2016 (QQI). • Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI). 		

<p>The Bridge Mills Galway Language Centre</p> <p>8.9 Procedures for Assessment Re-check, Review and Appeal or Complaint (QQI Programmes)</p>	
QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Assessment
<p>Procedure</p> <p><i>Definitions:</i></p> <p>Re-check: This refers to “the administrative operation of checking (again) the recording and combination of component scores for a module and/or stage” (QQI Assessment and Standards, Revised 2013, 4.10.3).</p> <p>Review: This refers to “the re-consideration of the assessment decision, either by the original assessor or by other competent persons” (QQI Assessment and Standards, Revised 2013, 4.10.3).</p> <p>Appeal: This refers to “a request to a higher authority for the alteration of the decision or judgement of a lower one” (QQI Assessment and Standards, Revised 2013, 4.10).</p> <p>Complaint: This refers, in the context of assessment, to “an expression of concern that a particular assessment procedure is unfair or inconsistent or not fit-for-purpose” (QQI Assessment and Standards, Revised 2013, 4.10).</p> <p><i>Notes:</i></p> <p>This procedure has been developed to reflect the requirements as specified by Assessment and Standards, Revised 2013, that:</p> <ul style="list-style-type: none"> • Deadlines for requests for re-checks and reviews should be no less than five working days following the issue of results. • Fees charged should be refunded in the event of a change in results. • Rechecks and reviews should be completed in time for the appropriate QQI grant of awards date. 	



Recheck Procedure

As required by Assessment and Standards, Revised 2013, assessment re-checks are managed directly by the responsible academic unit (the Programme team, supported by the Quality Officer).

Grounds for a Re-check

- The learner believes an error has been made in calculating their result

Steps:

1. The learner requests a re-check by emailing the school's Academic Coordinator (academic@galwaylanguage.com). The learner should include any relevant information pertaining to the requested re-check in the email.
2. Requests for re-checks should be submitted by learners within 10 days of being notified of results. BMGLC is not obliged to undertake re-checks requested more than 10 days after results notification.
3. The learner pays the re-check fee of €15 in the school office and is issued with a receipt. In the event of a successful re-check, this fee will be fully refunded.
4. The Quality Assurance Officer is notified of the request, and either undertakes the re-check or arranges for a suitably qualified person to do so. N.B. Re-checks are administrative checks of marks given and totalled, and do not require the exercise of academic judgement. However, persons undertaking a re-check must be able to use the marking scheme/rubric which informs them of how marks have been allocated.
5. The Quality Assurance Officer informs the learner in writing of the outcome of the re-check.
6. BMGLC endeavours to undertake and complete re-checks within 7 days of a request for re-check being received.
7. If a re-check results in a mark being raised or lowered, the Quality Assurance Officer will notify the Programme Leader and Academic Coordinator for the purpose of results amendment.

Review Procedure

As required by Assessment and Standards, Revised 2013, assessment reviews are overseen by BMGLC's Academic Committee. The Academic Committee delegates functional responsibility for handling reviews to the Quality Officer. The Quality Officer reports on all matters associated with reviews to the Academic Committee.

Grounds for a Review

QQI's Assessment and Standards, Revised 2013 states that "Learners are required to state the grounds for the requested review. The grounds for review will normally be that the learner suspects that the assessment was erroneous in some respect".

- The learner identifies that the academic procedures of BMGLC were not correctly implemented or followed, or that the assessment was erroneous in some respect.
- The learner identifies that compassionate circumstances exist which have not been considered by BMGLC or may not have been known by BMGLC. Evidence of these compassionate circumstances, clearly dated on or prior to the date of the assessment under consideration should be provided (for example, a medical certificate). Where evidence cannot be provided, BMGLC may consider the review, but is under no obligation to do so.



Steps:

1. The learner requests a review by emailing the school's Academic Coordinator (academic@galwaylanguage.com). The learner should include any relevant information pertaining to the requested review in that email, and attach any appropriate evidence (for example, a medical certificate).
2. Requests for reviews should be submitted by learners within 10 days of being notified of results. BMGLC is not obliged to undertake reviews requested more than 10 days after results notification.
3. The learner pays the review fee of €30 in the school office and is issued with a receipt. In the event of a successful review, this fee will be fully refunded.
4. The Quality Assurance Officer is notified of the request, and decides whether a review will be granted based on the grounds for review. The Quality Assurance Officer may consult with the Programme Leader and/or the Academic Coordinator, and may exercise judgement in relation to compassionate circumstances for which evidence cannot be provided.
5. If the review is granted, the Quality Assurance Officer allocates a qualified assessor who did not undertake the initial assessment to undertake the review.
6. BMGLC endeavours to undertake and complete reviews within 7 days of a request for review being received and granted.
7. The decision of the new assessor will supersede the decision of the original assessor.
8. If the learner is unhappy with the outcome of the review, and grounds for appeal exist, they may appeal the decision using the appeals process.
9. If a review results in a mark being raised or lowered, the Quality Assurance Officer will notify the Programme Leader and Academic Coordinator for the purpose of results amendment.
10. The Quality Assurance Officer informs the learner in writing of the outcome of the re-check.
11. The Quality Assurance Officer reports the outcome of all reviews to the Academic Committee.

Appeal Procedure

Grounds for an Appeal

BMGLC recognizes the right of learners to appeal assessment decisions made by the school *where grounds exist*. As required by QQI's Assessment and Standards, Revised 2013, BMGLC has transparent procedures in place for appeals.

Grounds for an appeal are as follows:

1. Evidence that BMGLC did not follow an established procedure in the making of a decision.
2. Circumstances or information of which the original decision-making body was not aware when its decision was taken, and a valid, substantiated reason why that information was not made available by the *appellant* (the person making the appeal).
3. Evidence of substantive bias by one or more of the decision-makers in arriving at a decision.

The following exclusions *do not* constitute grounds for an appeal:

1. Disagreement with a decision.
2. Disappointment with the result of an assessment or an opinion that a higher mark should have been obtained.



3. Complaints about persons or procedures, which must be addressed in the first instance under the school's complaints policy and procedure.
4. Reopening of a matter that has already been decided on in a previous appeals process.

Learners wishing to make an assessment appeal are referred to the BMGLC's Policy and Procedure for Appeals.

Complaints Procedure

As required by QQI's Assessment and Standards, Revised 2013, BMGLC has processes in place for dealing promptly with complaints made by learners concerning assessment. As per QQI's guidelines, this process is integrated with BMGLC's broader complaints policy and procedures.

Learners wishing to make an assessment complaint are referred to the BMGLC's Policy and Procedure for Complaints.

Version 1.0

Date Approved:
February 2020

Approved by:
Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

The Bridge Mills
Galway Language Centre

8.10 Policy for Extenuating Circumstances

QA Area (s)	Assessment of Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policy Owner	Academic Committee
Purpose The purpose of this policy is to ensure that learners are able to attempt assessment under fair and reasonable circumstances, and to avoid undue disadvantage to learners experiencing serious unforeseen circumstances.	
Scope This policy applies specifically to QQI validated programmes. Therefore, it is intended to interface with the programme specific assessment strategy of the QQI Level 7 SPA TESOL Certificate Programme.	
Policy As stated in BMGLC’s Policy for Assessment, BMGLC is committed to ensuring assessment is fair. BMGLC recognises that from time to time unforeseen circumstances can have an adverse impact on a learner’s performance, and that in such instances learners have the right to seek consideration of this in relation to the submission and/or marking of a specific piece of assessment. In such cases, learners can seek recognition of Extenuating Circumstances. <i>Definition:</i> Extenuating Circumstances are defined as being personal or medical emergencies or other unforeseen events. For example, becoming the victim of a crime, the bereavement of a close family member or partner or a domestic upheaval in the form of fire, burglary or eviction. To be considered extenuating, these circumstances must arise close to or during a summative assessment (typically, up to three days in advance). Evidence may be requested, at the discretion of BMGLC. While this policy endeavours to be sensitive of learner’s circumstances, it also seeks to ensure fairness for learners who meet prescribed deadlines, and therefore avoid abuse or inconsistency in application. Therefore, it is important to recognise that the following circumstances are not considered to represent Extenuating Circumstances: <ul style="list-style-type: none"> • Exam stress • The typical workload of the programme • Pre-existing factors • Relationship or financial difficulties • Commuting and transport issues • Paid employment or voluntary work 	



- IT and/or computer failure
- Sporting commitments
- Weddings or social events
- Holidays
- Minor illnesses such as a common cold

Learners granted recognition of extenuating circumstances must still demonstrate that they have achieved the learning outcomes in order to be awarded a pass mark for a module/programme. For this reason, recognition of extenuating circumstances typically involves learners:

- Being granted an extension.

OR

- Being granted a repeat attempt without a grading penalty.

Responsibility

- The **Learner** is responsible for disclosing their rationale for seeking Extenuating Circumstances.
- **All BMGLC staff** are responsible for ensuring disclosures by learners are handled respectfully, with discretion and regard to the absolute right of the learner to privacy and confidentiality.
- The **Academic Coordinator** and relevant **Programme Leader** are jointly responsible for identifying on a case by case basis whether Extenuating Circumstances can be recognised, and what alternative arrangements may be offered.
- In the event that Extenuating Circumstances create resource implications, the **Academic Coordinator** has responsibility for obtaining approval from the **Managing Director** for any associated expenditure.
- The **Academic Committee** has responsibility for approving this policy and associated procedures pertaining to Extenuating Circumstances.
- The **Academic Coordinator** with the help of the **Programme Leader** has ultimate responsibility for the implementation of policy and procedure pertaining to Extenuating Circumstances in the context of a specific programme.
- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Extenuating Circumstances to QQI's guidelines and policy statements, as well as those of relevant professional bodies.

Version 1.0

Date Approved:
February 2020

Approved by:
Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).



**The Bridge Mills
Galway Language Centre**

8.11 Procedure for Requesting Consideration of Extenuating Circumstances

QA Area (s)	Assessment of Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Extenuating Circumstances
<p>Overview</p> <p>Extenuating circumstances are a rare occurrence in which a case of Force Majeure impacts a learner's performance or ability to sit or complete an assessment. In the context of BMGLC, extenuating circumstances only apply to the QQI TESOL Programme, as assessment in ELE programmes is formative in nature, and is not the only determiner in demonstrating a learner's progress or achievement of learning outcomes. While the school does offer a number of exam classes (e.g. Cambridge, IELTS, TIE), extenuating circumstances in these cases are validated and governed by the examination/awarding body. BMGLC does not have the authority to exercise judgment on behalf of external examination bodies.</p> <p>Where unforeseen circumstances do arise, which may have an adverse effect on a learner's performance or ability to sit or complete an assessment, the learner can request consideration of extenuating circumstances, which are dealt with by the school on a case-by-case basis.</p> <p>Procedure</p> <ol style="list-style-type: none"> 1. Where a learner feels they have been impacted by an extenuating circumstance, they can make a written request to the school to be considered for extenuating circumstances. <ol style="list-style-type: none"> a. The written request must include: <ul style="list-style-type: none"> - Information about the extenuating circumstance. - When the extenuating circumstance occurred. - The impact of the extenuating circumstance. - What outcome(s) the learner is looking for with respect to their extenuating circumstance. (e.g. re-take an assessment at a later date) b. Under normal circumstances, requests should be submitted to the school <u>within three days</u> of the relevant assessment. However, BMGLC understands that each situation is different and will take consideration of the circumstances of each respective request. c. Where necessary, the learner should submit reasonable evidence of their extenuating circumstance to support their request. If evidence is not submitted, it 	



may be requested by the school. If, upon request by the school, the learner still does not submit evidence of their extenuating circumstance, their request may be denied. Should the learner wish to appeal this decision, they may choose to invoke the school's *Policy and Procedure for Appeals*.

2. Upon receipt of a request for consideration of extenuating circumstances, the Programme Leader and Academic Coordinator review and evaluate the case, making a joint decision as to whether the learner's situation constitutes an extenuating circumstance. (Please refer to the *Policy for Extenuating Circumstances* for examples of what is and is not considered to be an extenuating circumstance). Consultation with Managing Director may also be sought where extra expense may be incurred by the facilitation of an extenuating circumstance.
3. If the Programme Leader and Academic Coordinator conclude that the learner's situation does constitute an extenuating circumstance, the learner will be notified within five working days. All other relevant persons (e.g. assessors) will also be notified, though the specifics of the extenuating circumstance will remain confidential.
4. Learners granted recognition of extenuating circumstances must still demonstrate that they have achieved the learning outcomes to be awarded a pass mark for a module/programme.

This applies whether the extenuating circumstance relates to a written assessment or teaching practice. For this reason, recognition of extenuating circumstances typically involves learners:

- a. Being granted an extension or deferral, *or*
 - b. Being granted a repeat attempt without a grading penalty.
5. If the Programme Leader and Academic Coordinator conclude that the learner's situation does not constitute an extenuating circumstance, the learner will be notified within five working days. In this instance, all normal penalties will apply.
 6. If the learner chooses to appeal this decision, they may invoke the school's *Policy and Procedure for Appeals*.
 7. Where a student is in need of support or guidance as a result of their extenuating circumstance, the Student Support Officer may provide information and/or advice.

Responsibility

- The **Learner** is responsible for disclosing their rationale for seeking Extenuating Circumstances.
- **All BMGLC staff** are responsible for ensuring disclosures by learners are handled respectfully, with discretion and regard to the absolute right of the learner to privacy and confidentiality.
- The **Academic Coordinator** and relevant **Programme Leader** are jointly responsible for identifying on a case-by-case basis whether Extenuating Circumstances can be recognised, and what alternative arrangements may be offered.
- In the event that Extenuating Circumstances create resource implications, the **Academic Coordinator** has responsibility for obtaining approval from the **Managing Director** for any associated expenditure.
- The **Academic Committee** has responsibility for approving this Procedure and its associated Policy pertaining to Extenuating Circumstances.
- The **Academic Coordinator** with the help of the **Programme Leader** has ultimate responsibility for the implementation of Policy and Procedure pertaining to Extenuating Circumstances in the context of a specific programme.



- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC policy and procedure pertaining to Extenuating Circumstances to QQI's guidelines and policy statements, as well as those of relevant professional bodies.

Version 1.0

Date Approved:

February 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

The Bridge Mills Galway Language Centre 8.12 Policy for Reasonable Accommodation & Additional Support	
QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners • Supports for Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policy Owner	Academic Committee
Purpose <p>The purpose of this policy is to recognize that prospective and enrolled learners at BMGLC are diverse and may at times require reasonable accommodations and additional supports to facilitate their full and equitable participation in the programmes delivered by the school.</p>	
Scope <p>This policy applies to all programmes at BMGLC. It further applies to all staff involved in teaching, support and administrative roles at BMGLC who have contact with learners.</p>	
Policy <p>BMGLC is committed to facilitating fair, equitable and accessible participation in learning and assessment for learners with disabilities, learning differences or medical conditions. Accordingly, BMGLC will make Reasonable Accommodations and provide Additional Supports for learners as far as is reasonably practicable. Learners and prospective learners at BMGLC are encouraged to disclose any specific or additional needs to BMGLC’s representatives in order to facilitate this. BMGLC and its staff will at all times strive to provide a supportive and inclusive learning environment.</p> <p>BMGLC does not have the expertise or capacity to undertake medical or psychological assessments, or to determine the supports required to accommodate the needs of learners who seek reasonable accommodations or additional support (defined as actions taken to alleviate substantial disadvantage due to disabilities, learning differences or medical conditions). Therefore, BMGLC will, under normal circumstances, require learners seeking reasonable accommodations or additional supports to provide documentation from a medical consultant or educational psychologist. This documentation should include recommendations regarding the form or nature of the accommodations or supports required.</p> <p>Following the disclosure of specific or additional needs to BMGLC by a learner, the allocation of reasonable accommodations and additional supports will be guided by the following principles:</p>	

Principles Guiding Reasonable Accommodation & Additional Support

- Reasonable Accommodations and/or Additional Supports remove disadvantages.
- Reasonable Accommodations and/or Additional Supports do not provide advantages.
- BMGLC reserves the right to require that appropriate evidence of a disability, learning difference or medical condition be submitted by the learner before committing to the facilitation of Reasonable Accommodations and/or Additional Supports.
- BMGLC reserves the right to decide what is reasonable.
- Reasonable Accommodations and/or Additional Supports cannot, under normal circumstances, be applied retrospectively.

On QQI Programmes:

- Reasonable Accommodations for assessment activities will be restricted to the minimum changes/amendments required, and will not dilute the standard of learning to be obtained.
- All learners, including those requiring Reasonable Accommodations, must demonstrate attainment of learning outcomes in order to pass.

Where Reasonable Accommodations and/or Additional Supports are deemed practicable and reasonable, they will be provided by BMGLC. Within reasonable limitations, BMGLC will strive to provide these at no additional cost to the learner. Examples of accommodations and supports are:

- Extra time in assessment
- Spelling waivers
- Advance access to learning materials and course readings
- Changes to font types or sizes
- Changes to the assessment/examination environment
- Use of assistive technology

Exclusions

BMGLC does not have the authority to exercise judgement on behalf of externally validated or administered testing and examination bodies. These include, but are not limited to Cambridge, IELTS and TIE. These tests and examinations are therefore not within the scope of this policy. Learners seeking reasonable accommodations on such tests or examinations are therefore required to follow the processes of the relevant body.

Responsibility

- The **Learner** is responsible for disclosing their rationale for seeking Reasonable Accommodation and/or Additional Support. The **Learner** is also responsible for permitting further disclosure by BMGLC to relevant members of staff (for example, teachers and assessors) where this is necessary to facilitate provision of the Reasonable Accommodation and/or Additional Support.
- **All BMGLC staff** are responsible for ensuring disclosures by learners are handled respectfully, with discretion and regard to the absolute right of the learner to privacy and confidentiality.



- The **Student Support Officer**, **Academic Coordinator** and relevant **Programme Leader** are jointly responsible for identifying on a case by case basis what practicable and reasonable supports and accommodations can be provided to a learner, and for ensuring these are implemented consistently.
- Where Reasonable Accommodation & Additional Support needs have significant resource implications, the **Academic Coordinator** has responsibility for obtaining approval from the **Managing Director** for any associated expenditure.
- The **Academic Committee** has responsibility for approving this policy and associated procedures pertaining to Reasonable Accommodation & Additional Support.
- The **Academic Coordinator** with the help of the **Programme Leader** has ultimate responsibility for the implementation of policy and procedure pertaining to Reasonable Accommodation & Additional Support in the context of a specific programme.
- The **Student Support Officer** and **Quality Officer** are jointly responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Reasonable Accommodation & Additional Support to QQI's guidelines and policy statements, as well as those of relevant professional bodies.

Version 1.0

Date Approved:
February 2020

Approved by:
Academic Committee

Related legislation, regulation or guidelines:

- Assessment and Standards, Revised 2013 (QQI).
- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
- Principles, Guidelines and Procedures for the Granting of Reasonable Accommodations in Examinations to Students with Disabilities, June 2019 (Disability Advisors Working Network - DAWN)
- Charter for Inclusive Teaching and Learning (AHEAD)



**The Bridge Mills
Galway Language Centre**

8.13 Procedure for Requesting Reasonable Accommodation and/or Additional Support

QA Area (s)	<ul style="list-style-type: none"> • Assessment of Learners • Supports for Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Reasonable Accommodation & Additional Support

Overview

This Procedure details the steps by which a learner with a disability, learning difference or medical condition may disclose any specific or additional needs, or request provision of support or accommodation. Accordingly, it also details how disclosures and/or requests are handled by school staff.

This procedure applies to all learners in QQI and English/Foreign Language Programmes at Bridge Mills Galway Language Centre. It further applies to all staff involved in teaching, support and administrative roles at the school who have contact with learners. However, the school does not have the authority to exercise judgement on behalf of externally validated or administered testing and examination bodies. These include, but are not limited to, Cambridge, TIE, and IELTS. Learners seeking reasonable accommodations on such tests or examinations are therefore required to follow the processes of the relevant body. Where a learner’s request for reasonable accommodation and/or additional support in external examinations is accepted by the examination body, Bridge Mills Galway Language Centre will act upon the specific advices of the body as much as is reasonably possible.

Procedure

1. Learners or Prospective Learners with disabilities, learning differences or medical conditions are encouraged to contact the office if they wish to disclose any specific or additional needs, or make a request for reasonable accommodation. Learners have the option of doing so formally in writing at the point of application or enrolment.
 - a. While learners can make disclosures and requests at any time, we encourage them to do this as early as possible to give the school sufficient time to arrange appropriate supports.
 - b. Learners may also disclose information or make a request verbally to a staff member. Where a learner is requesting an accommodation related to a piece of assessment, the staff member will advise the learner that in order for the accommodation to be made, the disclosure must be formally made to the school. Additional support needs, if minor, may not require a learner to make a formal disclosure. Examples of minor support needs would include being seated close to



- the board/screen/teacher/audio due to visual or auditory impairments, or not being asked to stand/move frequently during classes.
- c. Learner disclosures are always handled with discretion and with regard to the absolute right of the learner to privacy and confidentiality.
2. Formal requests for reasonable accommodation and/or additional support will be sent to either the Programme Leader, Academic Coordinator, or Student Support Officer, as appropriate, and should include:
 - a. Information about the learner’s disability, learning difference or medical condition.
 - b. Information about how the learner may be impacted or disadvantaged without accommodations or support.
 - c. The provisions they are requesting from the school in relation to reasonable accommodation and/or additional support.
 - d. Documentation from a medical consultant or educational psychologist providing evidence of the learner’s disability or condition. (Where evidence is not provided, it may be requested by the school).
 3. Should a learner require assistance in completing their request, identifying their needs or obtaining any evidence, the Student Support Officer, Academic Coordinator or Programme Leader are available as needed.
 4. The Programme Leader, Academic Coordinator, and Student Support Officer are jointly responsible for reviewing disclosures and requests on a case-by-case basis, and identifying what practicable and reasonable supports and accommodations can be provided to a learner that do not compromise the learning outcomes of the relevant programmes. This may also involve consultation with Managing Director where extra expense may be incurred by the implementation of supports.
 5. Once the learner’s request has been reviewed, the learner is informed of the outcome within five working days of submission of their request.
 6. Where the request is accepted, the learner is informed of any supports and arrangements put in place, and it is confirmed with the learner that they are happy for necessary disclosures to be made as required (e.g. to assessors).
 7. Where the request is denied, the learner is informed how and why the decision was made.
 8. A learner may appeal a decision by invoking the school’s *Policy and Procedure for Appeals*.

Version 1.0	Date Approved: February 2020	Approved by: Academic Committee
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- Related legislation, regulation or guidelines:**
- Assessment and Standards, Revised 2013 (QQI).
 - Core Statutory Quality Assurance Guidelines 2016 (QQI).
 - Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).
 - Principles, Guidelines and Procedures for the Granting of Reasonable Accommodations in Examinations to Students with Disabilities, June 2019 (Disability Advisors Working Network - DAWN)
 - Charter for Inclusive Teaching and Learning (AHEAD)

9. Supports for Learners

<p>The Bridge Mills Galway Language Centre</p> <p>9.1 Policy for Learner Support</p>	
QA Area (s)	<ul style="list-style-type: none"> • Supports for Learners
Applies to	<input type="checkbox"/> Staff only <input checked="" type="checkbox"/> <i>Learners only</i> <input type="checkbox"/> Staff and learners
Policy Owner	Student Support Officer
<p>Policy</p> <p>BMGLC is committed to providing all learners with a fair, accessible and supportive learning environment which allows them to study effectively and with minimum disruption. This is done through careful consideration of learner needs, which are routinely monitored through ongoing learner feedback.</p> <p>This document outlines the systems and resources available to all learners enrolled at BMGLC, which are routinely monitored, reviewed and updated.</p> <p>1. Learning Environment</p> <p>The school is dedicated to creating a positive, safe and supporting learning environment, providing students with reasonable access to support services and routinely serviced facilities. The school monitors and acts upon learner feedback in relation to this on an ongoing basis.</p> <p>2. Learner Induction</p> <p>On day one of each new programme, all new students are given an induction talk in the school by the Student Support Officer. This gives new students an opportunity to meet other new students, and to receive important information pertinent to their time in the school. The induction talk covers a broad range of subject including:</p> <ul style="list-style-type: none"> • Details about the school and classes • How to deal with issues in class • How to deal with host family issues • Information on visa applications for visa-requiring students • Details about the Exit Exam which visa-requiring students must take • School Social Programme 	



- Borrowing books in the school
- The Students Room
- Bike and Car hire in Galway

3. Student Handbook

All students are provided with a Student Handbook at the point of enrolment. This Handbook includes information about:

- Things to do in Galway
- School Activities
- Cultural Norms
- Study Advice
- Tests and Exams
- Visa rules
- Safety information
- Host family and Accommodation
- Additional Support Services

4. Counselling Services

Student welfare is considered a top priority at Bridge Mills Galway Language Centre, and any student who is experiencing difficulty or distress during their time in the school is encouraged to talk to the Student Support Officer, who can advise on external counselling services. This information is also available in the Student Handbook which is provided to every student upon enrollment.

5. Student Support Officer

The Student Support Officer has responsibility for the coordination and delivery of high-quality student support at Bridge Mills Galway Language Centre. He/She is an important point of contact for learners on a day-to-day basis, and takes functional responsibility for coordinating the collection of learner feedback and the logging of learner complaints.

The Student Support Officer works in the school's office and is available to talk to in the office throughout the day, or can be contacted via email (support@galwaylanguage.com).

6. Complaints & Appeals

An integral part of the school's Quality Assurance Framework is the development and implementation of Policies and Procedures addressing learner complaints and appeals. These can be invoked by any learner who feels they may have been unfairly disadvantaged. Please refer to the school's Quality Assurance Manual for specific Policies and Procedures regarding complaints and appeals.

7. Learner Representation



The Academic Committee is due to meet three times in any given year, and each meeting of the Committee will have a learner representative who can provide valuable insight and feedback on behalf of the student body. This representation ensures that learners enrolled in Bridge Mills Galway Language Centre are given an active voice, reinforcing the school's commitment to open communication and transparency.

8. Students Room, Library and Computers

The school provides students with a functional Students Room, fitted with free-to-use computers, photocopier, water cooler, tables and chairs for studying, and noticeboards with information pertinent to their time in the school. The school also provides free WiFi to all students.

The school operates a book borrowing scheme, whereby students can request to borrow any book available to them in the school and are charged a €5 deposit. This deposit is refunded when the student returns the book, provided the book is in the same good condition as when they borrowed it.

9. Access to Information

All learners have a right to request access to information relevant to their time in the school. Learners wishing to request information pertaining to their visa, counselling, support services, attendance, classes or performance in school are asked to go to the office, where the Student Support Officer and Academic Coordinator are on hand to assist. Where a student is wishing to get involved in the school's social programme, sign up for workshops, travel in or around Ireland, get information on services in Galway, or has questions or feedback on school facilities, Members of Office Staff, the Office Manager, the Student Support Officer, and the Academic Coordinator are on hand to assist.

Responsibility

1. All **learners** are responsible for acting upon information and resources provided to them relevant to their time in the school, or as a result of a request.
2. The **Student Support Officer** has responsibility for the coordination and delivery of high-quality student support at Bridge Mills Galway Language Centre, and should be available on a day-to-day basis to guide or assist students where necessary.
3. The **Academic Coordinator** is responsible for the promotion of excellence in student support, dealing directly with student queries or issues, reviewing student feedback and developing action plans as appropriate.
4. All **Members of Staff** are responsible for assisting learners where assistance is clearly needed or requested.

Version 1.0

Date Approved:
February 2020

Approved by:
Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

10. Information and Data Management

10.1 Data Protection Policy – Organisation

Everyone has rights with regards to how their personal information is handled. During Bridge Mills Galway Language Centre activities we may collect, store and process personal information about staff, students, guardians, host families, educational partners, clients and service providers, and recognise the need to treat this data in an appropriate and lawful manner. Bridge Mills Galway Language Centre is committed to complying with its obligations in respect to all personal data it handles.

The school will identify key data that will be used as key performance indicators e.g. minimum and maximum learner numbers per programme, learner progression/learner attrition or drop-out rates, completion rates, graduation / certification rates including grade analysis and career paths of graduates where appropriate. This data will be analysed appropriately and reviewed by the Academic Committee and reported to the Board as performance indicators.

The types of personal data that Bridge Mills Galway Language Centre may be required to handle includes details of current, past and prospective employees, students, guardians, educational partners, host families, suppliers, customers and others that Bridge Mills Galway Language Centre communicates with. The information, which may be held on paper or on a computer or other media is subject to certain legal safeguards specified in the General Data Protection Regulation (GDPR) (EU) 2016/679 and other regulations. The GDPR impose restrictions on how Bridge Mills Galway Language Centre may collect and process data.

In accordance with GDPR, Patrick Creed is the designated 'Data Protection Lead' (DPL) within Bridge Mills Galway Language Centre and is responsible for all aspects of the Data Protection Policy and implementation of same.

This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action up to and including dismissal.

Purpose and Scope of the Policy

This policy sets out Bridge Mills Galway Language Centre's rules on data protection and the legal conditions that must be satisfied in relation to the collection, obtaining, handling, processing, storage, transportation and destruction of personal and sensitive information.

If an individual considers that the policy has not been followed in respect of personal data about themselves or others, they should raise the matter with the DPL.

Definition of Data Protection Terms

Data – Information which is stored electronically, on a computer, or in certain paper-based filing systems. This includes IT systems and CCTV systems.

Data Subjects - For the purposes of this document includes all living individuals about whom Bridge Mills Galway Language Centre holds personal data.

Personal Data – Data relating to a living individual who can be identified from the data (or from that data and other information that is in, or likely to come into the possession of the data controller). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal).

Data controllers – The individuals or organisations who control and are responsible for keeping and use of data.

Data users – Employees whose work involves using personal data. Data users have a duty to protect the information they handle by following Bridge Mills Galway Language Centre’s data protection security policies at all times.

Processing – Performing any operation or set of operations on data including: -

Obtaining, recording or keeping data

Collecting, organising, storing, altering or adapting the data

Retrieving, consulting or using the data

Disclosing the information or data by transmitting, disseminating or otherwise making it available

Aligning, combining, blacking, erasing or destroying the data

Sensitive personal data – Information about a person’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health condition or sexual life, criminal convictions or the alleged commission of an offence. Sensitive personal data can only be processed under strict conditions and will usually require the express consent of the person concerned.

Data Protection Principles

Anyone processing personal data must comply with the eight enforceable principles of good practice. These provide that personal data must be: -

Obtained and processed fairly

GDPR’s are intended not to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject. The data subject must be told who the DPL is, in this case Patrick Creed, the purpose for which the data is to be processed by Bridge Mills Galway Language Centre and the identities of anyone to whom the data may be disclosed or transferred.

For personal data to be processed lawfully, certain conditions must have been met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, more than one

condition must be met. In most cases the data subject's explicit consent to the processing of such data will be required.

Kept only for one or more specified, explicit and lawful purposes

Personal data may only be processed for the specific purposes notified to the data subject when the data was first collected or for other purposes specifically permitted by GDPR. This means that personal data must not be collected for one purpose and used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject must be informed of the new purpose before any processing occurs. Any employee personal data collected by Bridge Mills Galway Language Centre is used for ordinary Human Resources purposes. Where there is a need to collect employee data for another purpose, Bridge Mills Galway Language Centre will notify the employee of this and where it is appropriate will get employee consent to such processing.

Used and disclosed only in ways compatible with these purposes

Personal data should only be collected to the extent that it is required for the specific purposes notified to the data subject. Any data which is not necessary for that purpose should not be collected in the first place.

Kept safe and secure

Bridge Mills Galway Language Centre and its employees must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

GDPR require Bridge Mills Galway Language Centre to put in place procedures and technologies to maintain the security of all personal data. Personal data may only be transferred to a third-party data processor if the third party has agreed to comply with those procedures and policies or has adequate security measures in place.

The following must be maintained: -

Confidentiality – Only people authorised to use the data can access it. Bridge Mills Galway Language Centre will ensure that only authorised persons have access to an employees' personal file and any other personal or sensitive data held by Bridge Mills Galway Language Centre. Employees are required to maintain the confidentiality of any data to which they have access.

Integrity – Personal data is accurate and suitable for the purpose for which it is processed.

Availability – Only authorised users should be able to access the data if they need it for authorised purposes

Security Policy / Procedures include: -

Secure lockable desks and cupboards. - Clear desk policy, all desks and cupboards remain locked when not in use. (Personal information is always considered confidential) and treated with extra precautions ensuring no one can see work that contains the same.

Methods of disposal. – Paper documents must be shredded. All removable media should be wiped and physically destroyed when no longer required.

Equipment – Data users should ensure that individual monitors do not show confidential information to passers-by and that the screen saver starts as soon as their PC is unattended.

ISO 27001 – Compliance is required to all Policies with regards to ISO27001, including the IT Security Policy documents.

Kept accurate, complete and up to date

Personal data must be accurate and kept up to date. Information which is incorrect, or misleading is not accurate, and steps should be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data should be destroyed. Employees should ensure that they notify the DPL and Human Resources of any relevant changes to their personal information so that it can be updated and maintained accurately. Examples of relevant changes to data would include a change of address.

Adequate, relevant and not excessive

Retained for no longer than is necessary for the purpose or purposes for which it was collected

Personal data should not be kept longer than is necessary for the purpose. For guidance in relation to data retention to data retention employees should contact their manager. Bridge Mills Galway Language Centre has various legal obligations to keep certain employee data for a specified period. In addition, Bridge Mills Galway Language Centre may need to retain personal data for a period to protect its legitimate interests.

Provided to data subjects as requested

Data must be processed in line with data subject's rights. Data subjects have a right to: -

Request access to any data held about them by the Data Controller

Prevent the processing of their data for direct marketing purposes

Ask to have inaccurate data amended

Prevent processing that is likely to cause or distress to themselves or anyone else

Dealing with Subject Access Requests

A formal request from a data subject for information that Bridge Mills Galway Language Centre holds about them must be made in writing. Any employee who receives a written request in respect of data held by Bridge Mills Galway Language Centre should forward it to the Data Controller.

Providing Information Over the telephone

Any employee dealing with telephone enquiries should be careful disclosing any personal information held by Bridge Mills Galway Language Centre over the phone. The employee should: -

Check the identity of the caller to ensure that information is only given to a person who is entitled to that information

Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified

Refer the request to their manager and/or the Data Controller for assistance in difficult situations. No employee should feel forced into disclosing personal information.

Direct Marketing

At Bridge Mills Galway Language Centre, it is our policy not to contact any potential individuals without their permission. To comply with this policy, our pre-sales employees are requested to ensure the following: -

Do not call or email another organisation until it is confirmed that they have a web presence or already in the public domain with their contact details such as address and telephone number published on the same.

When a call is made, permission must be sought to get the correct contact information such as the relevant decision maker with regards to IT purchasing. A record must be kept of whom our employee spoke to and date and time of the call.

All email contact must contain an 'Opt-Out' clearly identified options.

We do not market via Postal, Text or Fax.

All Opt-Outs must be respected (telephone or electronic) by deleting the contact permanently.

Policy Review

Bridge Mills Galway Language Centre will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives on at least an annual basis and more frequently if required considering changes in the law and organisational or security changes.

10.2 Data Protection Policy - Employees

Bridge Mills Galway Language Centre processes personal data of all employees. Bridge Mills Galway Language Centre will process all such data in accordance with the General Data Protection Regulation (GDPR) in force from 25th May 2018.

The purposes for which we process the personal data on employees are: -

To manage the progression of each employee throughout their tenure of employment

To ensure that correct training and development is provided

To ensure employees are correctly rewarded for their service to the appropriate bank accounts

To engage with Revenue for payment of employment taxation

To comply with all relevant law

To ensure contact details of employees are available if required for the purpose of providing our services

To manage any disputes, should they arise

To ensure a next of kin can be contacted if required

Bridge Mills Galway Language Centre share employee details with external bodies such as Revenue, Social Welfare, outsourced Employment Law advisors, auditors, pension brokers & trustees and insurers.

Bridge Mills Galway Language Centre does not transfer any employee personal data to a 3rd country.

Bridge Mills Galway Language Centre ensures all employees personal data is processed subject to sufficient organisational and technical safeguards to protect employee data.

Types of Personal Data (i.e. any information relating to an identified or identifiable person)		Legal Basis	Retention Period
Demographic Data	e.g. name, date of birth, age,	Contract	End of Employment plus 7 years
Contact Details	e.g. home/work landline phone number, personal/work mobile, home/work postal address, personal/work email address	Contract	End of Employment plus 7 years



Financial Data	e.g. bank account number, credit card number	Contract	End of Employment, when P45
Digital Identifiers	e.g. IP Address, MAC Address, X/Y Geographic Coordinate, meta data	Contract	End of Employment
Social Media	URL LinkedIn,	Consent	End of Employment
Special Data	e.g. data relating to racial or ethnic origin, political, religious or, philosophical beliefs, trade union membership, health, sexual life or orientation, genetic or biometric data	Not Collected	Not Collected
Criminal Offences/Convictions	N/A	N/A	N/A
Government Identifiers	driver's licence, income tax number	Contract	End of Employment plus 7 years for Income Tax, End of Employment plus 1 year for driving license
Time Records	Timesheets	Compliance	3 Years

I.I Right to Erasure

When have I the right to all my personal data being deleted by Bridge Mills Galway Language Centre?

You have the right to have your personal data deleted without undue delay if: -

The personal data is no longer necessary in relation to the purpose(s) for which it was collected/processed

You are withdrawing consent and where there is no other legal ground for the processing

You object to the processing and there are no overriding legitimate grounds for the processing

The personal data has been unlawfully processed

The personal data must be erased so that we are in compliance with legal obligation

The personal data has been collected in relation to the offer of information society services with a child

What happens if Bridge Mills Galway Language Centre has made my personal data public?

If we have made your personal data public, we, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform those who are processing your personal data that you have requested the erasure.

What happens if Bridge Mills Galway Language Centre has disclosed my personal to third parties?

Where we have disclosed your personal data in question to third parties, we will inform them of your request for erasure where possible. We will also confirm to you details of relevant third parties to whom the data has been disclosed where appropriate.

I.II Right to Data Portability

When can I receive my personal data in machine readable format from Bridge Mills Galway Language Centre?

You will receive your personal data concerning you in a structured, commonly used and machine-readable format if: -

processing is based on consent.

processing is carried out by automated means.

Would Bridge Mills Galway Language Centre transfer the personal data to another service provider if I requested this?

We can transfer this data to another company selected by you on your written instruction where it is technically feasible taking account of the available technology and the feasible cost of transfer proportionate to the service we provide to you.

Under what circumstances can Bridge Mills Galway Language Centre refuse?

You will not be able to obtain, or have transferred in machine-readable format, your personal data if we are processing this data in the public interest or in the exercise of official authority vested in us.

Will Bridge Mills Galway Language Centre provide me with my personal data if the file contains the personal data of others?

We will only provide you with your personal data, ensuring we protect the rights and freedoms of others. Where personal data of another person may be on the same files as yours, we will redact the full details of the other person.

Contact us at director@galwaylanguage.com

I.III Right for Automated Individual Decision Making including Profiling

What are my rights in respect of Automated Decision making?

Bridge Mills Galway Language Centre does not have any automated decision-making processes. Where any such processes are introduced, we will provide you with the relevant information required under the “General Data Protection Regulation”.

I.IV Right to Object

Have I already been informed about my right to object?

We have informed you of your right to object prior to us collecting any of your personal data as stated in our privacy notice.

When can I object to Bridge Mills Galway Language Centre processing my personal data?

You can object on grounds relating to your situation.

Bridge Mills Galway Language Centre] will stop processing your personal data unless: -

we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

the processing is for the establishment, exercise or defence of legal claims.

What are my rights to object for direct marketing purposes?

Where your personal data is processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, we will no longer process this data for such purposes.

What are my rights to object in the use of information society services?

In the context of the use of information society services, you may exercise your right to object by automated means using technical specifications.

Contact us at director@galwaylanguage.com

I.V Right to Restriction of Processing

When can I restrict processing?

You may have processing of your personal data restricted: -

While we are verifying the accuracy of your personal data which you have contested.

If you choose restricted processing over erasure where processing is unlawful.

If we no longer need the personal data for its original purpose but are required to hold the personal data for defence of legal claims.

Where you have objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our legitimate grounds override.

What if Bridge Mills Galway Language Centre has provided my personal data to third parties?

Where we have disclosed your personal data in question to third parties, we will inform them about the restriction on the processing, unless it is impossible or involves disproportionate effort to do so.

How will I know if the restriction is lifted by Bridge Mills Galway Language Centre and/or relevant third parties?

We will inform on an individual basis when a restriction on processing has been lifted.

Contact us at director@galwaylanguage.com

I.VI Right of Rectification Policy

What can I do if Bridge Mills Galway Language Centre is holding incorrect personal data about me?

Where you suspect that data we hold about you is inaccurate, we will on demand rectify any inaccuracies without undue delay and provide confirmation of same.

What happens if Bridge Mills Galway Language Centre has disclosed my personal to third parties?

Where we have disclosed inaccurate personal data to third parties, we will inform them and request confirmation that rectification has occurred. We will also provide you with details of the third parties to whom your personal data has been disclosed.

Contact us at director@galwaylanguage.com

I.VII Right to withdraw Consent

Under what circumstances could I withdraw consent?

You can withdraw consent if we are processing your personal data based on your consent.

When can I withdraw consent?

You can withdraw consent at any time.

If I withdraw consent what happens to my current data?

Any processing based on your consent will cease upon the withdrawal of that consent. Your withdrawal will not affect any processing of personal data prior to your withdrawal of consent, or any processing which is not based on your consent.

Contact us at director@galwaylanguage.com

I.VIII Right to lodge a complaint

Can I lodge a complaint with the Data Protection Commissioner?

You can lodge a complaint with the Data Protection Commissioner in respect of any processing by or on behalf of Bridge Mills Galway Language Centre of personal data relating to you.

How do I lodge a complaint?

Making a complaint is simple and free. All you need to do is write to the Data Protection Commissioner giving details about the matter. You should clearly identify the organisation or individual you are complaining about. You should also outline the steps you have taken to have your concerns dealt with by the organisation, and what sort of response you received from them. Please also provide copies of any letters between you and the organisation, as well as supporting evidence/material.

What happens after I make the complaint?

The Data Protection Commissioner will then take the matter up with Bridge Mills Galway Language Centre on your behalf.

I.IX Right of Access Policy

When do I have the right to access my personal data from Bridge Mills Galway Language Centre

Where Bridge Mills Galway Language Centre process any personal data relating to you, you have the right to obtain confirmation of same from us, and to have access to your data.

What information will Bridge Mills Galway Language Centre provide to me?

If we are processing your personal data you are entitled to access a copy of all such personal data processed by us. We will also provide the following information including your full rights under Data Protection: -

why we are processing your personal data

the types of personal data concerned

the third parties or categories of third parties to whom the personal data have been or will be disclosed. We will inform you if any of the third parties are outside the European Economic Area (EEA) or international organisations

how your personal data is safeguarded where we provide your personal data outside the European Economic Area or to an international organisation

the length of time we will hold your data or if not possible, the criteria used to determine that period

your rights to: -

request any changes to inaccurate personal data held by us.

have your personal data deleted on all our systems.

restriction of processing of personal data concerning you.

to object to such processing.

data portability.

your right to lodge a complaint with the Data Protection Commission info@dataprotection.ie

where we have collected your personal data from a third party, we will provide you with the information as to our source of your personal data.

any automated decision-making, including profiling which includes your personal data. We will provide you with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

How long will it take to receive my personal data from Bridge Mills Galway Language Centre?

We will provide you with a copy of the personal data we are currently processing within 30 days of request. In rare situations if we are unable to provide you with the data within 30 days we will notify you, within 10 days of your request, explaining the reason for the delay and will commit to delivery within a further 60 days. i.e. 90 days in total.

How much will it cost me to receive my personal data?

We will not charge for providing your personal data unless we believe the request is excessive and the cost of providing your data is disproportionate to your services provided.

Can I request additional copies of my personal data?

If you require additional copies we will charge €20 to cover our administrative costs.

Can I receive my personal data electronically?

You can request your personal data by electronic means and we will provide your personal data in a commonly used electronic form if technically feasible.

What will Bridge Mills Galway Language Centre do if another person's personal data is shared with my personal data?

We will only provide you with your personal data, ensuring we protect the rights and freedoms of others. Where personal data of another person may be on the same files as yours, we will redact the full details of the other person.

Contact us at director@galwaylanguage.com



Bridge Mills Galway Language Centre will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives on at least an annual basis and more frequently if required considering changes in the law and organisational or security changes.

Signed: Patrick Creed

Date: 28/05/2019

ISMS Policy Owner: Bridge Mills Galway Language Centre

10.3 Data Protection Governance Framework

Purpose

GDPR places onerous accountability obligations on controllers and processors to demonstrate compliance.

The purpose of the Data Protection Governance Framework is to ensure Bridge Mills Galway Language Centre has good governance in the management of personal data processed as a controller and a processor.

Objective

To ensure personal data processed as a controller and/or a processor is monitored, controlled and recorded by the appropriate members of Bridge Mills Galway Language Centre throughout the lifecycle from creation, processing, storage, transmission, deletion and destruction of personal data. Privacy by design and data protection by default must be standard practice for processing all personal data within Bridge Mills Galway Language Centre.

To provide an accountability approach by: -

Documenting policies and procedures to be implemented by all staff

Building a culture of data protection in the office, on client site and while transferring data

Educating all staff to ensure data protection encompasses the whole lifecycle of data in use, in transit and in rest whether physical or logical

Providing the infrastructure for ongoing, efficient data protection management

Developing a data protection risk mitigation strategy (specifically for the individual)

Embedding data protection risk management throughout Bridge Mills Galway Language Centre

Empowering Partners and Managers to assume responsibility for ensuring maintenance of Accountability Framework.

Scope

The scope of this policy is to cover all categories of personal data held on various data subjects including but not limited to: -

Students

Guardians

Teachers

Educational Partners

Host Families

Potential candidates for employment

Employees

Contractors

Sole Traders/Partnerships personal data

Sole Traders/Partnerships business personal data

Companies

Suppliers

Personal data is information relating to an identified or identifiable natural person ('data subject'). Identifiable natural person is one who can be identified, directly or indirectly, name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data Protection Management

Bridge Mills Galway Language Centre will assign the management of personal data to Director@galwaylanguage.com. The role will include: -

Provide external training providers to inform Bridge Mills Galway Language Centre of their obligations under GDPR

Coordinate the monitoring of compliance to GDPR with the assistance of external consultants and management

Alert management when Data Protection Privacy Impact Assessments are required

Report to management

Being a member of the Data Breach committee

Training

Bridge Mills Galway Language Centre will implement a training programme covering data protection generally and the areas that are specifically relevant to their schools or colleges.

Senior Staff

Bridge Mills Galway Language Centre will ensure all management and teachers are educated about their requirements under GDPR and the possible impact of non-compliance for Bridge Mills Galway Language Centre

Bridge Mills Galway Language Centre will identify key senior management to support the data protection compliance programme.

General Staff

Bridge Mills Galway Language Centre will ensure all staff and teachers are provided with a training programme covering data protection generally. Also, the areas that are specifically relevant to their jobs, providing the new policies setting out to comply.

Bridge Mills Galway Language Centre has a policy that all staff and teachers should be trained on Data Protection and will also ensure refresher training is provided when required.

Attendance at all training courses is recorded.

Privacy by Design

Bridge Mills Galway Language Centre will adopt internal policies, Technical and Organisational Measures (TOM) to meet the principles of privacy by design and data protection by default. [Bridge Mills Galway Language Centre] will adopt internal policies and implement technical and organisational measures by: -

Implementing pseudonymisation and encryption where feasible

Data Minimisation

Risk Management

Integrating data privacy into IT policies, Data Retention and Deletion Policy

Providing data subject transparency and access

By developing access controls for confidentiality which provide that only personal data which is necessary for each specific purpose of the processing is processed during the retention period as informed to the data subject

By developing access controls (roles-based) which provide that personal data is not made accessible to more individuals than necessary for the purpose

Providing an audit trail of the access controls

Ability to restore availability of and access to data in the event of an incident

Regular test of the effectiveness of security measures

Data Privacy Impact Assessment (DPIA)

Bridge Mills Galway Language Centre will carry out privacy impact assessments where a type of processing is likely to result in a high risk for the rights and freedoms of data subjects in the following cases but not limited to this list: -

- in the event of a systematic monitoring of a publicly accessible area
- in the context of profiling on which decisions are based that produce legal effects
- in the event of implementing new IT which infringes on the data subject's rights
- in the event there is a change to the risks posed by the processing operations to personal data

Bridge Mills Galway Language Centre will have in place a process for determining whether a Data Privacy Impact Assessment (DPIA) is required. A DPIA will be embedded in all Business Cases presented to management for any proposed new projects.

If a DPIA is required, the following process will be conducted: -

- a systematic description of the processing operations and purposes of the processing
- an assessment of the necessity and proportionality of the processing operations
- an assessment of the risks to the rights and freedoms of data subjects
- if appropriate may seek the views of the affected data subjects measures envisaged to address the risks

Bridge Mills Galway Language Centre will consult the Supervisory Authority if a DPIA result is of a high level of risk where Bridge Mills Galway Language Centre cannot take measures to mitigate this risk.

Demonstrating Consent

Bridge Mills Galway Language Centre will have an audit trail for consent. This will demonstrate that consent was given when relying on consent as a ground for processing personal data. Given the nature of the services offered consent is predominately relied on prior to engagement letters signed by the student or parent/guardian at the enrolment stage.

Consent is recorded from all data with a clear record of what each individual data subject consented to: -

Demonstrating Compliance to the data protection principles

Bridge Mills Galway Language Centre will document all the current processing activities to provide a Personal Data Register Data Protection Register identifying: -

- Service Department and Service line
- Data Class and Data Category
- Process Name
- Purpose for processing
- Data category and Data class
- Controller/Processor/Both/Joint Controller
- Data Owners
- Lawful basis
- Data Accuracy Process
- Process Map where available
- Format of Data
- Recipients of Data
- Data shares internally and lawful bases provided
- Transfer methods
- Location of Data storage
- Retention Periods
- Data Access Controls
- Risk Management
- Transfers to Third Countries

- External Processor

Bridge Mills Galway Language Centre will update its current policies and procedures to ensure compliance to the principles. See Section Policy Section.

Records to be maintained as a Data Controller

Bridge Mills Galway Language Centre will: -

- clearly identify where personal data is processed within the company, including by third party processors
- provide the name and director@galwaylanguage.com details of the Bridge Mills Galway Language Centre and any joint controller
- use the Personal Data Register to record details of
- the purposes of the processing
- a description of categories of data subjects and personal data
- the categories of recipients of personal data
- the details of transfers to third countries
- the time limits for erasure of different categories of data
- a general description of technical and organisational security measures taken

Records to be maintained as a Processor Bridge Mills Galway Language Centre as a Processor for many of its clients will maintain a record of all categories of personal data processing activities carried out on behalf of its clients (controllers).

Bridge Mills Galway Language Centre will use the Personal Data Register to record the following details in respect of each Client (controller)

- name and contact details of the client (controller) on behalf of which it is processing
- categories of processing
- transfers of data to a third country or international organisation
- general description of the technical and organisational security measures

As part of data accuracy Bridge Mills Galway Language Centre will keep information relating to the contracts that they are responsible for up-to-date and accurate.

Export of Personal Data

Bridge Mills Galway Language Centre will review and map the international data flows, including:

- data flows where Bridge Mills Galway Language Centre is exporting to a controller or processor outside of the EEA
- data flows Bridge Mills Galway Language Centre is importing as a processor or controller
- consider what existing data transfer mechanisms are in place and whether these continue to be appropriate.

Countries that are currently white listed remain so until a Commission review finds otherwise

Andorra, Argentina, Canada, Switzerland, Faeroe Islands, Guernsey, Israel, Isle of Man, Jersey, Uruguay and New Zealand

Standard Contract Clauses remain a valid mechanism for non-EEA transfers

- ensure that export obligations are flowed down through subcontractor chains and across to other controllers where required

Joint Controller Agreements

In circumstances where Bridge Mills Galway Language Centre and another organisation determine the purposes for which and the way the personal data is processed, each party will be a controller and will be liable for the entirety of any damage to a data subject, unless they can prove they were not in any way responsible for the event giving rise to the damage.

Bridge Mills Galway Language Centre will ensure that there is a clear attribution of data protection responsibilities between joint controllers and that this information is made available to data subjects through privacy notices or other means so that a controller will be able to show it was in no way responsible for the event giving rise to the damage if this is the case.

[Bridge Mills Galway Language Centre will ensure that contract negotiators are aware of the default position of each controller being liable for the entire damage to a data subject if it is in any way responsible for the event giving rise to the damage and include appropriate cross indemnification.

Processors

Bridge Mills Galway Language Centre is processors for all their Clients who are legal entities. Bridge Mills Galway Language Centre as a processor will ensure: -

- to implement Technical and Organisational Measures (TOM) to safeguard the personal data:
- not to appoint sub- processors without the consent of the controller
- to notify breaches to the controller
- to cooperate directly with the Supervisory Authority
- to assess any intra-group processor agreements and make amendments to include minimum requirements and if necessary to keep liability limited towards the group's main establishment or service companies

Budget

Bridge Mills Galway Language Centre will allocate an annual budget for data protection compliance.

Reporting

Staff are required to report any data breaches to Director@galwaylanguage.com as soon as the data breach is discovered (regardless of the timing of the discovering any day of the week and any time of the day).

The Office Manager will report to all staff any new changes to GDPR and of any cyber treats or attacks as this information becomes known, also providing steps to take to avoid this occurring to[Bridge Mills Galway Language Centre

The Office Manager will report to management monthly of: -

- Internal incidences reported
- Internal breaches
- GDPR improvements implemented

- Status of current projects on GDPR
- Awareness and training process
- Relevant external breaches reported
- Updates to compliance
- DPIA's

The DPL will assess all data breaches reported in line with the data breach policy and if such a breach requires reporting to the Supervisory Authority, this will be approved by management.

Reference to Policies & Procedures

The following policies and procedures, contracts and handbook form part of Accountability Framework (to be amended to suit each school or college)

- Data Protection Policy
- Staff Handbook
- Down loading PD on personal devices
- CCTV policy and procedure
- Clear desk policy
- Leaving policy to retrieve PD
- Unsolicited CV's management policy
- Personal Data Management policy
- Procedure for Data Accuracy
- Data Management Policy/Data transfer policy
- Data Breach Policy and procedure
- PD Retention and Deletion Policy
- Right of Access Policy
- Right to Object Policy and procedure
- Right to Erasure Policy and procedure
- Right to Rectification Policy and procedure
- Right to restriction of processing
- Right to data portability
- Rights on automated individual decision making including profiling
- Right to withdraw consent
- Right to lodge a complaint
- Consent Policy
- Privacy Impact Assessment Plan
- Engagement Letter
- Contracts
- Cookies Statement
- IT Policies covering
- Firewall and network perimeter controls
- Secure Configuration
- User Access Control
- Malware protection

- Patch Management
- Physical and Environmental Control
- Vulnerability scan

IT Polices are documented as follows: -

- Information Security Policy
- IT Equipment Management Policy
- IT Operations Management Policy
- IT Change Management Policy
- Backup Policy
- Outsourcing Policy
- Disaster Recovery Policy
- Cyber Security Policy

This framework including all the Information Security polices which form part of the overall Business Continuity Plan.

Appendix A Right to lodge a complaint with supervisory authority

Every data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy.

Appendix B Right to an effective judicial remedy against a supervisory authority

Each Client will have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

Each data subject shall have the right to an effective judicial remedy where the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

Appendix C Right to an effective judicial remedy against a controller or processor

Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

Proceedings against a Client as a controller or a processor may be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

Appendix D Representation of data subjects

The data subject has the right to mandate a not-for-profit body, organisation or association which has been properly constituted in accordance with the law of a Member State, has statutory objectives which are in the public interest, and is active in the field of the protection of data subjects' rights and freedoms with regard to the protection of their personal data to lodge the complaint on his or her behalf.

Member States may provide that anybody, organisation or association as described in previous paragraph, independently of a data subject's mandate, has the right to lodge, in that Member State, a complaint with the supervisory authority if it considers that the rights of a data subject under this Regulation have been infringed as a result of the processing.

Appendix E Right to compensation and liability

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation has the right to receive compensation from the controller or processor for the damage suffered.

Any controller involved in processing shall be liable for the damage caused by processing which infringes this Regulation. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of this Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller.

A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are, responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damage in order to ensure effective compensation of the data subject.

Where a controller or processor has paid full compensation for the damage suffered, that controller or processor shall be entitled to claim back from the other controllers or processors involved in the same processing that part of the compensation corresponding to their part of responsibility for the damage.

Court proceedings for exercising the right to receive compensation shall be brought before the courts.

Appendix F General conditions for imposing administrative fines

Each supervisory authority shall ensure that the imposition of administrative fines pursuant to this in respect of infringements of this Regulation shall in each individual case be effective, proportionate and dissuasive.

Administrative fines shall, depending on the circumstances of each individual case, be imposed. When deciding whether to impose an administrative fine and deciding on the amount of the administrative fine in each individual case due regard shall be given to the following: -

- (a) the nature, gravity and duration of the infringement taking into account the nature scope or purpose of the processing concerned as well as the number of data subjects affected, and the level of damage suffered by them;
- (b) the intentional or negligent character of the infringement
- (c) any action taken by the controller or processor to mitigate the damage suffered by data subjects
- (d) the degree of responsibility of the controller or processor taking into account technical and organisational measures
- (e) any relevant previous infringements by the controller or processor
- (f) the degree of cooperation with the supervisory authority, in order to remedy the infringement and mitigate the possible adverse effects of the infringement
- (g) the categories of personal data affected by the infringement
- (h) the manner in which the infringement became known to the supervisory authority, in particular whether, and if so to what extent, the controller or processor notified the infringement

- (i) where measures referred to in corrective powers have previously been ordered against the controller or processor concerned with regard to the same subject-matter, compliance with those measures;
- (j) adherence to approved codes of conduct or approved certification mechanisms and
- (k) any other aggravating or mitigating factor applicable to the circumstances of the case, such as financial benefits gained, or losses avoided, directly or indirectly, from the infringement.

If a controller or processor intentionally or negligently, for the same or linked processing operations, infringes several provisions of this Regulation, the total amount of the administrative fine shall not exceed the amount specified for the gravest infringement.

Infringements of the following provisions shall, be subject to administrative fines up to 10 000 000 EUR, or in the case of an undertaking, up to 2 % of the total worldwide annual turnover of the preceding financial year, whichever is higher: -

- (a) the obligations of the controller and the processor
- (b) the obligations of the certification body
- (c) the obligations of the monitoring body pursuant

Infringements of the following provisions shall, be subject to administrative fines up to 20 000 000 EUR, or in the case of an undertaking, up to 4 % of the total worldwide annual turnover of the preceding financial year, whichever is higher:

- (a) the basic principles for processing, including conditions for consent
- (b) the data subjects' rights
- (c) the transfers of personal data to a recipient in a third country or an international organisation;
- (d) any obligations pursuant to Member State law
- (e) non-compliance with an order or a temporary or definitive limitation on processing or the suspension of data flows by the supervisory authority or failure to provide access in violation of corrective power.

Non-compliance with an order by the supervisory authority as referred to in corrective action, be subject to administrative fines up to 20,000,000 EUR, or in the case of an undertaking, up to 4 % of the total worldwide annual turnover of the preceding financial year, whichever is higher.

11. Public Information and Communication

<p>The Bridge Mills Galway Language Centre</p> <p>11.1 Policy for Public Information and Communication</p>	
QA Area (s)	<ul style="list-style-type: none"> • Public Information and Communication
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Office Manager
<p>Policy</p> <p>BMGLC is committed to the publication of “clear, accurate, up to date and easily accessible”¹ information, and ensures that all information published by the school or external sources (i.e. Agents) is monitored for accuracy and honesty on an ongoing basis.</p> <p>Information, in this context, is any information about the school that is available publicly or specifically promoted. It can, therefore, refer to any of the following:</p> <ol style="list-style-type: none"> 1. Essential and legal details about the school. (e.g. full name, location of school, directors and key staff, legal and accreditation status, contact details) <p>These are available on the school website, and through official documentation which is available upon request.</p> <p><i>(Reviewed and updated, where necessary, annually)</i></p> <ol style="list-style-type: none"> 2. Programmes of Education and Training, their respective accreditation/validation status, and the awards they may lead to, where relevant. This includes the name of the awarding body, the title of the award and whether the award is recognized in the National Framework of Qualifications (NFQ) and if so, the award type and level. <ul style="list-style-type: none"> • For all TESOL Training programmes, it is clearly stated that graduates wishing to teach within Ireland will have to be Garda vetted prior to taking up a teaching position, and graduates wishing to teach elsewhere should check the specific requirements of that context/country. <p><i>These are available on the school website, in the Quality Assurance Manual, and through official documentation which is available upon request.</i></p>	



(Reviewed and updated, where necessary, annually)

3. Access, Transfer and Progress (ATP), Recognition of Prior Learning Procedure (RPL) and other relevant (Prospective) Learner information in relation to Programmes of Education and Training.

These Policies and Procedures are available in the Quality Assurance Manual.

(Reviewed and updated as and when appropriate)

4. The school's Quality Assurance Framework and Key Publications (e.g. QA Manual).

This information is available in the Quality Assurance Manual, which is available on the school website and upon request.

(Reviewed and updated throughout the year)

5. Information for Prospective and Enrolled learners, including details of Protection for Enrolled Learner (PEL) arrangements if PEL is a requirement.

This information is given in the welcome pack to students, during the induction talk, in the Student Handbook, in the Quality Assurance Manual, on the website and at school conferences and events.

(Reviewed and updated annually)

6. School Social Programme and School Activities.

This information is available through Social Media, School Noticeboards, and Printed handouts in the office.

(Updated weekly and monthly)

7. Information Provision and Data Management

This information includes details of how the school processes and manages data is available on the school website and in the Quality Assurance Manual.

(Reviewed and updated, where necessary, annually)

8. Marketing Materials

This information is available through brochures which are available in the office, and through online advertisements (e.g. Promoted Posts on Social Media), and at conferences, workshops and events where BMGLC has an active presence.

(Reviewed and updated, where necessary, annually)



Where information provision involves active engagement with the public/stakeholders, all communications shall be conducted in an honest, respectful and friendly manner.

Agents

BMGLC has dealings with a number of Agents on a regular basis, and the school takes very seriously Principle 2 of the London Statement which requires Agents to “provide current, accurate and honest information in an ethical manner”².

For this reason, the school has specific processes in place for the ongoing and routine monitoring of Agents Communications. Please refer to the *Procedure for Agents Communications Monitoring* for details.

Responsibility

- **Members of Office Staff**, overseen by the **Office Manager**, are responsible for the dissemination of all public information, and ensuring these documents are up-to-date. This inherently requires close communication with other members of staff who have oversight of specific documentation.
- The **Quality Officer** oversees the authorship, maintenance and review of all documentation relevant to the Bridge Mills Galway Language Centre’s Quality Assurance Framework.
- **Programme Leaders**, under the guidance of the **Academic Coordinator**, are responsible for the ongoing development and review of academic programmes, and producing programmes review documentation.
- The **Managing Director** is responsible for the maintenance and review of all legal documentation pertinent the school and its operations.
- The **Academic Committee** is responsible for approving all changes and updates to documentation that, in any way, directly affects or has an impact on the Academic Framework of the school.

Version 1.0

Date Approved:
March 2020

Approved by:
Academic Committee

Related legislation, regulation or guidelines:

- ¹Core Statutory Quality Assurance Guidelines, 2016 (QQI) - Section 9
- ²Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants (Known as ‘The London Statement’), 2012
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).



**The Bridge Mills
Galway Language Centre**

11.2 Procedure for Agent Communications Monitoring

QA Area (s)	<ul style="list-style-type: none"> • Public Information and Communication • Self-Evaluation, Monitoring and Review
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Public Information and Communications
<p>Purpose</p> <p>This Procedure details the steps taken by BMGLC to ensure information disseminated by Agents to Prospective Learners, and information available publicly on Agents' websites, is "clear, accurate, objective, up to date and easily accessible."¹</p> <p>Procedure</p> <p>BMGLC has dealings with a number of Agents on a regular basis, and the school takes very seriously Principle 2 of the London Statement which requires Agents to "provide current, accurate and honest information in an ethical manner"².</p> <p>With this in mind, the monitoring of Agents and their respective websites is conducted in the following manner:</p> <ol style="list-style-type: none"> 1. BMGLC provides all Agents with updated information each April. This information is pertinent to all Prospective Learners and the school requests that Agents update their websites and documentation within <u>one month</u> of receipt of this information. 2. Following this, each month a random selection of 25% of Active Agents is chosen for review by Administration (Agents with accurate information are not rechecked until all Active Agents have been checked once). 3. Agents who have not yet updated their information are given <u>two weeks</u> to do so or risk penalties from the school. Agents who fail to act in this time frame will be issued a notice from the school that their Agent agreement may be terminated in the following 30 days if they do not update their information. The school will issue a reminder at 14 days. 4. Monitoring continues each month throughout the year, ensuring all published information is accurate. 	



5. BMGLC will respond with immediate action, to any information given to it at any time, about inaccurate information being presented about BMGLC by its Agents.

Responsibility

1. **Administrative Staff**, overseen by the **Office Manager**, are responsible for updating school information, disseminating the updated information to relevant stakeholders, the periodic review and monitoring of Agents, and contacting Agents where they find dishonest or outdated information.
2. **Agents** are responsible for ensuring all information and documentation related to BMGLC which is available publicly or disseminated to Prospective Learners is honest and up to date.
3. The **Managing Director** is responsible for advising on penalties pertaining to Agents who are found to be providing Prospective Learners with dishonest and/or outdated information.

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Academic Committee

Related legislation, regulation or guidelines:

- ¹Core Statutory Quality Assurance Guidelines, 2016 (QQI) - Section 9
- ²Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants (Known as 'The London Statement'), 2012
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

12. Self-Evaluation, Monitoring and Review

<p>The Bridge Mills Galway Language Centre</p> <p>12.1 Policy for Self-Evaluation, Monitoring and Review</p>	
QA Area (s)	Assessment of Learners
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
Policy Owner	Academic Coordinator
<p>Purpose The purpose of this policy is to set out the framework for Self-Evaluation, Monitoring and Review at BMGLC, in alignment with QQI's Core Statutory QA Guidelines.</p>	
<p>Scope This policy applies directly or indirectly to all members of the BMGLC community, inclusive of learners, and staff holding teaching, administrative, management or support roles.</p>	
<p>Policy BMGLC is committed to maintaining robust and systematic processes for review and self-evaluation as part of the school's overall quality assurance framework. Internal self-monitoring and self-evaluation processes are systematically integrated within the school's overall Quality Assurance Framework. Responsibilities for activities pertaining to this are clearly delineated within the Terms of Reference for various units of governance at the school and within the individual role descriptions outlined in the management structure in Chapter 2 of the QA Manual. These are particularly emphasized within:</p> <ul style="list-style-type: none"> • ToR Board of Directors • ToR Academic Committee • ToR Programme Boards • ToR Examination Board • Role & responsibilities: Managing Director • Role & responsibilities: Academic Coordinator • Role & responsibilities: Quality Officer • Role & responsibilities: Student Support Officer • Role & responsibilities: Programme Leader 	



In addition, the following policies and procedures provide direct guidance to Self-Evaluation, Monitoring and Review activities at the school:

- Policy for the QAF at BMGLC
- Procedure for Development of New Policies and Procedures
- Policy for Ongoing Review of QAF Documentation
- Procedure for Ongoing Review of QAF Documentation
- Policy for the Update of Programmes of Education and Training
- Procedure for the Update of Programmes of Education and Training
- Procedures for Collection of Learner and Staff Feedback
- Procedure for Monitoring Teaching Staff Performance
- Policy and Procedure for Complaints
- Policy and Procedure for Appeals

BMGLC's internal Quality Assurance Framework has been designed to align with the school's external QA obligations. BMGLC engages actively with QQI and additionally with a range of sector specific recognition/accreditation bodies (these are listed in Chapter 13 of the QA Manual). The outcomes of all external review processes are considered by the Academic Committee and the Board of Directors, and, where appropriate, action planning is instigated to address identified weaknesses.

Responsibility

- The **Academic Committee** is responsible for approving this policy and associated policies and procedures, and making recommendations to the **Board of Directors** on Self-Evaluation, Monitoring and Review.
- The **Academic Coordinator, Quality Officer and Student Support Officer** are jointly responsible for making recommendations to the **Academic Committee** pertaining to Self-Evaluation, Monitoring and Review.
- The **Quality Officer** is responsible for monitoring and maintaining the overall alignment of BMGLC's policy and procedures pertaining to Self-Evaluation, Monitoring and Review to QQI's guidelines and policy statements.

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Date Approved:

March 2020

Approved by:

Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

The Bridge Mills
Galway Language Centre

12.2 Procedures for Collection of Learner and Staff Feedback

QA Area (s)	<ul style="list-style-type: none"> • Programmes of Education and Training • Staff Recruitment, Management and Development • Self-Evaluation, Monitoring and Review
Applies to	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policies this Procedure relates to	Policy for Self-Evaluation, Monitoring and Review

Procedure:

This document details the internal processes taken by the school to systematically gather feedback from learners and staff

The information gained through feedback provides invaluable insights to inform decision-making, guide continual improvement and enhance standards across the organization. Both staff and learner feedback are collected and reviewed on an ongoing basis.

1. Learner Feedback may be collected in the following ways:
 - a. New students are asked to provide feedback on the first Wednesday of their stay. This collection of feedback is carried out by the Student Support Officer.
 - b. The Academic Coordinator and Student Support Officer conduct a school-wide survey every quarter. Feedback is subsequently recorded and appropriate actions are taken to address them.
 - c. Students can provide feedback by speaking with the Academic Coordinator or Student Support Officer in the office. Issues raised are recorded and appropriate actions are taken, where necessary, to address them.
 - d. At the end of their course of study, all learners are provided with an exit questionnaire where they can provide comments and feedback on their experience in the school and their programme of education. (There are separate feedback documents for learners on ELE Programmes and learners on the QQI TESOL Programme)
 - e. Where learner feedback refers directly to staff performance, appropriate actions may be taken by the Academic Coordinator to ensure the relevant member(s) of staff is/are both aware of an existing issue (although specific, identifying details will remain confidential) and that action must be taken to address the issue.



f. If actions are initiated to address an issue, a further review is taken after a reasonable amount of time has passed to verify whether or not the actions taken are successful.

2. Staff Feedback may be collected in the following ways:

- a. Staff meetings which are held every four weeks provide teachers with an open channel for feedback and to raise concerns or issues. The meetings are chaired by the Academic Coordinator and all feedback is recorded. This means of feedback can provide a good indication of consensus, as more than one teacher may be experiencing a particular issue.
- b. Annual staff performance reviews give all staff the option to raise concerns. As these meetings are with the Managing Director, any feedback which falls under the remit of the Academic Coordinator may be referred as appropriate.
- c. Staff can provide feedback and raise concerns or issue by speaking with the Academic Coordinator. This feedback is recorded and appropriate actions are taken, where necessary, to address them.

Responsibility

- 1. The **Academic Coordinator** and/or **Student Support Officer** are responsible for the collection, review and monitoring of staff and learner feedback, and initiating any necessary actions to address issues/concerns/problems arising from feedback.
- 2. All **Staff** and **Learners** are responsible for providing, when requested or by choice, honest and relevant feedback.
- 3. The **Quality Officer** is responsible for working with the **Academic Coordinator** and/or **Student Support Officer** to ensure that feedback is collated and presented in appropriate formats to the appropriate units of governance for review (including the Programme Boards and Academic Committee)

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February 2020

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Academic Committee

Related legislation, regulation or guidelines:

- Core Statutory Quality Assurance Guidelines 2016 (QQI).
- Sector Specific (Independent/Private) Statutory Quality Assurance Guidelines 2016 (QQI).

13. Other Parties Involved in Education and Training

13.1 Peer Relationships with the Broader Education and Training Community

BMGLC has well-established relationships and good standing with a range of accreditation, recognition and service organisations within the ELE sector. These relationships are with reputable organisations and accreditation bodies, and are summarised in the following sections.

13.1.1 Other Accreditation Bodies & Accreditation Requirements

Name of Accreditation Body	Details
<p style="text-align: center;">ACELS</p>	<p>A quality assurance body for the English language teaching sector in Ireland, and the national body responsible for the oversight of inspection and recognition of English Language Teaching organisations.</p> <p>The school maintains and updates all necessary QA documentation in the DCF (Documented Curriculum Framework), copies of which are available in the office, staffroom and the school website.</p> <p>Website: www.acels.ie</p>
<p style="text-align: center;">EAQUALS</p>	<p>An international association which bring together education organisations with the aim of fostering excellence in language education.</p> <p>EAQUALS has Quality Assurance requirements to which members must adhere. Bridge Mills Galway Language Centre has met the required QA standard and is fully accredited by EAQUALS. The next review of the school will involve an on-site inspection in 2021.</p> <p>Website: www.eaquals.org</p>
	<p>An association of English language schools in Ireland with a primary focus on quality and assurance. MEI offers industry guidance and</p>



<p>Marketing English in Ireland (MEI)</p>	<p>support to its members, who must all also be accredited by ACELS and QQI.</p> <p>The school renews its membership with MEI each year and completes an annual QA review.</p> <p>Website: www.mei.ie</p>
<p>Quality English</p>	<p>A marketing body which connect independent students with independent English language schools in English speaking countries. Members are carefully selected and monitored closely to ensure quality and standards are maintained.</p> <p>The school undergoes a QA review every 4 years with Quality English, the last of which was in 2018.</p> <p>Website: www.quality-english.com</p>

13.1.2 Other organisations with which BMGLC is affiliated

Name of Accreditation Body	Details
<p>Cambridge (Examinations Centre)</p>	<p>The school is a Cambridge Examinations Centre. Cambridge have their own QA processes in place which are given to the school via a Centre handbook.</p> <p>Spot inspections occur every 12 to 18 months, with the last inspection in December 2018)</p> <p>Website: www.cambridgeenglish.org</p>
<p>Cambridge (Admissions Testing Centre)</p>	<p>Tests for people studying at 3rd level who need a pre-entry test.</p> <p>Cambridge Admissions testing have their own QA, to which the school adheres.</p> <p>Website: www.admissionstesting.org</p>
<p>TIE (Test of Interactive English)</p>	<p>The TIE exam is recognised as a valid exit examination which can be taken by visa-requiring student upon completion of their course of study.</p> <p>The school is a TIE Examinations Centre.</p> <p>Website: www.ielt.ie</p>



Association of Language Travel Organisations (ALTO)	The school is a member of ALTO, a forum which connects language travel agents, schools, and national associations. Website: www.altonet.org
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13.2 External Partnerships and Second Providers

BMGLC does not currently use second providers to deliver any of its programmes, and has no intentions to do so in the future. This includes QQI validated and non QQI programmes.

If for any reason this situation changes, BMGLC is fully aware of its obligation to develop QA procedures for collaborative provision and to have these approved by QQI. In any such instance, BMGLC would develop procedures to include provision for due diligence on the reputation, legal status, standing and financial sustainability of the other party/second provider.

13.3 Expert Panellists, Examiners and Authenticators

Explicit criteria and processes for the recruitment and engagement of external examiners are outlined in this manual in Section 8.5: Procedure for the Recruitment & Selection of External Examiners.

The recruitment process for any external, independent, national or international experts that BMGLC may need to engage will ensure, as per the Procedure for the Recruitment & Selection of External Examiners, that a declaration is made of any interests that could conflict, or might appear to conflict, with the role or responsibilities proposed by the provider.