

# **Inspection report**

Organisation name	Express English College, Manchester
Inspection date	17–18 April 2024

Section standards	
Management The management of the provision operates to the benefit of the students, and in accordance with the provider's stated goals, values, and publicity.	Met
Premises and resources The premises provide students and staff with a safe, comfortable and professional environment for work and relaxation. A range of learning resources is available, appropriate to the age and needs of the students. Guidance on the use of these resources is provided for staff and students where needed.	Met
Teaching and learning The academic staff team has a professional profile (qualifications, experience and continuing professional development) appropriate to the context. Teachers receive sufficient guidance to ensure that they support students effectively in their learning. Courses are structured and managed to provide the maximum possible benefit to students. The teaching observed meets the requirements of the Scheme.	Met
Welfare and student services The provision meets the needs of the students for security, pastoral care, information and leisure activities. Students benefit from well-managed student services, including, where offered, out-of-class activities and suitable accommodation.	Met
Safeguarding under 18s There is appropriate provision for the safeguarding of students under the age of 18 within the organisation and in any leisure activities or accommodation provided.	Met

# Recommendation

We recommend continued accreditation.

# **Summary statement**

The British Council inspected and accredited Express English College, Manchester in April 2024. The Accreditation Scheme assesses the standards of management, resources and premises, teaching, welfare, and safeguarding under 18s and accredits organisations which meet the overall standard in each area inspected (see <a href="https://www.britishcouncil.org/education/accreditation">www.britishcouncil.org/education/accreditation</a> for details).

This private language school offers courses in general English for adults (18+) and young people (16+).

Strengths were noted in the area of premises and facilities.

The inspection report noted a need for improvement in the area of academic staff profile.

The inspection report stated that the organisation met the standards of the Scheme.

#### Introduction

Express English College (EEC) was founded in 2016 and moved to its current premises in September 2017. EEC offers general English courses with IELTS preparation and Business English classes available on demand. Since the last routine new provider spot check in 2023 there have been changes to management including the new role of a principal, who also acts as an academic manager. A new assistant academic manager has been recruited, as well as a new welfare officer.

The inspection was conducted by two inspectors over one and a half days. Meetings were held with the operations manager and the principal/academic manager, the assistant academic manager and the welfare officer. There was also a meeting with the activity leader who has a combined role of teaching and social programme activities. Separate focus group meetings were held with the students and teachers. One inspector visited two homestays virtually. All teachers timetabled to teach were observed.

# Address of main site/head office

130 Princess Road, Manchester M16 7BY

# Description of sites visited/observed

The college occupies a three-storey, modern building a short distance (ten-minute drive) from Manchester city centre. The school facilities include a reception area, offices, a prayer room, a student common room with a kitchen area. The school also has a carpark for students and staff, as well as an outdoor courtyard area with seating. There is a secure bicycle park within the carpark area.

The premises were reconfigured and updated to create additional classroom space and more extensive facilities for students in January 2023. The student common room was expanded and now includes a kitchen area with facilities for making hot drinks as well as a larger seating area, vending machines, table football and a large TV screen. A small study/testing area with computers is also incorporated into the space, as well as a prayer/reflection space. The first and second floors now consist almost exclusively of classrooms. There is good toilet provision including one with disabled access on the ground floor.

Course profile	Year round		Vacation only	
	Run	Seen	Run	Seen
General ELT for adults (18+)				
General ELT for adults (18+) and young people (16+)	$\boxtimes$	$\boxtimes$		
General ELT for juniors (under 18)				
English for academic purposes (excludes IELTS preparation)				
English for specific purposes (includes English for Executives)				
Content and language integrated learning (CLIL)				
Teacher development (excludes award-bearing courses)				
ESOL skills for life/for citizenship				
Other				

#### **Comments**

The majority of courses are for general English students, with business English and IELTS offered as an option on demand. Extra options, such as academic writing, are run as required and a conversation club is also available.

# Management profile

The college director who works remotely is the school owner and leads on strategy and marketing. The day-to-day management of the school is handled by the principal and the operations manager. The principal started his role in autumn 2023; the position includes academic responsibilities. A newly appointed administration and welfare officer joined the team a month prior to the inspection.

# **Accommodation profile**

The school has recently started to recruit their own homestays. At the time of the inspection two homestays were in use. Previously they used an accommodation agency registered with British Council and will continue to use if

necessary. The school also has its own agreement with a large commercial residence. One student was staying here at the time of the inspection.

# Summary of inspection findings

#### Management

The provision meets the section standard. The management of the provision operates to the benefit of the students and in accordance with the provider's clearly stated goals and values, and their publicity. The structure of the organisation is effective, communication is good and student administration is carried out efficiently.

#### Premises and resources

The provision meets the section standard and exceeds it in some respects. The premises provide students and staff with a very comfortable, pleasant, and professional environment for work and relaxation. A range of learning resources is available, appropriate to the age and needs of the students. *Premises and facilities* is an area of strength.

### **Teaching and learning**

Overall, the provision meets the section standard. The academic team has appropriate experience but not the required level of qualifications. Course design is comprehensive and academic support is good. There is a need for improvement in the area of *Academic staff profile*. The teaching observed met the requirements of the Scheme.

#### Welfare and student services

The provision meets the section standard. The needs of the students for security, pastoral care, information and leisure activities are met. Pastoral care is very good, and the leisure programme is well-resourced. Students benefit from well-managed student services, including, where offered, out-of-class activities and suitable accommodation.

### Safeguarding under 18s

The provision meets the section standard. There is appropriate provision for the safeguarding of students under the age of 18 within the organisation and in any leisure activities or accommodation provided.

# Declaration of legal and regulatory compliance

The items sampled were satisfactory.

#### **Evidence**

#### Management

Strategic and quality management	Met
M1 There is a clear statement describing the goals and values of the organisation, which is made known to all staff.	Strength
M2 The management has clear objectives for the future of the organisation and has realistic plans to achieve them.	Met
M3 There is a documented and clearly understood structure for the ELT operation. There are sufficient staff to manage and deliver the provision, and to ensure continuity at all times.	Met
M4 There are effective channels of communication between all involved in the ELT operation, and between the ELT operation and any wider organisation of which it is a part.	Met
M5 The provider regularly obtains and records feedback from students on all the services offered. Feedback is circulated to relevant staff and appropriate action is taken and recorded.	Met
M6 The provider regularly seeks and records feedback from all staff on the services offered. Appropriate action is taken and recorded.	Met
M7 The provider reviews systems, processes and practices with a view to continuing improvement. Appropriate action is taken and recorded in an annual self-evaluation.	Met

#### **Comments**

M1 The statement is comprehensive and explicit, managers have a shared understanding of the goals and can articulate how they meet the current context.

Staff management and development	Met
M8 The provider implements appropriate human resources policies, which are made known to staff.	Met

M10 There are effective procedures for the recruitment and selection of all staff.  M11 There are effective induction procedures for all staff.  M12 There are effective procedures for monitoring and appraising all staff, for highlighting good performance, and for handling unsatisfactory performance or conduct. These procedures are made known to all staff.  M13 There are effective procedures to ensure the continuing professional development	Met
M12 There are effective procedures for monitoring and appraising all staff, for highlighting good performance, and for handling unsatisfactory performance or conduct. These procedures are made known to all staff.	Met
good performance, and for handling unsatisfactory performance or conduct. These procedures are made known to all staff.	Strength
M13 There are effective procedures to ensure the continuing professional development	Met
(CPD) of all staff to meet the needs of the individual, the students and the organisation.	Met

M11 Induction procedures are very thorough and include opportunities to shadow colleagues and there is paid induction time for teachers.

Student administration	Met
M14 Staff are helpful and courteous to students and their representatives, and provide good levels of customer service.	Strength
M15 Students or their representatives receive sufficient information and advice on their course choices before arrival and during their stay.	Met
M16 There are clear systems in place to enrol students effectively and maintain accurate information about student payment and course details. This information is readily accessible to relevant staff.	Met
M17 There are effective systems to maintain up-to-date and accessible records of local contact details for students, and their designated emergency contacts.	Met
M18 There is a clear and effective policy on student attendance and punctuality that is known to all staff and students and is applied consistently.	Met
M19 All staff and students are made aware of conditions and procedures under which a student may be asked to leave the course.	Met
M20 All students and, where appropriate, group leaders and parents/legal guardians, receive information in writing about who to see about problems and how to make a complaint.	Met

# Comments

M14 The recently purchased customer service system is well suited to the school requirements and is used efficiently. Very good levels of customer service are provided and students commented very positively on the helpfulness and approachability of staff.

Publicity	Met
M21 All publicity and information is accurate, and gives rise to realistic expectations about the premises, location, and the extent and availability of the services and resources.	Met
M22 All publicity and information about the provider and the services it offers is in clear, accurate and accessible English.	Met
M23 Publicity gives clear, accurate and easy-to-find information on the courses.	Met
M24 Publicity includes clear, accurate and easy-to-find information on costs.	Met
M25 Publicity or other information made available before enrolment gives an accurate description of the level of care and support given to any students under 18.	Met
M26 Publicity gives an accurate description of any accommodation offered.	Met
M27 Descriptions of staff qualifications are accurate.	Met
M28 Claims to accreditation are in line with Scheme requirements.	Met
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#### Comments

The main source of publicity is the website where a downloadable brochure is also available. Translations are also available in Arabic and Portuguese.

M27 Overall this criterion is met. References to staff qualifications on the website are accurate but the brochure refers to staff as 'well qualified' which was not the case at the time of the inspection.

#### **Premises and resources**

Premises and facilities	Area of strength
P1 Providers ensure the safety and security of students on their premises by measures appropriate to their age and background, and the location.	Met
P2 Premises, including any external areas, are in a good state of repair, cleanliness and decoration, and provide a comfortable environment for students and staff.	Strength
P3 Classrooms and other learning areas provide a suitable study environment.	Strength
P4 Students have adequate room and suitable facilities for relaxation and the consumption of food.	Strength
P5 There is adequate signage to buildings, routes, rooms and exits, and there are facilities for the display or sharing of general information.	Met
P6 There is sufficient space for all staff, for work, meetings, relaxation and the storage of personal possessions.	Met

## Comments

- P2 Premises are very well maintained throughout. Students and staff benefit from a welcoming multi-functional lounge as well as an outdoor area for use in good weather.
- P3 Classrooms are furnished with flexible seating that can easily be rearranged to accommodate different types of activity.
- P4 The lounge has comfortable seating, kitchen facilities, display screens, games and activities. It is popular and well-used by students.

Learning resources	Met
P7 There are sufficient learning resources for classroom use for the number of students enrolled, appropriate to their age and the level, length and type of courses offered.	Met
P8 There are appropriate resources for teachers, which are adequate in number, accessible, and well maintained and organised.	Met
P9 Any educational technology inside the classroom and elsewhere is well maintained with adequate technical support. Staff receive appropriate training in using the available technology to support learning.	Strength
P10 Students have access to resources for independent learning, relevant to their learning aims and expectations.	N/a
P11 There is a policy for the continuing review and development of teaching and learning resources, and evidence of its implementation.	Met

### Comments

P9 The provision of educational technology throughout the school is very good and facilitates the paper-free green ethos of the school. Resources are well maintained and used regularly and confidently.

# Teaching and learning

# Academic staff profile Need for improvement

- T1 There is a clear recruitment and support policy for the academic team relevant to the stated course objectives and student profile.
- T2 The academic manager/academic management team has an appropriate professional profile to provide academic leadership.
- T3 The teaching team has ELT/TESOL qualifications, general level of education, experience, knowledge and skills relevant to the courses they are teaching.

#### **Comments**

Overall, the academic staff team has a professional profile (qualifications and experience) that is not appropriate to the school's context. There was no member of the academic management team with the required level of qualifications. The recruitment and support policy is effectively devised and implemented in line with the stated course objectives and the student profile.

Academic management	Met
T4 Teachers are matched appropriately to courses and there are effective procedures for the appropriate timetabling of students, courses and classrooms.	Met

T5 There are formalised arrangements for covering for absent teachers which are satisfactory to students and staff.	Strength
T6 Where enrolment is continuous, explicit attention is paid to all aspects of academic management affected.	Met
T7 There are effective arrangements for the academic induction of new teachers appropriate to their needs.	Met
T8 There are effective arrangements, led by an academic manager, to ensure appropriate day-to-day guidance and support for all teachers.	Met
T9 There are effective arrangements for the observation and monitoring of teachers' performance by a TEFLQ academic manager based on clear standards known to teachers.	Not met
T10 There are effective procedures to ensure the continuing professional development (CPD) of all teachers to meet the needs of the individual teachers, the students, and the organisation.	Met

T5 Cover is readily available and comprehensive information is easily accessed via the shared information system. T9 Regular observations are conducted, and written feedback is provided using a shared standards template.

However, the observations are not completed by a TEFLQ person.

Course design and implementation	Met
T11 The course design is comprehensive and is based on the provider's stated approach to learning or educational philosophy, and is appropriate to the learning context.	Met
T12 Courses include strategies which help students to develop their language skills outside the classroom and benefit linguistically from their stay in the UK.	Met
T13 Course design is regularly reviewed in light of the different and changing needs of students and feedback from teachers and students.	Met
T14 Written course outlines and intended learning outcomes, appropriate to the course length and type, are available to students and referred to in class.	Strength
length and type, are available to students and referred to in class.	2

#### Comments

T12 Overall this criterion is met. The written course design provides appropriate guidance including learning outcomes and methods of assessment. Study and learning strategies are discussed with individual students in tutorials but are not included in the schemes of work.

T14 Written course outlines, are available online to students via the shared learning platform and teachers make reference to course outlines during class. Additionally, students view the information when accessing their homework assignments and or in tutorials with the academic manager.

Learner management	Met
T15 There are effective procedures for the correct placement of students, appropriate to their level and age.	Met
T16 There are effective procedures for evaluating, monitoring and recording students' progress.	Met
T17 Students are helped to identify their learning needs and receive support to meet course objectives.	Met
T18 Where relevant, students are guided to select the examinations and examination training best suited to their needs and interests. Students wishing to progress to mainstream UK education have access to relevant information and advice.	Met

# **Comments**

All criteria in this section are fully met.

## **Classroom observation record**

Number of teachers seen	2
Number of observations	4
Parts of programme(s) observed	All
Comments	

# None.

Teaching: classroom observation	Met
T19 Teachers produce accurate models of spoken and written English; they provide clear explanations and relevant examples of language and usage, that are appropriate to the aims of the lesson and suitable for the students' level.	Met
T20 The content of the lessons is based on the overall course objectives and takes into account the differing students' needs and backgrounds.	Met
T21 The intended learning outcomes of lessons are made known to students, and are achieved through an appropriate sequence of activities.	Met
T22 Teaching techniques used are appropriate to the focus of the lesson, to the context, and to the needs of the group and individual learners.	Met
T23 Teachers enhance learning by effectively managing the classroom environment and teaching and learning resources.	Met
T24 Students receive and benefit from appropriate and timely feedback on their performance during the lesson.	Met
T25 Lessons include activities for teachers and students to evaluate whether learning is taking place.	Met
T26 Teachers promote a positive and inclusive learning atmosphere and students are engaged in the lesson.	Strength

- T19 Teachers produced clear and accurate models of language and were able to respond effectively to students' questions about language.
- T20 Basic class profiles were available. The lesson content reflected the overall course objectives and timings were realistic.
- T21 Lesson content was clear and lesson segments contained a logical sequence of activities leading to coherent sessions. Learning outcomes were satisfactory.
- T22 There was evidence of a range of effective teaching techniques including for example, elicitation, questioning, concept checking and nomination.
- T23 Teachers managed the learning environment effectively and technology was used with confidence.
- T24 Teachers monitored students' performance and gave useful feedback.
- T25 Lessons included tasks that enabled teachers and students to evaluate the effectiveness of learning.
- T26 Teachers were sensitive to their students' learning needs and varied the mode and pace of lessons very well. Students were fully engaged, listening and responding to each other' contributions.

#### Welfare and student services

Care of students	Met
W1 There is a comprehensive plan to respond to any emergency. This plan is known to all staff, and relevant elements are known to students.	Met
W2 Students receive pastoral care appropriate to their age, background and circumstances. All staff and students know the name(s) of the person or people who deal with students' personal problems.	Strength
W3 There are policies to promote tolerance and respect, and procedures for dealing with any abusive behaviour. All staff and students are aware of these.	Strength
W4 Where relevant, students receive a 24-hour emergency contact number for the provider, in writing.	Met
W5 Students receive advice on relevant aspects of travel to and life in the UK.	Met
W6 Students have access to adequate health care provision.	Met

#### Comments

W2 Students receive a very good level of pastoral care. All staff and hosts are encouraged to be aware of students' needs and students reported that they appreciated the excellent care and support that they receive. All staff have received formal training in mental health first aid.

W3 There are very comprehensive policies to promote tolerance and respect and procedures for dealing with abusive behaviour. Tolerance and respect feature in the school's ethos and information is clearly presented in digital banners, during inductions and in handbooks.

Accommodation (W7–W18 as applicable)	Met
All accommodation	
W7 Students have a comfortable living environment throughout their stay.	Met
W8 Arrangements for cleaning and laundry are satisfactory.	Met
W9 A responsible representative inspects all accommodation (for safety and suitability) before students are placed, and at least every two years after that.	Strength
W10 Students receive written confirmation of accommodation booked, giving clear and accurate information.	Met
W11 There are effective procedures for identifying and resolving any problems students have with their accommodation.	Met
W12 Accommodation providers receive written confirmation of the rules, terms and conditions applied by the provider with respect to the provision of accommodation services.	Met
W13 Students receive meals as agreed; these offer a well-balanced diet, taking into account any reasonable dietary requirements students may have.	Met
Comments	

W9 The staff member carrying out visits has extensive relevant experience including being a homestay host and homestay visitor for many years with an agency registered with British Council.

Accommodation: homestay only	
W14 Homestay hosts comply with the agreed terms and conditions for student placements.	Met
W15 Homestay placements encourage students to use English.	Met
W16 Hosts ensure that there is an adult available to receive students on first arrival.	Met
Comments	

All the criteria in the above area are fully met.

Accommodation: other	
W17 Students receive information about the implications of their living in private rented accommodation and advice in case of difficulties.	Met
W18 The provider monitors any other accommodation recommended, and booking and payment arrangements are clear.	Met
Comments	

All the criteria in the above area are fully met.

Leisure opportunities	Met
W19 Students have appropriate information about and access to social, cultural and sporting events and activities which enhance their experience of studying in the UK.	Met
W20 The content of any leisure programme is appropriate to the age and interests of the students.	Strength
W21 Any leisure programmes are well organised and sufficiently resourced.	Strength
W22 There are effective systems to ensure the health and safety of students on all on-site and off-site activities.	Met
W23 Staff supervising sporting and leisure activities on or off-site have appropriate experience, support and training.	Met

# Comments

W20 The content of the leisure programme is entirely appropriate and adjusted to suit the interests of and requests from the students. Feedback from students about the leisure programme was very positive.

W21 The leisure programme is very well organised. As well as the operations manager, one of the teachers has an additional role to help with the organisation and delivery of the programme.

### Safeguarding under 18s

Safeguarding under 18s	Met
S1 There is a safeguarding policy which specifies procedures to ensure the safety and well-being of all students under the age of 18. A named member of staff is responsible for implementing this policy and responding to child protection allegations.	Met
S2 The provider makes the policy known to all adults in contact with under 18s through their role with the organisation, and provides guidance or training relevant to its effective implementation.	Strength
S3 The provider has written parental/guardian consent reflecting the level of care and support given to students under 18, including medical consent.	Met
S4 Recruitment procedures for all roles involving responsibility for or substantial access to under 18s are in line with safer recruitment good practice and the organisation's safeguarding policy.	Not met
S5 There are suitable arrangements for the supervision and safety of students during scheduled lessons and activities.	Met
S6 There are suitable arrangements for the supervision and safety of students outside the scheduled programme.	Met
S7 There are suitable arrangements for the accommodation of students.	Met
S8 There are suitable arrangements to ensure contact between the provider and parents, legal guardians or their nominated representatives concerning the welfare of students.	Met
Comments	

There were no students aged under 18 at the time of the inspection. There are generally very low numbers of 16–17-year-old students enrolled throughout the year.

S2 There is a very good level of training and awareness of safeguarding issues. The designated safeguarding lead and two others have a specialist level of training, and two other staff members are trained to advanced level. Homestays are encouraged to take basic level training.

S4 UK criminal record checks issued to applicants from a previous employment have been accepted when the checks were issued more than three months previously.

# Declaration of legal and regulatory compliance

D1 The organisation certifies that it operates at all times in accordance with the declarations in the *Declaration of legal and regulatory compliance*.

The Accreditation Scheme requires accredited providers to comply with all applicable laws and regulations. Providers must take steps to ensure that they are aware of, and comply with, all existing and new legal requirements.

On initial application and annual renewal of accreditation, providers are required to confirm that they are complying with all applicable laws and regulations.

Inspectors will check a random sample of items during inspection, in relation to criterion D1; if they find evidence of a breach of statutory or other legal requirements, the provider will be required to submit evidence of compliance confirmed by the appropriate regulatory body.

Any breach of the law or regulations will be viewed seriously by the Scheme and may result in the withdrawal or withholding of accreditation.

Any sustained breach of the law or regulations which an accredited provider fails upon reasonable notice to remedy will result in accreditation being withdrawn.

# **Comments**

D1 The items sampled were satisfactory.

# Organisation profile

Inspection history	Dates/details
First inspection	2019
Last full inspection	2019
Subsequent checks/visits (if applicable)	Spot check 2023
Current accreditation status	Accredited

Other related non-accredited activities (in brief) at this centre	N/a
Other related accredited schools/centres/affiliates	N/a
Other related non-accredited schools/centres/affiliates	N/a

# **Private sector**

Date of foundation	2016
Ownership	Name of company: Etihad Ltd Company number: 10319551
Other accreditation/inspection	N/a

**Premises profile** 

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Details of any additional sites in use at the time of the	N/a
inspection but not visited/observed	
Details of any additional sites not in use at the time of	N/a
the inspection	

Student profile	At inspection	Estimate at peak
ELT/ESOL students (eligible courses)	At inspection	July
Full-time ELT (15+ hours per week) 18 years and over	8	59
Full-time ELT (15+ hours per week) aged 16–17 years	0	3
Full-time ELT (15+ hours per week) aged under 16	0	0
Part-time ELT aged 18 years and over	0	0
Part-time ELT aged 16–17 years	0	0
Part-time ELT aged under 16 years	N/a	N/a
Overall total ELT/ESOL students shown above	8	62
Adult programmes: advertised minimum age	16	16
Adult programmes: typical age range	18–28	18–28
Adult programmes: typical length of stay	10 weeks	10 weeks
Adult programmes: predominant nationalities	Kuwaiti, Saudi Arabian, Brazilian, Chinese, Belarussian	Kuwaiti, Saudi Arabian, Brazilian, Italian,
Junior programmes: advertised minimum age	N/a	N/a
Junior programmes: advertised maximum age	N/a	N/a
Junior programmes: typical length of stay	N/a	N/a
Junior programmes: predominant nationalities	N/a	N/a

Staff profile	At inspection	Estimate at peak
Total number of teachers on eligible ELT courses	1	4
Number teaching ELT 20 hours and over a week	1	
Number teaching ELT under 20 hours a week	0	
Number of academic managers for eligible ELT course	2	2
Number of management (non-academic) and administrative staff working on eligible ELT courses	2	
Total number of support staff	1	

Academic manager qualifications profile

Profile at inspection	
Professional qualifications	Number of academic managers
TEFLQ qualification and at least three years' full-time relevant teaching experience	0
Academic managers without TEFLQ qualification or three years' relevant experience	2
Total	2

The principal who is also the academic manager provides cover as necessary but does not have a regular teaching commitment. The assistant academic manager teaches a full timetable.

Teacher qualifications profile

Profile in week of inspection	
Professional qualifications	Number of teachers
TEFLQ qualification/profile	0
TEFLI qualification	2
ATEFL portfolio in progress	0
Non-ELT-related qualified teacher status only (for short courses for under 18s)	0
Holding specialist qualifications only (for ESP/CLIL)	0
Alternative professional profile	0
Total	2
Comments	·

The assistant academic manager is full time and teaches up to 20 hours per week.

Accommodation profile

Number of students in each at the time of inspection (all	students on eligible courses)	
Types of accommodation	Adults	Under 18s
Arranged by provider/agency		
Homestay	2	0
Private home	N/a	N/a
Home tuition	N/a	N/a
Residential	1	N/a
Hotel/guesthouse	0	0
Independent self-catering e.g. flats, bedsits, student houses	0	N/a
Arranged by student/family/guardian		
Staying with own family	0	0
Staying in privately rented rooms/flats	5	N/a
Overall totals adults/under 18s	8	0
Overall total adults + under 18s	8	

# Items requiring early action

Evidence must be submitted within three months to demonstrate that weaknesses in S4 have been addressed and six months for T1-3 & T9. The required evidence was subsequently submitted.