

REVIEW OF IPA QA PROCESSES 2016-2017 AND QA ACTION PLAN



Executive Summary

In 2016, the IPA undertook an internal review its QA processes – policies, procedures, quality systems and governance – pertaining to the Whitaker School of Government & Management, which is responsible for the provision of accredited third-level programmes.

The IPA initiated the review for a number of reasons. QQI had recently published its core statutory guidelines (as provided for in the 2012 Qualifications and Quality Assurance Act), and the IPA was obliged to follow these guidelines. A new awarding body relationship and the growth of the Institute's accredited programme offerings in the decade since 2006 resulted in necessary revisions to IPA QA processes. And, finally, the awarding body, UCD, engaged with the IPA to prepare for the formal approval of its QA processes as provided for in the 2012 Act.

The purpose of the present internal review, which was conducted by the assistant registrar, was to:

- a) identify what work would be required to (i) comply with current statutory requirements and quality guidelines, (ii) meet the expectations of the awarding body, and (iii) bring policies and procedures in line with current Institute programme developments;
- b) make recommendations on foot of the findings;
- c) draw up an action plan to implement the required changes in advance of the approval by UCD of the IPA's QA system in 2017.

During the review, it became clear that any proposed QA improvement proposals would consist principally of developmental work. The review gave rise to 6 findings and 13 recommendations.

Essentially, the findings and recommendations can be categorised as follows:

- A. Upgrade of specific policies and procedures, and generation of new sets where required.
- B. Enhancement of monitoring, review and evaluation mechanisms.
- C. Enhancements to production and accessibility of QA related data.

This document forms a summary record of the review undertaken and the findings and recommendations arising. The record is complemented by a tabular presentation of those recommendations, with the actions required to achieve them (and progress updates), in a separate attachment.

A. Background

In the late 1990s, the IPA embarked on generating a handbook of quality assurance processes that would govern, inform and drive critical academic and administrative activity in the IPA. This coincided with both the Universities Act of 1997, which made it a legal requirement for universities to 'establish procedures for quality assurance aimed at *improving* the quality of education and related services', and the granting to the Institute of Recognised College status by the NUI in 2001 (IPA has been a Recognised College of UCD since 2011 and will revert to its status as a Recognised College of NUI from September 2018).

The IPA Corporate Plan at the time specified two activities concerned with putting in place Quality Framework procedures, namely to: (1) develop Quality Assurance/Quality Improvement procedures appropriate to the size of the IPA's education provision that are based on international best practice and the principles of the NUI system; and (2) publish the IPA's QA/QI procedures in the form of a handbook.

The Institute moved to document more systematically its own internal regulations and procedures, particularly in the area of examinations and appeals, and distributed these to students in course documentation. There were new standards and procedures for course approval and examinations that conformed to policy, standards and procedures applicable to a Recognised College of the NUI. The dominant QA reflection, however, focussed on developing methodologies for formal self-assessment and peer reviews (and identifying areas to be evaluated, sequencing of events during a site visit, etc).

That QA Handbook was reviewed over 2005 and 2006. The impetus for such work resulted from a restructuring process within the IPA in 2004-2005 that brought the IPA's entire suite of accredited programmes and research activity under the same roof: Whitaker School of Government & Management. Another impetus was the development of the National Framework of Qualifications and its explicit focus on student learning outcomes defined in terms of knowledge, skills and competence.

The IPA's revision of its QA processes adopted the 2005 Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The Institute consulted QA systems in other universities, such as UCD, TCD and Queen's University Belfast, with which the IPA was running a joint Doctorate in Governance. The IPA also enlisted the assistance of an international expert in quality assurance, who helped establish a comprehensive blueprint for quality in the IPA.

In effect, the scope of the handbook was significantly enlarged. The QA processes tracked the entire academic cycle, and discrete areas received individual focus in separate sections of the handbook: academic and administrative structures; student admissions; student records; designing and reviewing modules/programmes; course management – academic & administrative; student support; assessment & examinations; access, transfer & progression; student feedback; student complaints; and student discipline. The QA Handbook was submitted to NUI in 2007 as part of the accreditation relationship. Sections of the Handbook have been reviewed internally on a cyclical basis since then.

In 2012 the Qualifications and Quality Assurance Act came into force. The Act stated that "each relevant provider and linked provider shall establish procedures in writing for quality assurance for the purposes of establishing, ascertaining, maintaining and improving the quality of education ... and related services the provider provides" (S.28 (1)). The Act obliged QQI to develop core QA guidelines for providers and stated

that "each relevant provider and linked provider shall have regard to the guidelines issued by the Authority under section 27(1)(a) in establishing procedures" (S.28 (2)). Furthermore, the Act required designated awarding bodies to approve the QA processes of its linked providers and to evaluate their effectiveness. Those "procedures for an evaluation shall include procedures for evaluation ... by the provider and by enrolled or formerly enrolled learners."

While awaiting the QQI core guidelines, the IPA continued to update sections of its QA Handbook in line with ESG guidelines, most notably in the area of examination irregularities, plagiarism, discipline and appeals. In early 2013, the Institute submitted its existing QA Handbook to UCD as part of its new status as a Recognised College of UCD. This submission was independent of the formal QA approval process that the IPA was scheduled to undergo with UCD once the QQI Guidelines were published.

In 2016, the IPA moved to review its QA processes once again for a number of reasons. QQI had recently published its core statutory guidelines (as provided for in the 2012 Act), and the IPA, like other third-level institutions in Ireland, was obliged to follow these guidelines. There were necessary revisions to the IPA QA system on foot of a new awarding body relationship (UCD) and the growth of the Institute's accredited programme offerings. And the awarding body began to work with the IPA to prepare for the formal approval of the QA processes as provided for in the 2012 Act, thus providing the IPA with an ideal opportunity to review its QA system in advance of approval. This document forms a record of the review undertaken and the consequent work-in-progress plan.

B. Context for Review

In late 2016, the IPA instigated an internal review of its academic QA processes (hereafter designated 'the Review') led by the assistant registrar. The Review was precipitated by a number of factors:

- a) national developments in the areas of quality assurance, access, transfer & progression, provision
 of education to international students and protection of learners as provided for in the 2012
 Qualification & Quality Assurance Act;
- the publication of revised standards and guidelines for quality assurance in the European higher education area that were endorsed by the Bologna Follow-up Group in the autumn of 2014 and received Ministerial approval in May 2015;
- c) the publication by QQI of statutory core and sector specific guidelines that, under legislation, the IPA is obliged to have 'regard to' in QA procedures;
- d) the statutory requirement to establish these new procedures 'as soon as practicable after the issue of [QQI] guidelines';
- e) commitment by the Designated Awarding Body, UCD to review the Institute's QA processes in 2017 as provided for in the 2012 QQA Act;
- f) the need to provide for QA developments in the IPA Strategic Plan;
- g) the recognition that the QA Handbook was due a revision to accommodate procedural and policy changes in the IPA.

C. Scope

The present Review considered all aspects of the IPA's academic QA processes — policies and procedures, monitoring and evaluation mechanisms. The review also addressed broader aspects of the IPA's QA system: the Whitaker School's arrangements for governance, management, planning, and resourcing as it related to QA oversight, duties and operational responsibilities. The IPA's corporate HR policies and governance procedures did not feature in the Review exercise as they are managed by the HR manager and Company Secretary/Director of Finance and Support Services respectively, each of whom conducts review exercises of their own.

D. Purpose

It is important to make clear that the Review was *not* concerned with identifying the various strengths of the present QA system. The IPA is aware of these strengths; the effectiveness of the system has been confirmed by recent reports on exam statistics, which have shown high exam success rates, and by recent surveys of students, which have also shown high satisfaction rates (see section G below for more detail). In due course, the strengths and weaknesses of the QA system, and its implementation, will be internally and externally evaluated in the self-assessment report and peer review report during an Institutional effectiveness review.

The purpose of the present Review was instead to:

- a) identify what work would be required to (i) comply with current statutory requirements and quality guidelines, (ii) meet the expectations of the awarding body, and (iii) bring policies and procedures in line with current Institute programme developments;
- b) make recommendations on foot of the findings;
- c) draw up an action plan to implement the required changes in advance of the approval by UCD of the IPA's QA system in 2017.

E. Evidence-Base

Relevant review material included:

- a) 2012 Qualification & Quality Assurance Act
- b) QQI statutory core and sector specific guidelines
- c) European Standards & Guidelines for Quality Assurance
- d) IPA Quality Assurance Handbook (2006 version, with updates to selected policies and procedures)
- e) UCD Guidelines issued by Quality Office & Quality Committee
- f) Best practice benchmarks in selected third-level Institutions

F. Methodology

The IPA conducted an internal review of its QA system. The Review was carried out by the assistant registrar and another member of faculty with QA responsibility. The Review involved:

- a) an examination of the available documentation from QQI (and relevant European authorities) and UCD to ascertain current requirements and recommendations;
- b) a review of material available from selected third-level institutions of varying sizes to ascertain their current approaches to QA;
- c) an assessment of IPA documentation and practice QA Handbook; minutes from academic meetings; information flows between Head of the Whitaker School, assistant registrar and course co-ordinators; evidence gathered as part of QA activities.

The Review was conducted in an open and deliberately critical manner. The objective was to identify where and how the Institute needed to revise its existing QA system in order to enhance its education delivery and to comply with QQI and awarding body requirements.

G. Finding & Recommendations

Following an extensive review of the available IPA material and systems, and an assessment of national and university requirements, the following recommendations emerged. The recommendations formed the framework for the enhancement of the IPA's QA system in late 2016-early 2017 in advance of the submission to UCD, scheduled for April/May 2017.

During the review, it became clear that any proposed QA improvement work would consist of developmental rather than replacement work. Generally, the Institute's QA system is a robust one, and it has served the Institute well. Recent reports on student satisfaction (2014) and examination statistics (2015) testify to student performance and satisfaction with the Institute. For example, the examination results of 3,400 students on undergraduate degree programmes between the academic years 2010/11 and 2014/15 were examined. The average exam success rates across BA stages 1-4 were broadly consistent in the five years of study (91%, 90%, 88%, 85% and 84%). This was also true of the BBS stages 1-4 (84%, 89%, 83%, 83% and 79%). There was little difference in the exam success rate between IPA-based and distance education students across the 5 years under review. The results of a further 2,250 students were examined for undergraduate special purpose (sub-degree) programmes. As might be expected for programmes that have a strong practical application, and are undertaken by practitioners often on block release from their employers, the average success rates were generally in the 90-100% range, with the majority in the 1H and 2H1 category.

The patterns were similar for postgraduate programmes. The results of approximately 700 students were examined for the period 2011-2015. Again, the success rates were high: an average success rate of 100% for the MEcon Science, a 94% exam success rate for the MA and an 81% exam success rate for the MSc students.

Student satisfaction is also high. In a comprehensive periodic survey of students and graduates in 2014, an average of 82% of respondents rated the Institute as either 'Very Good' or 'Good' across all questions. This

ranges from 92% satisfaction ('Very Good' or 'Good') with the quality of programmes in increasing knowledge and understanding, 90% satisfaction with the quality of weekend seminars/tutorials, 89% satisfaction with the quality of evening classes at the IPA, and 84% satisfaction with the quality of distance education manuals to a comparatively lower, but still a majority, rating of 60% satisfaction with Moodle. There was also a high satisfaction rating with the efficiency of the administration and support services (86%), another important rating given the requirement for flexible course delivery structures in the IPA.

These performance and student satisfaction ratings attest to the fact the IPA has worked hard to keep the service to students at the forefront of its activities, despite the challenging environment faced by the Institute during the recession. However, it is also a fact that resource constraints have meant that the Institute has not been in a position to develop its QA processes to the extent that it would have liked, particularly in the area of monitoring, evaluation and review. With recent approval from the Department of Public Expenditure & Reform to begin filling vacant posts, the Institute is finding more time for self-reflection, evidence gathering and assessment of effectiveness. It is in this light that the recommendations below should be read.

Responsibility for acting upon the recommendations remained with the assistant registrar and the quality support team, with the support of the Head of the Whitaker School and members of the Faculty who, under the guiding principles of a coherent and embedded QA system, are contributing to the further development of the IPA QA system.

New and amended QA policies and procedures have been approved by the Head of the Whitaker School, IPA Faculty and, where practicable, by such advisory bodies as the Education Committee and oversight bodies as the IPA-UCD Joint Academic Programme Board. The IPA is also liaising with the UCD Quality Office during the implementation of these recommendations.

The IPA's Action Plan, made on foot of these recommendations, clearly outlines the scope and type of work undertaken during the implementation phase. The Action Plan is attached to the Review as an Appendix and will be continually monitored by the assistant registrar to ensure that significant progress is made before the formal QA approval process.

Findings and Recommendations:

1. While there was a clear articulation of policy in many areas, this was not the case in all areas relating to Education provision. Also, policies, procedures and guidelines were not clearly distinguishable within the documents.

Recommendation 1:

Where necessary, re-draft procedural documents to distinguish clearly between the policies and supporting procedures and, where required, generate policy statements that will underpin the procedures, regulations and guidelines.

- 2. The 2012 Qualifications and Quality Assurance Act states that "each relevant provider and linked provider shall have *regard to* the guidelines issued by the Authority under section 27(1)(a) in establishing procedures" (S.28 (2))". The IPA is obliged therefore to review its suite of QA policies and written procedures in the light of QQI statutory core guidelines, QQI sector specific guidelines, European Standards & Guidelines for QA, and other recent QQI and statutory positions. For example:
 - ➤ QQI have issued guidelines in relation to governance & management of quality; documented policies and procedures; programme development, delivery and review; student admission and progress; staff recruitment and development; teaching & learning; student assessment; student support; information systems and data management; public and learner information; self-evaluation. The IPA QA processes need to accommodate the guidelines recommended under each of these areas.
 - ➤ The IPA needs to address current developments in the area of access, transfer & progression and recognition of prior learning.
 - ➤ The IPA needs to develop new policies and procedures where required such as QA governance & management; public information; protection of enrolled learners.

Recommendation 2:

Update policies and written procedures and associated academic systems and practices, and where necessary, generate new ones, to accommodate best practice and national and European policies and guidelines.

- **3.** Selected policies and procedures have undergone constant revision, but other documents need updating; especially in relation to accreditation arrangements and new programme requirements. For example:
 - ➤ In the area of assessment regulations and appeals, and academic discipline, the procedures have been updated on a cyclical basis since 2006, primarily as a result of developments following examination sessions. In other areas, such as course design and approval, and appointment of externs, the existing documentation does not wholly reflect modified practice arising from new accreditation arrangements. Marks & Standards documentation does not fully accommodate certain specialist one-year diplomas.
 - Written procedures are occasionally cumbersome and put a strain on current resources.

Recommendation 3:

Update policies and written procedures to align them with new programmes and accreditation arrangements.

Recommendation 4:

Establish a review cycle to ensure that policies and procedures are kept up-to-date.

4. While procedures identify individuals responsible for specific activities, there could be more detailed reference across the QA system to control, co-ordination, monitoring and self-assessment. How are we to know that procedures are followed?

Recommendation 5:

Clarify and articulate QA governance and management structures: QA ownership, role of oversight bodies, QA implementation structures, and responsibilities of staff.

Recommendation 6:

Further develop mechanisms, at local and general levels, for monitoring QA activity.

- 5. The IPA engages in continual programme enhancement, but there can be gaps in evidence gathered to support these changes and in records logging these changes. The IPA also reviews reports at relevant committee meetings, but such evaluation and review procedures are selective. For example:
 - The IPA makes changes to modules on an annual basis, particularly in the area of distance education materials. These changes demonstrate commitment to enhancement. Course review, however, could occur in a more systematic manner, and be more fully recorded.
 - ➤ The IPA gathers evidence for a range of QA activities student surveys, internal examiner reports, extern examiner reports, but the evidence could be more comprehensively collected or systematically analysed. Such activity would constitute a valuable resource for QA enhancement.
 - There are good recent reports (and others in progress) evaluating student feedback and examination statistics. There are records and minutes of these reports being reviewed by Faculty and various advisory/oversight bodies. There are clear action points arising to support enhancement. The IPA needs to go a step further to integrate these reports into a systematic review cycle and to monitor the action points arising.

Recommendation 7:

Systematically collate evidence where outlined in individual sets of procedures – student feedback, examiner's comments, etc.

Recommendation 8:

Improve mechanisms to systematically evaluate and enhance modules and programmes.

Recommendation 9:

Enhance moderation and review to ensure that results and findings are systematically reviewed and acted upon.

6. There is a considerable bank of minutes, reports, policies and procedures extant in the IPA. These documents provide a valuable repository for enhancement of QA activity, management, and communication within the Division. They can also serve a vital role in public reassurance:

demonstrating our commitment to accountability and enhancement. However, the documents appear in diverse locations, with no clear policy on distribution or review. For example:

- Selected policies and procedures are made available to students in course documentation where the situation demands, but not all are publicly accessible.
- Reports are available to staff at relevant committee meetings, but not available to the students.
- Minutes of staff meetings are distributed at meetings, but they could also be stored in a more accessible fashion.
- Some committees meet regularly according to a set schedule Education Committee and IPA-UCD Joint Academic Programme Board. Other standing committees meet less frequently.

Recommendation 10:

Review policy in relation to public information in the light of QQI statutory guidelines, student-centredness and commercial sensitivities.

Recommendation 11:

Make QA policies and procedures publicly available on IPA website.

Recommendation 12:

Set committees on a more regular schedule of meetings.

Recommendation 13:

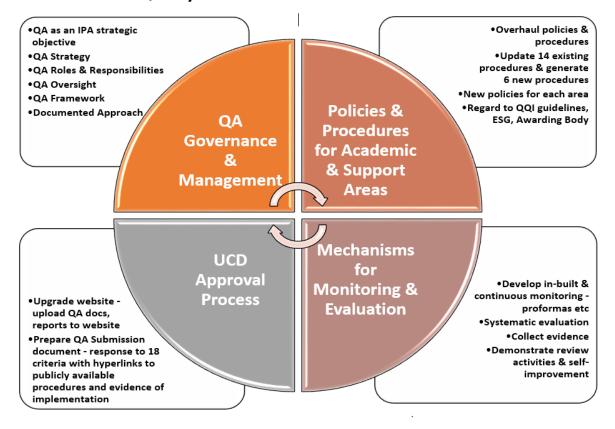
Make archived minutes and reports accessible, where and as agreed in recommendation 10.

See below for a summary of key actions arising from the recommendations of the Review.

Dr Denis O'Brien Assistant Registrar February 2017

Appendix 1

Quality Assurance Action Plan 2016-2017





Review of IPA Quality Assurance Processes 2016/2017

QA Recommendations & Actions

Table 1: Recommendations & Action Plan - Review of QA Processes 2016/2017

Recommendations	Actions	Status
Recommendation 1: Where necessary, re-draft procedural documents to distinguish clearly between the policies and supporting procedures and, where required, generate policy statements that will underpin the procedures, regulations and guidelines.	 Provide clear articulation of policy for the following areas: quality assurance; admissions; access, transfer & progression; recognition of prior learning; student assessment; course design, delivery & review; student support; student engagement & feedback; marks & standards; academic misconduct & discipline; public information; data protection; data management and analysis; protection of enrolled learners; complaints; staff development & resourcing. Secure contribution and approval of Faculty and oversight bodies for policies. Accommodate these policies in a QA Framework document and, where necessary, include summary policy statements at the head of each set of procedures and regulations. 	Completed Completed Completed
Recommendation 2: Update policies and procedures and associated academic systems and practices, and where necessary, generate new ones, to accommodate best practice national and European policies and guidelines.	 Review and amend procedures and regulations for each of the policy areas outlined above in conjunction with QQI core guidelines and IPA context. Eg include procedures for annual student feedback and annual module evaluation, periodic stakeholder feedback, programmatic reviews, recognition of prior learning, breaches of assessment regulations & plagiarism. Generate new policies and procedures for public information; teaching & learning; protection of enrolled learners; library; student charter; public information; data collection & review. Secure contribution and approval of Faculty and oversight bodies for procedures and consequent changes to work practices. 	Completed Completed Completed

Recommendation 3: Update policies and written procedures to align them with new programmes and accreditation arrangements. Recommendation 4: Establish a review cycle to ensure that policies and procedures are kept up-to-date.	 Generate summary sheets for each set of procedures for ease of use. These sheets will provide for a quick identification of the following: (a) purpose; (b) scope; (c) contents; (d) audience & communication; (e) contextual guidelines; (f) related IPA policy; (g) policy owner (h) key implementation mechanisms; (i) monitoring, evaluation and improvement mechanisms; (j) revision history, commencement & date of next review. Document the policy owner, revision history and date of next review in respect of each document. Compile administrative procedures and guidelines (applications, student records, assessment, payments). 	Completed Completed In Progress
Recommendation 5: Clarify and articulate QA governance and management structures: QA ownership, role of oversight bodies, QA implementation structures, and responsibilities of staff.	 Develop new policy document and framework for QA governance & management. Clarify roles, responsibilities and committee oversight. Establish QA as a corporate strategic objective in IPA Strategy. 	Completed
Recommendation 6: Further develop mechanisms, at local and general levels, for monitoring QA activity.	 Enhance monitoring & review processes for principal academic & administrative activities. At the beginning of each set of policies and procedures, provide a summary sheet making explicit reference to the nature of the document and the mechanisms by which the relevant procedures will be implemented and monitored, thus providing clarity for internal staff and stakeholders around purpose, status, action and responsibility. 	Completed Completed

Recommendation 7: Systematically collate evidence where outlined in individual sets of procedures – student feedback, examiner's comments etc	 Agree timelines, mechanisms and resources for systematic collection of: Exam results data – grade classification by programme, stage, tuition method, intake & progression rates etc Student feedback (pro-formas, student committees) Intake & progression rates Award statistics Internal & examiner's comments Client feedback 	Completed
Recommendation 8:	Review and update detailed module descriptors.	Completed
Improve mechanisms to systematically evaluate and	Develop new procedures for annual review of modules that incorporates student foodback, integral 8, output and a superior of foodback, source as a ordinate review and	Completed
enhance modules and programmes.	feedback, internal & external examiner feedback, course co-ordinator review and related monitoring and oversight activity.	
	> Develop new procedures for periodic review of programmes that incorporates	Completed
Recommendation 9:	student feedback, internal & external examiner feedback, course co-ordinator	
Enhance moderation and review to	review, peer review and related monitoring and oversight activity.	
ensure that results and findings are	Sequence programme reviews.	Completed
systematically reviewed and acted	Agree timelines for generating reports on:	Completed
upon.	 Exam results data – grade classification by programme, stage, tuition 	
	method, intake & progression rates etc	
	Annual and periodic course reviews - Student foodback	
	Student feedback Decord decisions, policy changes, strategies, course amondments.	Ongoing
	Record decisions, policy changes, strategies, course amendments	Ongoing

Recommendation 10:	Develop new policy on public information.	Completed
Review policy in relation to public	 Decide what reports and QA findings should be publicly available, available to staff 	Completed
information in the light of QQI	etc.	Completed
statutory guidelines, student-	> Archive the following:	Ongoing
centredness and commercial	Minutes of Education Committee meetings	Oligonia
sensitivities.	Minutes of Faculty meetings	
	Minutes of Admin meetings Minutes of Admin meetings	
	 Minutes of Admin freetings Minutes of IPA-UCD Joint Academic Programme Board meetings 	
Recommendation 11:	Minutes of relevant course review/management meetings	
Make policies and procedures		
publicly available on IPA website	Minutes of relevant meetings with students or clients	
	Results of previous feedback surveys	
	 Results of embedded monitoring & review processes 	
Recommendation 12:	 Annual course review reports 	
Set committees on a more regular	 Internal examiner reports 	
schedule of meetings.	External examiner reports	
	 Module descriptors 	
	Course schedules & curricula	
Recommendation 13:	 Place Education Committee, Faculty, Teaching & Learning & Assessment Group, 	Ongoing
Archive minutes and reports in areas that are accessible, where and as agreed in recommendation	Joint Academic Programme Board on a more scheduled basis	
	Examine possibility of staff portal for archiving business related information -	2017/2018
10.	minutes etc.	
	Place QA framework, marks & standards and policies & procedures on website as per QQI guidelines.	Completed
	 Place extensive course information on website (in addition to existing hard-copy 	Completed
	brochures) and other info considered publicly relevant.	Completed
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Table 2

QA Policies and Procedures Record of Progress

Policy/Procedure	Progress
Governance, Oversight & Quality Framework	Completed
2. Teaching & Learning Policy	Completed
3. Public information Policy	Completed
4. Learner Charter	Completed
5. Library Policy, Procedures, Charter	Completed
6. Module/Programme Design and Approval Policy	In Progress
7. Module/Programme Review Policy and Procedures	Completed
8. Student Feedback & Participation Policy	Completed
Procedures for Creating & Revising Distance Education (Course) Materials	Completed
10. Assessment Regulations and Procedures	Completed
11. Exam Administration	Completed
12. Procedures for Appeal of Examination Results Policy	Completed

Policy/Procedure	Progress
13. Marks & Standards	Completed
14. Disciplinary (Non-Assessment) Policy & Procedures	Completed
15. Complaints (Non-Assessment Related) Policy & Procedures	Completed
16. Admission Policy & Criteria	Completed
17. Access, Transfer & Progression Policy	Completed
18. Protection of Enrolled Learners	Completed
19. Recognition of Prior Learning	Completed
20. Research Strategy	In Progress
21. Student/Pastoral care and Support Policy	
	In Progress

Note: The Institute's corporate policies such as Recruitment Policy and Procedure, Training and Development Policy, Health & Safety Policy, and Privacy Statement/Data Protection Policy are managed by the HR manager and Company Secretary/Director of Finance and Support Services and, therefore, did not feature in the Review. Hence, they are not listed in the Record of Progress.