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## Staff Recruitment and Selection Policy

### 1. Policy Overview

This policy outlines how the College recruits and selects staff. It exists to

- Demonstrate a commitment to a fair, consistent and transparent process that duly reflects the equality of opportunity in the College's recruitment and selection practices.
- Ensure all applicants are considered based on their merits and relevant abilities for any role in support of the College's diversity and inclusion aims as an international and multicultural education institution.
- Provide a robust framework for the recruitment and selection of staff ensuring that the most suitable candidate is appointed to each role.

### 2. Policy Statement

The College wishes to ensure that there is a systematic approach to the fair and transparent recruitment of staff as guided by QQI<sup>1</sup>, namely that procedures for recruitment address:

- Roles, responsibilities, and codes of conduct.
- Academic/professional/technical standards for all staff and how these are maintained and enhanced.
- Pedagogical standards for teaching staff and how these are maintained and enhanced.
- Benchmarking staff profiles (at a programme level) with those of similar providers.
- Recruitment, selection, probation, and tenure.
- Collection and use of regular and timely learner and other relevant feedback on the teaching staff.
- Pedagogical training and certification of teaching staff.
- Performance management.

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<sup>1</sup> Statutory Quality Assurance Guidelines developed by QQI for use by all Providers (2016), section 4.1



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Besides, all recruitment and selection practices are performed in compliance with the following Irish legislative requirements:

- Employment (Miscellaneous Provisions) Act 2018:
- Minimum Notice and Terms of Employment Acts 1973–2005.
- Industrial Relations (Amendment) Act 2015.
- Organisation of Working Time Act 1997.
- Organisation of Working Time (Records) (Prescribed Form and Exemptions) Regulations 2001.
- Safety, Health and Welfare at Work Act 2005 (as amended): replaced the provisions of the Safety, Health and Welfare Act 1989.
- The Employment Equality Acts 1998–2015.
- Equal Status Acts, 2000 to 2004.
- Equality (Miscellaneous Provisions) Act 2015.
- The Criminal Justice (Spent Convictions and Certain Disclosures) Act 2015.
- Protection of Employees (Part-Time Work) Act 2001.
- Protection of Employees (Fixed-Term Work) Act 2003.
- Cara Inclusion Charter - <https://caracentre.ie/sport-inclusion-disability-charter/>.

### 3. Roles and Responsibilities

This policy is relevant to the recruitment and selection of all staff, whether full-time or part-time, whether academic, managerial, or administrative. It is the responsibility of the HR, DPO and People Officer ("People Officer") or their designee to ensure that this policy is implemented in full. The Programme Manager is responsible for ensuring that College staff selection results in the appointment of staff who are a true reflection of the type of people-



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centred educator it wants to be. All staff are expected to comply with UDCO005 UniHaven Code of Ethics Rev 1.

The Academic Director is responsible for ensuring that policies are developed and maintained, that they remain fit for purpose, that they remain in compliance with QQI guidelines, that they are updated as per agreed schedules, and that they are being implemented as intended. In the latter context, the Academic Director will inspect a sample of policies each year to check for the correct implementation and bring the findings to AC as part of the annual QA/QQI review and reporting process.

#### 4. Policy

It is important to the high quality of education and student care that the College strives to provide that academic and administrative staff have sufficient experience and expertise to fulfil their designated roles. Recruiting the right staff helps to enhance the teaching and learning environment for students such that they will achieve their academic and career goals. Teaching and student support staff roles are critical to the levels of engagement students have while studying at the College and the degree to which they are satisfied with the overall study abroad experience while studying in Ireland. These roles are held by staff who, as student-facing staff, are tasked with being the main point of contact with students and are likely to be the ones most likely to detect and observe the learning or non-learning issues that cause most concern to them. For these reasons, the recruitment and selection of staff at the College are paramount to making sure that the College ethos, mission, values, strategic priorities, and programme objectives are all achieved.



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## Principles

The College commits to:

- Operating a competitive recruitment process founded upon a fair, open and transparent approach designed to enable the selection of the most suitable person from the widest possible range of suitable applicants. It is mandatory for staff involved in recruitment and selection to complete the following or equivalent training to ensure a fair and impartial approach is taken to staff recruitment:
  - Unconscious Bias (online) - <https://www.mslearning.microsoft.com/course/72169/launch>.
  - Recruit and Selection (online) - <https://www.open.edu/openlearn/money-business/human-resources/human-resources-recruitment-and-selection/content-section-0?active-tab=description-tab>.
- Ensuring that all candidates are treated fairly, with dignity, respect, and courtesy, and ensuring a positive candidate experience.
- Attracting and engaging staff from a wide and diverse background and proactively seeks to avoid unfair bias in its processes. We encourage the recruitment of staff with disabilities and will make reasonable adjustments at all stages of the recruitment process as required.
- Promoting best practices in recruitment and selection and will continuously develop innovative attraction and delivery strategies in our practices.
- Treating all documentation relating to applicants confidentially under data protection legislation and our UPOL020 UniHaven Data Protection Policy Rev 1.
- Encouraging applications from all suitably qualified candidates. If necessary, the successful candidate is required to provide appropriate documentary evidence of their right to work in Ireland before taking up their employment.
- Ensuring academic staff are recruited with sufficient competence and expertise to teach their assigned programme and modules including its Blended Learning aspects<sup>2</sup>. An

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<sup>2</sup> Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes, section 3.1.3



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appraisal of the teaching (including assessment) ability of Teachers is a key part of the selection procedures.

There are three key stages in the College's recruitment and selection procedure, namely Planning, Selection, and Verification and Offer. These procedures are outlined fully in section 5.

### **Selection Criteria**

The selection criteria for the key College roles are described below.

#### **Academic Director Selection Criteria**

- Essential Requirements
  - Masters qualified with a recognised TEFL certification.
  - 5+ years of teaching experience in a QQI or equivalent accreditation environment, at least 2 of which are in a multicultural environment.
  - Curriculum design.
  - 2+ years' experience in managing programmes.
  - Experience in online teaching, assessment, and support.
  - Must be comfortable with change/flexibility, working on own initiative, working in and with a small team.
  - Garda Vetting.
- Desirable Requirements
  - PhD with 2+ years of centre management experience.
  - Has taught overseas.



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## **Programme Manager Selection Criteria**

- Essential Requirements
  - Degree qualified at NFQ level 8 minimum.
  - 3+ years of secondary, further, or higher education teaching experience in a related discipline, at least 1 of which is in a multicultural environment.
  - Curriculum design with experience in teaching, assessment, and learning support.
  - 1+ years' experience in managing programmes.
  - Must be comfortable with change/flexibility, working on own initiative, working in and with a small team.
  - Garda Vetting.
- Desirable Requirements
  - Masters qualified.
  - A recognised TEFL certification (CELTA, Trinity TESOL or QQI Certificate in Teaching English as a Second or Other Language (TESOL) - NFQ level 7 (Special Purpose Award)).
  - 1+ years' experience in centre management.
  - Teaching qualification.

## **Teacher Selection Criteria**

- English Teachers
  - Essential Requirements
    - Degree qualified at NFQ level 8 minimum.
    - Recognised TEFL certification (CELTA, Trinity TESOL or QQI Certificate in Teaching English as a Second or Other Language (TESOL) - NFQ level 7 (Special Purpose Award))
    - English teaching experience – 3 years minimum.
    - Experience in teaching, assessment and learning support.
    - Garda Vetting.
  - Desirable Requirements
    - MA TESOL, Applied Linguistics, or related discipline.



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- Teaching qualification.
  - Academic Module Teachers
    - Essential Requirements
      - Degree qualified at NFQ level 8 minimum in a related discipline.
      - 3+ years of secondary, further, or higher education teaching experience in a related discipline, at least 1 of which is in a multicultural environment.
      - Experience in teaching, assessment and learning support.
      - Garda Vetting.
    - Desirable Requirements
      - Postgraduate degree in a related discipline.
      - Teaching qualification.

### **Student Support Officer Selection Criteria**

- Essential Requirements
  - Degree-qualified at NFQ level 7 minimum or equivalent work experience.
  - Excellent administrative and organisational skills with the ability to prioritise their work to meet deadlines.
  - Good IT skills, experience working with MS Office.
  - Excellent interpersonal skills including both verbal and written communication.
  - Garda vetting.
- Desirable Requirements
  - Experience in a similar role with an international provider or higher education institution.
  - Experience in working with and providing both administrative and pastoral support to students.



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## 5. Procedures and Forms

### Planning

The recruitment and selection process will not commence until the need for a role has been established consistent with the College strategic priorities and its budgetary constraints. The Executive Management Team (EMT) signs off on all new roles. Before signoff is secured, a Manager or Officer must present a business case to EMT to justify the rationale for proposing any new role. This rationale should include at a minimum:

- The role proposer is tasked with refining the role description for the role outlining the aim of the role, its key responsibilities, the skills, and competencies needed for the role, the level of experience required and the required qualifications, both essential and preferred.
- The workload rationale explaining why the workload relevant to the proposed role cannot be done by someone else, by a reorganisation of workload allocations among existing staff or by technology improvements that minimise existing staff workloads...see also UPOL011 Academic Workload Allocation Policy Rev 1 for recommended workload allocation approaches.
- If the proposed role is full time or part-time.
- The cost-benefit analysis relevant to the proposed role includes financial and non-financial factors.
- If the vacancy is for a role to be filled overseas (e.g., an overseas student recruitment role), the same processes will apply but the terms and conditions will be a mix of those relevant to Irish employment laws, terms and conditions and those required to satisfy the legislation of the country in which the role will be located.

If EMT is satisfied with the rationale presented, the role is signed off together with the salary band and benefits applying, as well as the advertising budget and location. All roles will be open to internal and external applicants. Preparation for the selection stage then starts.



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## Selection

The role proposer consults with the People Officer who oversees the section process. The following aspects of selection are key to the successful appointment of a new role holder at the College:

- Advertising
  - The People Officer is responsible for placing recruitment advertisements for staff.
  - A budget will have been assigned by EMT.
  - An advertising location will have been guided by EMT, but all vacancies will be advertised on internal and external company websites.
  - Adverts will utilise proactive and positive language, reflecting a desire to attract diverse applicant pools and in line with staff training – see section 4.
  - Adverts will reflect the selection criteria for the role.
- Closing Date
  - Vacancies will be advertised for between 2 and 4 weeks with the more senior roles being advertised for a longer period.
- Membership of Selection Committee
  - The People Officer will decide on the composition of the interview Selection Committee. The People Officer will be one of a minimum of three committee members, with at least one other being the Line Manager of the role being filled, i.e. for Teachers, the Line Manager will be the Programme Manager who is also a qualified teacher.
- Shortlisting
  - The Selection Committee carries out the initial shortlisting of applications by comparing evidence in the application against the essential and desirable criteria for the post as set out in the job description. Such decisions and their rationale are recorded by the People Officer. It is important to remember that individuals may challenge any shortlisting decision and may seek feedback



accordingly. Shortlisting decisions must be fair, objective, non-discriminatory, and properly recorded.

- Where a candidate does not meet one or more of the essential criteria, the role must be re-advertised until suitable candidates have been identified.
- Where many applicants appear to meet the essential criteria then the desirable criteria should be used to identify those who are most suitable to be invited for an interview.
- The People Officer contacts interviewees, ideally at least three, and prepares the interview assessment sheets for the interviews.
- The Interview
  - All shortlisted candidates will be seen and considered by the same Selection Committee and should typically be interviewed on the same day. Where this is not possible, the interviews should be held over as short a period as possible.
  - Video conferencing facilities are available and should be considered as needed. Candidates will be offered additional support and will make reasonable adjustments as required.
  - Before interviews being held, each member of the Selection Committee should:
    - Review the role description.
    - Assess the application form/CV of each applicant.
    - Review the essential & desirable criteria and identify areas for further exploration/ questions and the sequencing of these.
    - The People Officer will take responsibility for this discussion and coordinate the question set and the allocation/ordering of these via Committee members. All candidates should broadly be asked the same set of questions.
  - Presentations on areas such as strategy, college management etc. are included as part of the selection process for EMT and Academic Management roles.
  - Presentations to assess pedagogical standards, teaching and assessment ability, and teaching style are included as part of the selection process for



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Teachers where Teachers will be asked to 'teach' a sample of programme content on which they will be assessed by the interview panel.

- Interview Assessment Forms mirroring the criteria from the role descriptions will be prepared by the People Officer and supplied to all Selection Committee members. After each interview, all members of the Selection Committee should record their comments and rate each candidate against the pre-determined essential and desirable criteria from the job description in the Interview Assessment Form.
- One Interview Assessment Form representing the collective view of the Selection Committee should be completed for each candidate after the interviews have concluded.
- Where consensus is reached by the Selection Committee, there is no need for further discussion. Further discussion is however necessary where there is not complete agreement on the interview assessment of each candidate.
- The interview outcome and justification for a recruitment decision should be recorded on each form to ensure the process is suitably robust and transparent. This will enable the College to demonstrate that the most suitably qualified candidate is appointed along with the requisite documentary record of the decision and will enable constructive feedback to be provided to candidates on their request.
- Recommendation
  - Once a preferred candidate has been identified by the Selection Committee, the People Officer will formally notify EMT of the decision and seek their approval to proceed. The EMT reserves the right to call for a second interview and/or to have the CEO or Academic Director (as relevant to the role) discuss the proposed role with the proposed candidate. Should a second interview be required, it will follow the above process.
- The People Officer will issue all post-interview correspondence, including regret communications. Once selected, all staff will be issued with a statement of



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employment, an employment contract, and a copy of UDOC007 UniHaven Employee Handbook Rev 1 that forms a part of the contract.

## **Verification and Offer**

The formal written offer of employment and written particulars of terms and conditions of employment will be issued by the People Officer, typically following verbal or email acceptance by the preferred candidate. The candidate is asked to accept the offer in writing by a specified date. All offers are conditional on the successful candidate meeting the following requirements:

- Verification of qualifications
  - Original qualifications will be checked and verified by the People Officer.
  - If the evidence of any candidate's qualifications shows that such candidates do not meet the minimum selection criteria in this aspect, whether through candidate oversight, error or through misinformation, such candidate will no longer be considered for the role in question and may be dismissed or removed from teaching duties if such fact is uncovered after being appointed to a role.
- References
  - The People Officer will seek at least two verbal employment references for external candidates once approval has been given by the candidate. References are not required for internal candidates.
  - The purpose of an employment reference is to obtain information about the employment history of a candidate. References require to be treated with caution due to the potential for bias whether favourable or unfavourable to a candidate.
  - In the event of the People Officer or Line Manager having any concern regarding a reference, they should discuss this immediately and resolve by either seeking additional information from or about the candidate or declining



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the candidate, in which case the second most suitable candidate will be offered the role.

- Occupational Health (if appropriate)
  - An Occupational Health referral may be required for certain roles or where any potential health issues have been identified during the recruitment process.
- Garda Vetting (mandatory)
  - All candidates who are successfully appointed to a new role at the College must have Garda Vetting because it teaches students under the age of 18. Garda Vetting is completed as per UPOL012 UniHaven Garda Vetting Policy Rev 1 and UPRO001 UniHaven Garda Vetting Procedure Rev 1 and is coordinated by the Child Protection Officer.



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## Appendix

### Sample Job Advertisement - Academic Director

We are now hiring an experienced Academic Director to lead the academic function as it established its network of overseas and local international teaching colleges and begins its online programmes. The ideal candidates are flexible and experienced academic directors with an international education background or academic managers who feel they are ready to step up into a more senior role.

#### Essential Requirements

- Essential Requirements
  - Masters qualified.
  - Recognised TEFL certification.
  - 5+ years of teaching experience in a QQI or equivalent accreditation environment, at least 2 of which are in a multicultural environment.
  - Curriculum design.
  - 2+ years experience in managing programmes.
  - Experience in online teaching assessment and support.
  - Must be comfortable with change/flexibility, working on own initiative, working in and with a small team.
  - Garda Vetting.
- Desirable Requirements
  - PhD.
  - 2+ years of centre management experience.
  - Has taught overseas.

#### Job Benefits

- Salary range: €TBC
- 25 days annual leave



Sample Role Description – Academic Director

<p align="center"><b><u>Academic</u></b></p> <p align="center"><i>Meeting UniHaven Academic Objectives</i></p>	<p align="center"><b><u>Business</u></b></p> <p align="center"><i>Managing UniHaven Student Admission and Partner Requirements</i></p>	<p align="center"><b><u>Compliance</u></b></p> <p align="center"><i>Meeting UniHaven Quality Assurance and Regulatory Compliance Objectives</i></p>
<p>Working with the CEO</p> <ul style="list-style-type: none"> <li>• Promotion and Representation of the College Externally.</li> <li>• Leading all aspects of our Academic Department.</li> <li>• Overseeing Programme Review and Development.</li> <li>• Enhancing Teaching and Learning.</li> <li>• Enhancing the Student Experience.</li> </ul>	<p>Working with the CEO and CRO</p> <ul style="list-style-type: none"> <li>• Implementing UniHaven Strategic Objectives.</li> <li>• Supporting the Efforts to Bring in Additional Revenue.</li> <li>• Setting, Monitoring and Control of College Budgets.</li> <li>• Management of Academic Workload and Performance.</li> <li>• Management of Academic Administration and Structures.</li> <li>• Academic Facilities and IT Coordination/Management.</li> </ul>	<p>Working with the CEO</p> <ul style="list-style-type: none"> <li>• Enforcing Academic Standards, Quality Assurance and Student Policies.</li> <li>• Managing and Updating College Policies.</li> <li>• Upholding College Governance and Accountability.</li> <li>• Overseeing Accreditation Processes including Programme Validation and Revalidation in Ireland.</li> <li>• Compliance with all UniHaven and Local Legislative Requirements.</li> </ul>
<p align="center"><b><u>Staff</u></b></p> <p align="center"><i>Valuing and Managing Staff in the Achievement of UniHaven Goals and Objectives</i></p>		
<p align="center">Working with the CEO</p> <ul style="list-style-type: none"> <li>• Taking Ownership of Academic Staff Recruitment, Evaluation and Retention.</li> <li>• Staff Development.</li> </ul>		



Sample Interview Assessment Forms – For Academic Director Interviews 1 and 2 – To Be Modified for Other Roles

Key Questions	Expected Points to Mention	Very Poor	Poor	Good	Very Good	Excellent
Tell us your understanding of this role?	Thoughts generally					
What appeals to you about the role that led to you applying?	Desire for role					
Tell us why you believe you are suited to the role?	Self-awareness v understanding of the role					
Why do you want to work in this international education industry	Industry knowledge					
In the future, what do you believe are the greatest challenges this industry will face?	Industry knowledge					
What is your greatest failure and what did you learn from it?	Self-reflection and attitude to setbacks					
What is the most important aspect of taking a programme and creating deliverable content and timetable for it?	Know-how and student focus					
What understanding do you have of QQI accreditation and overseas equivalents?	Know-how					
What experience have you of small business, startups, and what do you think are the most important qualities for someone to succeed in such environments?	Understand needs of small business, flexibility, can-do, juggling....					
What challenges and opportunities does online learning present?	Student engagement, content design/presentation, delivery					
What are the key differences between teaching and managing others to teach/managing academic units?	Academic, management, operations, finances, facilitator					
When were you most satisfied with your job?	What excites them					
How would your colleagues describe you?	Self-awareness – modesty/self-criticism,					
	<b>Overall Rating</b>					



Key Questions	Expected Points to Mention	Very Poor	Poor	Good	Very Good	Excellent
Tell us what you expect to help UniHaven to achieve in the next 6 months (i.e. the pre-I/V request)	Key Priorities of Accreditations, Programme Design for Online, Staff Hiring, Overseas Oversight Their approach to planning and stakeholders – i.e. Ganttts, process-driven etc. Use of KPIs to measure success – which KPIs					
What needs to happen for a programme to go from an outline to being delivered in class virtually or physically?	Understanding of learning outcomes Develop student-centred content Hiring the right teachers and support staff					
How do you approach the maintenance of very high QA standards for our programmes and our overseas colleges	Focus on processes as required by accrediting bodies KPIs to evidence the assurance needed Stakeholder surveys for feedback Staff engaged, motivated, and bought into QA					
How do you ensure that the academic division and staff uphold our brand and our values in their working lives?	Being brand ambassadors Walking the talk re our values Being present with and for staff to have your 'ear to the ground'					
How do you know if our colleges are meeting our academic expectations?	Use of salient KPIs Asking staff and students Asking university partners					
What do you do if you believe we are recruiting the wrong type of student?	Gather evidence Raise at senior level in a constructive manner					
	<b>Overall Rating</b>					



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## Offer Letter of Employment

*(May be customised further to suit the role)*

**Date:**

**Employee Name:**

**Employee Address:**

Dear \_\_\_\_\_,

I am pleased to offer you an appointment with our staff. This is a permanent position subject to the satisfactory completion of a probationary period of six months for the start of employment. The Company reserves the right to extend the probationary period, but in any case, it will not be extended beyond 12 months.

During the probationary period, employment may be terminated at the Company's absolute discretion. In such a case you will be entitled to 1 weeks' notice, after the completion of 13 weeks of service.

You are being offered a position in our \_\_\_\_\_ team/department.

**Position:**

**Your Position will be:**

**Your Manager will be:**

**Location:** The company premises are at \_\_\_\_\_, where you shall be presently employed, however, you may be relocated in the future and you will be given notice before this occurring.

On your first day of employment with the company, you should report to \_\_\_\_\_ at \_\_\_\_\_ am at the above address.

**Commencement Date:** Your appointment will commence on the \_\_\_\_\_ and will not continue beyond your 66<sup>th</sup> Birthday. (or some other agreed year)



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- Duties:** Please refer to your Job Description attached.
- Salary:** Your salary will be €\_\_\_\_\_ per annum, and will be paid monthly/weekly/  
by cheque/direct debit etc.
- Hours of Work:** The Company operates from \_\_\_\_\_ to \_\_\_\_\_.  
Work hours are from \_\_\_\_\_ to \_\_\_\_\_.  
You will be required to work \_\_\_\_\_ hours per week.
- Sick Pay:** The Company does/does not (***adjust before issuing***) operate a sick pay scheme. The company, therefore, is not obliged to pay you during any absence on grounds of illness, and in such event, you should avail of the appropriate Department of Social Protection benefits.
- Law:** Irish Law shall govern this agreement and disputes arising under or about it should be subject to the exclusive jurisdiction of the Irish Courts.

I will be happy to go into more detail with you on the enclosed terms and conditions of employment if you wish and if you have any queries, please do not hesitate to contact me on \_\_\_\_\_.

Please acknowledge acceptance of this offer on the terms stated by signing and returning the enclosed copy of this letter. This offer of employment will remain open until \_\_\_\_\_pm on \_\_\_\_\_.

Yours sincerely,

\_\_\_\_\_

Manager (on behalf of the Company)

## Quality Assurance Manual (QAM) Chapter 5

<b>Document Name</b>	<b>Staff Recruitment and Selection Policy</b>
<b>Procedure Document Number</b>	<b>UPOL009</b>
<b>Version Reference</b>	<b>Rev.2</b>
<b>Document Owner</b>	<b>Academic Director</b>
<b>Roles with Aligned Responsibility</b>	<b>Programme Manager, HR, DPO and People Officer</b>
<b>Approved By</b>	<b>Academic Council (AC)</b>
<b>Approval Date</b>	<b>2.3.2023</b>
<b>Date Policy Becomes Active</b>	<b>1.4.2023</b>
<b>Revision Cycle</b>	<b>Annually</b>
<b>Revision History/Amalgamation History</b>	<b>Revised post programme validation</b>
<b>Additional Information</b>	<b>N/A</b>
<b>References/ Supporting Documentation</b>	<p>UDOC000 UniHaven Quality Assurance Manual Rev 2  Statutory Quality Assurance Guidelines developed by QQI for use by all Providers (2016)  Statutory Quality Assurance Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis (2016)  Employment (Miscellaneous Provisions) Act 2018:  Minimum Notice and Terms of Employment Acts 1973–2005.  Industrial Relations (Amendment) Act 2015.  Organisation of Working Time Act 1997.  Organisation of Working Time (Records) (Prescribed Form and Exemptions) Regulations 2001.  Safety, Health and Welfare at Work Act 2005 (as amended): replaced the provisions of the Safety, Health and Welfare Act 1989.  The Employment Equality Acts 1998–2015.  Equal Status Acts, 2000 to 2004.  Equality (Miscellaneous Provisions) Act 2015.  The Criminal Justice (Spent Convictions and Certain Disclosures) Act 2015.  UPOL012 UniHaven Garda Vetting Policy Rev 1  UPRO001 UniHaven Garda Vetting Procedure Rev 1  UPOL014 UniHaven QQI Blended Learning Policy Rev 1  UPOL020 UniHaven Data Protection Policy Rev 1</p>