



Internal Quality Assurance Policy

**For Accredited Learning Programmes developed and delivered by KPMG Talent
(P5+) Ltd. Ltd.**

Updated January 2021



General Statement

KPMG Talent (P5+) Ltd.'s Training and Development Internal Quality Assurance (IQA) Policy is geared towards ensuring that the student (aka learner) benefits to the maximum from the learning experiences provided and addresses any potential constraints within its control that may significantly limit the chances of learning. It is aimed at ensuring consistent standards throughout all our Development Programmes irrespective of duration and level.

Principles underlying KPMG Talent (P5+) Ltd.'s IQA Policy

Our IQA aims at ensuring fairness, proper assessment to reflect the holistic learning process, ensure equality, and provide the best material and premises for delivery of the learning:

- Fairness – every student has an equal chance of obtaining a good grade if they follow the module material; there is no need to refer to outside sources to obtain a good grade.
- Assessment – The assessment is an ipsative form of assessment and therefore reflects and focuses on the development of one's skills. Besides, all assessments are prepared and corrected by KPMG Talent (P5+) Ltd.'s trainers responsible for the learning programmes to ensure a uniform assessment to all participants.
- Equality – All students have an equal chance of success as the same materials will be provided including module notes and slides.

Material and Premises - Students who apply of their own volition for KPMG Talent (P5+) Ltd.'s learning programmes will have access to a detailed student handbook. In addition, KPMG Talent (P5+) Ltd. will make sure that all premises used will have access facilities for participants with special requirements. Furthermore, participants will also be in a position to follow the programme and interact with the tutors online via a Virtual Learning Platform depending on the course they follow, when required



The sections below address the standards set by the National Commission for Further and Higher Education which KPMG Talent (P5+) Ltd. is required to adhere to in order to ensure that the educational programmes offered to students are of the required quality.

General Structure of the programmes

All programmes initiated by KPMG Talent (P5+) Ltd. shall be coordinated by at least one appointed person (i.e. a Co-ordinating Facilitator, hereafter referred to as **CF**) who will be properly qualified in the subject area to assist in attendance, material resourcing, and other relevant logistics like venue availability, physical training conditions, etc. The CF will be responsible for a number of defined cohorts in any learning programme and will be responsible for:

- 1 Ensuring proper student registration
- 2 Ensuring proper student management including appeals, attendance, and issuing of results and certificates
- 3 Coordination of the tutors/trainers when several cohorts are involved
- 4 Actively engage in the interactive sessions on VLE by being responsible for the interactive component of the module when applicable
- 5 Evaluate student progression
- 6 Assist students when the issues go beyond the responsibility of the trainer or tutor

1. Policy for quality assurance: entities shall have a policy for quality assurance that is made public and forms part of their strategic management

This IQA Policy will be made available to every student and tutor involved in the learning programmes organized by KPMG Talent (P5+) Ltd. Further to this it will be made public for those who wish to view it, highlighting KPMG Talent (P5+) Ltd.'s commitment to transparency and quality and willingness to receive feedback both from direct stakeholders and from any other interested parties.



This IQA Policy shall be revised once every two years to ensure that its contents and procedures reflect the current state of the learning programmes. The present review represents a significant overhaul of the IQA Policy in response to the External Quality Assurance Audit conducted by the National Commission for Further and Higher Education during November 2018 and the feedback and final report published in March 2020.

KPMG Talent (P5+) Ltd. will not tolerate fraud, discrimination or harassment by or towards either their staff or students. Any such accusations will be investigated by an ad hoc internal Board composed of the Head of Institution and two independent members of the KPMG People and Change business unit, with a representative from the programme funding body or the corporate client sponsoring the course, if applicable.

2. Institutional probity: entities shall ensure that they have appropriate measures and procedures in place to ensure institutional and financial probity

Finance

KPMG Talent (P5+) Ltd. forms part of KPMG Malta, which is registered as a Maltese civil partnership. It is run by a board of four directors, with day to day operations managed by a Director of Studies, assisted by staff from KPMG Malta.

Since KPMG Talent (P5+) Ltd. is owned and operated as part of KPMG Malta, it has access to adequate financial reserves to support its operations even in case of unpredictable adverse financial events. This ensures that under such circumstances, courses could continue to be supported at a loss if necessary until the current cohort/s of students complete their course. This eliminates the risk to students of having their course/s abruptly terminated.



Leadership

The current Director of Studies, Mr. Malcolm Pace Debono, has years of expertise in project management and talent management, both of which are integral to the operations of KPMG Talent (P5+) Ltd.. Should he be unable or unwilling to fill this role, a call for applications will be issued. Criteria required for the headship position are envisaged to be:

Education:

A minimum of a Level 7 qualification in one of the fields related to KPMG Talent's (P5+) operations (e.g. people management, organizational psychology)

And/or

Experience:

A minimum of 15 years of managerial experience in talent management or a related field

While not necessary, candidates with managerial experience within an educational institution would be given priority as these would be able to manage both the technical and educational elements of the firm.

Eligible applicants will be interviewed by a Board composed of both Directors of KPMG Talent (P5+) Ltd. and KPMG Malta, using a competency-based interview.

3. Design and approval of programmes: self-accrediting providers shall have appropriate processes for the design and approval of their programmes of study

KPMG Talent (P5+) Ltd.'s NCFHE-accredited courses are offered primarily to participants of JobsPlus initiatives and/or ESF-funded projects. They may also be offered to corporate clients if requested, or periodically as stand-alone courses to the general public. The accredited courses meet all NCFHE requirements in terms of ECTS/ECVETS workload, target groups, learning outcomes (defined in terms of



knowledge, skills and competences) and methods of assessment, as well as definitions of eligibility criteria for both students and teaching staff.

New courses may be considered if repeated requests for a specific subject area are received, or if directly requested by JobsPlus as part of an ongoing initiative, or where KPMG Talent (P5+) Ltd. is bidding for, or has been awarded, a tender which involves delivery of a course not yet covered by the existing repertoire of courses. Other circumstances considered include requests from within KPMG Malta or by a corporate client.

When developing new courses, a bottom-up approach is taken, with an Academic Board set up (composition dependent upon the subject of the proposed course, with all members required to have practical experience in the subject¹) and tasked with overseeing the design of the course. Feedback from potential employers, tutors and students is also sought to ensure that the proposed course meets the requirements and expectations of these groups, as well as any other stakeholders who may be identified.

Consultation will be carried out while designing the course (in the form of meetings with, as appropriate, recognized external experts in the field, potential tutors, employers and students, as well as other parties with a vested interest, such as JobsPlus personnel. Written and/or verbal suggestions will also be taken on board.

The internal Academic Board will evaluate the feedback and use it to guide development of the proposed course and to prepare a draft training programme. This is reviewed internally, with amendments made where necessary until all internal parties are satisfied with the draft. This is used to fill in the required NCFHE application for accreditation.

¹ This Board may be composed of internal staff if KPMG Talent (P5+) Ltd. or KPMG Malta staff possess the necessary expertise in the subject, or external consultants are engaged to assist where such experience is lacking
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4. Student-centred learning, teaching and assessment: entities shall ensure that programmes are delivered in a way that encourages students to take an active role in the learning process

KPMG Talent (P5+) Ltd. Ltd. Learning Philosophy

The institution's values are Passion, Perseverance, Positivity, Performance and Pride. It is these values that enable KPMG Talent (P5+) Ltd. to provide top quality services through best-of-breed service delivery methodologies. We believe that our consultants, educators and trainers go the distance to consider all the elements that make people and organisations succeed. The institution's overall aim and mission is to develop critical thinkers and adaptable doers who will succeed in today's challenging work environment.

Despite having two quite distinct audiences for our courses, all our development programmes are based on our Learning is R.E.A.L philosophy which allows us to deliver courses that are reflective, experiential, applied, and support long-term and ongoing development. In view of this, we utilise a blend of approaches organised in a systematic manner. The approaches include:

- Simulation-based development (support insight and motivation, and contribute towards skill development and real-world practice);
- Practice- based activities (includes large amounts of practice time, whereby the participants will 'learn by doing');
- Action learning (supports insight, motivation, skill development, real-world practice and accountability).



Our Learning is R.E.A.L. Philosophy:



Assessments

Each accredited programme shall have its own method of assessment depending on the level of accreditation and in relation to the specific learning outcomes defined per programme. Each learning programme will adopt its own distribution of marks.

However, it will be standard that any learning programme shall be assessed partly by students' active attendance in class, partly by their on-line contribution when applicable and partly through applied-based assessments that will test students' ability to apply their learning within their wider social and working context.



It will be the duty of the trainer to prepare end-of-module or end-of-programme assessments. S/he will need to ensure that the assessments prepared link up closely to the learning outcomes underlying the module / programme.

In addition, apart from end-of-module applied assessments, students undertaking learning programmes organized by KPMG Talent (P5+) Ltd. shall be evaluated at the end of the full programme using both reaction-type evaluations and also be guided to reflect on personal improvements using a Personal Action Plan. These will not necessarily be part of the formal assessments or part of the final criterion for obtaining the certificate but it will be an integral part of the learning experience. To this end, it will be the duty of the CF to contact students after a three-four month period from finishing the programme to follow up their progress. It shall also be the duty of the CF to follow up on participants who show poor performance in progressive modules. If necessary, any improvements suggested will be implemented.

Learners must request extensions before the assignment deadline. Such requests will be evaluated on a case by case basis, and formal evidence may be requested to support the request. In this case, a mitigating circumstances form, along with formal evidence will need to be submitted to the CF. Acceptance and/or penalties for late submission of assignments without a prior request for an extension will also be evaluated on a case by case basis.

Learners who fail to pass a module will be given the opportunity to re-take the module assessment once.

Assessment Criteria

Each learning programme will have clear assessment criteria. These will be clearly communicated to each learner at the beginning of the programme.



Assessment Quality

The following will be the duty of the CF:

1. Each tutor will be sampled on every unit assessed across all modules at some point during the course programme.
2. Each method of assessment used in the course programme will be sampled once during a course programme.

When a course exceeds 150 hours, at the beginning of each intake of said courses, a qualification sampling plan will be drawn up to identify which assessors, which modules, which learners and what methods will be sampled. This is developed at the start of each programme and shall be the responsibility of the CF. A sampling activity will take place once during each course programme.

Each sampling activity should ensure that it covers all stages of the learners' journey from induction to the end of the course programme. To ensure consistency in assessment practices, clear criteria shall be given to each assessor. One learner's work should be sampled through the programme for the majority of units once at the first delivery of each course programme to provide a benchmark. This activity should be repeated every time there is an amendment or update to a course programme.

Using the sampling formula $\sqrt{n+1}$, the following records will be sampled in each course:

- student's work;
- comments on tutor/trainer ;
- end of course assessments.

One observation of class delivery to assess the course delivery and the participation of students will be held once at the beginning of a course module. However, all tutors are observed once on induction and then at regular intervals (alternate courses). It is envisaged that the same tutor will cover all the modules in each course programme.

The CF will monitor online participation qualitatively and quantitatively.



When a course is less than 150 hours, a sampling plan will not be necessary due to the short course structure. However, each tutor and method of assessment will still be sampled and reviewed using the above criteria.

The information collected from the sample can then form the basis of what the IQA does with the team, how they may adapt systems and will inform how they can support and develop team members to improve their practice.

Results from sampling and monitoring undertaken shall be recorded in sufficient detail to justify any decisions.

Appeals

Students who have signed up for a course of their own volition who would like to appeal for a decision taken by the CF and/or programme tutors can do so by contacting KPMG Talent (P5+) Ltd. electronically. A panel made up of a representative of KPMG Talent (P5+) Ltd. (not the CF or tutor) and two external experts will be convened to study the case and decide whether the appeal is justified. A Chair shall be appointed amongst the two external experts.

Where the student is obliged to follow the course by their employer or some funded programme, they are required to consult with that body prior to lodging their appeal. An organisation/programme representative may also be required to form part of the panel.

The panel will decide whether

- a) The appeal is justified
- b) The appeal is rejected

In the case of a) the Chair of the Panel, after consulting the other members and looking deeply at the case, will take a decision on the appropriate actions to be taken and the student notified.



In the case of b) the student will be notified of the decision and the relevant reasons. The ground for appeal is there if there is disagreement with the assessment which is communicated in the students' programme handbook. Details are provided about where to find the appeals form and the procedure for the panel who will decide on the appeal. The timeframe for reviewing the grievance and contacting the student is 15 days.

5. Student admission, progression, recognition and certification: entities shall consistently apply pre-defined and published regulations covering all phases of the student 'life-cycle'

The accredited courses provided by KPMG Talent (P5+) Ltd. courses are primarily lower-level courses aiming to impart soft skills – for the majority of these courses, no formal qualifications or experience are required. Courses may be offered:

1. Directly to corporate clients upon request
2. As part of government or ESF-funded initiatives (e.g. Work Programme Initiative run by JobsPlus)
3. Directly to the general public

The procedure for admission of students varies as outlined below:

Corporate Clients:

A meeting is set up with potential clients in order to understand their needs and identify which, if any, of the existing accredited courses would be appropriate. If an existing accredited course is considered suitable, KPMG Talent (P5+) Ltd. staff will confirm participant eligibility if there are any specific entry requirements associated with the selected course. More often, accredited courses are not suitable and a non-accredited short course, customized to the client's needs, is developed. In this case, a list of participants is provided by the corporate client and no formal admission process is required.



KPMG Talent (P5+) Ltd. staff will have met with client representatives in order to understand the client's needs and to confirm the training programme. Upon confirmation of participants, they are sent information regarding the course and what they may expect during the training. This may be sent directly from KPMG Talent (P5+) Ltd. to participants, or be sent via the corporate client's HR department, depending on client preference. Regardless of sender, contact details for KPMG Talent (P5+) Ltd. are always included, enabling participants to make direct contact in case of any queries. Should a course be devised which includes multiple possible streams, testing will be carried out prior to commencement of the course to ensure students are placed in the appropriate stream.

Government and ESF-funded Initiatives:

The majority of courses offered by KPMG Talent (P5+) Ltd. were developed for use as part of JobsPlus' Work Programme Initiative and entry criteria were identified in consultation with JobsPlus and/or other funding bodies' staff.

The funding body handles and approves applications from prospective students and/or identifies the individuals required to attend such courses, and provide KPMG Talent (P5+) Ltd. staff with a final list. Prospective students are then called for a profiling interview conducted by KPMG Talent (P5+) Ltd. staff in order to identify possible courses for the student to follow, and to assess student's level of proficiency with regard to the skills covered so that they may be placed in a class which best corresponds to their present ability. Apart from ensuring participant suitability for courses, this interview is also used to explain the programme and the relevant operations of the institution to participants in details, as well as to answer any questions they may have.

Depending on the ESF-funded initiative, KPMG Talent (P5+) Ltd. tests students prior to the beginning of classes using the institution's bespoke profiling tool to ensure that they are placed in courses suitable to their level of proficiency in the area (typically for language courses) at the beginning of their learning journey. Where this testing cannot



be conducted in time, or a mismatch is detected at the beginning of their course, students are moved to the appropriate level and provided with support to catch up with any missed work. Movement to higher-level courses will only be made during the first 3 weeks of the course since it is considered that any changes further in to the course would impact the student's ability to catch up with any missed work, while any movement to lower-level courses may be made at any time following consultation with the trainers of both courses and with JobsPlus staff.

KPMG Talent (P5+) Ltd. strives to ensure that all participants part of an ESF/ government funded programme are advised in advance of the courses which they will be following, and provided, if necessary (i.e. multiple courses including progression between courses), with a user-friendly action plan which outlines the courses they will be following. This document gives them an understanding of the path they are to follow and allows them to track their own progress.

In light of the NCFHE's feedback during the External Quality Assurance audit conducted in 2018, action plan templates have been simplified for ease of use by students, and an internal deadline imposed to ensure that, where their applications were received within a specified timeframe, participants receive their action plan prior to commencement of their course/s to ensure they have sufficient time to read and understand it, make enquiries, and any necessary adjustments made and uncertainty resolved.

General Public:

Accredited courses may be marketed periodically to the general public and run when there is a sufficient number of eligible applicants. An application form is made available online and upon request from KPMG Talent (P5+) Ltd., occasionally through the KPMG Learning Academy (KLA), and this must be submitted together with copies of any qualifications required for entry to the course. This application form is reviewed separately by two members of the KPMG Talent (P5+) Ltd. team and/or KPMG Learning Academy (should the CF be a member of the KLA staff) and referred to the Director of Studies if the two reviewers are not in agreement. When an applicant is accepted onto



their chosen course, they are required to present certificates to KPMG Talent (P5+) Ltd. for verification by not later than the first day of the course.

Should a course be devised which includes multiple possible streams, testing will be carried out prior to commencement of the course to ensure students are placed in the appropriate stream.

KPMG Talent (P5+) Ltd. has tools and processes in place to collect, monitor and analyse student data securely. All computers, servers and other devices used to access, store and analyse student data are provided to staff by KPMG Malta and follow the stringent security procedures applicable across the wider organisation. This ensures that all devices receive all necessary updates and protection against malicious software or attacks.

Student progression between courses is only applicable to Work Programme Initiative participants, who move between courses, or programmes of a similar nature, with participants from corporate clients typically attending only one course. A KPMG Talent (P5+) Ltd. staff member is responsible for keeping track of Work Programme Initiative students, monitoring their progression and ensuring that they are registered for further courses in line with their action plan. Members of the general public who attend KPMG Talent (P5+) Ltd. courses may request to meet staff members to discuss further learning opportunities, however courses are considered to be stand-alone awards rather than progressive.

For all participants, certification is issued upon successful completion of courses. Depending upon whether the student successfully completed the course's assessment, this is a Certificate of Achievement, or a Certificate of Attendance for students who fail the assessment. All certificates include the course's MQF level and amount of ECTS.

KPMG Talent (P5+) Ltd. staff remain committed to assisting students in their progress in employment following conclusion of their course/s. Students are encouraged to keep



KPMG Talent (P5+) Ltd. administrative staff informed of any progress in employment which they make using the skills learned during their courses and to get in touch if they require guidance or suggestions on further steps in education which they could take to assist their career progression. All such communications with alumni are documented.

6. Teaching staff: entities shall assure the competence and effectiveness of their teaching staff

KPMG Talent (P5+) Ltd. will ensure that all trainers and tutors engaged to participate in the preparation and delivery of the programmes will be qualified in the subject matter.

By this it is meant that tutors will be:

1. Graduates with a qualification or post-graduate qualification relevant to the subject matter
2. Will have at least 2 years of active work experience, preferably in their area of instruction
3. Will have experience in training, learning and/or teaching in recognised Further and Higher Education Institutions or will have undergone a programme which provides development in training (e.g. Train the Trainer)
4. If any of the above criteria are not met, in order to deliver accredited training, tutors must meet the NCFHE requirements as stated in the Accreditation Application document.

Where it is not possible for teaching on accredited courses to be conducted by existing members of KPMG Talent (P5+) Ltd., the CF will reach out to KPMG People and Change's network of professionals to identify potential trainers/tutors. Where staff cannot be found through this college of associates, a public call for applications will be issued, including a brief job description and outlining eligibility requirements and selection criteria. Eligible applicants will be interviewed by a panel made up of at least three members and chaired by the Director of Studies to determine their suitability for the post. CVs will be retained and made accessible to authorised third parties in case of verification or quality assurance exercises.



It is understood that all trainers are to be kept abreast of both the latest advancements in the subject area as well as be kept informed of any new learning techniques that could be implemented in the delivery of the course. This is ensured through:

- i. Quality review checks that are conducted during the delivery of accredited programmes.
- ii. The sharing of relevant articles/research material with trainers.
- iii. Regular feedback sessions and performance discussions with trainers.
- iv. Course evaluation feedback from participants.

7. Learning resources and student support: entities shall have appropriate funding for their learning and teaching activities and sufficient learning resources to fully support the students' learning experiences

In order to ensure all parties involved in the delivery of courses are on the same page, prior to the start of each course, involving management and tutors, addressing ways of improving student support so as to ensure that any issues are recorded and addressed appropriately, hence strengthening the institution's delivery of teaching and learning and ensuring that students are supported in all their needs.

In relation to material, all accredited programmes by KPMG Talent (P5+) Ltd. will generally have:

- 1 Module description sheets outlining the aims and learning outcomes
- 2 A student's handbook which will contain information about the institution, all information related to each specific course
- 3 A complete slide deck
- 4 A Personal Action Plan sheet when applicable (Work Programme Initiative participants)
- 5 List of additional readings in PDF format when applicable
- 6 Instructions on how to access and use VLE when applicable

Moreover, students will be informed in detail about their assessment requirements, their rights and obligations and their attendance and programme requirements to qualify.



Virtual Learning Platform

All accredited programmes that make reference to a Virtual Learning Platform developed and initiated by KPMG Talent (P5+) Ltd. may adopt a Virtual Learning Platform that will serve to facilitate all forms of communication and interactive sessions (where necessary) between the CF, trainer and the students.

Due to the size and setup of our institution, together with the type of courses we deliver, the technological infrastructure required for our participants is limited. That being said, whenever our participants require any technological infrastructural support (such as laptops for the Award in Basic IT course), we do provide them with one for use during classes.

8. Information management: entities shall ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities

KPMG Talent (P5+) Ltd. will ensure that an up-to-date IS that tracks and records all important data about learners and the general profile of the student population is used for all student data. In doing so, KPMG Talent (P5+) Ltd. will adhere to all the legal provisions as set out in the Data Protection Act and any information will be for internal consumption and with the purpose to improve the programmes or maintain contact with the student participants. Every bit of information asked from the student will be provided after consent from the student is sought.

Student feedback is collected by the CF during and after their programme to specifically ensure that the learning programme, including its content, and delivery is relevant, interesting and applicable to their learning and career needs, with significant areas of concern acted upon in a timely manner. All feedback received from different cohorts will be collated by the CF and analysed by KPMG People and Change's in-house data analysis staff once a programme has been delivered 10 times. The results of data analysis will be used to guide the next scheduled review of KPMG Talent's (P5+)



Internal Quality Assurance document and to identify areas where existing mechanisms and training provision may be improved.

Student feedback may be collected in hard or soft copy, depending upon the needs of the particular cohort.

9. Public information: entities shall publish information about their activities which is clear, accurate, objective, up-to-date and readily accessible

KPMG Talent (P5+) Ltd. runs as part of the wider People and Change department within KPMG and consequently is not able to maintain a dedicated institutional website. Instead, a sub-section of the People and Change webpage will be dedicated to institutional information, gathering all available information together. This webpage will include, for prospective students, a list of all KPMG Talent's (P5+) accredited courses, including their learning outcomes. In the interest of transparency, this IQA document shall also be made available online.

While relevant information regarding accredited courses is made available online, course details provided will also include contact details for the individual/s taking responsibility for that particular programme and to whom any enquiries may be directed. These same individuals are responsible for ensuring that information available online is updated wherever necessary.

10. Ongoing monitoring and periodic review of programmes: entities shall implement the 'Quality Cycle' by monitoring and periodically reviewing their programmes to ensure their continuing fitness for purpose

All learning programmes will be as accurate as humanly possible at the time of the accreditation period. However, for accredited courses offered to corporate clients and the general public, the content of every learning programme will be reviewed and revised every year. This will ensure that the material contained within is up-to-date and



relevant material or appropriate learning resources that are required to enhance the learning experience are added. Review and revision of course material within government or ESF-funded projects is subject to the terms of agreement with the sponsoring body and any changes suggested following the internal monitoring and review process require approval from their end before they may be implemented, so the period between updates may exceed one year.

In addition, it will be standard practice for KPMG Talent (P5+) Ltd. to survey learners during and after their programme to specifically ensure that the learning programme, including its content, and delivery is relevant, interesting and applicable to their learning and career needs. Any significant feedback will be taken into consideration and any reviews in this regard shall not await the 4 year period to expire.

Student survey results will be forwarded to KPMG Talent (P5+) Ltd. senior management, course teaching staff and any stakeholders so that any suggested changes relating to their practices may be considered.

Beyond the content of all accredited courses, KPMG Talent (P5+) Ltd. undertakes to regularly review (on at least a two-yearly basis) and update its own Internal Quality Assurance policy document to reflect the results of its own internal review and monitoring or to account for hitherto unforeseen circumstances or changes in practice.

The periodic review will be undertaken by the Head of Institution and all staff responsible for the accredited courses which have been offered during the review period, taking into account any feedback received from staff, students or stakeholders. Consultation with any or all of these groups may also be required, whether from specific individuals or collectively.

11. Cyclical External Quality Assurance



KPMG Talent (P5+) Ltd. fully understands the need for the relevant authorities to carry out a regular review of quality assurance practices throughout this institution and will cooperate fully throughout any audits or checks that may be deemed necessary, as well as taking any recommendations on board.

The action plan created following recommendations will set timeframes for the implementation of recommendations, with those deemed urgent or critical by the licensing authority given priority.