



INTERNAL QUALITY ASSURANCE DOCUMENT



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1 Introduction

1.1 Vision Statement and Objectives

The vision of School of Business & Management (SBM) is: to offer affordable, quality, and recognized qualifications in Malta which could provide a steppingstone towards university.

The School of Business & Management trades under the name of World Learning Ltd. Besides possessing expertise and experience of over 20 years in the UK offering par excellence recognized education services, we have a team of professionals who possess not only the required qualifications but also industry experience.

The purpose of this educational establishment is to offer MQF level 1 – 4 qualifications to Home, EU and International students at affordable rates. These qualifications are issued by OTHM, which are recognized by British universities. This will further enhance the base of our motivation that English taught, and widely accredited qualifications should be made available to local students even after Brexit. This would allow a wider, professional, and work base horizon to these students. It will also further support the country's economy by attracting EU and International students and will further develop the education industry in Malta.

1.2 Overview

This SBM-Education Quality Framework (AQF) is a guide to quality assurance at SBM. In particular, the AQF provides easy-access guidance for staff, students and others concerned with the quality of the total learning experience of students on education programmes delivered by SBM. The AQF will be made public and available on the SBM Malta website. This Quality Handbook forms part of the AQF.

1.3 Quality Assurance Information

There are specific sources of information related to Quality Assurance and the confirmation of Education Standards for programmes, namely:

- a) The overarching Education Regulations and Quality Assurance requirements arising from collaborations with other awarding bodies. These are mainly existing approved partners of SBM in the UK.
- b) The internal SBM Quality Framework documentation. This is made up of: -

(1) The Quality Handbook provides a reference handbook and descriptive guidance for all internal and external stakeholders across all quality assurance areas related to the education and operational aspects of SBM. This includes the vision, governance, internal quality mechanisms, education standards matters, protocols and other appropriate areas. Furthermore, the Quality Handbook also contains key strategies, education policies, and related supporting documents.

These are applicable to all students, staff and is also relevant for all education programmes. The reference areas include: - education governance; educational programmes; educational management; the student experience; the learning environment; teaching faculty and support staff; information management; educational strategies, policies and SBM protocols.

(2) The SBM Education Regulations, application, and formal interpretation of the Quality Handbook and Quality Framework These are regulations used by all staff and students, and applied to all internal procedures, processes, mechanisms, and general arrangements as these relate to all internal Quality Assurance and Education Standards operations activities, requirements, management arrangements and protocols. These three components of the SBM Quality Framework are also supplemented by specific guidance notes, policies and strategy papers where required. In the event of uncertainty on any aspect of Quality Assurance and Enhancement or on Education Standards matters, the following guidelines apply for resolving conflicts and formally interpreting SBM quality regulations.

The SBM education Board in Malta is primarily responsible for the maintenance, development, and oversight of the Education Quality Framework. SBM Education Board has the ultimate responsibility for the content of the Quality Framework. Moreover, the Education Board is required to confirm and approve the educational strategies and policies which are developed, incorporated in, and implemented as a part of the SBM Quality Framework. The Quality Handbook will be updated from time to time, in accordance with requirements within the educational sector.

The Quality Handbook

1.1 Vision

The aims of SBM are student-centred, focused on an inclusive learning community offering a wide range of courses and disciplines that are steered to respond to the key segment of the region and the broader multicultural community. This will be achieved by engaging students in a unique experiential learning environment, producing skillful, innovative, and entrepreneurial graduates who possess global and technical competencies.

With over 20 years' experience in Education in various international markets, we aim to extend our services to Malta. Our courses offer a wide range of skill acquisition opportunities in the form of accredited courses from MQF level 1 to 4. Our student success rate is an impressive one (on average 92%) which is a factor propelling us to bring this success to Malta.

Our present partnerships with UK awarding bodies such as Pearson, OTHM and MFHEA (Malta Further and Higher Education Authority), as well as renowned British universities is further proof of our commitment to offering standardized high-quality educational services. Courses on offer will include Business Management and Health & Social Care.

The members of the executive management team have been involved in helping a wide range of community members, both learners and mature students and we feel that our services are in line with Malta's Education Strategy (2014-2024), where equal opportunities are to be provided to those at risk of poverty as well as low socio-economic segments of society. Our vision is also based on firm foundations established in the UK which are designed to ensure that SBM will continue to develop further on a sound financial base.

1.2 Objectives

SBM aims to provide - within the environment of an independent educational establishment/alternative provider - quality focused and cost-effective Further Education programmes in the discipline fields and subject areas as below:

- Business Studies
- Business Administration
- Health & Social Care
- Accounting
- Information Technology
- E-Commerce

These educational activities are based on established expertise and proven success in the delivery of internationally focused high-quality programmes and the educational commitment to, and belief

in, the following:

- Educational discipline and subject areas are intrinsically international in their focus and multicultural in context and nature
- Education philosophy recognises and aims at respecting and responding to a variety of international cultures, learners and stakeholders and their respective needs
- In order to remain competitive and relevant to stakeholder requirements, programmes delivered by SBM are required to maintain their currency in terms of their curriculum content, pedagogic approaches, and responses to market and environmental circumstances

SBM's educational vision, objectives and commitment must therefore ensure:

- The inclusion of practical applications and culturally referenced teaching in learning and teaching practice (as appropriate)
- Rigour and critical relevance in scholarship; associated research activities; major project, case study and business development teaching; and their links to the education experience of our students
- Innovation in learning, teaching, stakeholder development and relationship developments

1.3 Planning and Implementation of the Education Vision and Strategy

The strategic planning process and the implementation of strategic plans is developed within a number of contexts and specific priorities. This includes the carefully considered establishment, firm consolidation, and successful continuous development of:

- An appropriate Further Education portfolio of education provision
- A track record of providing a good quality educational experience for students

A cornerstone of SBM's vision and strategic plan is the objective of delivering high-quality career-related programmes. All education programmes provide a clear and detailed foundation of knowledge and experience in the principles and subject areas which make up the respective practice-focused disciplines and the provision within the portfolio is benchmarked against the expectations and the 11 Standards of the Malta Quality Assurance Framework.

Building on these principles, all teaching is designed to provide students with the knowledge and expertise necessary to develop their overall professional and career capability and by providing them with an opportunity to develop specialist expertise and career development directions. SBM's teaching philosophy and pedagogic vision therefore provides an educational experience with strong emphasis on the knowledge, skills and capabilities appropriate to the rapidly changing global, cultural, human, and technological business and organisational environment.

Our focus is primarily on quality standards within all programmes and with integrating both teaching experience and professional external world experience in teaching teams. Responsibility for the development of the SBM strategy lies with the Executive Management team advised and guided

by the SBM Education Board, as appropriate.

This remains central to the quality principles which underpin the delivery of the curriculum and the teaching philosophy which leads programme developments. Programmes are designed to build on and reinforce strength in learning and teaching which develops the student's professional capabilities and their theoretical understanding which informs practice. Furthermore, SBM caters for an international educational market and students who enter programmes are able to build on their career experience to date within a high quality theoretical, practice focused and career intentioned learning experience.

a) Quality Assurance and Enhancement Policy and Strategy

The Education Board, with membership drawn from the education and administrative teams responsible for the delivery of education programmes, provides the oversight for quality assurance and enhancement activity and the strategic development and implementation of the quality assurance policy. The goal of providing a quality focused education portfolio is to help achieve the vision and meet strategic business objectives through ensuring quality within the provision and stimulating enhancement in all aspects of the education portfolio.

Moreover, SBM recognises the importance of engagement with external organisations in ensuring quality and promoting improvement. The formal process utilized is the OTHM Quality Handbook which ensures the involvement of external stakeholders, which is very comprehensive. Further details are available in Appendix 5

Engagement with organisations includes working closely with the following entities:

- Other educational partners who SBM might work with in the future.
- MFHEA, as the national accreditation and quality assurance body.
- The QAA (particularly in relation to education programmes and education standards and within the expectations of the 11 standards of the Malta Quality Assurance Framework.
- Appropriate relevant professional organisations (e.g., the Chartered Institute of Marketing (CIM); ACCA – as deemed appropriate)
- Once established, SBM will seek to widen its collaboration with other relevant Maltese organizations.

b) The Quality Assurance Structures

Quality and quality enhancement are responsibilities for management, teaching staff and support staff across SBM. Furthermore, the development and operation of quality assurance at the programme level is primarily the responsibility of the Programme Leaders and the Senior Programme Leader. In these areas, the Head of Quality and appropriate staff based in Malta (e.g., the Registrar/senior administrative staff), provide general and specific advice as well as reporting to SBM Education Board and advising the executive and senior management team, as appropriate. Presently, we have a Quality Head, however as soon as we are granted the license

to operate, we will be able to employ additional staff including a Quality Manager.

SBM Education Board responsibilities include the following:

- Development of quality policies and strategies including those for education standards, quality assurance and enhancement processes and supporting procedures
- Monitoring of quality and the operation of quality policies, standards, and processes
- Providing a focus as a catalyst in quality improvement which enhances the student experience at the same time as supporting overall enhancement activity.

Across all areas, the SBM Education Board promotes the sharing of good practice and provides a focus for enhancement based on critical self-appraisal. In doing this, key Education Board operating principles include the following:

- Transparency – quality processes and enhancement activities are able to demonstrate the maintenance of education standards and assurance of quality to those not directly engaged with the specific or particular programme.
- Simplicity – quality processes and enhancement developments are ‘fit for purpose’ and integrated with the normal education and programme activity whenever practical and feasible.
- Focus on participants and outcomes – quality activities are driven by the desire to deliver high quality educational programmes to students as well as meeting vision aims.

In relation to education programmes, the achievement of education standards is monitored within quality processes at programme level through the following:

- The confirmation of education standards by External Examiners and at Progression-interim-Finals / Examinations Boards/Awards Boards
- Regular annual and periodic review monitoring undertaken by the Education Board; education and administrative support staff; the Head of Quality; the respective education programme team; the Senior Programme Leader and the collaborating /OTHM
- Regular formal reporting mechanisms: e.g., required regular reporting to the Education Board and oversight by Senior Education Staff; Programme Leaders; Head of Quality; Registrar; and the Executive and Senior Management Team.

Where appropriate, SBM will also make use of external experts and consultants in ongoing enhancement activities. External experts and consultants may be engaged on the Advisory Board or on Review Panels, as appropriate and as necessary.

Review Panels are set up regularly and will include SBM staff, representatives of the student-staff liaison committee, external experts, and consultations, as necessary and as required. Such review panels might be set up for specific programmes or per subject area.

Student-Staff Liaison Committee (SSLC) is a standing committee which includes representatives of students and staff and aims to act as a formal feedback mechanism.

Each member of the teaching faculty and support staff is responsible for the quality delivered to

the students and the programme with which they are engaged. They are, in turn, fully accountable to programme leaders for their work.

c) Quality Assurance and Feedback Channels

Quality is assured through regular use of **feedback channels**. These include: -

- Student-Staff Liaison Committee (SSLC) which provides formal feedback from student representatives
- Student feedback is given formally (through questionnaires) on the quality of their learning experience. All students will have the opportunity to complete student satisfaction surveys anonymously at key times during their programme, usually after enrolment and induction and then later in the year.
- Teaching faculty feedback on module and programme matter. There will be weekly meetings within each team, with their academic manager, where they will discuss issues that they encounter and how they can proceed. This will also be supported with any training that may be required. The academic manager will take note of feedback and revert to the individual teachers. There will be also the possibility of further discussions which will be held in yearly reviews.
- Students provide feedback on the programme through questionnaires and at school committees – the Student-Staff Liaison Committee, Programme Management Committees and Education Board. Module review results are circulated to individual teaching staff and teams (as required) with issues discussed in programme committee meetings and team meetings where, if needed, corrective actions are initiated.
- Students are also able to provide feedback at the student-staff liaison committee, and at programme management committee meetings where individual comment is invited and encouraged on any aspect of the programme. All programmes are required to use these mechanisms which are designed to provide regular, systematic feedback to which all students may contribute. Programme committee meetings and other documentation provide records of feedback that ensure audit trail transparency.
- Student feedback given at Programme Management Committee meetings is reviewed by the Programme Leader/Senior Programme Leader who provide a feedback report to Education Board. Actions and responses to student feedback may be actioned at the Programme Management Committee, or at the Education Board, as required.
- Module performance analysis related to the evaluation and monitoring of education standards reached in each module and each programme
- External Examiners' feedback via External Examiners Reports and Programme Team responses to these reports
- External review and monitoring of programmes through regular partner processes and procedures. Collaborative feedback through Moderators' Reports/Link Tutor reports, and within Annual Review procedures and Periodic Review procedures and requirements (as required)
- Overall monitoring and evaluation of programme performance, peer observation and review of teaching
- Use of mentoring and appraisal systems. These mechanisms, combined with the initiative and substantial experience of teaching and support staff, contribute equally to the ongoing

enhancement of programmes and the learning environment as well as supporting the maintenance standards achieved by students.

SBM is committed to meeting Maltese and UK quality standards at all times, since the programmes are delivered both in Malta and in the UK. This includes meeting all the requirements of the MFHEA, the FHEQ: the UK Quality Code for Higher Education; Subject Benchmark Statements and the present and future requirements of the respective collaborating universities and awarding bodies, and national accreditation bodies (as appropriate). SBM is already licensed and accredited by the OTHM and full compliance will follow under their instructions. Moreover, SBM will also comply under MFHEA guided instructions to fulfil compliance. The quality assurance approach towards its education programmes reflects in matters of detail SBM's distinctive strategy and strength rather than seeking to simply copy and imitate approaches used. SBM seeks to encourage and engage its teaching staff with a range of external activities and professional bodies in order to gain from the breadth of experience.

1.4 Learning, Teaching and Assessment Strategy

The learning, teaching and assessment strategy reflects SBM's vision which is focused on good quality education delivered in a cost-effective and competitive manner, while encouraging and enabling students to gain the competences that will enable them to excel in employment or in business anywhere in the world.

The strategy also embraces delivery through collaborating relationships which are fundamental to the business model operated by SBM. This strategy also responds to the 11 standards outlined in the National Quality Assurance Framework for Further and Higher Education, the UK Quality Code, and the components of the OTHM for education programmes, module design, learning outcomes, and criteria referenced assessment as well as for validation and approval, monitoring and review, and student assessment, and learning environment.

Moreover, SBM is mindful of its responsibilities for promoting equality and diversity, and the development, promotion, and adoption of an inclusive approach to learning and teaching. The SBM seeks to support student learning and success through: -

- Provision of continuously enhanced, high-quality, practice-informed and practice focused teaching
- Providing timely support for students, through the provision of an excellent learning infrastructure implementing effective formative and summative assessment practices within a supportive student focused learning environment

This implies the following:

- The programme portfolio is regularly reviewed (subject also to collaborating partnership requirements)
- Teaching faculty are expected, and required, to regularly update the curriculum and the currency of their teaching
- Teaching faculty and support teams introduce and prepare students effectively in making use

of educational experiences using best available educational technologies

- Learning and teaching approaches encourage participation; active and relational development; problem-identification and problem-based development; transformational activity, inquiry related activity, practice focused and applied learning
- That student education achievement and performance is subject to authentic assessment, and that student performance is measured on evidence of their understanding of programme content and practical application and against the defined learning outcomes for the module, and programme.

a) Learning Strategy

The learning strategy is driven by the recognition that effective learning results from collaboration between students and faculty members, using expected learning outcomes to motivate growth and measure competence development.

The learning environment supports the effectiveness of learning and teaching while making learning resources available to students in a variety of formats and encouraging information literacy and learning skills development. Students are encouraged to learn from each other, as well as from faculty members and learning strategy is underpinned by an awareness that teaching and learning processes are not identical, and that faculty members should design educational experiences that facilitate effective, career- relevant learning, on a continuing basis.

Consequently, SBM faculty members:

- Are encouraged to provide experiences for their students that enable them to progressively develop new understandings of subject content and engage students in articulating their learning in specific and concrete ways that impact upon their colleagues and appropriate contexts.
- Encourage students to make systematic use of their own prior professional experiences, where applicable, in their class participation.
- Collaborate to ensure the ready availability of learning materials relevant to each class and make full use of the on-line facility provided by the SBM Student Portal.
- Work closely with their students to ensure the attainment of educational outcomes and learning outcomes that are consistent with the Malta MFHEA Quality Framework, the QAA UK Quality Framework for Higher Education and national UK/collaborating OTHM Education and Regulatory Frameworks and the Malta accreditation body.

b) Teaching Strategy

SBM provides programmes at MQF Levels 1, 2,3 & 4. In the case of Level 4 teaching, faculty benchmark their teaching, assessment requirements and indicative module teaching content.

Learning Outcomes: Where required, and subject to the location of delivery SBM courses also benchmarks its strategy against the appropriate national accreditation body requirements. In

Malta, the teaching will be guided by the learning outcomes as set out by the Malta Qualifications framework and in line with the UK Subject Benchmark Statements, UK OTHM Level Characteristics Statements; UK Learning Outcome descriptors and UK Education Level qualification descriptors. The teaching aims to encourage students to develop a systematic understanding of key aspects of the body of knowledge and subjects which make up their discipline and field of study, including acquisition of coherent and detailed knowledge, at least some of which is at, or informed by, the forefront of defined aspects of a discipline.

Learning Outcome matrices are used in each programme validation/approval document to indicate the requirements of the programme and of individual modules.

c) Assessment Strategy

SBM faculty makes use of diagnostic, formative, and summative assessment methods, providing feedback on assignments in an accessible way, based upon an agreed timeframe. The assessment and the assessment strategy are linked to learning and teaching strategies, and to the required education level of learning outcomes, descriptors and assessment criteria. The balance between assessment of, and assessment for, learning is a key element of assessment.

The School promotes good practice in assessment by:

- Minimising opportunities for plagiarism, please refer to section 'Education fraud' below d)
- Aligning assessment criteria with learning outcomes and education level descriptors
- Providing regular feedback to students, this is given on the management platform and students have access to it.

SBM recognises the strong correlation between the assessment strategy and the facilitation and support of student learning. Assessment processes reflect this through a variety of measures including:

- Use of formative feedback to students
- Summative assessment

d) Education fraud

SBM adopts a zero-tolerance approach to any **education dishonesty**. Education dishonesty includes, but is not limited to, cheating in a written assessment, and committing plagiarism. Cheating in a written assessment includes, but is not limited to, sharing answers for an exam, or receiving help from someone else during an exam. Any student caught cheating, plagiarizing, or engaging in any other form of education dishonesty will be subject to immediate dismissal from SBM. Moreover, if any learner helps another learner to cheat or plagiarize, then this learner will also be subject to being dismissed immediately from SBM. The School's zero tolerance policy on education dishonesty protects the integrity of the professional training that learners receive at the School.

e) Staff Development and Learning, Teaching and Assessment

SBM recognises that the success of the learning experience enjoyed by its students is directly linked to the quality of teaching. It also recognises the key role that staff play given the model of programme delivery adopted by the School, and the need to encourage scholarship-informed teaching.

The approach builds on the high-quality teaching and support staff in place, and their particular expertise as educators and administrators with other institutions or as practitioners in the field. SBM uses a wide interpretation of scholarship and reflection on teaching and learning, which ranges from subject focused enhancement activity through to practitioner informed development and reflection on personal development and achievement. There are two major strands to staff development in these areas: -

- (a) Firstly, the approach to promoting good practice as part of the enhancement agenda and ensuring that good ideas are encouraged to be implemented more widely.
- (b) Secondly, the development of the education framework of the School, the refinement of procedures and processes and the response to national developments. Other inputs to the staff review process arise from the annual monitoring process, where the reports may identify areas for developments or opportunities for advancing innovative ideas or simply securing and improving existing provision.

This policy and strategy paper sets out the scholarship and the aim of supporting, developing, and disseminating appropriate activities. The overall aims of the policy are to:

1. Create intellectual capital for the benefit of the School and its students and staff
2. Promote teaching excellence
3. Promote the excellence of the students learning experience
4. Promote programme currency in content, curriculum, and relevance
5. Create networking and developmental opportunities for the benefit of the programmes, the students, external client contributors, and external networks (as appropriate)
6. Promote opportunities for student project development, student career and professional development.

Scholarship and research policy and their strategic development are firmly related to the overarching educational ethos of the School. The role of scholarship and research policy and strategy is concerned with:

1.5 Scholarship and Research which Underpin Teaching

SBM promotes the exploration of research development opportunities in project work for students and in external networking opportunities with appropriate professional bodies, regional bodies, and governmental agencies.

These activities are seen as contributing to the following:

- Dissemination and enhancement of intellectual capital across the education programme portfolio and within the curriculum and programme content
- Building into all education programmes a currency and relevancy which is required in today's fast changing professional and career environment
- Building of programme brand awareness in the highly competitive education market and the creation of new business opportunities
- Consistent development of best practice in learning and teaching and the assurance of high standards of teaching quality.

a) Established Experience, Competency and Creative Development

SBM teaching staff are encouraged to interpret and apply in the teaching to problem identification/problem solving approaches in learning, practical application, and practice focused learning. Applied critical thinking to real world situations is central to the scholarship and research policy.

This approach supports the career and professional development of SBM's students and enables them to contribute effectively to the performance of those organisations which employ them or who will employ them in the future. Future employers of SBM alumni will also be included in the list of SBM stakeholders and be referred to for review purposes.

The SBM approach centres on understanding, reflecting on and explaining ideas and concepts which enable students to be more effective in their career, to understand the professional contexts in which they work, and to have a professional standard of performance which is immediately recognisable to employers. School teaching strength is founded on the ability to create added value for students through teaching approaches. Added value for an employer is gained by effectively incorporating practice based and focused thinking alongside rigorous education curriculum requirements.

b) Scholarship and Research Policy

The established experience of SBM in the UK is based on solid teaching-led foundations. Opportunities exist within this experience to contribute to the collective knowledge and to enhance the strategic advantage of the School. There are also important options which support the School in reinforcing competitive strengths, enhancing credibility among education peers, and enabling the School to focus on areas of good and best practice in association with partners. The consideration of strengths and existing models for the definition of research provides a framework for understanding different approaches to generating intellectual capital, scholarship, and research activity.

Moreover, the purpose of the scholarship and research framework is to provide a clear explanation of the type of research and scholarship-led activities which SBM wishes to recognise, encourage, support, develop and reward.

In broad terms, there are three levels of research that contribute to the generation of intellectual capital and teaching excellence.

- Keeping in touch with developments in one's subject area.
- Developing new teaching and learning materials-and teaching content.
- Undertaking applied scholarship and research which relates to practical issues, and which is useful to the School and students and may contribute to networking development or to the gaining of additional qualifications.

External Benchmarking Scholarship and research policies fall within four categories of activity:

1. Education research and scholarship – which has been defined as “the production and organisation of new knowledge, the development of new theory and the design of new methodologies within a particular discipline”
2. Practice-related research and scholarship – creation of new knowledge contributing to new practices. This is usually underpinned by methodologies based on in-depth and close observation of complex business situations, often by means of case studies, surveys, or the rationalisation of significant accumulated managerial or consulting experience.
3. Pedagogic Development and Innovation – involves the provision of innovative pedagogical methodologies, educational tools and learning materials in support of more effective learning.
4. Facilitating Dissemination and Communication – by identifying and promoting opportunities at education and practitioner conferences and in-house seminar-workshops; and providing help and advice for dissemination, publishing, and other similar activity.

c) The Implementation of the Scholarship and Research Policy and Strategy

There are three areas of focus for strategic development of the policy:

1. Identifying Funding Opportunities – the process of securing external funding would contribute to the programme of research and scholarship. This includes identifying live major projects which relate directly to external business sponsorship and commercial and industrial liaison
2. Building Partnerships – in order to learn from colleagues in the education and commercial communities. Once the license is issued, we will be able to build partnerships with employers and also other institutions.
3. Supporting teaching faculty – by organising internal seminars to foster research and

scholarship activity; identifying training and development opportunities to enhance research and scholarship skills; and utilising experienced faculty as mentors to work alongside less experienced teaching faculty. This activity is supported and promoted within the Education Board and committee structures, in the networking activities of staff, and within the staff development policy and its implementation.

The focus of research and scholarship activities will reflect the interests and concerns of key audiences and stakeholders, who should all be involved in the QA process, including:

- Shareholders in SBM
- Current and future students
- Staff who design and deliver teaching and learning
- Future employers and networking partners/business sponsors/student sponsors
- Colleagues and employers in the professional community
- Awarding body collaborating partners

A key aspect of the research policy and strategy requires there to be explicitness and focus on the type of research and scholarship activity undertaken by teaching and support student and staff development and its contribution to SBM. There will be a regular review of research and scholarship activity undertaken by teaching staff and this will be matched to the requirements of the staff development policy and strategy.

Summary

The clear purpose of research and scholarship policy and strategy is to create intellectual capital and promote teaching excellence by supporting activities that meet the dual hurdle of education rigour and practical relevance.

Beyond the specific activities outlined above, the implementation of the research policy and strategy is integrated across the organisation in a number of ways:

SBM encourages applications from teaching staff. to undertake further studies and carry out research and scholarship activity as part of the faculty development process, even though our license is for further education only.

1.6 Staff Development Policy

The policy is summarised as follows:

“SBM encourages its staff and students to seek learning opportunities that will help in their future skills. A key objective is the development towards the job market opportunities.”

a) Strategic Overview

- Teaching staff are required to have a higher level than the taught programme. This experience may be gained from their prior employment within institutions or organisations where programmes are delivered, within colleges, universities, or similar institutions; or from their membership of professional bodies and/or from teaching or coaching or similar experience gained in their professional backgrounds. Teaching staff may also be required to meet the education levels of qualification required by partner universities prior to teaching on fully validated programmes.
- Administrative and support staff are required to have experience, or to be capable of developing relevant experience in appropriate administration or support areas. The general staff development policy and strategy is adopted within the constraints of available resources. Policy and the Strategy may be benchmarked against appropriate good practices which have been successfully used at other institutions or organisations delivering education programmes, including professional organisations, as appropriate.

b) Staff Development Aims

The staff development policy and strategy are broadly aimed at:

- Facilitating and supporting the first-class standard of the Learning Environment and the teaching and delivery of the education programmes
- Providing a coherent framework for the development of teaching faculty and support staff
Ensuring that methods of responding to student learning, teaching requirements and educational development are consistently based on best/good practice
- Supporting teaching and maintaining the currency of approaches towards Learning and Teaching and in programme delivery
- Supporting best/good practice approaches to the development of education programme content and its relevance to local and regional needs
- Encouraging and ensuring best pedagogic practice and philosophy
- Supporting the development of scholarship approaches which are pertinent to the vision of SBM and the aims and objectives of its education programmes

c) Compliance

SBM is well aware of the need to ensure that staff are appraised of Maltese Regulatory requirements; equality and diversity; child protection act; health and safety; first aid; fire regulations; and freedom of information/data protection; and all staff are required to be fully cognizant with the School policies and their implications. SBM provides all this information to all staff when employed and will have it easily accessible to staff at all times.

d) Communication

On a day-to-day basis, all administrative and teaching staff are kept informed of current issues and matters arising through regular meetings and one-to-one sessions. These are supported by a regular schedule of Executive Management Team, Senior Management Team, full staff meetings (every quarter), Education Management meetings (Education Board, RDC), Programme Management Committee meetings, Student Staff Liaison Meetings, programme leader meetings, and extensive use of electronic communications.

e) Recruitment and Induction of Faculty Members

Faculty teaching members are recruited against defined criteria. Appointment to teaching posts typically involves consideration of:

- A required and relevant level of qualification in a specified and appropriate discipline which is related to the teaching to be undertaken by the member of staff
- Relevant and significant professional experience Teaching/ training development experience
- The ability to contribute to SBM's intellectual capital development.
- Preference is given to applicants with:
 - A post-graduate level education qualification
 - A continuing professional development and/or scholarship record of appropriate teaching experience
 - Excellent communication skills
 - Appropriate education and/ or professional experience

During the recruitment process, applicants for faculty teaching positions are evaluated for their current and potential ability in teaching and learning. This recruitment process has been finetuned in our other schools in the UK, for example the employment of teachers involves a micro teaching session of 15 minutes. If there are specific development needs for a new faculty member these may be identified at this stage. An induction to SBM, their facilities and policies, including health and safety and equal opportunities, is provided to all new members of staff. All new members of faculty receive professional advice and feedback on their progress during their early months of employment from programme leaders.

f) Faculty Curriculum Vitae

Teaching faculty are required to maintain an up-to-date curriculum vitae by informing the office of new developments. These are for office purposes only.

1.7 Staff and Faculty Development

SBM is committed to the development of teaching faculty and all staff and provides encouragement and support for this. The staff development policy is summarised as follows:

Encouragement is given for internal training and development including:

- The enhancement of qualifications held by an individual
- Attendance at Further Education programmes
- Courses for membership of professional bodies
- External professional development courses and qualifications
- Internally organised training
- Other job-related training

Furthermore, encouragement is also given for:

- Participation in internal conference attendance
- Delivery of conference papers and speaking at conferences
- Attendance at discipline group, scholarship, teaching and learning networks or similar professional events
- Other training and development that benefits both the School and the individual member of staff.
- Additional formal encouragement for faculty education development related to developmental projects and individual initiatives is provided.

The SBM Education Board reviews staff development activity on a regular basis; identifies continuous improvement themes; prioritises each theme; identifies proposals for the development of themes; places these in the context of SBM's education and professional objectives and confirms which themes will provide the focus for a series of staff development workshops in the current and/or following education cycle.

Internal staff development also provides more formal opportunities for teaching and support staff to increase their levels of qualification and enhance their career development.

Peer teaching observation may be used to enhance the quality of teaching and learning, as well as to share good practice. The teaching of each faculty member may be peer observed. This is undertaken on an individual, developmental basis with feedback from the peer observer to the member of teaching faculty observed. Peer observation is designed to enhance the quality of teaching and learning as well as to share good practice. The systematic collection of student and participant feedback is a further complementary process, enhancing the quality assurance process at SBM. Within its terms of reference, the SBM Education Board will also consider how Peer Review of Teaching, which involves classroom observation, is incorporated into faculty support and quality enhancement approaches.

1.8 Policy and Strategy Review

Staff development activity and outcomes are reviewed by the Education Board. Following review themes and identified targets for enhancement actions are identified and a calendar of activity for the following cycle is identified and confirmed.

The SBM Education Regulations

1. Staff development review

SBM operates a process of individual staff development review which incorporates two areas of focus for confirmation of individual KPI activity in two specific staff development areas which are related to the mission of the School namely:

a) The Learning and Teaching Mission and Focus of the School

This includes staff development and updating activity which is associated with the delivery of the School and their mission as a teaching institution. This includes identification of and meeting with the individual goals and targets for:

- Teaching, Learning, Assessment, and programme/module delivery within required time scales and to satisfactory levels of achievement
- Reaching satisfactory levels of student progression and education standards in module assessments benchmarked against assessment criteria, module learning outcomes, external examiners reports, examinations board statistics
- Maintaining of curriculum and syllabus relevance within modules and/or at programme level
- Teaching and learning and approaches towards assessment activities have been maintained and enhancement activity has occurred in an identifiable aspect of teaching, learning and/or assessment and/or delivery within the programme and/or the modules for which the member of staff is responsible at SBM or, where appropriate and as demonstrated at other institutions or professional bodies with which the member of staff is associated and has been specifically responsible for the development

b) The Individual Development of the Member of Staff

In addition to the KPI targets for learning, teaching, assessment and associated activity, education members of staff are being requested to confirm which three (minimum) KPI's have been met in the previous annual period of activity, and which are to be identified for activity in the next annual period.

The annual report template and process for the review of staff development activity is intended to be used in three ways:

1. To provide a report on activity completed during the past annual period for the individual and within a corporate framework of reference which was originally negotiated with the education member of staff.
2. To provide a basis for discussion with individual members of staff at the time of their Peer Teaching Observation.
3. To provide a basis for discussion with members of staff at the time of their Peer Teaching Observation.

2. Faculty Teaching and Support Teams

Education leadership across the School is provided by the Senior Programme Leader and the team of education programme leaders, supported by the Head of Quality, Registrar and Executive Management team. The staff are all part of the School in Malta. All teaching members of staff are required to utilise their professional and education experience in their teaching delivery. This ensures that curriculum content incorporates an enriched mixture of theoretical, applied, and experiential teaching references which are relevant to the content of the module, the requirements of the module specification, and the “real world” contexts of module content.

a) Programme Teams

In Malta, there is a regular structure for the support and delivery of each SBM programme. Programme teams are made up of the Senior Programme Leader, Programme Leaders, students, Module Leaders and Programme Administrative Support staff. Cross-programme support is provided by centralised Library and IT support facilities with a dedicated Librarian and IT support staff.

Programme teams are supported by the Senior Programme Leader, Head of Quality, the Education Registrar, the Director of Operations, and the Directors of Marketing and international office staff. Programme teams meet regularly and there are scheduled programme management committee meetings (PMC) which are required to take place at least once each semester (a minimum of at least three each year). Programme progression-interim/examinations boards meet on a scheduled timetable. All teaching staff on a programme are members of the programme management committee and the progression- interim/examinations board.

b) Programme Leadership

Programmes are overseen by programme leaders after the above takes place, which involves student participation. The programme leaders have quality assurance and education standards responsibility for their programme areas and for all modules within their programme. Programme leaders meet frequently to consider matters of common concern and the sharing of good practice. This ensures that communication within the team of programme leaders is regular and that any operational matters, or quality assurance or education standards matters, may be identified, and responded to where required. All programme leaders form part of the extended Senior Management Team, which is comprised of the Executive Management Team, programme leaders, Senior Programme Leader, Head of Quality, Education Registrar. Additional members of staff, and/or external advisors, are invited to attend meetings of the Senior Management Team to provide internal advice or external consultancy advice and comment.

The Senior Management Team meets regularly with the members of the Executive Management Team. Programme leaders attend and are fully represented at the Education Board, and the Student Staff Liaison Committee meetings. Moreover, programme leaders are required to participate in all management functions at SBM. Programme Leaders work closely with the Director

of Operations, the Director of Marketing, Head of Quality; Registrar; and the Senior Programme Leader; examinations office staff; student services staff; marketing staff; programme administrators, and other staff to ensure that their programme is effectively and efficiently managed, and all quality assurance, programme, and student requirements are met.

c) Module Leadership

Module leaders are appointed for modules within programmes. These arrangements ensure that operational matters, as well as quality and standards matters are addressed at both a programme and module level. Module leaders are members of the programme team responsible for the delivery of the programme. They are responsible to the programme leader for the effective delivery of their module, and they participate in all management matters related to the delivery of the module. Module leaders attend programme boards and progression interim/examinations boards and programme team meetings. Module leaders are responsible for the quality and delivery of their module; for ensuring that module content is appropriate to the education level requirements for the module; that all assessment processes and procedures are carried out according to regulatory requirements: all other matters directly related to the delivery of their module(s)

Faculty Teaching Staff: In addition to full-time staff, faculty teams may be supplemented by full time teaching equivalent faculty (FTTE); proportional/fractional FTE teaching staff; contract staff that have a particular teaching specialism; teaching staff who provide specific support for the development of the research, taught Masters, or undergraduate level teaching; contract and proportional FTE teaching staff that are drawn from UK based lecturers and from an international pool.

Fractional staff are selected based on their specific areas of expertise and experience and may be recruited from the UK or from international sources. All members of teaching staff are required to maintain their personal Continuing Professional Development and scholarship activity.

3. International Student Recruitment

SBM recruits its students from over 120 different countries. This is part of a deliberate aim to create a truly multinational student body, rather than one which is dominated by one, or a small number of, nationalities. Many of these are themselves alumni. They are required to be fluent in their native language and in English, the minimum level of English required is IELTS 5.5 or equivalent. The Admissions team are responsible for the initial screening and interviewing of potential applicants.

This includes detailed checking of previous qualifications; benchmarking applications against both SBM and the Malta Regulations requirements; checking applicants' ability to meet regulations, entry and applications requirements, and financial commitment requirements, prior to formally receiving any offer of a place on a programme. The interviews are designed to confirm the applicant's suitability for entry to the programme to which they are seeking admission. Interviews include an evaluation of the applicant's education abilities and their professional experience and are designed to ensure that the candidate has the necessary ability and background to cope with the education demands of the programme. Interviews may be conducted on a face to face, or video link, or teleconference basis. These are then viewed in Malta in order to adhere to local rules and regulations. At the moment, no form of RPL is taken into account.

The School has an identified process for the consideration of applications and their approval and progress to admission, entry and registration for a programme. All quality assurance matters related to recruitment, admissions, enrolment are benchmarked against the requirements of the Chapters of the OTHM UK and Malta Quality Assurance Framework.

4. Equal Opportunities and Diversity

Integral to the development and future strategy of the School is the commitment to equal opportunities in all aspects of the work of the School. In achieving this aim the School seeks to ensure through formal policies and procedures, and in its operating practices, that no present or future student or programme participant or employee will receive less favourable treatment than any other on the grounds of any condition or status not directly affecting their study or work. In support of these objectives, SBM aims to provide an enabling and supportive working and learning environment, which encourages all students, participants, and employees to fully participate in all its educational opportunities and activities. Further details may be found in Appendix 2.

5. Governance and Business Management

a) The Council in the UK

The Council has responsibility for advising the Chief Executive in Malta on:

- Strategic direction and development
- Planning priorities and contexts
- The evaluation of risk, and ensuring that measures are in place to mitigate risk
- Annual strategy development
- The structure and content of the education portfolio

The organisation's discharging of its education and legal obligations Council receives and comments on minutes from the Education Board and may from time to time refer particular matters to Education Board or to the Executive Management Team for further discussion, action and report.

The membership of the Council includes individuals with broad senior-level experience in the fields of Finance; Further and Higher Education; politics; and the Public.

b) Student feedback

All full-time students will be allocated a personal tutor. Full-time students will be taught for 15-20 hours per week. Presently, we are not taking on board part-time students. Every personal tutor is requested to review learners' progress regularly against an Individual Learning Plan, which has details of qualifications on entry and personal targets for achievements.

Formal complaints by students will be made through the complaints/suggestion process as outlined in the Student Handbook.

All students will have the opportunity to complete student satisfaction surveys anonymously at key times during their programme usually after enrolment and induction and then later in the year.

Student representatives will be elected to both Education Board and the Corporation. Elections will be held yearly. Students will volunteer for the position and will be elected by their peers.

SBM will encourage the integration of students with disabilities into the School. Students with learning difficulties will be offered customised programmes of study to assist them where necessary, in line with the Equal Opportunities Policy of the School.

c) Powers Delegated to Education Board

The Education Board has a delegated education responsibility and authority from the Council and is charged with the effective and efficient development and operational implementation of the education strategies agreed by the Council. The Education Board is also required to operate within the overarching strategic plans set by the Executive Management team

The Education Board reports to the Council and is generally responsible for:

- Approving the content of the SBM Education and Quality Framework and all related SBM documentation.
- Approving the education strategies and policies contained in the SBM Quality Framework, as well as any major changes in its structure and content. The Education Board is the primary education authority of SBM and responsible for the development of education activities. The Education Board includes a mix of education and administrative staff as well as student representative(s) and/or co-opted members and normally meets 2-3 times within each calendar cycle. They will be part of the Programme Board, as mentioned above.

The majority of SBM staff (90%) employed will be from Malta as our purpose is to create employment opportunities for locals. These will include the Centre Manager, Deputy Dean, Business Studies lecturers and Health & Social Care lecturers, Finance Officer, Front Desk & Administration and Support Staff.

d) Other Business Management Teams

There are a number of additional Business Management teams in the UK which contribute to the effective business and administrative management and delivery of the portfolio of activities in Malta. Once the School is established, we will be able to employ relevant staff locally.

e) Student Services

Student services are coordinated by a nominated manager of student services and provides overall support for students prior to and at the point of entry to the School. The offer of a place is matched

to discussion with the successful applicant on accommodation arrangements found in Malta, financial planning arrangements related to the successful undertaking and completion of the programme; social contacts and welfare arrangements including guidance on medical registration travel to study and other social activities. Student services staff are fully involved in student induction.

f) Additional Staff Team Meetings

A number of other staff groups meet and deal with operational matters on a regular basis. All meetings are minuted accordingly. There are regular meetings of the marketing and operational lead staff teams conducted by the Director of marketing or the Director of Operations. These team meetings cover as appropriate: - administration; business calendar; CAS; assessments and examinations; database and IT; hospitality; education and teaching; reception/registry/front of house; social and events; general student matters; student welfare; teaching timetables; and travel matters.

The CEO and Senior Management Team hold quarterly meetings with all staff present to maintain up to date communication on matters of overall strategic interest to the School.

g) Staff Communication

In addition to the above mechanisms there is extensive use of informal communications through electronic means which may lead to meetings being arranged which focus on specific matters requiring discussion.

6. Financial Planning, Budgets and Risk Management

Financial plans, income targets, margins, and overall expenditure and budgetary allocations are identified as a part of the annual planning cycle and are regularly monitored and reviewed throughout each annual period. The review of financial performance against target is undertaken on a monthly, quarterly and/or by exception basis, if required.

7. Education Management Education Board and its Sub-committees

The Education Board has overall strategic oversight and responsibility for SBM quality assurance; education standards; learning, teaching and assessment (subject to collaborating /OTHM regulations, operations, and implementation requirements as appropriate for particular programmes); Continuing Professional Development; enhancement development; and associated scholarship and research activities within the School.

Moreover, the Board has the authority for reporting on a regular basis on the annual and periodic monitoring of programmes and the provision to collaborating and OTHM institutions. The Education Board provides reports to the SBM Council. The Education Board discusses and formally approves reports required by collaborating universities or OTHM's as a part of their governance, quality assurance and education standards procedures and requirements.

Responsibility for the detailed and operational development of specific aspects of quality assurance; education standards; enhancement; and learning, teaching and assessment, resides with the Board or with subcommittees or groups which the Board identifies for these purposes.

The Education Board both directly or by virtue of its powers, establishes such committees or standing panels as it considers necessary to enable it to carry out its responsibilities and together with these sub- committees and panels fulfils the responsibilities indicated below:

Overall responsibility for internal quality assurance and education standards, and learning teaching and assessment, across all education programmes delivered by SBM lies with the Education Board. These areas of responsibility are subject, where appropriate, to the Education Regulations of collaborating universities and OTHM's and the specific areas which are delegated to SBM by collaborative institutions and includes:

a) Quality Assurance:

Responsibility for the internal SBM overview of quality assurance, and devising and implementing appropriate procedures and processes for monitoring their effective and consistent implementation, including:

- Submissions to and internal management of all documentation and internal arrangements for collaborating/OTHM's validation/approval of their education programmes and subsequent delivery at SBM
- Periodic review of education programmes; campus delivery; and SBM portfolio provision (as appropriate/required by a respective internal quality assessor which can be the dean of the school)
- Annual review of education programmes; campus delivery; and SBM portfolio provision (as appropriate/required by a respective education)
- Education regulations – SBM regulations and those of collaborating bodies
- Education complaints (Through the procedures agreed with the respective head of the programme)
- Education Appeals - please see below for the template

b) SBM Education Appeal Form

Important notes:

Students have the right to appeal if their application for enrollment in a course is rejected. You may only appeal on your own behalf, by sending the appeal by email to info@sbm.edu.mt. An appeal submitted by a third party will not be accepted unless accompanied by written authorisation from you.

[Note: In the case of refusal to allow a student permission to take an examination on the grounds of unsatisfactory work and attendance, the appeal must be submitted within **10** working days of notification of the decision to allow sufficient time for the appeal to be considered.]

1. About You

Full Name:	
ID Number:	
Course:	
Year of Study:	
Address for correspondence:	
Tel no:	Mobile no:
E-mail:	

2. About Your Appeal

Please state the decision against which you are appealing (e.g. exclusion, resubmission of coursework, grades awarded etc):

Please state the date on which you were notified of the decision against which you are appealing and include a copy of the notification with this form (please note that you cannot appeal against provisional results):

<p>Please mark the box(es) below to indicate on what grounds you are appealing:</p> <p>Note that an appeal which questions the education or professional judgement of those charged with the responsibility for assessing a student’s education performance or professional competence will not be permitted. This means that you may not challenge marks or grades awarded unless you believe that they may have been affected by factors under (a) – (d) below.</p>	
<p>a) There exists or existed circumstances affecting the student's performance of which, for a credible and compelling reason, the Examination Board or equivalent body may not have been made aware when the decision was taken, and which might have had a material effect on the decision.</p>	
<p>b) There has been a material administrative error or procedural irregularity in the assessment process or in putting into effect the regulations for the programme of study of such a nature as to cause significant doubt as to whether the decision might have been different if the error or irregularity had not occurred.</p>	
<p>c) There is evidence of prejudice or bias or lack of proper assessment on the part of one or more of the examiners.</p>	
<p>d) The supervision or training in respect of research for a dissertation or thesis or equivalent work was unsatisfactory to the point that your performance was seriously affected.</p> <p>Note: if students wish to appeal on such grounds but the supervisory concerns arose significantly before the assessment result against which they are appealing, and without it having been raised in writing with the School before the appeal, the student must provide credible and compelling reasons for only raising these concerns at appeal</p>	
<p>Please give details of your appeal here along with your desired outcome (continue on a separate sheet if necessary)</p>	

Note: if you are appealing on ground (a) above, you MUST give credible and compelling reasons with supporting documentation explaining why this information was not made available prior to the decision being made

d) Please indicate what supporting documentation you are submitting that you wish to be considered in the appeal (e.g. medical certificate, emails and other correspondence etc) and include it with this form. Evidence should normally be contemporaneous, and capable of verification. All evidence should be written in English, or, if not, certifiably translated.

Declaration:

I declare that the information given in this form is true and that I have consulted the Procedure before completing the form.

Signed:

Date:

(An electronic signature is acceptable)

8. Exams

The office is responsible for securely receiving signed-off and approved examinations papers; for all security related to examinations papers and similar materials; for the effective organisation and carrying out of examinations procedures; for invigilation arrangements; for all matters related to the organisation of examination-based assessments on campus: distribution of scripts to markers; distribution of scripts to external examiners and all similar activity. The examinations office coordinates in the UK pre-examinations Boards, undertakes arrangements for final examinations boards and progression-interim boards; maintains the electronic and paper-based marking sheets, archives past papers and examinations scripts. The Examinations office staff work closely with Malta SBM and other collaborating bodies in ensuring that all/OTHM regulations and requirements are complied with at all stages in the examinations/assessments processes.

Standard 8 requires that Archives must give adequate assurance that their contents will be available for 40 years in Malta. Only students' names, surnames, and education records for the purpose of issuing education transcripts or certificates shall be kept for a period of 40 years. Data of Requirements b to e of the said standard 8 shall be kept in an anonymised manner following the retention period which is of 4 years from the date of graduation. This is in line with GDPR.

9. Student Induction

Registration takes place prior to the commencement of teaching in the semester. Students are given a welcome induction pack which includes the following, once registered as a student:

- The SBM generic handbook
- The respective programme handbook
- Timetable for semester
- Information about the school and its facilities
- General school rules and regulations
- Outline of requirements for submission of work for assessment, education referencing and plagiarism
- Fee details and payment plan for the programme
- Terms and Conditions of entry

Students attend a formal induction, during which they are introduced to School staff including an outline of their roles and job functions. This provides an outline of contacts within the School and identifies contacts that students may be required to meet if a need arises in a specific area.

On commencement of classes, students are given access to programme materials with details of:

- Programme syllabus and module specifications
- Lecture sequences
- Calendar of assessment dates
- Module requirements
- Bibliographies
- Sample assessments examples
- Details of module lecturer(s)

Students are also provided with information from the Examinations office staff on assessment requirements, minimum assessment requirements, procedures for education appeal and non-education complaints and contact persons. A student services and welfare member of staff provides a range of support, advice and guidance services tailored to the needs of international students.

The structure of the staged approach to learning ensures that the learning workload is evenly distributed through all programmes. This pedagogic ethos supports the development of a professional attitude to learning which enhances skills required within future careers.

The learning approach is designed to enhance necessary discipline expertise and transferable learning skills. Students also have supervisors with whom they can discuss education issues and problems they may be facing.

10. Student-Centred Learning

SBM teaching philosophy promotes a culture of student-centred learning culture which focuses on student needs and learning requirements which are fostered within:

- A learning environment which nurtures personal education growth
- Administrative procedures that help students to obtain a high-quality education
- Personal experience that leads to feeling "connected" to the School
- Learning opportunities that develop students as responsible citizens and skilled professionals

Teaching and delivery at the School is through a blend of lectures, tutorials, seminars, workshop/discussion sessions and other appropriate teaching modes which utilise a variety of learning and assessment methods. This includes the consideration of a variety of types and sources of case studies; individual and/or team presentation; joint class discussions; tutorial-support surgeries; and other appropriate learning methods. A summary of approaches is indicated below.

Students are expected to undertake: -

- Directed learning
- Self-managed independent learning

These strategies are designed to encourage the development of the student and to enable each student to have confidence in their own abilities while developing an enquiring mind.

11. Monitoring of Student Education Performance

Student education performance is monitored through each module and at the end of each module. Assessment outcomes are checked by the Examinations office and by the module and programme leader at the end of each module. These are reviewed with the student and in the event of unsatisfactory performance guidance is given by the programme leader or a nominated tutor on ways in which education performance may be improved. Student performance is also monitored on a semester basis; at the end of each examination date (which may be at the end of a semester); at the end of a cohort assessment year; and at other times where this involves resubmission or resit assessment reviewed by 2 assessors to ensure fairness in assessment.

In the event of unsatisfactory performance or the need for ameliorative action to take place the student is counselled by the Programme Leader, module tutor or nominated education member of staff as appropriate.

12. Attendance

Students are required to attend all lectures, seminars, and workshops for the modules for which they are registered. There are likely to be instances when absence due to illness or other reasons may arise. All absence is required to be covered by a medical or similar certificate and the school administration and registry is required to be informed.

In the case of absence due to illness, or to extenuating exceptional circumstances, e.g., bereavement, the school education and administrative management will be sympathetic, and staff will provide all possible guidance to enable students to maintain progress on their programme of study.

There is a specified attendance policy in place within SBM which is required to be complied with, and all students' attendance records are monitored on a daily basis. If attendance levels fall below the requirements set by the School it is the duty of the School to notify the relevant authorities. Attendance is monitored electronically, and the student record updated automatically in real time. Failure to attend will result in a requirement for the student to attend an interview with the Course Leader to discuss his/her education progress and/or may require the school to inform the local authorities should this be required by law. It is the student's responsibility to ensure that his/her attendance is noted at each lecture/seminar/workshop. If there are medical reasons for any absence, medical evidence (e.g., certificate from the GP or hospital) must be presented to the

Course Leader, in Malta is the Deputy Dean. If the Education Board or the school management is of the opinion that the student's attendance has been consistently below the required levels for legal reasons or the School requirements, then it is entitled to terminate the registration of the student.

13. Education Progress

Students are required to take responsibility for their own education development. The expectation of the School is that students will undertake directed work and further study in their own time. Work undertaken throughout the programme will vary in accordance with the assignment load and the scheduling of assessments.

The assessment schedule is published in advance, so students will know what is expected and when. However, the programme leader and the structure of the staged approach to learning will ensure that the workload is evenly distributed. By utilising this ethos throughout the programme, students will be developing a professional attitude, which will be necessary during their future career. The discipline will also support the need for students to understand the nature of continuing professional development. Education staff monitor individual education progress through performance in seminars, tutorials, practical workshops, case studies and the guided preparation of major project work. Performance in formative and summative assessments provides further material for monitoring student progression.

Students have direct access to course administrators who can facilitate education or pastoral support, including referral to teaching assistants, education staff, or English language support. There is a student welfare officer and a student services manager who provide oversight of general pastoral care and student support requirements.

14. Student Welfare

Welfare support is available for all students. The nominated welfare officer has primary responsibility for welfare activities particularly for student social events, sporting activities and similar activities. Students may also be taken on visits/trips, to introduce them to a variety of cultural activities and to enable them to broaden their perspectives of life and business in Malta. Student activities are divided into sporting, cultural and recreational activities and there is an ongoing programme.

a) Student Accommodation

SBM undertakes to arrange student accommodation for its students in Malta where this is required. Student accommodation is handled by vetted and approved independent agency(s) and detailed care is taken to meet the requirements of all students. All accommodation is inspected and regularly monitored to ensure that the highest standards are maintained. Students are provided with choices of accommodation.

b) Student Feedback

Students will fill out feedback forms as mentioned earlier, and also, there will be 2 student representatives elected from each cohort of courses.

c) Career Development Support

Career development support takes place within the education syllabus and delivery of programmes and is particularly related to the education choices made by students in their planning of their eventual career and professional development direction. Students receive advice on continuing education study from Teaching Staff and Programme Leaders who are able to comment on further study.

Additional career advice is provided through guest lecturers, seminar discussions and similar events.

15. Teaching Staff

Teaching staff, through a public call, are selected on the basis of a strong teaching background, individual experience in respective professional and career areas, experience of delivery to international students, and the ability to teach at the appropriate level for the respective programme.

Teaching staff have broad research and scholarship records in consultancy, brand management, marketing, international business areas, finance, and scholarship and research.

Guest lecturers and speakers can be invited to contribute to seminars, workshops on programmes to ensure that an appropriate balance between theory and external practice is maintained.

Expertise from across the School is utilised to enhance the student learning experience. Guest lecturers can contribute their specialist knowledge on marketing, financial management, business ethics and project management to aid the development of student knowledge and skills.

16. Learning Environment and Learning Resources

All Learning Resources are provided and maintained at the highest level of specification and substantial investment has been maintained to ensure that the delivery of the programmes and the student experience of the provision is of the highest quality.

a) The Learning Environment

The learning environment is designed to encourage the attainment of high education standards by students and the development of career aspirations which are matched to the achievement of professional standards and personal career goals. The learning environment therefore is focused on:

- Providing an education and educational environment in which the pursuit of excellence and best practice in all learning and teaching; and in all programmes, is of primary importance
- Providing a learning experience which encourages and supports each student in their pursuit an achievement of their individual potential in their education studies,
- Providing a learning environment which supports students in identifying their career opportunities and enhances the development of relevant skills, career capability and professional capacity
- Ensuring that all education programmes are designed to provide a clear and detailed foundation of knowledge and experience in the principles and subject areas which make up the discipline and that these meet the demands of the contemporary world including facilitating and providing students with the skills required for successful entry to the employment market.

b) Virtual Platforms

In the delivery of a high-quality learning experience to its students, SBM makes substantial use of the Student Portal Learning Platforms, and it can operate fully online, if necessary. A fundamental part of a learning environment in which traditional lecture, seminar, and tutorial-based learning is supported through the use of on-line provision of lecture notes, interactive discussion, and virtual support packages of learning materials.

The Student Portal platform is used as a learning vehicle for all programmes. This is facilitated through the availability of Wi-Fi across the campus and the extensive provision of computer lab and open access computing stations at specific campus locations.

The Information Security Policy (Appendix 4) underpins the provision of IT support and student services of the school.

c) School campus

Resources will be available of the courses offered. These comprise books physically found in the Malta campus and reader databases.

17. Marketing Information

Website content – www.sbm.edu.mt

Website content is produced by a dedicated web designer/web developer. Where updating of the website is required, this is subject to a series of checks involving the Programme Leader for education content; the Head of Student Services for social and associated content; the Director of Marketing for oversight and compliance. Where updating is required, these are undertaken

promptly. All updates are proof-read for accuracy. The team leaders undertake regular and scheduled periodic monitoring and updating of the website contents.

18.Student Records

SBM registry staff and examinations office staff are responsible to the collaborating universities/OTHM's, for the accuracy of all communications to students which are related to admission, registration, and progression of students from entering the programme to the completion of their programme and the conferment of the award to the student. Universities reserve the right to issue CAS information where required. Assessment details are entered into secure spreadsheets which in the first instance are collated by the Examinations office staff working, where required.

Assessment records are checked by both SBM and OTHM staff prior to their use at final examinations boards. (Subject to agreements with the respective students) Records are kept in both electronic and physical format where required for security and/or format purposes. Staff in the SBM registry, marketing, and the Examinations office manage the internal SBM student records and ensure that the following are securely held:

- Application and admission information
- Visa and sponsorship information
- Registration Information
- Attendance records
- Education Progression Information
- Records of Marks and Assessments and Examinations Results
- Records of Grades awarded, the conferment of exit awards, Final Education Awards made
- Disciplinary records
- Education Appeals records and Student Complaint records
- Student results, and related information

SBM has its own dedicated databases supported by a development team, which ensures that the records and registry systems are fit for purpose, and adapt to changes in programmes, customer service needs and the regulatory environment. The Examinations office, which handles all examinations, is located in a secure and separate suite of office accommodation. There is a dedicated examinations office team which ensures the secure and effective handling of all assessment and examinations requirements within programmes delivered at SBM.

19.Version Control and Updating

Version controls for all documentation are in place and subject to authoring access control, editing control, and level of confidentiality control.

20.Documentation Responsibilities

Responsibility for authoring, editing, generating documentation is identified and confirmed and resides with the functional responsibilities and roles of specific individuals within the School.

21. Programme Documentation

Programme definitive documentation, including programme specifications, programme and module descriptors, validation reports, and associated materials are held in specific sections of the quality library.

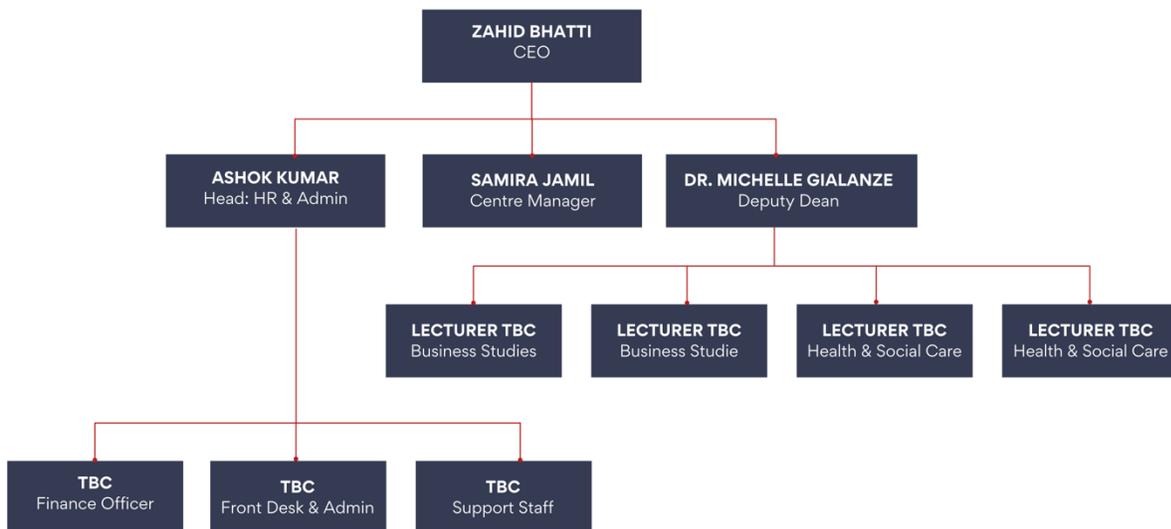
Following the validation of a programme, marketing team leaders consult with the Senior Programme Leader, Programme Leader, and the Head of Quality/Registrar (as required) to identify promotional and marketing texts which are approved for use in the marketing, promotion, and advertising of the programme.

APPENDICES

Appendix 1: SBM Organogram

SCHOOL OF BUSINESS & MANAGEMENT - ORGANISATION CHART

WORLD LEARNING LTD. (C92577)



Appendix 2: Diversity and Equal Opportunities

General Principles

SBM is committed to the provision of equality of opportunity for all students. In the provision of equal opportunities, SBM realises and accepts its responsibilities under the law with regard to unfair discrimination and is committed to fostering a discrimination free environment within which individuals will feel free to disclose relevant circumstances. SBM staff have a legal responsibility and a personal duty of care beyond the letter of the law for the practical application of this policy. Discrimination on account of ethnicity, gender, language, age, sexual orientation, religion, socio-economic status, physical or mental ability, thinking styles, experience or education will not be shown against any person in determining whether he or she is eligible to be admitted as the student, or during his or her studies. Every possible step will be taken to ensure equality of opportunity.

When choices are made regarding admission to programmes, staff associated with making admissions decisions will admit on merit, recognising the desirability of maximising the diversity of the intake to programmes. Applicants are admitted to academic programmes principally for reasons of academic ability, professional and personal experience, their individual motivation, and to promote diversity. Certain programmes are designed for particular categories of students and admissions to such programmes will reflect the programme philosophy. Issues relating to practical implications of a disability are dealt with subsequently.

SBM considers that diversity of backgrounds brings a range of qualities and experience to individual programmes and reflects the broader community in which staff and students operate. All publicity material relating to programmes will reflect the broad principles listed above.

Implementation Framework

Information that is used for academic monitoring or other purposes shall protect an individual's privacy and provide the basis for the provision of effective support for disabled students, or to ensure health and safety. At Induction, students will be informed by the programme leader about the systems of support available to them. Transparent procedures will be used during all selection interviews, tests, and assessments so that individuals are not disadvantaged. Selection criteria will be kept under review to ensure that individuals are treated only based on the programme requirements as appropriate and on their relevant academic, professional, and personal capabilities.

Work tasks, patterns and facilities will be arranged wherever possible, within the constraints of the business and its operations, to support those individuals with particular identified needs. Flexible approaches to enabling alternative means of participation (e.g., the online learning platform) where physical access is impossible or unreasonably difficult will be adopted). Staff development relating to diversity awareness/equality will be provided for all staff. Appropriate staff will receive information about any particular needs of students in a clear and timely way. Complaints' students will have the means of reporting breaches of this policy, where they believe them to exist, without embarrassment or fear of reprisal.

Definitions

Direct discrimination is the less favourable treatment of an individual on the grounds of:

- Gender, sexual orientation, or marital status
- Nationality or ethnic origin
- Discrimination against Religion or Belief (or lack of it)
- Age

Indirect discrimination

is the imposition of a requirement or condition which is applied, or would be applied equally to persons covered by the legislation cited in the paragraph above but which:

- Is such that the proportion of persons of the same gender, marital status race or disability who can comply with it is considerably smaller than the proportion of persons not of that group who can comply with it cannot be shown to be justifiable irrespective of the gender, sexual orientation, marital status, religion, or belief (or lack of it), sexual orientation or disability of a person to whom it is applied.
- Is to the detriment of the individual concerned because he or she cannot comply with it.

Harassment

Harassment is behaviour that is unwelcome and undermines the dignity of the recipient. It may be based on someone's race, gender, convictions, age, or disability, or may involve bullying. It includes unwanted physical, verbal, and non-verbal conduct that results in the individual feeling vulnerable or compromised. It is the perception of the recipient that is important.

Examples include sexual or racial banter; the display of material with sexual or racial overtones (even if not directed at the complainant); sarcastic personal remarks about colleagues; and constant unfounded criticism of work performance.

Appendix 3: IT Acceptable Use Policy

Introduction

The School recognises the key role that Information Technology (IT) plays in both teaching and research in the education and teaching community

1.1. Purpose

The policy is created to provide a framework for IT resources and should be understood within the framework of other policies of the school.

1.2. Policy

The School also has a statutory duty, under Section 26 of the Counter Terrorism and Security Act 2015, termed “PREVENT”. The purpose of this duty is to aid the process of preventing people being drawn into terrorism.

1.3. Scope

Members of the School and all other users (staff, students, visitors, contractors, and all others who may be associated in the work of the School), of the School facilities are bound by the provisions of its policies in addition to this Acceptable Use m

Unacceptable Use

A. Subject to exemptions defined in 2f), the School Network may not be used directly or indirectly by a User for the download, creation, manipulation, transmission, or storage of: data. All school networks will not be abused or utilised for anything other than academic work.

Appendix 4: Information Security Policy

a) Background

This Information Security Policy is based upon the International Standard ISEC/ISO 27001 Code of Practice for Information Security Management and ISEC/ISO 27002.

b) Requirements for Policy

Nimbus Hosting Ltd. (hereafter referred to as the Company) has an obligation to clearly define requirements for the use of its information technology (IT) facilities and its information systems (IS) to all staff, suppliers, and partners.

The objective of this requirement is to ensure that users of IT/IS facilities do not unintentionally place themselves, or the Company, at risk of prosecution or disciplinary action, by carrying out computer related activities which contravene current policy or legislative restrictions. Information within the Company is intended to be openly accessible and available to all members of the organisation who require access to carry out their roles. Certain information (sensitive information) must be processed, handled, and managed securely and with accountability.

This policy outlines the control requirements for all information contained within the Company network and IT systems.

c) Policy Structure

This document forms the Company's Information Security Policy. Its purpose is to provide an overarching framework (a commitment of undertaking) to apply information security controls throughout the Company.

Supporting policies and guidance documents containing detailed Information security requirements will be developed in support of this policy. Dependent upon the subject matter, supporting policies and guidance will either apply across the Company or to more specific groups or individuals within the Company.

d) Purpose and Scope

All processing of data and collection of information will be processed in accordance with UK and Maltese law, including the GDPR directive.

This policy defines how the Company will secure electronic information, which is found within:

- The Company's IS/IT infrastructure.
- Key Business System data and information.
- Security of information held in electronic form on any Company computer.

Individuals who process key data and information within Key Business Systems.

It is processed or used by:

- Company Staff and suppliers who have access to or administer the Company network or IT systems.
- Individuals who process key data and information within Key Business Systems.

e) Objectives

Information Security controls are designed to protect members of the Company and the Company's reputation through the preservation of:

- Confidentiality: knowing that key data and information can be accessed only by those to do so.
- Integrity: knowing that key data and information is accurate and up-to-date and has not been deliberately or inadvertently modified from a previously approved version; and
- Availability: knowing that the key data and information can always be accessed.

The Company is committed to protecting its members and Key Business Systems. Controls will therefore be deployed that mitigate the risk of vulnerabilities being exploited which adversely affect the efficient operation of the Company.

f) Applicability

This policy applies to all users of the Company network and IT Services and includes:

- All full-time, part-time, and temporary staff employed by, or working for or on behalf of the Company.
- Suppliers working at the Company.
- Third party contractors and consultants working for or on behalf of the Company.
- All other individuals and groups who have been granted access to the Company's network, data, or IT services.

These categories of persons and agencies are collectively known as the 'user' in the policy document.

The Directors of the Company are ultimately responsible for ensuring that adherence to this policy is observed and for overseeing compliance by users under their direction, control, or supervision.

Each user is responsible for their own actions and must ensure all actions relating to using the Company network and IT Services adheres to the principles and requirements of this policy.

g) Legislation and Policy Legislation

Supply and use of the Company network and IT Services is bound by UK law and Maltese law.

Associated Policies

The Company is also governed by external policies which impose responsibilities on the provision of IT Services and network access.

The principles in this policy support and enhance the requirements contained within these documents and ensure compliance with contractual agreements.

h) Information Security – Risk Management

Information security governance is the structure which supports the implementation of this policy. An IT infrastructure will be implemented within the Company to ensure the effective and efficient implementation of this policy across the Company.

i) Ownership and Maintenance of Policy

This policy is owned by the Company and is maintained, reviewed, and amended by the board in accordance with Company policy, procedures, and guidance. This policy will be subject to annual review.

j) Risk Management and Electronic Service Incidents

The Company will be responsible for raising an incident message in relation to any reported security incident at the Company. These incidents will be recorded as 'Electronic Security Incidents'.

Electronic Security Incidents will be recorded with a unique reference number. A review of incidents will be conducted at monthly intervals. Incidents considered to be exhibiting unacceptable levels of risk to the Company network or IT Services will be subject to an investigation to identify the inherent vulnerabilities exposed by this incident. A report will be submitted to the Information Security Management Team for consideration of the question of suitable remedial action, which may be effectively implemented to mitigate future risks.

k) Security of Third-Party Access

Procedures will be developed to regulate access to the Company's information processing facilities by third parties. Such access will be controlled and regulated in order to protect information assets and prevent loss or damage to data through unauthorised access. The IT Manager will consider applications for access to facilities by contractors or third parties based upon a risk assessment of the proposed task.

Identification of Risk from Third Party Access

Third parties who require access to the Company's IT/IS infrastructure will be bound by contracts which define Company security requirements. Prior to being granted any network connectivity they

will be required to sign and undertake to adhere to the requirements of the Company policy and where sensitive information, or sensitive business/research information is involved, they will be required to sign a non-disclosure agreement prior to access to the IT network.

l) Asset Clarification

Information assets will be categorised and recorded to enable appropriate management and control.

Inventory of Assets

The Company will maintain an inventory, subject to audit, of IR related assets.

For each item, the inventory will state the item's description, make, model, serial number and/or service tag and location. This inventory is in addition to asset records maintained under Company financial regulations.

Any system and the data it contains that is not part of the above inventory is the responsibility of the creator of that system. However, the asset will require compliance with this policy and users will be required to adhere to the principles of this document.

All asset identification procedures must be compliant with and support the Company Business Continuity Plan.

m) Personnel Security

Issues Roles and Access Levels

Controls will be deployed to reduce the risks of human error, theft, fraud, nuisance, or malicious misuse of facilities.

The Company maintains a directory of people and suppliers which are authorised to use the Company network, IT services and applications. All users, staff, suppliers, external users and guest users are subject to the principles of this policy and must certify that they agree to the terms. If a user's relationship with the Company alters, due to a change in role or employment relationship, then the revised level of access must match both the new role and relationship with the Company. All IT account access levels must comply with the requirements of the Company policy.

Training

All staff will receive training on this policy. New starters will receive training as part of the induction process. Further training will be provided at least every 12 months or whenever there is a substantial change in the law or any associated policy and procedure.

Initial training is provided through seminars, with subsequent sessions being through a suitable delivery method. Completion of initial training is compulsory before any access to Company IT systems is granted, completion of on-going training is also required as part of continued employment at the Company.

The board will continually monitor training needs. Employees are encouraged to request/recommend further training on any aspect of the relevant law, the Information management and security policy or associated procedures.

Security in Job Descriptions

Security roles and responsibilities will be included in job descriptions where appropriate. These will include any specific responsibilities for the protection of particular assets, or the execution of particular processes or activities such as data protection.

n) Confidential Personal Data

Sensitive Information

All data which identifies any individual will be handled in accordance with the Maltese Data Protection Act which was amended in April 2018 to reflect the changes brought about by the General Data Protection Regulation (GDPR) which came into effect on the 25 May 2018. Personal details will be held securely and in accordance with current UK legislation.

All data classified as sensitive data will be processed and stored in compliance with the current sensitive information guidelines and Company policies and procedures.

There are restrictions on international transfers of personal data. You must not transfer personal data [internationally at all OR outside the EEA (which includes the EU, Iceland, Liechtenstein, and Norway) OR other than within the EEA (which includes the EU, Iceland, Liechtenstein, and Norway), Switzerland, Hungary or, in some cases, Canada] without first consulting the Board.

Confidentiality Undertaking

All suppliers, members of staff and partners are reminded of their obligation to protect confidential information in accordance with the Company's standard terms and conditions of employment.

All users will be bound by the confidentiality agreement in either their contract or terms of employment.

Employee Responsibilities

All staff (including agency and casual staff) must agree to written terms and conditions contained within the Company policies when they register to use an IT service.

The Company shall ensure that:

- Confidentiality agreements form part of the terms and conditions of employment.
- Awareness training about electronic information security forms part of Company staff induction programmes.
- Information for all staff on electronic information security is maintained in the Company information.

The Company must ensure that where there are specific security roles and responsibilities, they are documented in all relevant job descriptions and that there is appropriate screening of applicants.

Staff Leaving Employment

On termination of employment with the Company, any applicable user accounts, accesses, and passwords will be changed or removed. Except where a strong business case exists, which meets the needs of the Company, all user accounts will be closed at the termination of employment. Files and folders will be deleted shortly after the user leaves the Company. If staff leave during term time, they shall be required to give notice and undertake a handover and will be replaced by a lecturer who is able to take on the duties.

o) Responding to Security Incidents

Suspected Security Breach

Staff or suppliers using or administering the Company network or IT Services must not in any circumstances try to prove or collect evidence in relation to any suspected or perceived security breach. The exception to this rule is where staff has been granted a specific policy exemption which allows them to do so as part of their role. The Sales Director will be responsible for identifying members of staff who are responsible for security breach investigations.

A security incident is any incident which alters, destroys, or amends data within the Key Business Systems without authority. This may cause damage to or reduce the efficiency of the Company network or IT Services. This includes any actions or behaviours which contravenes Company policy, statutory or common law, legal requirements or professional regulation or guidance.

Reporting Security Incidents

All suspected security incidents are to be reported in the first instance to Tim Dunton.

All reported security incidents and active investigations will be monitored by the Information Security Management team. An appropriate investigation and action plan will be prepared and agreed.

Within the provisions of the Maltese and UK Law, the Company reserves the right at any time to intercept and monitor communications in accordance with the Regulation of Investigatory Power

Act; The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations. The above legislation will be implemented in compliance with the Company monitoring provisions.

Monitoring and recording of electronic communication and data will be carried out in accordance with current Company Policy and interception / monitoring of individual activity shall normally only take place with prior express approval of the Company Directors but may be undertaken without any prior notice to the users of the Company systems. Permission for undertaking monitoring or surveillance of user activity may in the first instance be given verbally. Any such permission must be recorded in writing as soon as practical. This requirement is to ensure an auditable investigatory process exist for any subsequent disciplinary or criminal proceedings.

Security Incident Management / Investigation

The Information Security Management team member identified as being responsible for investigating the incident will ensure that all steps are taken to limit damage and loss of data whilst preserving the reputation of the company.

The IT Manager will maintain written procedures for the operation (e.g., start up, backup, and change control) of those Company Key Business Systems where threat, risk and organisational impact would adversely the operational effectiveness or organisational reputation.

Investigating Information Security Incidents.

On receipt of information indicating that a security incident may have taken place, the Information Security Management team will nominate a member of the team to coordinate the investigation.

Network Isolation and Reconnection

Any device perceived as placing the integrity of the Company IT network at risk of harm or service interruption will be isolated from the main network.

Suspension of network connectivity will remain in force until the issue has been investigated and a plan of action agreed with the IT Manager to resolve the issue.

Subsequent reinstatement will only be permitted once the requirements of that action plan have been met, verified, and authorised by the IT Manager.

p) Physical and Environmental Security

Controls will be implemented as appropriate to prevent unauthorised access to, interference with, or damage to information assets.

Physical Security

Computer systems and networks will be protected by suitable physical, technical, procedural, and environmental security controls.

File servers and other systems that hold or process high criticality, high sensitivity or high availability data will be located in a suitable area. All Key Business Systems will be subject to security measures which supports the Company Business Continuity Plan.

Data Storage Facility Security

Access to the offices and server rooms and any locations containing data communications or telephone equipment will be controlled and restricted. Authority to access these areas will be controlled by the IT Manager.

Equipment Security

Servers holding corporate information will be held in a secure environment protected by:

- Physical security and access control.
- Fire detection and extinguishing systems (as deemed appropriate by a risk assessment).

External hosting of data must not take place without prior approval from the Board.

The IT Manager must ensure the IT infrastructure is covered by appropriate hardware and software maintenance and support.

Workstations must be appropriately secured and operated by Company staff who must be trained in and fully conversant with this policy and their personal responsibilities for confidentiality of information displayed on the screen or in printed output.

Backup media must be retained in accordance with the Company Policy on retention of records and the Data Protection Action 1998 and the GDPR.

All Company data must be cleared securely from Company IT equipment and media on disposal. The responsibility for disposal lies with the IT Manager.

q) *Communications and Operations Management*

Controls will be implemented to enable the correct and secure operation of information processing facilities.

Documented Operating Procedure

Design, build and configuration documentation will be produced in respect of system platforms. Sensitive documentation will be held securely, and access restricted to staff on a need-to-know basis.

Segregation of Duties

Access to Key Business Systems and key data and information will only be granted based on the user role and access clarification.

When deemed necessary, segregation of duties between operations and development environment shall be strictly maintained and all work on Key Business Systems will be strictly segregated. Permanent and full access to live operating environments will be restricted to staff on role-based requirements.

Sensitive operations will be identified, and action taken to implement split functional controls, where appropriate.

r) System Planning and Acceptance System Changes

All changes to live Key Business Systems will follow a predefined change management process, to ensure that activities are undertaken in accordance with stringent change control processes.

Controls Against Malicious Software

Controls will be implemented to check for malicious or fraudulent code being introduced to Key Business Systems. All systems will be protected by a multi-level approach involving firewall, router configuration, email scanning, and virus and spy/malware protection on all workstations on the Company network.

All Company workstations will have the appropriate anti-virus software installed and set up to update anti-virus signatures automatically. This must not be turned off by users with unlocked desktops. Any device found to pose a threat to data, or the provision of the Company network will be isolated from the Company network until the security issues are resolved.

Staff and suppliers may use their own PC hardware to connect to the Company guest Wi-Fi network. Any equipment wishing to join the company network will be the subject to security checks and a number of prerequisites before being allowed to establish a connection.

Network traffic will be monitored for any anomalous activity which may indicate a security threat to the network.

Virus Protection

A Virus Protection procedure will be implemented to prevent the introduction and transmission of computer viruses both within and from outside the Company. Failure to maintain a device in a state which prevents or detects virus infection will leave the device liable to exclusion from the Company network until the security issue is resolved.

Security Patches Fixes and Workarounds

The IT Manager will be responsible for the day-to-day management of systems. System backups will be performed automatically by the relevant systems or manually by staff in accordance with documented procedures. The procedure will include keeping backups off site. As per Standard 8 requirement, archives must give adequate assurance that the contents will be available for 40 years. Periodic checks will be made to ensure backup media can be read and files restored. Records of backups will be monitored by the IT Manager and be subject to random audits.

The IT Manager will be responsible for ensuring that security patches, fixes and workarounds are applied in a timely manner to reduce vulnerabilities to devices within the Company network. Such patches, fixes and workarounds must be tested and approved before deployment and the efficiency of the deployment will be monitored to ensure the effective mitigation of risk due to known vulnerabilities.

s) IT Housekeeping and Storage Data Storage

Backups protect electronic information from major loss or failure of system software and hardware. Backups are not designed to guard against accidental deletion or overwriting of individual user data files backup and recovery of individual user files is the responsibility of the information owner.

Standard 8 requires that Archives must give adequate assurance that their contents will be available for 40 years. Only students' names, surnames, and education records for the purpose of issuing education transcripts or certificates shall be kept for a period of 40 years. Data shall be kept in an anonymized manner following the retention period which is of 4 years from the date of graduation. This is in line with GDPR.

Network Management

Controls will be implemented to achieve, maintain, and control access to computer networks, including wireless LANs.

No IT equipment may be connected to the Company network without approval. Any device found to be installed without prior authority will be disconnected, the equipment removed, and an investigation

commenced to establish the cause of the network compromise. Users should be aware that installation of such devices is potentially a disciplinary and criminal offence under the Misuse of Computers Action 1990.

Devices Disposal

Removable magnetic and optical media containing Key Business System data or Sensitive Information will be reused or disposed of through controlled and secure means when no longer required, in accordance with the Disposal of IT Equipment Advice. Redundant computer equipment

will be disposed of in accordance with the Waste Electrical and Electronic Equipment (WEEE) Regulations and through secure and auditable means.

Procedures will be made available for the secure disposal of removable data storage media containing Key Business System data or sensitive information when these become defunct or unserviceable.

Software Usage and Control

Software will be used, managed, and controlled in accordance with legislative and Company policy requirements in relation to asset management and license agreements. All major software upgrades and in-house systems development for Key Business Systems will be appropriately controlled and tested through a managed process before live implementation and deployment.

All software used on devices managed by the Company must be installed in compliance with current software licensing policies. Software installed without prior authority and agreement may leave a user liable to prosecution under the Misuse of Computers Act 1990 and disciplinary action.

Information Exchange Requests

Use of the Company network will be governed by the Information Security Policy and the Policy for using IT Resources.

Failure to comply with these requirements will leave a user liable to disciplinary and/or possible criminal legal penalties.

Exchange of Information with Outside Organisations

Requests by external bodies for the provision of electronic information from Key Business Systems will in all instances be referred to the information owner. This includes Data Subject Access Requests made under the auspices of the Data Protection Act 1998.

Requests for information under the Freedom of Information Act will be referred to the Company Directors. All applications will be handled in accordance with the FOI Application Procedure. Confidential information must not be removed from our offices without permission from the Board except where that removal is temporary and necessary (e.g., for attendance at court, client meetings or at a conference with counsel).

In such circumstances all reasonable steps must be taken to ensure that the integrity of the information and confidentiality are maintained. This will include (but not be limited to):

1. Not transporting files in see-through or other un-secured bags or cases
2. Not reading files in public places (waiting rooms, cafes, trains, etc.)
3. Not leaving files unattended or in any place where they are at risk (e.g., in conference rooms, car boots, cafes, etc.)

Postal, document exchange (DX), fax and email addresses and numbers should be checked and verified before information is sent to them. Particular care should be taken with email addresses where auto- complete features may have inserted incorrect addresses.

All sensitive or particularly confidential information should be encrypted before being sent by email or be sent by tracked or recorded delivery.

Sensitive or particularly confidential information should not be sent by fax unless you can be sure that it will not be inappropriately intercepted at the recipient fax machine.

Home working

Confidential or other information may only be taken to your home with the permission of the Board. The Board will grant permission if they are satisfied that you have appropriate technical and practical measures in place to maintain the continued security and confidentiality of that information.

No confidential information is to be stored on any home computing device (PC, laptop, or tablet). Confidential information (both electronic and physical) must be kept in a secure and locked environment where they cannot be accessed by family members or visitors.

t) *Access Control*

Procedures for the registration and deregistration of users and for managing access to all information systems shall be established to ensure that all users' access rights match their authorisations. These procedures shall be implemented only by suitably trained and authorised staff. A periodic review will be conducted to verify user access and roles.

Access to Key Business Systems will be appropriately controlled and comply with the access rights of the user. Access to the Company network and IT Services will be restricted according to the access classification of the user.

The Company reserve the right to be able to view company network, and IT services including company email addresses at any time.

User Responsibilities

Users of the Company network must comply with Company Policies and the Information Security Policy.

All staff (including agency and temporary staff) must agree to written terms and conditions covering use of IT when they register to use Company IT services.

The HR function within the Company shall ensure that:

- Confidentiality Agreements form part of the terms and conditions of Employment
- Awareness training about electronic information security forms part of Company Staff Induction Programmes
- Information for all staff on electronic information security is maintained in the Contract of Employment and Staff Handbook

The Company must ensure that where there are specific security roles and responsibilities, they are documented in all relevant job descriptions and that there is appropriate screening of applicants.

Access to Company systems may be withdrawn and Company disciplinary procedures invoked where a serious or deliberate breach of the policy is made.

Guest Users and Open Access

Guest user accounts and open access facilities may be used to allow visitors strictly limited access to public Company IT. Written records of such IT use (who, when and where) must be maintained by the Company.

Access to corporate systems, protected electronic resources, Company email services and personal file stores will not be permitted for guest users.

u) Company Key Business System Access Subject Access Management and Administration

Formal procedures will be implemented for granting access to both the Company network and IT services. This will be supported by a formal review of user privileges on a regular basis to ensure that they remain appropriate to the role and relationship with the Company. Accounts identified as dormant will be closed in accordance with current procedures.

Remote Access

Controls will be implemented to manage and control remote access to the Company's network and IT services.

Users should note that failure to comply with Company policies will leave the user liable to disciplinary action and possible criminal law prosecution under the appropriate legislation.

Mobile Computing

The Company recognises the inherent dangers of information stored on portable computers (laptops, notebooks, tablets, and smart phones) as well as removable media. The Company will

provide security advice to staff as requested. The advice is issued as a guideline for users and failure to follow recommended guidance will leave a user vulnerable to disciplinary action should Key Business System Data or sensitive information be lost or altered.

Password Management

Users are required to follow good security practices in the selection, use and management of their password and to keep them confidential.

Primary access to Company IT services is governed by username and password giving access to the set of services.

System administrator passwords will be issued on the express authority of the Managing Director on a need-to-know basis. Such password will be changed regularly and when authorised systems administrator staff leaves.

For all Company issued IT equipment, the following password requirements must be observed:

- Passwords must be a minimum of seven characters, which must include 3 of the following 4: lowercase, uppercase, numerical, and non-alphabetic characters
- Passwords should be subject to periodic change. The life of a chosen password will be 60 days
- Reuse of the last 12 password changes is not allowed
- Accounts should be locked on the third failed log in attempt

Policy on password complexity will be reviewed periodically and in line with current industry guidance. Passwords for all third-party services should meet the above complexity requirements, using 2FA where possible. The Nimbus Company Password vaults can be used for shared accounts, the vault password needs to be extremely complex.

The Information Security Manager must be notified when staff leave and will be responsible for closing the associated accounts.

The account type should at all times reflect the business relationship existing with the member of staff. As a staff member moves to a less formal relationship with the Company then the account associated with that person should reflect this new relationship.

The Company will maintain a list of staff with access to key business systems and services. A password matrix will be maintained to ensure business continuity and mitigate risk. This password matrix will be kept securely to ensure swift response to critical incidents.

Unattended User Equipment

Users of the Company network and IT services are responsible for safeguarding Key Business System Data and sensitive information. In order to protect these information assets, users are required to ensure that devices are not left logged on when unattended and that portable equipment in their custody is not exposed to opportunistic theft, unauthorised access, or observation of

sensitive information.

Where available, password protected screensavers and automatic log out mechanisms are to be used on office-based systems to prevent individual accounts being used by persons other than the account holders, but not on cluster computers that are shared by multiple users.

Users should utilise the following security features of the system:

- Logging out of sessions when the session is finished
- Locking desktop sessions when a computer is to be left unattended
- Whenever possible and at the end of the working day, switch off computers when not in use

Users are required to follow the guidance on user responsibilities and Personal Responsibilities for Information Security. Failure to adhere to these recommendations could leave the Company or user liable to possible disciplinary or criminal prosecution.

v) Monitoring Systems Access and Use

Access to and use of the Company network and IT systems will be monitored in accordance with the provisions of the Policy for Using IT Resources.

Remote access by third party contractors to maintain and support Company IT systems will be subject to appropriate monitoring and control measures defined by IT services. Third party access will only be granted where the applicant has agreed to the terms and conditions of the ICT Acceptable Use Policy.

w) Compliance

Compliance with Legal and Company Policy

Supply and use of the Company network and IT services is bound by Maltese law current at the time of any reported incident. The policy for using IT resources provides guidance on the most common legal and policy requirement pertaining to Company network use.

Guest users may be permitted limited right to use IT services. The Company will review this policy periodically.

The Information Security Manager will maintain and monitor, at six monthly intervals, reports of records of electronic security incidents. Reports will be considered by the Board. It will then be decided if further action or investigation is required.

The IT services password matrix, listing members of staff with access to key systems and services, will be maintained by the Information Security Manager and the master copy held in a secure public folder.

People who are neither staff nor suppliers do not normally have an automatic right to use the Company network or IT services. Authorisation for such external users will be subject to sponsorship from a member of Company staff along with written agreement from the user to abide by the Company policies.

All applications for external users will be subject to approval by the Company Directors or nominated representative.

Any outsourcing must include express provisions with respect to IT security and control and any applicable UK and Maltese law in relation to data processing and confidentiality.

The school campus site is situated at: No. 104, Triq Is-Sidra, Swieqi, SWQ 3150, Malta

The SBM library is automated and uses management packages to support its provision. Systems are able to produce catalogue reports by author, title, subject etc. and various other circulation reports. Titles cover a wide range of topics including management, marketing, E-Commerce, information technology, computing, law, and business categories. There is a recommended texts policy and reference and loan copies available ratio within the collection (normally on a 10:1 basis), A book reservations system is in place. Further reading material is purchased as a matter of routine so that students can read around their subjects. The library stocks all the module study guides, which list recommended and additional reading lists, together with the subject outlines. These are for all validated programmes and for the run-out phases of previous SBM programmes. It has a customer account with the British Library Document Supply Centre for inter-library loans and letters of introduction are provided for students who wish to use public libraries.

x) The Quality Assurance Library

SBM maintains an electronically based quality assurance document library which is located on the staff public folder, in which quality assurance and education standards items, keynote documents and similar material is archived. The library provides access to a range of documentation including committee and board minutes; key guidance papers; policy and strategy papers; validation documentation; programme documentation; learning and teaching papers and support material; scholarship and research papers and supporting documentation; annual monitoring and periodic monitoring documentation; education standards papers; QAA Documentation; REO/EO Annual Monitoring Documentation, and other material which is relevant to the continued development and context of SBM. The library is developed with a variety of levels of access which are designed to maintain confidentiality if required but also to facilitate access to a common source of documentation related to the overall activities of the school. The library is populated by named individuals according to the level of access required. There are also access controls which allow specific authors and sources to enter material, edit material and make material available to the whole school if required.

The Quality Library is both an archive and an ongoing resource for the development of the School. As such it is designed to be a proactive reference source for all documentation and for the continued enhancement of the provision.

Appendix 5: OTHM Quality Assurance Policy

OTHM QUALITY ASSURANCE POLICY

1.0 Introduction

The key role of OTHM is to secure standards for those qualifications we certificate. As part of our commitment to quality assuring standards we aim to provide guidance and support to help Centres and their learners to achieve learning and development goals. We also ensure that any regulatory requirements are met, and in turn we support Centres to meet those requirements.

We review all our policies annually or in response to regulatory changes to ensure that they remain fit for purpose.

2.0 Scope of policy

This policy is aimed at all OTHM stakeholders including learners, Centres, and other parties involved in any aspect of OTHM qualifications and endorsed learning provision.

3.0 Policy statement

OTHM are committed to ensure that management and assessment of our qualifications is valid and reliable and that learners who have shown that they can meet the standards of a qualification receive certification. Our quality assurance procedures must also ensure consistency of standards over time for all qualifications.

4.0 Quality assurance principles

OTHM quality assurance system is based on the following principles:

- The quality assurance system should be understandable to stakeholders, effectively administered and cost effective to operate
- Qualifications should be accessible to all learners who have the potential to achieve them
- The criteria, which define the performance required of learners for them to achieve qualifications, should be appropriate to the purpose, explicit and in the public domain
- Each criterion should be unique and necessary, and should comply with the specifications for the qualification
- Assessment should be valid, reliable and practicable, and assessment results should be in line with the criteria for the qualification
- Qualifications should be only offered in Centres that have the resources and expertise to assess learners against the qualification's criteria
- Staff in Centres should be provided with effective support in assessing and internal quality assuring learner work for certification
- Responsibility for quality assurance should be shared with Centres.

5.0 Quality assurance components

To ensure that the qualifications OTHM offers are designed, delivered and assessed to acceptable national standards, several quality assurance elements are set out, which are based on the quality assurance principles. These elements underpin all OTHM qualifications and underpin the mechanisms through which national standards are maintained.

Element	The Criteria Cover
Recognition as an OTHM Centre	The management procedures which underpin the implementation and assessment of OTHM qualifications in Centres.
Approval to offer specific OTHM qualifications	Resources required of Centres for the implementation and assessment of specific OTHM qualifications.
Validation of OTHM qualifications	Ensuring that OTHM qualifications are fit for purpose
Internal verification of internal assessment	The process by which Centres ensure that all internal assessments are valid and consistent with approval from OTHM prior to use and through the use of standardisation activities.

Each element covers an area of assessment or quality assurance and is divided into requirement or criteria. The criteria set out the corresponding responsibilities of OTHM and its Centres.

6.0 Internal Quality Assurance

OTHM recognise the crucial importance of establishing and retaining standardisation of assessment requirements across subjects and levels.

Internal quality assurance at Centres must cover assessment decisions made by

- all assessors
- assessment decisions to meet the criteria of the specifications
- learner work that reflects the level of achievement and
- learner work that reflects certificate claims

Centres must undertake standardisation activities appropriate for each qualification to be delivered with all relevant assessors and internal quality assurance staff. In general this should be conducted prior to first delivery of the qualification as part of the preparation for delivery, prior to assessment and as part of the post delivery review. In addition any new assessors and quality assurance staff should undertake standardisation prior to working with the qualification. With an established qualification where no changes have occurred, centres should conduct standardisation activities twice in an academic year as a minimum.

7.0 External Quality Assurance

OTHM will appoint individuals who are occupationally and professionally competent to

ensure accurate and consistent standards of assessment, across OTHM delivery Centres and over time. They are responsible for completing any External Quality Assurance (EQA) activities.

The purpose of such activities is to ensure Centres:

- Have appropriate levels of resources to support the delivery of the qualification, including both physical resources and staffing
- Are using appropriate assessment methods and making appropriate assessment decisions according to OTHM requirements
- Have appropriate internal quality assurance arrangements as outlined within the relevant qualification specification
- Are using appropriate administrative arrangements to support the function of delivery and assessment.
- Feedback to Centres is given through the EQA report form which includes details on the above criteria and any areas where further development is required.

8.0 Monitoring and Training

OTHM monitor and review all quality assurance processes and procedures continually and formally at least annually. We provide mandatory training for EQAs at least annually and more frequently if required in addition to providing feedback and support on performance.

9.0 Regulatory references

Ofqual requires all regulated Awarding Organisations to establish and maintain evidence of their compliance with the General Conditions of Recognition. As part of its ongoing process of compliance, OTHM policies and procedures will reflect the particular conditions and criteria they address.

This policy addresses the following Ofqual General Conditions of Recognition (GCR).

GCR Reference	GCR Section title
D1	Fitness for purpose of qualifications
E4	Ensuring an assessment is fit for purpose and can be delivered
G1	Setting the assessment
G9	Delivering the assessment
H1-6	From marking to issuing results

10.0 Policy review date

July 2020

11.0 Useful contacts

For more information on our qualifications and services visit: www.othm.org.uk.
Alternatively, call at: +44(0)20 7118 4243 or email at: info@othm.org.uk

End of policy