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GBS Information Management Policy

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Related GBS Policies

- GBS Data Protection Policy
- GBS Social Media Policy
- GBS Equality and Diversity Policy
- GBS Communications Policy
- GBS Data Breach Policy
- GBS Privacy Policy
- GBS Student Terms and Conditions
- GBS Public Information Policy
- Academic Standards and Quality Manual

External Reference Points

- CMA: UK higher education providers – advice on consumer protection law (May 2023)
- Office for Students: Registration with the OfS – Conditions of Registration
- QAA UK Quality Code for Higher Education 2024
- Information Commissioner's Office (ICO)
- UK Data Protection Act 2018
- UK Equality Act 2010

Contents

Part A: Policy Framework.....	4
1. Policy Statement.....	4
2. Purpose.....	4
3. Scope.....	5
4. Definitions	6
Part B: Staff Roles and Responsibilities	7
5. Principles.....	7
6. Staff Responsibilities	8
7. Governance Responsibilities	10
Part C: Provision of Information and CMA Compliance	11
8. Provision of Material Information	11
Part D: Programme Documentation Management.....	13
9. Programme Approvals: Production of Definitive Programme Documents	13
10. Changes to Existing Programmes.....	14
11. PSRB Documentation.....	16
Part E: Marketing Collateral and Non-DPI Information	16
12. Marketing Collateral: Approval Process	16
Part F: Policy Lifecycle Management	17
13. Policy Development.....	17
14. Policy Approval.....	18
15. Policy Review	19
16. Policy Amendment.....	19
17. Policy Withdrawal	19
18. Policy Publication	20
19. Policy Communication	20
20. Policy Administration	20
Part G: Communicating and Publishing Definitive Programme Documentation	21
21. Responsibilities.....	21
Part H: Monitoring, Review, and Compliance	21
22. Monitoring and Review	21
23. Data Protection and Confidentiality.....	22
24. Equality and Diversity	22
25. Alternative Format	22
Appendix A: Workflow to Tackle a CMA Breach.....	23
Appendix B: Guidance on Writing an Accessible Policy	24
Appendix C: Policy Categories.....	25

Part A: Policy Framework

1. Policy Statement

- 1.1. This policy establishes a unified framework for the management of external information, definitive programme documentation, and the policy lifecycle at Global Banking School (GBS). It brings together the principles and procedures that ensure all published information – whether relating to programme content, marketing, or institutional policies – is accurate, accessible, current, and compliant with Consumer Protection Law as informed by the Competition and Markets Authority (CMA).
- 1.2. GBS is legally required to comply with Consumer Protection Law, as informed by the CMA. GBS must provide applicants, prospective, and current students with accurate, accessible, and up-to-date information on its programmes, their structure, fees and costs, and any relevant regulations and policies. This applies equally to Definitive Programme Information (DPI) and to non-programme marketing information used for promotional purposes.
- 1.3. Compliance with consumer protection legislation also forms part of the Office for Students (OfS) Ongoing Conditions of Registration (C Conditions). In this context, 'material information' as defined in the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) refers to any important information that prospective and current students rely on to make an informed decision about what and where to study.
- 1.4. Well-developed and clear policies, readily available to members of the GBS community and other users, are fundamental to an efficient, transparent, diverse and inclusive organisation. To support effective decision-making and to ensure that students, staff and other stakeholders understand how GBS works, policies must be maintained as current, written with due regard to matters of equality and legal and regulatory compliance, and clearly signalled to all who need to access them.

2. Purpose

- 2.1. This policy sets out the principles and procedures that underpin:
 - GBS's compliance with Consumer Protection Law and CMA guidance for the provision of material information to prospective and current students;

- the management of Definitive Programme Documentation (DPD) from initial approval through all stages of delivery and the appropriate retention period;
- the coverage of non-DPI marketing information, ensuring that all externally published information used for promotional purposes is accurate, consistent with approved programme documentation, and compliant with CMA requirements;
- a consistent approach to the development, approval, review, amendment, withdrawal, publication, communication, and administration of GBS policies.

2.2. GBS will:

- Provide clear, accurate, and timely material information to students, prospective students, and other stakeholders, including enabling informed decisions at every application stage.
- Ensure pre- and post-contract information remains up-to-date and accurate.
- Maintain processes to communicate changes to applicants and offer holders, inform them of their rights, and specifically highlight any unexpected or important terms and conditions.
- Establish processes for communication, consultation, and consent from students regarding changes to programmes once registered.
- Ensure complaints handling processes are accessible, clear, and fair.
- Ensure that marketing and promotional materials are reviewed and approved in accordance with CMA requirements before publication.

3. Scope

3.1. This policy applies to:

- all information provided to applicants, prospective, and current students applying to or registered on taught programmes delivered by GBS, including Definitive Programme Documentation;
- all marketing and promotional information published on the GBS website, prospectuses, social media channels, and any other external communications;
- all GBS regulations, policies and procedures. References to 'policies' in the Policy Framework sections of this document include regulations and

procedures. The Policy Framework provisions do not apply to codes of practice and guidelines/guidance documents.

4. Definitions

4.1. Definitive Programme Documentation (DPD)

4.1.1. A set of documents considered definitive after final approval by the Chair of Academic Board, and following any awarding partner approval as necessary. The DPD set must include:

- **Programme Specifications:** Required for all programmes using the GBS template. These summarise the main features of the programme providing clear statements of: programme final award title, level and total credit (FHEQ); interim awards; awarding body; teaching delivery body; GBS Faculty; proposed locations for delivery; mode of study; duration; external reference points; PSRB accreditation; UCAS code; EDI; HECoS code; recognition of prior learning; entry requirements; programme overview; aims; learning outcomes; teaching, learning, and assessment strategy; careers and employability; work-based learning; programme structure; version control; and module map against programme learning outcomes.
- **Module/Unit Specifications:** Required for all modules/units using the GBS template, indicating: module title; GBS-defined module code; approved programmes; status (core or optional); FHEQ level; credit volume; mode of delivery; teaching period; delivery accommodation; locations; pre-requisites; HECoS code; EDI; indicative content; aims and learning outcomes; learning and teaching strategy; inclusivity; work-related learning opportunities; assessment strategies; student contact and independent study hours; assessment descriptions; additional costs; and reading list/resources.

4.2. Material Information (CMA)

4.2.1. As defined by the Consumer Protection from Unfair Trading Regulations 2008, material information is any important information that prospective and current students rely on to make an informed decision about what and where to study, whether to apply to and/or accept an offer to study at GBS, as well as any information provided once students have registered and entered into a contract with GBS.

4.3. Non-DPI Marketing Information

- 4.3.1. Information used for marketing and promotional purposes that is not derived directly from the Definitive Programme Documentation but which is published externally and upon which prospective students may rely when making decisions about studying at GBS. This includes, but is not limited to, campus facility descriptions, student experience narratives, career outcome statements, and general institutional information. All such information must be accurate, not misleading, and compliant with CMA requirements.

4.4. Policy Types

- **Regulations:** Rules and principles governing how GBS operates, applying broadly across GBS or to significant parts of the organisation. They must be followed.
- **Policies:** Documents that set out requirements determining how specific parts of GBS work. They support the implementation of GBS strategies and regulations and must be followed.
- **Procedures:** The official method by which a policy is carried out. Procedures are linked to and support a particular policy and must be followed.
- **Codes of Practice:** Advisory documents indicating a course of action that will usually be followed unless there is an exceptional reason for not doing so.
- **Guidelines/Guidance Documents:** Flexible, timely documents providing advice and support for a particular activity.

Part B: Staff Roles and Responsibilities

5. Principles

- 5.1. All staff involved in drafting and publishing programme, module, marketing, and policy information are responsible for its accuracy and the timely communication of changes.
- 5.2. The following principles apply to all published information processes:
- The Definitive Programme Documentation is the single source of programme information. Information shared with students must reference this approved source and avoid rewriting or duplication.

- Staff take responsibility for checking that the information they provide is consistent with the approved programme documentation.
- GBS clearly identifies and communicates material changes to programmes, modules, and other core aspects of studying at GBS.
- Non-DPI marketing information must be reviewed for accuracy and CMA compliance before publication.

6. Staff Responsibilities

6.1. The Head of Marketing is accountable for:

- Accurately promoting material information to applicants, prospective students, and agents using the approved programme and module specifications.
- Providing CMA guidance and training to all staff and to any third parties participating in preparing and delivering communications to students or prospective students.
- Ensuring that non-DPI marketing information (campus descriptions, career outcomes, student experience content) is accurate, not misleading, and compliant with CMA requirements.

6.2. The Director of UK Admissions is accountable for:

- Briefing the admission and recruitment teams on material changes to programmes.
- Informing applicants and offer holders of material changes to modules and programmes.
- Producing compliant and accurate offer letters (where relevant).

6.3. The Academic Registrar is accountable for:

- Ensuring that Thesis (Unit 4) records are updated following notification of Definitive Programme Documentation changes to ensure that programme-specific material information remains accurate and up to date.

6.4. The Director of Academic Standards and Quality is accountable for:

- The versioning and storage of definitive programme information following approval by Academic Board.

- Ensuring that accurate and up-to-date DPD is provided to Registry to update Thesis (Unit 4) following the approval of a new programme or the modification of an existing programme.
- Managing the internal programme approval and modification processes and supporting external programme validations and modifications.
- Advising the faculty on whether consultation with applicants and/or students is required as part of the programme approval or modification process.
- The administration of the policy database and review schedule, providing advice and guidance regarding the classification of policies and the approval process.
- Liaising with the policy lead, approving bodies, and the Communications team at various stages in the policy lifecycle.
- Ensuring that new or updated policies are sent to the relevant team for upload to Life (Human Resources) and/or the GBS website (Marketing), and instructing the removal of any superseded policy.

6.5. The Deans are accountable for:

- Providing the Director of Academic Standards and Quality with up-to-date programme and/or module specifications following approval by the awarding body.
- Following the GBS programme and module approval or modification process as set out in the Academic Standards and Quality Manual (ASQM).
- Consulting applicants (where relevant) and students regarding changes to programme and module specifications.
- Providing the Director of Academic Standards and Quality with evidence of consultation with applicants and students on programme and module changes.

6.6. Policy leads are responsible and accountable for the drafting, development, review and, where necessary, amendment of a policy. The policy lead coordinates input from relevant stakeholders into the policy.

- 6.7. The approving body secretary is responsible for providing the Academic Standards and Quality Office with a new or amended policy, confirmation of its approval by the relevant body, and information about the policy for communications purposes.
- 6.8. The Communications team is responsible for disseminating information about new or amended policies to relevant user/stakeholder groups.
- 6.9. Human Resources is responsible, following communication from the Academic Standards and Quality Office, for uploading new or updated policies for staff access to the Life platform, as well as removing policies that have been superseded.
- 6.10. Marketing is responsible, following communication from the Academic Standards and Quality Office, for uploading new or updated policies to the GBS website, as well as removing policies that have been superseded.

7. Governance Responsibilities

- 7.1. The Board of Directors: The governing body ensures compliance with the OfS's ongoing conditions of registration, including CMA. The Board holds overall responsibility for GBS's compliance with Consumer Protection Law and the CMA Guidance.
- 7.2. Academic Board: Maintains the academic standards of programmes delivered by GBS and approves academic policies, student-facing policies, and major (material) programme modifications.
- 7.3. Academic Standards and Quality Committee: Considers and approves minor modifications and makes recommendations regarding major (material) modifications to Academic Board.

Part C: Provision of Information and CMA Compliance

8. Provision of Material Information

- 8.1. GBS will ensure that prospective students, applicants, and current students have the necessary information to make informed choices about studying at GBS and to undertake their studies successfully.
- 8.2. In accordance with CMA requirements, GBS must provide 'material information' for applicants and students as defined in section 4.2.
- 8.3. All forms of information provided to prospective students and applicants, whether in writing or verbally by any member of GBS staff or its agents, form part of the material information on which prospective students may base a decision to apply to study at GBS.
- 8.4. GBS will provide general information about studying at GBS, including its facilities and services, in its prospectuses and other resources, including online. It will ensure that this information is clear, accurate, and accessible.
- 8.5. All printed material will carry a statement to confirm that it is accurate at the time of printing and applicants and students will be directed to the GBS website for the most up-to-date information.

8.6. Pre-Contract Material Information (CMA)

- 8.6.1. The CMA guidance regarding 'material' information for prospective students is set out in the table below.

Information Category	Pre-Contract Material Information
Offer Conditions	Full details of conditions to take up a place; indication of standard/typical offer; student contract terms and conditions.
Programme Information	Programme title; composition including core/mandatory modules/units and likely options; overall learning, teaching and assessment methods; expected

	contact hours and workload; English language requirements; regulatory body (OfS conditions); professional accreditations.
Programme Delivery	Delivery methods (lectures/seminars/workshops etc.) and types of assessment; guest speakers and external resources.
Location of Study	Place of study; possible placement locations (if known).
Award	Award title with interim awards; awarding body.
Duration	Length of programme; optional/mandatory placements.
Costs	Tuition fees per period of study; fee increase information; additional costs (field trips, equipment, DBS checks etc.) including whether fixed/estimated, optional/mandatory, and timing; deposits (if required).
Complaints	Clear information on the Admissions Policy covering pre-contract complaints and the complaints process.
Cancellation	Right to cancel and withdraw within 14 days of commencement of teaching; full refund of deposits during cancellation period.

8.7. Post-Contract Material Information (CMA)

8.7.1. The CMA guidance regarding ‘material’ information for registered (current) students is set out in the table below.

Information Category	Post-Contract Material Information
Offer Conditions	Full details of conditions to take up a place; student terms and conditions.
Programme Information	Programme title; composition including core/mandatory modules/units and likely options; learning, teaching and assessment methods; professional accreditations.
Programme Delivery	Type of delivery; number and type of contact hours including self-directed and guidance learning; guest speakers and external resources.
Location of Study	Place of study; possible placement locations (if known).
Award	Intended award; awarding body.

Duration	Length of programme; optional/mandatory placements and their length.
Costs	Tuition fees per period; fee increase information; additional costs including whether fixed/estimated, optional/mandatory, and timing; deposits.
Complaints	Clear information on the Student Complaints Policy and the complaint mechanism.
Cancellation	Right to cancel and withdraw within 14 days of commencement; full refund of deposits during cancellation period.

8.8. Registration

- 8.8.1. Applicants are issued with details of the Student Terms and Conditions at the point a formal offer is made. Students studying on programmes leading to Pearson awards will have their Terms and Conditions issued by GBS. All other students will have their Terms and Conditions issued by the relevant validating University.
- 8.8.2. To move from applicant status to registered status, students are required to accept the formal offer and enrol.
- 8.8.3. Although students are required to re-enrol annually subject to satisfactory progress, they do not enter a new contract each year as the contract set out in the offer letter covers the duration of the programme.
- 8.8.4. GBS retains programme and module specifications and other relevant documents (Definitive Programme Documentation) in relation to each cohort of students. Previous versions are available from the Academic Standards and Quality Office (ASQO).

Part D: Programme Documentation Management

9. Programme Approvals: Production of Definitive Programme Documents

- 9.1. The Academic Standards and Quality Office (ASQO) produces an Outcomes Report following GBS Programme Approvals, Modifications and Periodic Reviews where a list of conditions and recommendations are set with timescales for the faculty to act upon.

Once conditions and recommendations are addressed and approved by the Chair of Academic Board, the Definitive Programme Documentation is confirmed.

- 9.2. Following approval, the Definitive Programme Documentation must be presented to ASQO which holds and maintains these documents in the DPD Directory. The directory is updated and maintains the internal and awarding body's approval date, date of first delivery and the review period for each DPD set. The DPD Directory is the 'single source of truth' for Definitive Programme Documentation.
- 9.3. Once the DPD receives final approval, the Director of Academic Standards and Quality authorises issuing of the DPD to the following senior staff who are responsible for updating systems/information sources:
- Academic Registrar (Thesis and for admissions purposes)
 - Head of Marketing (GBS website)
 - Head of Timetabling (Zoho)
 - Head of Learning Resources and Technology (Moodle)
 - Faculty Dean (Programme and module handbooks)
 - Head of HR (Life).
- 9.4. The DPD is also issued for information to the Head of Data and Information and the Head Librarian.

10. Changes to Existing Programmes

10.1. Programme Modification

- 10.1.1. In line with the Academic Standards and Quality Manual, programme modification processes are managed internally and considered and approved by Academic Board before submission to the relevant awarding body. Minor modifications are approved by the Academic Standards and Quality Committee, whilst major modifications are considered initially by ASQC before being recommended for approval by Academic Board.
- 10.1.2. Where the awarding body seeks further development of the DPD, the revised documentation is submitted for approval by the Academic Standards and Quality Committee or Academic Board, as appropriate.

10.1.3. Once the DPD receives final approval following modification, the Director of Academic Standards and Quality authorises the issuing of the updated DPD to the senior staff listed in section 9.3.

10.2. Programme Modifications and CMA Requirements

10.2.1. GBS will not normally make any changes to programmes (programme title, duration, structure; core modules) after offers have been made to applicants but before these students commence, other than in exceptional circumstances.

10.2.2. Offer holders: Where changes are proposed that alter any of the contractual details set out in the offer letter, the Academic Registrar, prompted by ASQO, will inform offer holders of the change, provide information on the rationale and benefits of the change, and advise them of their rights to withdraw from the contract.

10.2.3. Enrolled students: Where any changes are proposed that alter the student's existing programme of study, the Academic Registrar, prompted by ASQO, will contact the affected students to inform them of the change(s) and provide information on the rationale and benefits.

10.3. Programme Suspension

10.3.1. Where Academic Board confirms the suspension of a programme, ASQO contacts the senior staff listed in section 9.3 so that systems and information are updated regarding the status of the programme, as appropriate to continuing students and applicants.

10.4. Programme Withdrawal and Closure

10.4.1. Where Academic Board confirms the withdrawal of a programme, a teach-out plan is drawn up by the Faculty in liaison with relevant professional services and approved by Academic Board. Teach-out plans are monitored by the Academic Standards and Quality Committee until the final cohort has graduated. Once the final cohort has graduated, ASQO archives the DPD.

11. PSRB Documentation

- 11.1. All documentation related to the application and approval of accreditation provided by Professional, Statutory and Regulatory Bodies (PSRB), together with all accompanying details of the arrangements for accreditation, are maintained by ASQO. The details of accreditation are held in the DPD Directory and include the PSRB name, date and details of the accreditation and scope of any conditions. These details are maintained with the DPD and updated annually. ASQO is responsible for providing Registry with details of PSRB accreditations in line with reporting requirements for Discover Uni.
- 11.2. Where a programme has attracted support from industrial or other bodies providing access to materials or experiences which contribute to material provision, the details of the relationship between GBS and the supporting body are included in the DPD. Such details are maintained and reviewed at least annually by ASQO.

Part E: Marketing Collateral and Non-DPI Information

12. Marketing Collateral: Approval Process

- 12.1. Product, pricing, and the approved module and programme specification will be provided to the Marketing Team by ASQO.
- 12.2. The Marketing Team is responsible for developing all marketing collateral including non-DPI marketing information such as campus descriptions, student experience content, career outcome statements, and general institutional information.
- 12.3. Once the collateral has been developed, the relevant Dean is responsible for reviewing it and ensuring that any non-definitive programme information is accurate, such as information on what students may expect in a programme.
- 12.4. Once approved by the relevant Dean, ASQO reviews the collateral to ensure that any specific programme information such as structure, modules, and accreditations is accurate. ASQO holds all definitive programme information and ensures that any validating partner requirements for promotional material are met.

- 12.5. The collateral is then presented to the Head of Marketing for review of external regulatory compliance with the Competition and Markets Authority (CMA), the Information Commissioner's Office (ICO), and the Advertising Standards Agency (e.g. costs).
- 12.6. The Head of Marketing provides the final version to ASQO for confirmation that no incorrect changes have been made to the programme information, before publishing.
- 12.7. The Director of Academic Standards and Quality holds executive responsibility, while the Board of Directors holds overall responsibility for GBS's compliance with Consumer Protection Law and the CMA Guidance.

Part F: Policy Lifecycle Management

13. Policy Development

- 13.1. Before proceeding to develop a new policy, policy leads should consider first whether a new GBS policy is needed and/or whether amendment of an existing policy would provide a more coherent policy approach.
- 13.2. A new or amended policy may result from: an external driver/requirement such as new legislation; a change in structure, responsibilities or circumstance; the need for clarity or to broaden scope; or the regular review of policies.
- 13.3. Policy leads should liaise with the Director of Academic Standards and Quality to determine whether there are already policies in place that might address the specific issue, or that might reasonably be amended to do so.
- 13.4. In drafting a new policy or substantially amending a current policy, the following should be considered: scope and applicability; conflict or overlap with existing policies; regulatory implications (OfS and other external bodies); legal implications (Health and Safety, EDI, data protection, Prevent); relationships with external parties; stakeholder consultation requirements; and whether the policy is better introduced as an element of an existing policy.

- 13.5. All policies must be presented on the GBS template. The style of policies should follow accessibility guidance (see Annex).

14. Policy Approval

- 14.1. Before a policy can be published and implemented it must go through a formal approval process. The policy lead must ensure that the correct route is followed:

Policy	Approving Body
Academic policies (including Academic Regulations)	Academic Board
Student-facing policies	Academic Board
HR policies	Finance and Resources Committee recommends to Board of Directors
Finance policies	Finance and Resources Committee recommends to Board of Directors
IT policies	Finance and Resources Committee recommends to Board of Directors
Governance policies	Board of Directors
Legal and regulatory policies	Board of Directors
Whistleblowing Policy	Audit and Risk Committee recommends to Board of Directors
Anti-Fraud and Anti-Bribery Policy	Audit and Risk Committee recommends to Board of Directors
Health and Safety Policy	Finance and Resources Committee recommends to Board of Directors

- 14.2. Once the approving body has authorised the new or amended policy, the relevant committee secretary provides the Academic Standards and Quality Office with the

policy, confirmation of its approval, and information about the policy for communications purposes.

15. Policy Review

- 15.1. All policies are reviewed periodically. Typically, reviews take place every three years. Review may take place earlier if requested by the approving body, due to external body requirements, or due to changes in the internal and/or external environment.

16. Policy Amendment

- 16.1. Two versions of the amended policy should be presented for approval: one with tracked changes identifying all amendments and one 'clean' version. The amended policy must be presented with a coversheet stating where material changes have been made and setting out the impacts¹.
- 16.2. Where only minor amendments are required and these do not constitute any material change, this should be identified clearly on the coversheet. In such cases it may be appropriate to request Chair's Action. It will be a matter for the approving body to confirm that this is appropriate.

17. Policy Withdrawal

- 17.1. Where a policy has become redundant or requires such substantive change that the replacement be considered a new policy, it must be withdrawn. The policy lead should contact the Director of Academic Standards and Quality to request that the withdrawal is agreed by the approving body. Where withdrawal is agreed, the Director of Academic Standards and Quality ensures that the policy is removed from publication on the Life platform, Moodle and/or the GBS website, as applicable. Where necessary, the Director of Academic Standards and Quality will liaise with the Communications team so that the policy withdrawal is disseminated to relevant stakeholder groups.

¹ Policy owners are advised to complete the Policy Approval Cover Page for seeking changes to policies. For further information, please contact the Academic Standards and Quality Office.

18. Policy Publication

- 18.1. All policies (including student-facing policies) are published on Life, the GBS intranet. A sub-section of policies are published on the GBS website for the general public. Student-facing policies are made available to students via Moodle. Publication and withdrawal of policies on Moodle links to the GBS website and is automatically actioned when changes are made to relevant website content.

19. Policy Communication

- 19.1. Following publication of new or amended policies, the Academic Standards and Quality Office contacts the Communications team which alerts relevant staff, students, and stakeholders to the new/amended policy.

20. Policy Administration

- 20.1. A database of policies is maintained by the Academic Standards and Quality Office. The database contains details of the policy version, approving body, policy lead, date of original approval, date of review, changes made at last review, date from which the policy is effective, and date of next review.
- 20.2. A policy review schedule is maintained by the Academic Standards and Quality Office. In July of each year, the Office identifies which policies are due for review in the coming academic year and informs both the policy lead and the approving body. The policy lead is then responsible for ensuring that the review occurs, with outcomes reported to the Academic Standards and Quality Office for inclusion in the policy review schedule.
- 20.3. The Academic Standards and Quality Office provides an annual report of policies reviewed (reported against the expected schedule for review) to the Senior Management Team, which reports on this activity to the Board of Directors through the regular CEO report.

Part G: Communicating and Publishing Definitive Programme Documentation

21. Responsibilities

- 21.1. The Academic Standards and Quality Office is responsible for providing the Definitive Programme Documentation to the senior staff listed in section 9.3.
- 21.2. Definitive Programme Documentation is reviewed annually by ASQO. At that point ASQO communicates any changes to the senior staff listed in section 9.3.
- 21.3. ASQO checks the accuracy of programme information published on the GBS website, Life, Moodle and in programme and module handbooks annually in September and additionally following the implementation of programme modifications. ASQO liaises with the relevant senior staff should action be needed following the accuracy check.
- 21.4. Changes to the DPD outside the processes set out in this policy are not permitted.

Part H: Monitoring, Review, and Compliance

22. Monitoring and Review

- 22.1. This policy will be reviewed on a triennial basis, or earlier where circumstances require.
- 22.2. An annual audit will be conducted by ASQO, which will:
 - i. Sample programme information (e.g. prospectuses, websites, handbooks and offer letters) and non-DPI marketing materials across faculties to ensure consistency against Definitive Programme Documentation and CMA requirements.
 - ii. Assess minutes of student-involved committee meetings, qualitative student feedback (e.g. arising from surveys), and formal student complaint outcomes to reflect on any concerns from students relating to CMA compliance.
 - iii. Assess changes made to material information throughout the year, especially those occurring outside of normal academic cycles, specifically to check if proper communication and consultation activities were conducted with prospective students, offer holders, and current students.

- 22.3. An annual report to the Senior Management Team by ASQO will be produced, providing commentary on GBS's CMA compliance and any related institutional-level complaints in line with the outcomes of the annual audit. The report will outline recommendations for improving procedures and guidance.

23. Data Protection and Confidentiality

- 23.1. GBS is registered with the Information Commissioner's Office (ICO) as a Data Controller. Details of the School's registration are published on the Information Commissioner's website.
- 23.2. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).
- 23.3. All GBS staff and students should be clearly informed about the limits of confidentiality in terms of information sharing in line with data protection law. Please refer to the GBS Data Protection Policy for further guidance.

24. Equality and Diversity

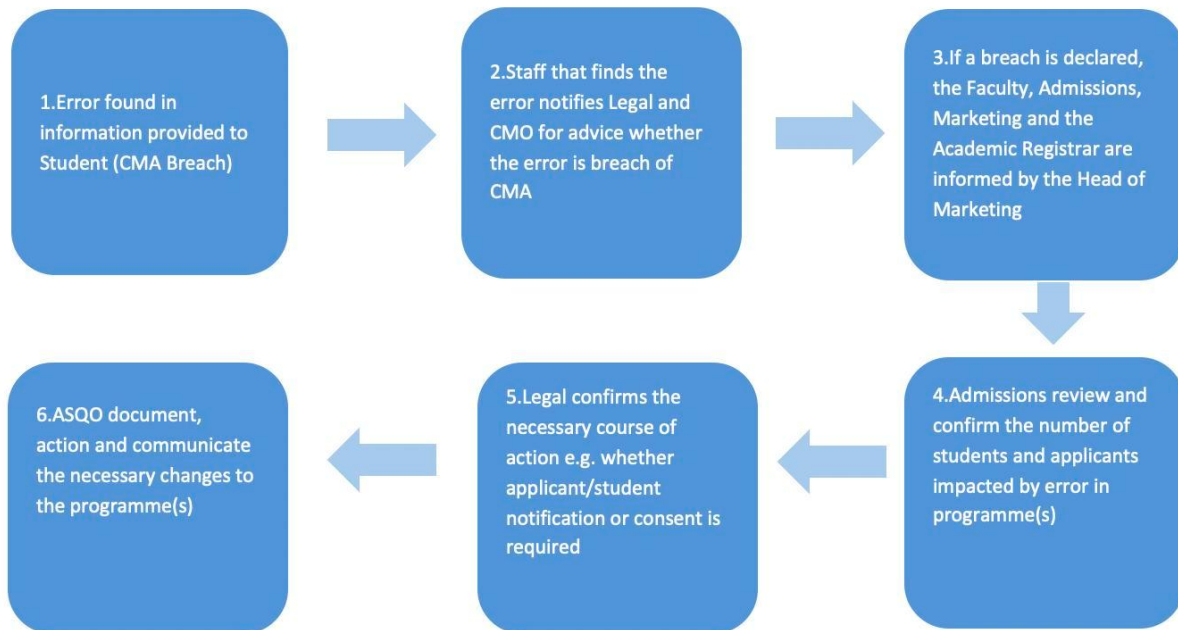
- 24.1. The Equality Act 2010 provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics. It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

25. Alternative Format

- 25.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.

Appendix A: Workflow to Tackle a CMA Breach

Where an error in marketing material(s) leads to a CMA breach, the following workflow applies:



1. The CMA breach is identified (through audit, student complaint, or staff report).
2. The Director of Academic Standards and Quality is notified immediately.
3. The nature and scope of the breach is assessed, including the number of students and prospective students potentially affected.
4. The inaccurate information is corrected or removed from all channels (website, prospectus, social media, marketing materials) as a matter of urgency.
5. Affected applicants, offer holders, and/or current students are contacted with accurate information and advised of their rights.
6. A record of the breach, corrective actions taken, and communications issued is maintained by ASQO.
7. The breach and corrective actions are reported to the Senior Management Team and the Board of Directors.
8. Lessons learned are incorporated into guidance and training to prevent recurrence.

Appendix B: Guidance on Writing an Accessible Policy

1. Template

The GBS policy template must be used. Contact the Academic Standards and Quality Office for a copy.

2. Keep Language Simple

- Use clear and simple language. Simple language makes the document accessible to people with cognitive impairments and learning disabilities.
- Policies should be written in plain English, and concise, accessible, gender-neutral language should be adopted.
- Where technical terms, abbreviations or acronyms are used, explain what they mean the first time they appear.

3. Keep the Document Structure Simple

- Keep sentences and paragraphs short.
- Avoid underlining, except for links.
- Avoid footnotes where possible. Provide explanations inline instead.
- Use left alignment rather than justified text to ensure even word spacing.
- Use 1.5 spacing between lines and leave at least one-line spaces between paragraphs.
- Use bold to emphasise items and avoid italics and underlining.

4. Images and Charts

If using images or charts, consider how to make the content accessible to people with visual impairments:

- Make the same point in the text of the document so people with visual impairments get the information they need.

- For online publication, provide alternative text for any image or chart. Screen readers announce alternative text in place of images.

Appendix C: Policy Categories

The main categories of policy are as follows:

Category	Description
Academic policies	Form part of the academic infrastructure to secure academic standards and quality.
Student-facing policies	Support the quality of the student experience.
Staff-facing policies	Form the basis for the terms and conditions of GBS employees.
Finance policies	Determine financial sustainability and operations, including financial arrangements with staff and students.
Governance policies	Ensure that the governance (including academic governance) of GBS is secure and sustainable.
Legal and regulatory policies	Required by legal and/or regulatory frameworks (e.g. Health and Safety, Freedom of Information).
Operational policies	Ensure day-to-day activities are efficient, effective and aligned with strategic objectives.

If you require assistance in confirming the classification of a policy, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.