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# **GBS Policy Framework**

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**Related GBS policies**

The GBS Policy Framework applies to all GBS regulations, policies and procedures.

**External Reference Points**

Information Commissioner's Office, accessed online at: <https://ico.org.uk/>

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## **1. Policy Statement**

1.1. To support effective decision making and to ensure that students, staff and other stakeholders understand how GBS works and their own roles as part of our community, our 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. 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.

## **2. Purpose**

2.1 The purpose of this Policy Framework is to ensure a consistent approach to the development, approval, review, amendment, withdrawal, publication, communication and administration of policies.

## **3. Scope**

3.1 The Policy Framework applies to all GBS regulations, policies and procedures. References to 'policies' in this Framework include regulations and procedures. The Policy Framework does not apply to codes of practice and guidelines/guidance documents.

## **4. Definitions**

### **4.1 Regulations**

Regulations are a set of rules and principles which govern how GBS operates. They apply **broadly** across GBS or to **significant parts** of the organisation (for example, the Academic Regulations). They reflect our values and ensure compliance with external legislation. Regulations must be followed.

### **4.2 Policies**

Policies are documents that set out requirements that determine how **specific** parts of GBS work (for example, Health and Safety Policy, Assessment and Feedback Policy). They support the implementation of GBS strategies and regulations, reflect our values and ensure compliance with external legislation. They may be supported by procedures, codes of practice and guidance. Policies must be followed.

#### 4.3 Procedures

Procedures articulate the official method by which a policy is carried out and must be followed. Procedures are linked to and support a particular policy.

#### 4.4 Codes of Practice

Codes of practice are advisory documents which indicate a course of action that will usually be followed unless there is an exceptional reason for not doing so. They provide best practice and guidance to ensure staff and others comply with specific policies and procedures.

#### 4.5 Guidelines/guidance documents

Guidelines provide advice and support for a particular activity. They are flexible, timely and helpful documents that are often implemented to support compliance with a policy or procedure.

If you require assistance in confirming the classification of the document you are developing, please contact [governance@globalbanking.ac.uk](mailto:governance@globalbanking.ac.uk)

### 5. Principles

#### 5.1 Policies share a number of characteristics:

- They reflect GBS' mission, vision and values.
- They ensure compliance with applicable laws and regulations.
- They support effective decision making.
- They help to ensure that staff, students and other stakeholders understand how GBS works.
- They are available to an internal and external audience.

#### 5.2 The main categories of policy are as follows:

- **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 the financial sustainability and operations of GBS, including financial arrangements (non-pay) with staff and students (e.g. student fees).
- **Governance policies** ensure that the governance (including academic governance) of GBS is secure and sustainable.
- **Legal and regulatory policies** do not meet the criteria above but are required by legal and/or regulatory frameworks (e.g. Health and Safety, Freedom of Information).
- **Operational policies** ensure that the day-to-day activities of GBS are efficient, effective and aligned with strategic objectives.

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## **6. Roles and Responsibilities**

### 6.1 Policy lead

The policy lead is 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.

### 6.2 Approving body secretary

The secretary to the approving body is responsible for providing the Governance team with a new or amended policy, confirmation of its approval by the relevant body and information about the policy for communications purposes.

### 6.3 Governance team

The Governance team is responsible for the administration of policies, including the policy database and the review schedule. It provides advice and guidance regarding the classification of policies and the approval process. It liaises with the policy lead, approving bodies and the Communications team at various stages in the policy lifecycle. Once approved, the Governance team sends new or updated policies to the relevant team for upload to Life (Human Resources) and/or the GBS website (Marketing). The Governance team also instructs the relevant team noted above to remove any policy that has been superseded, where applicable. Publication and

withdrawal of policies on Moodle links to the GBS website and is automatically actioned when changes are made to relevant website content.

#### 6.4 Communications team

The Communications team is responsible for disseminating information about the new or amended policy to relevant user/stakeholder groups.

#### 6.5 Human Resources

Following communication from Governance, HR is responsible for uploading new or updated policies for staff access to the Life platform, as well as removing policies that have been superseded (see 12.1 below).

#### 6.6 Marketing

Following communication from Governance, Marketing is responsible for uploading new or updated policies to the GBS website, as well as removing policies that have been superseded (see 12.1 below).

### **7. Policy Development**

7.1 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.

7.2 A new or amended policy may result from:

- An external driver/requirement, such as an amendment to or new legislation.
- A change in structure, responsibilities or circumstance.
- The need for clarity or to broaden the scope of the policy.
- The regular review of policies.

7.3 Policy leads should liaise with the Head of Governance to determine whether there are already policies in place that might address the specific issue, or that might reasonably be amended to do so. Consideration should also be given to how the policy aligns with GBS' strategic objectives and priorities.

7.4 In drafting a new policy or substantially amending a current policy, the following questions should be considered:

- What is the scope of the policy (i.e. to which members of the GBS community does it apply)?
- Is there any conflict or overlap with or impact on any existing policy or procedure?
- Is there any conflict with or impact on regulatory requirements set by the Office for Students or other external bodies?
- Are there any legal implications or requirements?
- Are there any elements of the policy that would impact compliance with legal obligations on:
  - Health and Safety
  - Equality, Diversity and Inclusion
  - Information compliance and data protection
  - Prevent
- Does the policy involve relationships with parties or organisations outside GBS?
- Which stakeholder groups need to be consulted during policy development (e.g. students, staff, employers)?
- Is the policy closely related to existing policy and therefore better introduced as a new element of an existing policy (perhaps requiring a broader policy scope and title)?

7.5 All policies must be presented on the GBS template [add link]. The style of policies should follow accessibility guidance (see Annex).

## **8. Policy Approval**

8.1 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 for the approval of new policies and the amendment of existing policies:



Policy	Approving body
Academic policies (including the Academic Regulations)	Academic Board (with the exception of the Admissions Policy which is approved by the Board of Directors)
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

Once the approving body has authorised the new or amended policy, the relevant committee secretary provides the Governance team with the policy, confirmation of its approval and information about the policy for communications purposes.

## 9. Policy Review

9.1 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.

## 10. Policy Amendment

10.1 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 for approval with a coversheet, stating where material changes to the policy have been made and setting out the impacts of those changes.

10.2 Where only minor amendments are required to a policy and these do not constitute any material change, this should be identified clearly on the coversheet when the amended policy is presented for approval. In such cases it may be appropriate to request Chair's Action to approve the amended policy. It will be a matter for the approving body to confirm that this is appropriate.

## **11. Policy Withdrawal**

11.1 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 Head of Governance to request that the withdrawal is agreed by the approving body. Where withdrawal is agreed by the approving body, the Head of Governance ensures that the policy is removed from publication on the Life platform, Moodle and/or the GBS website, as applicable (see 12.1 below). Where necessary, the Head of Governance will liaise with the Communications team so that the policy withdrawal is disseminated to relevant stakeholder groups.

## **12. Policy Publication**

12.1 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.

## **13. Policy Communication**

13.1 Following publication of new or amended policies, Governance contacts the Communications team which alerts relevant staff, students and stakeholders to the new/amended policy.

## **14. Policy Administration**

14.1 A database of policies is maintained by the Governance team. 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.

14.2 A policy review schedule is maintained by the Governance team. In July of each year, Governance 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 Governance for inclusion in the policy review schedule. Where amendment is required, the process set out in section 10 is followed.

14.3 Governance 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.

## **15. Data Protection and Confidentiality**

15.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioner's website](#). GBS as a Data Controller implements 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).

## **16. Alternative Format**

16.1 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 Governance team at [governance@globalbanking.ac.uk](mailto:governance@globalbanking.ac.uk).

Note: This policy may be amended by GBS at any time. If there are any queries relating to policy administration, please contact the Governance team at [governance@globalbanking.ac.uk](mailto:governance@globalbanking.ac.uk).

## **Annex: Guidance on writing an accessible policy**

### **1 Template**

The GBS policy template must be used. Contact the Governance team for a copy - [governance@globalbanking.ac.uk](mailto:governance@globalbanking.ac.uk)

### **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 you need to use technical terms, abbreviations or acronyms, explain what they mean the first time you use them.

### **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. This ensures the spacing between words is even.
- 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 you're using images or charts, think about how to make the content accessible to people with a visual impairment. Two options are:

- make the same point in the text of the document (so people with visual impairments get the information they need - the image or chart is there as an extra for people who are able to see it)
- for online publication of the policy, provide alternative text for any image or chart. Screen readers announce alternative text in place of images, helping users with visual or certain cognitive disabilities perceive the content and function of the images. If an image fails to load or the user has blocked images, the browser will present the alternative text visually in place of the image.