

UP Your Level Academy

INTERNAL QUALITY ASSURANCE DOCUMENT

February 2022
Version 2.1

UP Your Level Academy Purpose

UP Your Level (UYL) Academy's purpose is to enable individuals, organisations and communities unleash their full potential to bring about more positive change. This is reflected in our methodology, programme design and delivery.

At the core is our FIRE philosophy that allows anyone following our courses find alignment between their individual personal and professional objectives in life, so that they can eliminate conflict between the two and lead a much more fulfilled lifestyle, whether in business, socially or with loved ones.

This document will provide the internal framework to continuously focus on providing learners the best UYL can offer in further education and training for business and life.

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I. Introduction

All education and training service providers are required to adhere to important quality assurance standards. These standards are defined in the European Standard Guidelines which govern the European Higher Education Area. UP Your Level (UYL) academy has developed an internal quality assurance structure as part of its strategy with the objective of providing learners with high-quality education and training focusing mainly on Levels 5, 6 and 7 of the Malta Qualifications Framework.

UYL academy aims to provide an array of programmes, structured into awards, on various themes and fields associated with leadership and the business environment. The structure proposed is a progressive one, enabling learners to build on any of the award programmes to pursue further programmes for our library. With several years of experience in the education, training and business fields, the idea of YLP Academy is now to upgrade its level to offer accredited programmes.

Within this context, this internal quality assurance (IQA) document aims to define all the operational procedures, policies and processes that will govern the academy in its drive to achieve ultimate performance also on matters related to quality assurance in education.

Additionally, new policies and procedures will also be developed as the operations start. This will allow UYL academy to continue to improve its educational and training services and serve to cyclically update the IQA document.

2. Institutional Probity

UYL academy will be instituted in the name of Nathan Farrugia. In his role as founder and Managing Director of UYL, Nathan will be responsible for the following main areas of operation:

- Budget & financial strategy
- Overall Quality Assurance and Review
- Teaching Staff Recruitment and training

UYL Academy, as part of UP Ltd will follow all local financial, legal and employment legislations, including those on reporting such as submission of accounts according to the relevant standards as per Standard 2 of the NQAF.

In addition, UYL will benefit from the services of a CEO and Academy Manager. The CEO will be responsible for:

- Financial management
- Curriculum Design and development
- Teaching Staff Recruitment
- Learning, Teaching, Assessment, Resources and Support

The Academy Manager will be directly responsible for the following operations:

- Business Development & Marketing
- Daily running of the Academy
- Public Information
- Registry Functions
- Information Management
- Curriculum Quality Assurance
- Digital Platform maintenance and recovery plan

These leading positions will be occupied by personnel that possess the following minimum qualifications and experience:

- Master level of education (MQF Level 7)
- 10 years experience in the business industry
- 10 years experience in the management of education and training

The criteria defined above will hold true even in the eventuality of a replacement in top management positions. This will ensure that the leadership of UYL academy is fit for purpose

at the initial stages but also as the academy develops further.

Recruiting of replacements will follow the standards required for positions of high level responsibility. Candidates will need to meet the educational, professional and ethical standards expected of UYL, depending on the role and position.

UYL Academy actively seeks to maintain highly competent personnel amongst its cohort of teaching staff. The recruitment process is open, transparent and fair. Lecturers and tutors are employed according to national employment requirements and are given the best possible conditions to grow within the Academy as well as keeping abreast of developments within their area of competence.

Staff Recruitment Policy

1. Scope & Purpose

This policy is intended to provide assistance to those members of staff involved in the recruitment process within the organisation and specifies the procedures through from advertising to offer of employment. It is also intended to provide advice on best practice to ensure that the Academy's recruitment process is transparent, consistent and effective.

2. Responsibility & Authority

The responsibility for the recruitment of staff lies with the Academy Senior Management team & HR Manager. Authority for the implementation of the policy may be delegated to a senior manager.

Before any post/vacancy can be advertised, it is necessary to obtain formal authorisation from the CEO. Such authorisation shall include the number and description of posts to be advertised and agreement of details of where the post is to be advertised.

When deciding whether to grant authorisation Management shall consider the rationale for the vacancy e.g. replacement, restructure or expansion, to ensure that recruitment is justified.

3. Recruitment Aims

Through its recruitment procedures UYL Academy aims to:

- Attract high calibre candidates
- Ensure equal treatment of all applicants
- Identify and appoint the best applicants
- Maintain an effective and streamlined recruiting process which makes the best use of time and money

4. Equal Opportunities

UYL Academy's Equality & Diversity policy applies equally to the recruitment process and must be complied with at every stage of the recruitment process.

This means that prospective applicants should not be discriminated against either directly or indirectly on the grounds of race, nationality, ethnic origin, gender, marital status, sexual orientation, cultural or religious beliefs, disability and age. In addition, candidates should not be discriminated against based on pregnancy.

Preparation of job descriptions, person specifications, advertisements, short-listing, interviewing and selection of applicants should reflect a commitment to achieving and maintaining equal opportunities within the workplace. HR Manager will be responsible for the above.

Interviewers should only ask job-related questions.

5. Recruitment Documents

Before a vacancy is advertised the following information should be prepared:

- An updated job description
- A person specification
- Draft advertisement

6. Job Description

The job description should define the nature of the tasks, duties and responsibilities that the post will require and where the post fits into the organisational structure.

The job description should be written in clear and simple language.

Where a job description already exists for the vacancy then it should be reviewed to ensure that it still accurately describes the role and should be updated where necessary.

The grade/salary for the post should be determined and included in the job description.

A copy of the job description should be sent out to all persons applying for the post to enable them to prepare adequately for the interview process

The job description will eventually form part of the applicant's contract of employment.

7. Person Specification

The Person Specification differs from the job description as it provides a summary of the minimum criteria in terms of qualifications, skills, experience, knowledge and personal characteristics required to undertake the role. Any criteria set should be related to the post and ability required for the post. There should be no unnecessary conditions attached, or the use of words, which would imply unjustifiable bias.

A copy of the person specification should be sent out to all persons applying for the post.

8. Advertisement

The job advertisement should be prepared by the same author of the job description and person specification to ensure consistency.

The advertisement should be kept short and simple and provide all the relevant information to enable individuals to determine whether they have the relevant skills, experience and qualifications for the post.

Vacancies should be advertised externally in as wide a range of channels as possible.

The advertisement should also specify the closing date for the return of the application forms.

Any advertisement should be carefully worded so as to be free of any discriminatory words, phrases or intention. For example, it should avoid giving age limits or age ranges, also avoid the use of words such as, “young graduates”, “mature person” or “selection will be based upon age and experience”. Where possible relevant skills, rather than qualifications should be highlighted.

9. Receipt of Application Forms and Short Listing

All applications received are to be reviewed by Senior Management and be given equal and fair consideration. Any conflict of interest identified at this point should be declared to the Head of the Academy.

Applications should be evaluated against the set criteria contained within the Person Specification and Job Description only and all candidates are to be informed of the outcome of this stage in the selection process. Successful applicants at the short-listing stage

10. Interviews

All candidates who meet the essential criteria for the post (as set out in the person specification) will be offered an interview.

Interview should normally be carried out by a minimum of two people. Those involved in recruitment should consider how best to convey a positive image.

Notes recording the salient points of the interview should be taken by the interviewers, so that they can refer back to these when assessing candidates against the person specification and making decisions.

In the event that a candidate requests feedback about their performance in the selection process. This should be arranged by the Interviewer although he or she may delegate this to another member of staff where appropriate.

Unsuccessful interview candidates should be dealt with courteously and sensitively and will receive telephone or written notification of the outcome of the selection process.

11. References

Information sought from a minimum of two referees should be structured around the requirements of the job and the job description should be provided.

Referees should not be contacted without the candidate's consent and the information provided should be treated as confidential by the members of staff collecting the information.

In certain circumstances a school or personal reference is acceptable.

12. Appointments

We recognise open contracts as the general form of employment relationship between employers and employees and will appoint new and existing staff to indefinite contracts unless necessary and objective reasons justify use of a fixed-term contract.

Appointments will usually be made at the minimum level of the advertised salary scale unless directly relevant experience would justify additional increments. Advice should be sought from the HR Manager if the intention is to appoint at the maximum of the advertised salary scale. No appointment can be made above the advertised scale.

Once a selection decision has been made the Head of the Academy will produce a written offer of employment. Offers of employment are normally subject to satisfactory references, medical clearance, checks of qualifications and any other checks as appropriate, such as Asylum and Immigration checks, Criminal Records Bureau checks etc.

In addition, any non-EU national will be subject to additional checks regarding their right to remain and right to work in Malta.

3. Curriculum Development and Review

To ensure that the programmes delivered by UYL academy are of high value, a specific business process has been developed. The owner of this process is the academy's Founder and MD, and will be supported by subject specific experts that will be engaged on a contract for service. Additionally, the academy's administration manager will also ensure that this process is adhered to as part of the internal quality assurance mechanism.

Step	Description of activity
1. Market and Industry Research	Specific training needs are identified by means of several activities which include business meetings, focus groups with students and content analysis.
2. Proposal	Based on the market research conducted, a brief proposal is developed with the objective of defining: <ul style="list-style-type: none"> - Target audience - Programme level - Programme duration and workload - Programme title
3. Development	Once the proposal is approved by the academy's leadership, the development of the programme is executed in alignment with MFHEA's Manual of Procedures for accreditation. By the end of this activity, the programme (apart from the parameters defined in step 2 above) will contain the following: <ul style="list-style-type: none"> - Teaching methods - Assessment methods - Learning outcomes - Knowledge, skills and competences - Learning content - Reading lists - Credit value and distribution
4. Approval	The developed programme is then submitted to MFHEA for external approval as stipulated in the Manual of Procedures.

UYL academy has also developed a programme review procedure. An important aspect of the programme review procedure will be the ongoing monitoring of programmes that will be conducted by the head of administration (HOA) together with the Academy Manager. The HOA will be collecting information directly from students and teaching staff throughout and after the implementation of the programme.

Information will be collected by means of formal meetings with student, formal meetings with teaching staff and specific questionnaires that will be disseminated at the end of the programme. This information will be analysed (as will be explained in better detail in section 8 on information management) and will serve as important information in order to upgrade the quality of programmes.

In addition to feedback from students and teaching staff, UYL academy will also involve employers when conducting programme evaluation. This will be done through a dedicated focus group meeting at the end of the academic year.

UYL academy will be reviewing its programme regularly to ensure they meet the intents and purposes of the programme, industry and other important factors. Following the initial three years of operation, programmes will be reviewed structurally every two years. This will ensure that the programmes offered by the academy contain the latest knowledge, information, techniques and learning content.

4. Teaching Staff

Teaching staff that will be engaged with UYL academy will all bring with them a level of expertise in their respective field that will fulfil the intended learning outcomes of the programmes they will be delivering. All teaching staff operating under the UYL Academy brand will be guided by either a contract for services or contract of employment that will be governed by a terms of reference.

In summary, teaching staff are expected to:

- Support in the development of the programme
- Identify learning resources for the programme
- Implement the programme effectively
- Develop valid assessments
- Support students academically
- Review and correct students work
- Support in the evaluation of the programme

To be eligible to teach with UYL academy, all teaching staff are expected to possess the relevant qualifications as stipulated by the UYL terms of reference or accreditation requirements. In addition, they will have a minimum of 5 years relevant experience in the field and, 2 years' experience in education and training.

The recruitment process will be the responsibility of the CEO and Academy Manager. (Refer to Section 1 above where the entire recruitment process has been outlined). The HOA will ensure that the process moves smoothly and that contracts for services are issued to respective teaching staff engaged with the academy. The recruitment process is as outlined in Section 1 of the IQA document. Candidates will need to have minimum education, professional and ethical standards. Minimum Level 6 education and 10 years professional experience in a relevant area will be required. UYL Academy may also use the services of professional recruitment firms to assist and aid with the process on the basis of the requirements set out by UYL Academy.

UYL academy will also induct teaching staff with a dedicated programme. This induction programme will ensure that all teaching staff are up-to-date with teaching methodologies and with the academy's internal quality assurance processes. The programme will be

structured into four parts, namely:

- Part 1** UYL Ethos and methodology
- Part 2** Assessment methods
- Part 3** Quality Assurance
- Part 4** Curriculum development and evaluation

This CPD will include updating of occupational competence in line with relevant regulatory and professional requirements and ensuring that good practice is maintained in relation to facilitating learning and assessment. There are a number of points where this is particularly pertinent:

- When assessors are new – either to the team, to the Academy, or to the qualifications
- When programmes or qualifications change or guidance is revised
- Following external quality assurance activities or other inspections.

New educators/coaches/trainers should complete an induction process. What this induction process involves will depend on their previous experience, both of qualifications generally and/or a particular suite of qualifications. As with the learner induction the process is more effective if it is coherent and structured. All new team members will undertake an induction programme and receive a pack which contains relevant data and plans for what a new team member will undertake in their induction and what the expected outcomes are.

The IQA will ensure that all educators/coaches/trainers in the Academy have access to:

- Copies of the relevant qualification handbook(s) or requirements for the qualifications they are delivering and all other documents related to the qualifications offered and any updates that are issued from time to time.
- Copies of UYL Academy's policies and procedures.
- Information about available support resources for learners and team members, equipment and facilities.
- Information about their learners
- Any learning or assessment needs, access arrangements etc.
- Contact point for advice from IQA or experienced senior team member

The IQA will also check and hold on file the following information for team members:

- Personal profiles or CVs demonstrating skills, knowledge, experience and competence (where required) at an appropriate level
- Original assessor certificates. When the originals have been viewed by an external quality assurer then copies signed by the EQA can be maintained in place of originals.

- CPD records that demonstrate that all team members have completed development activities required by the relevant assessment strategies.

This information is to be accessible and available for examination at all times.

Tutor observations are recorded with all relevant feedback to the tutor observed.

Where there are new educators/coaches/trainers in the team, the IQA should increase the amount of sampling and monitoring that takes place regardless of whether or not the assessors are qualified. This additional monitoring and support should take place earlier, ideally by the third lecturer of a course. This ensures that new tutors/assessors have access to additional support and enables the IQA to identify any training and development needs that these assessors may have.

If a newly appointed educators/coaches/trainers has experience, this period of additional sampling may be quite short. However, whatever the level of experience, the incoming tutors/assessors will still benefit from additional support provided whilst they become familiar with UYL Academy's systems.

It is the responsibility of the IQA to monitor educators/coaches/trainers' completion of the planned CPD activities. This is completed as part of the ongoing support provided by the IQA to team members. During support meetings the IQA reviews and updates the content of the CPD plans accordingly.

By the end of a year all team members will have completed the activities listed on the plan in order to meet the CPD requirements of the qualification and satisfy their own development needs.

Also on an ongoing basis throughout the year, every team member is to transfer the detail of what activities they have completed on to their CPD records. CPD plans and records are requested by the EQA as part of every sample.

5. Public Information

Informative and updated data will be disseminated to students and other interested stakeholders by means of a dedicated website. The website will be maintained by the academy's HOA and will be structured into several domains to provide clear information on the following:

a. Domain A - Information on programmes

All programme outcomes, MQF level, duration, method of delivery and further learning opportunities will be displayed on the academy's website. Additionally, students can also ask further specific information on the programme through a dedicated support line that will be made available.

b. Domain B - Application process and Fees

The application process (explained in section 7 of this IQA) and associated programme fees will be made available online.

c. Domain C - Administrative information

Aspects of administrative information such as structure of the academy, support services, information management will be made public available on the website.

d. Domain D - Quality Assurance

UP academy's adherence to quality assurance as determined by the National Quality Assurance Framework will also be made available on the public domain.

STUDENT RECRUITMENT & SELECTION

UYL Academy recruits potential students via publicity on its web page, social media pages and by word-of-mouth recommendations. Prospective students are then requested to contact UYL Academy to commence the application process.

The Academy operates a policy of equality & diversity policy as outlined in IQA Manual. Applications are accepted without prejudice to the applicant and adjudicated solely on the basis of qualification and/or the applicants' ability to complete the training course successfully.

The next stage is when applicants complete and submit the application form with their personal details and course selection. Applicants also sign a declaration on the application form confirming that they have read and understood the terms and condition of sale incorporated in the registration form.

The completed application forms are received by the Head of Academy for vetting. The application forms are reviewed for completeness and accepted or, in case of errors or omissions, the application forms are returned to applicants for corrections. Only correct and complete application forms are accepted for processing.

The Head of Academy with Academy Administrator process the application forms by checking that the applicant has the minimum requirements for admission to the training course.

If the case requires, the Head of Academy may request the candidate to attend an interview to assess his/her suitability and the Head of Academy will record his decision to admit or reject the applicant on the application form.

Student Registration

Students' entry requirements are stated in each Programme specification.

Students of UYL Academy programmes must complete the application procedure and apply to the Academy before registering on a programme of study.

The Application procedure enables the Academy to verify students' suitability for study against the entry criteria stated in programme specification and serves to confirm criteria such as:

- Qualification, i.e. possession of a recognized initial degree, etc
- In cases where relevant experience forms the basis of entry, the Academy's documentation on Recognition of Prior Learning must be consulted, unless otherwise stated, for groups of students following a particular qualification and as stated within the respective programme specification.

All students seeking registration on any programme offered at the Academy must complete the Application Form and return it to the Academy to be processed

- Where applicable, a certified copy of the initial degree certificate must be attached.
- Where students' certificates are in a language other than English, a signed and stamped English version must be provided by a formal translation organisation together with an MQRIC statement.
- The Academy may in certain cases request potential students to attend an interview to assess further their competency to undertake the proposed course of study

The Academy will issue an acceptance letter for each student whose application is successful.

6. Learning, Teaching, Assessment, Resources and Support

This section is subdivided into three further sub-sections (Delivery and Assessment, Resources and Student Support) in order to provide clear information on the intended activity which fall under the responsibility of the academy's Founder and CEO.

6.1 Delivery and Assessment

Teaching staff at UP academy will be responsible for the delivery and assessment of programmes. This is specified in their terms of reference. Nevertheless, the academy's CEO and Founder will monitor the delivery and assessment of programmes.

A variety of teaching methods will be utilized by UP academy including formal lectures, workshops, group-work, flipped classroom techniques and video conferencing. Similarly, various assessment methods will be deployed by UP academy in order to meet the diversity of learning needs and styles. Typical assessment methods will include portfolio development, written assignments, projects and standard examinations. Assessments will be graded on the basis of assessment criteria defined for each learning outcome and weighted over a percentage mark according to the table below:

Percentage Mark	Grade
85 - 100	A
70 - 84	B
55 - 69	C
45 - 54	D
0 - 44	Fail

Criteria for methods of assessment will be shared by the tutors with the students once

registered in respective programmes. During induction students will also receive a course handbook which clearly states the method of assessment and the criteria in which assessed work will be marked.

The correction of assignments are the responsibility of the respective tutors. Feedback on assignments will be given by the respective tutors in a fashion appropriate to the programme and determined by the tutor. In the eventuality of a recourse, both internal and external reviewers may be utilised for further assessment. Mitigating circumstances are to be discussed between the learner and the tutor directly.

UYL Academy will appoint a number of Internal Quality assurers are responsible for ensuring that they lead, advise and support the assessors/trainers allocated to them through:

- Ensuring adherence to the principles of assessment and guidance provided by the Academy
- Provision of guidance on the interpretation and application of assessment criteria correctly and consistently applied
- Observation and supply of formative feedback on working practices
- Sampling of assessment activities such as assessment decisions, formative feedback supplied, completion of portfolio documents etc.
- Ensuring tutors have opportunities for updating and developing their vocational and professional competence
- Portfolios of evidence are valid, authentic, current and sufficient by:
 - Following the sampling plan
 - Ensuring that all students portfolios are sampled for each component
 - Carrying out a quality audit of the documentation used within and format of the portfolios of evidence
- Undertaking an active role in raising issues of good practice in assessment
- Ensuring that equal opportunities and anti-discriminatory practices are upheld in the assessment process
- Liaising with other IQAs and the External Quality Assurance to implement the requirements of the assessment system
- Ensuring that all trainees' achievement records and Academy documentation are completed in accordance with requirements

UYL Academy's Learning Management System includes application which allows lecturers/tutors when correcting assessments to log feedback to each individual student for each piece of assessment submitted

Mitigating Circumstances:

The Academy's Policies specify what constitute special circumstances, these include (documented):

- illness
- accident
- close bereavement or
- on closely related compassionate grounds.

Candidates who have brought forward mitigating circumstances that have affected their performance in an examination/assessment, or which has caused absence from an examination /assessment need to be carefully considered in order that the appropriate action can be taken. This might include allowing a candidate a further attempt at an examination previously failed, with no penalty applied.

6.2 Resources

Teaching staff are required to identify the respective learning resources need for the effective deployment of programmes. These learning resources are then made available to students upon registration and as the course progresses, subject that the cost of the identified resources remains with the budget established for each programme.

In addition, UYL Academy will make available any resources, publicly available or part of the UYL own library, to staff in order to support the delivery of the respective programmes. Resources may include physical texts, or online catalogues, articles penned directly by the UYL Academy staff and third parties. UYL will ensure that the content of the resources are shared in accordance with copyright law and the protection against plagiarism.

Each student registered on a course will receive individual log in details which will provide access to course material, sample assessments and to a range of resources consisting of e-books and relevant e-libraries.

Staff will be able to monitor trainee activity on the platform as well as provide assistance and advice through messaging.

The platform will also be used for the uploading and downloading of assessment tasks and trainee portfolios.

6.3 Student Support

Academic support to students will be provided by respective teaching staff members. In addition, students with special needs or require some form of guidance/counselling will also be offered dedicated services on a one-to-one basis. Such services will be outsourced to professionals within the field according to the exigencies of students.

Students will also have the possibility to log a complaint on any issue related to their learning at UP Academy. Such issues are to be reported to the Head of Administration who will look into the respective cases and proceed with corrective actions if required. Students can also appeal any decision by writing directly to the academy's Founder and CEO. The latter will address any issues on a case by case basis. Information related to student case will also be kept in dedicated student records/profiles as outlined in section 8 of this IQA document.

6.4 IT

This section will describe how the UYL IT infrastructure will assist and support students during the course of the programmes.

6.4.1 The registered office where the IT platform is registered is the Main registered office for the UYL Academy: 30/2, Sunlight Apartments, Buontempo Estate, Wied-Hal-Balzan, Balzan, Malta BZN 1172.

6.4.2A The programme offered will be all supervised by qualified educators / trainers / coaches who have met the recruitment policy outlined in Section 4 above of this IQA document.

6.4.2B All students will be able to access the platform on a 24/7 basis. This will be protected by our 'always on' service, cloud hosted technology and 24/7 IT support and maintenance. Interaction with tutors will be as determined in the enrollment and course-specific guidelines.

6.4.2C Content provided through the UYL Academy are ALL based on the latest pedagogical and industry approved methodologies. The learning outcomes of each programme are detailed in the respective programme content details.

6.4.3 The Platform will provide one of several ways for learners to interact with the UYL Academy staff and educators / trainers / coaches. For a fully online programme, the platform will be the sole means for learners direct contact hours. For blended programmes this will be partially used for direct contact hours as specified in the programme description. Contact hours will be tracked by the duration of the programme learning sessions, whether pre-recorded content or live tutorials, or virtual Q&As.

6.4.4 Quality of online environment content, whether pre-recorded video content or live, tutor-led sessions, or text content will all meet UYL Academy quality standards. Furthermore, learner feedback will be collected following each programme as part of an integral Monitoring and Evaluation Policy for all UYL programmes.

6.4.5 The VLE used is LearnDash. As one of the best platforms to integrate with our WordPress website, LearnDash was the best available platform to ensure seamless integration between the two platforms. It allows for easy upscaling of aesthetics and components to existing and new programmes. It allows for the uploading of pre-recorded content, text and even stream live without needing participants to change platforms.

6.4.6 Main technical features of the platform will be the use of video content, both for pre-recorded content, as well as live streamed webinars and/or tutorials. There is no key technical skills required apart from basic use of a PC, and a valid e-mail address.

6.4.7 Data on students' interaction in the virtual learning environment will be stored on our cloud servers. Video interactions (live sessions or Q&As) will be recorded and transcripts kept until the end of the programme and certificates issued. This also includes any surveys and feedback received from learners on programme content, facilitation, resources or tools used.

6.4.8 Student privacy is regulated by adhering to EU GDPR laws. In addition, each student / learner will create their own password which are encrypted by the system and only utilized when combined with the users' e-mail.

6.4.9 Does the virtual learning environment have automated back-up systems? This is a requirement in terms of quality assurance. Please indicate the back-up systems (not archiving but redundancy systems such as mirroring) that are used and how you would ensure continuity of service in case of failure of hardware, software and online services.

Web Hosting:

We commit ourselves to continue supporting the current infrastructure as well as improve and update as necessary. All communication will be handled by secure means while passwords and access keys will be shared via encrypted means. It is company policy that access to client systems (staff) is on a need-to-know basis. We guarantee this through implementation of the ISO 27001:2013 (Information Security Management System (ISMS)) requiring documentation and implementation of all security policies effectively.

Security is at the core of our culture and we factor security into the framework of how we build and maintain each site. By strategically putting security first in our development plans and adhering to industry best practices, we reduce your site's vulnerability and protect you and your customers. We also perform daily checks and 24/7 monitoring for any changes and security issues are addressed and rectified within minutes of detection through process such as but not limited to:

- Website Malware Scanner - this scanner monitors for signs of website malware and indicators of compromise (IOC) with our website scanning tools
- SSL Certificate Monitoring - if any changes are made to your website's SSL certificate (HTTPS), receive immediate alerts so you can take action
- Website Server-Side Scanner - we check all files on the server for signs of malware to find backdoors, phishing pages, spam, DDoS scripts, and more
- Blacklist Status - this scanner monitors for security warnings from blacklist authorities
- Website Uptime Monitoring
- DNS Monitoring - our scanners detect changes to your website's domain name system (DNS) settings. We alert you if any changes are made
- Malware and Hack Protection
- We protect your website against malicious code and prevent website hacking with our Web Application Firewall (WAF)
- Zero-Day Exploit Prevention
- DDoS Attack Mitigation
- Block layer 3, 4, and 7 DDoS attacks
- Brute Force Attacks Protection

We have a team dedicated to application maintenance and updates and hence we are thorough as well as pro-active in our approach from every aspect. The website hosting infrastructure will be able to scale its resources (up or down) relative to any visitor traffic and is able to cater for traffic spikes. All websites are thoroughly and constantly tested for known vulnerabilities to minimise the possibility of hacking. Active and passive security measures to stop attacks and malicious intent in its tracks are carried out continuously as is monitoring for uptime, DDoS attack detection, software-based restrictions, and hardware firewalls. We also implement tight software-based restrictions and malware scanning daemons that run continuously in the background to protect your WordPress site. Our support team is also standing by in case you need additional help/implementation.

Every site on our infrastructure runs in an isolated software container that contains all of the software resources required to run the site (Linux, NGINX, PHP, MySQL). This means that the software that runs each site is 100% private and is not shared. We use Linux containers as the underlying container technology for our infrastructure. Each site container runs on a generously sized virtual machine in one of multiple Google Cloud Platform (GCP) data centers and is secured behind the GCP firewall. Hardware resources

(RAM/CPU) are allocated to each site container automatically by our virtual machines on an as-needed basis (a neat feature we refer to as auto-scaling).

Google also has relationships with some of the biggest ISPs in the world, which helps improve the security of your data in transit as it means less hops across the public internet. They also employ encryption at rest to store customer data. Within our hosting infrastructure, features include daily backups, 24/7 support, high speed infrastructure based on Google Cloud Platform allowing it to scale up and down to ensure that your website is ready for unpredictable traffic surges which may be experienced from time to time. Multiple redundancies are in place to keep your data safe and secure in case of a disaster while remaining GDPR compliant, including:

- Page caching performed by the server and tuned for WordPress;
- WordPress-specific security rules;
- Easy-to-use site creation and migration request wizard;
- Ability to purge site cache from the dashboard;
- Detailed analytics including bandwidth, CDN usage and insights, cache HIT and MISS ratio, and performance data;
- Staging environments and the ability to push staging to live and restore backups to staging;
- Option to add your own New Relic key to dive into further debugging and optimisation on your site;
- Use our search and replace tool to make bulk updates on your site. (Ex. change HTTP URLs to HTTPS or update old shortcodes);
- Website speed, image and energy saving optimisation;
- Multi-user permissions and roles which allow you to define access on both the site and company level;
- Multi-factor authentication for administrative logins;
- Documented security protocols and a dedicated Information Security staff;
- Detects and mitigates Distributed Denial-of-Service attacks at multiple layers (we also recommend the use of CloudFlare);
- Web Application Firewall.

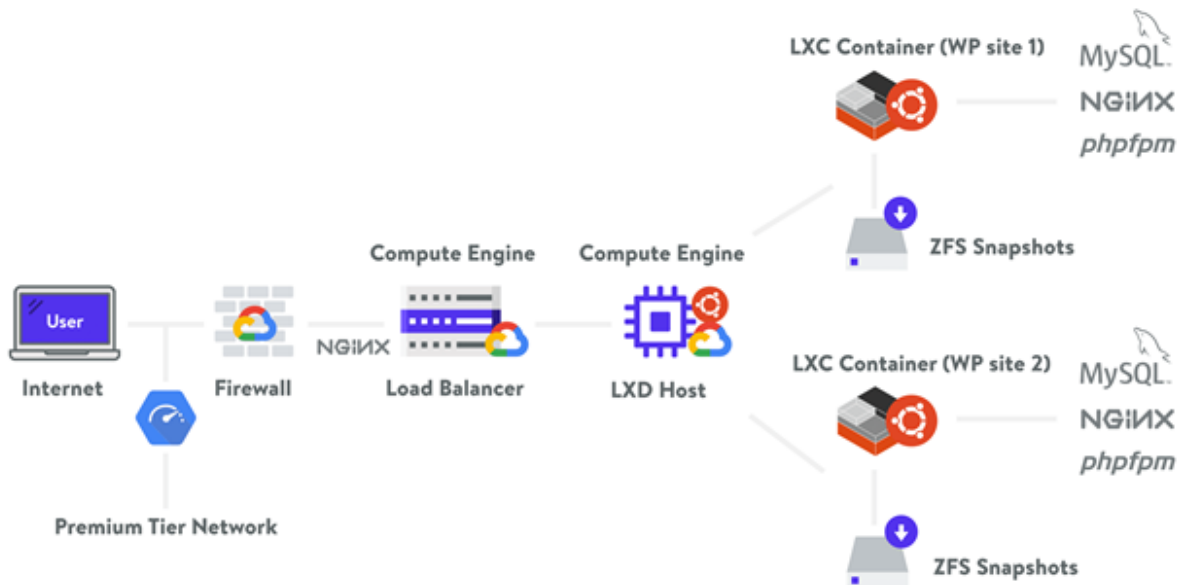


Figure 1 - IT set-up

6.5 Other Considerations

6.5.1 ADMISSION: *What are the administrative processes for student admissions and their authentication? (i.e. What is the process for giving them access to the online platform used?)*

Learners will all require a valid e-mail address to register and log in. Registration will be carried out via the UYL website elearning landing page, and all learners will be required to provide the following details:

- E-mail address
- Password
- Residential address
- Phone contact details
- Alternative e-mail address

On registration, learners will receive a welcome e-mail requiring them to confirm their identity.

6.5.2 TECHNICAL INFRASTRUCTURE: *At programme design stage, how do you ensure that the virtual learning platform or other online tools used can deliver the programme or part thereof, and it facilitates teaching and learning? Please specify any tools/ technologies used to assist students with special needs.*

The Head of the Academy and tutors are constantly reviewing the success rate of the programmes offered through interactions with learners and results achieved by the learners.

The Platform selected affords the Academy to make any changes required to ensure optimum delivery and achievement of Learning Outcomes. For online delivery we have focused on quality production services that include the use of closed captions for the hearing impaired and use of colour schemes that do not adversely affect those with visual impairments.

6.5.3 TUTOR SUPPORT: *How do tutors receive academic, administrative and technical support on the provision of the programme both in person and online / remotely?*

All tutors will have their induction on the use of the platform and administrative requirements/responsibilities as per **Section 4** above. They will also have access to the UYL Academy staff for any content or student related issues during working hours and technical support via the UYL IT support service on a 24/7 basis on platform related issues.

6.5.4 STUDENT SUPPORT: *How will the education institution provide technical, administrative and academic support including counselling to students in a virtual or blended environment?*

Students / learners will be able to contact UYL support services via a dedicated e-mail address for registration, programme and assessment issues. A separate e-mail address will be provided for platform related issues. UYL does not provide counselling services directly, but will be able to direct learners to appropriate professionals if issue is related to UYL programmes or staff issues.

6.5.5 TUTOR COMPETENCIES: *How will you ensure that tutors have the necessary ICT and pedagogical skills to use the virtual learning environment and other digital tools? Also describe any technical support which can be provided to staff in using this and other digital tools.*

All tutors / staff will have proven their IT competencies during recruitment stages. Where necessary UYL will provide all staff with the training to operate seamlessly any IT infrastructure utilized for the delivery of programmes.

6.5.6 PEDAGOGY: *What pedagogical methods do you use for teaching and learning? Explain your selection with reference to virtual learning or both virtual and traditional in case of a blended provision.*

The basis for the pedagogy adopted by the UYL Academy programmes is the concept of creating a Community of Inquiry as intended by Garrison, Anderson and Archer (2000) whereby the value of learning emanates from the learning experience derived by the individual learner through the inputs of the group of learners, the educators, and the content delivered (see Figure 2 below).

This also determines the type of technology and formats for delivery. Where students require self-paced learning this is provided. Where students require a blended approach including the interaction with other learners and educators, this is provided for. And where learners require a fully-fledged in-presence model with continuous interaction with other learners and educators, this is provided.

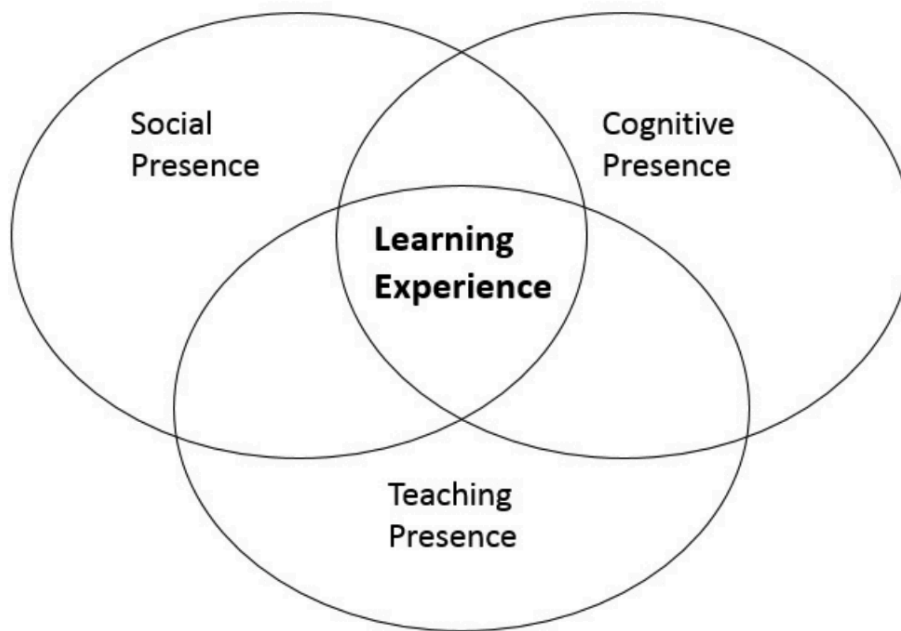


Figure 2 - Community of Inquiry (Garrison, Anderson, and Archer, 2000)

This therefore expands the Garrison, Anderson, Archer Model to a more comprehensive model as designed by Anderson's Online Learning Model (Figure 3). This model also gives relevance to the social and environmental context within which the learners operate and the platforms or technologies used.

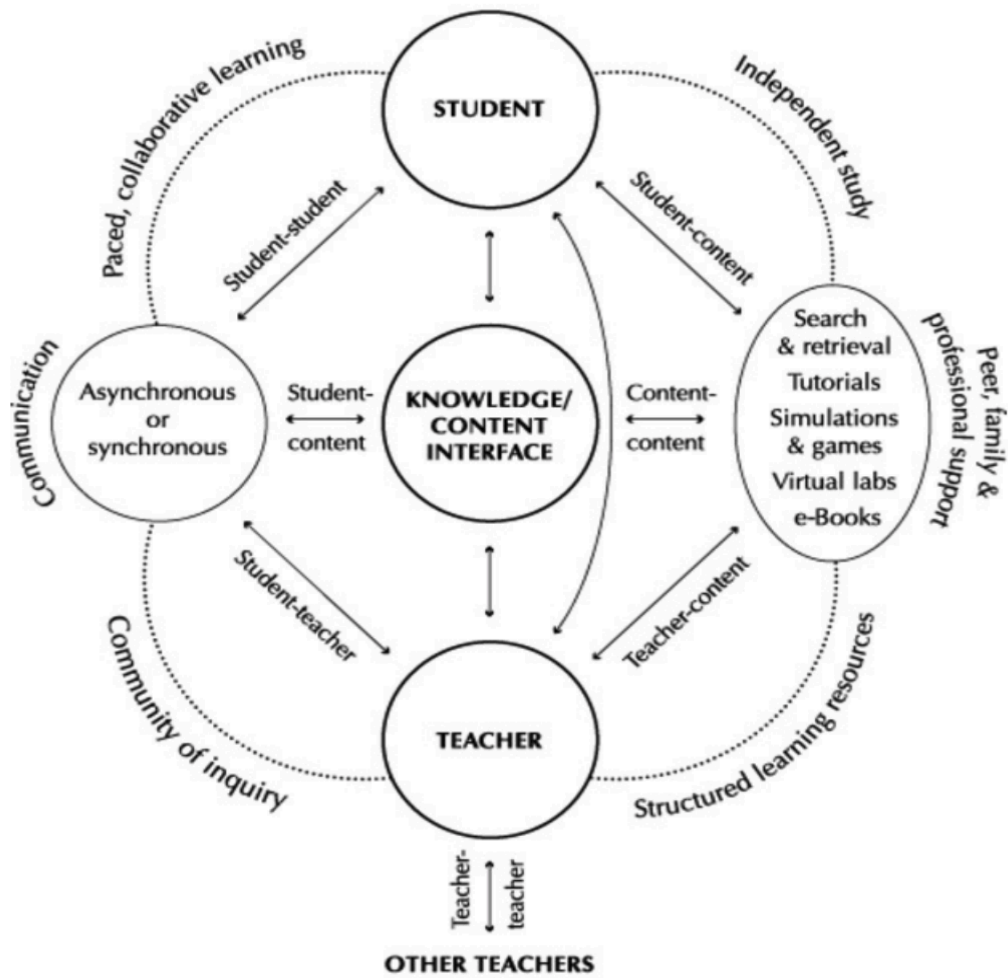


Figure 3 - Anderson's Online Learning Model (Anderson, T. (2011). *The theory and practice of online learning*. (2nd edition). Edmonton, AB: AU Press.

Finally, the theoretical underpinning will inform the elements required to ensure the learner's experience is seamless and can cater for all modalities. Figure 4 below from Picciano A.G. outlines the multimodal model that creates the learning community within which all programmes are delivered. How the various elements are utilized depends on the format of the programme offered. However, this provides the UYL academy with a model that can deliver any format required by the learner.

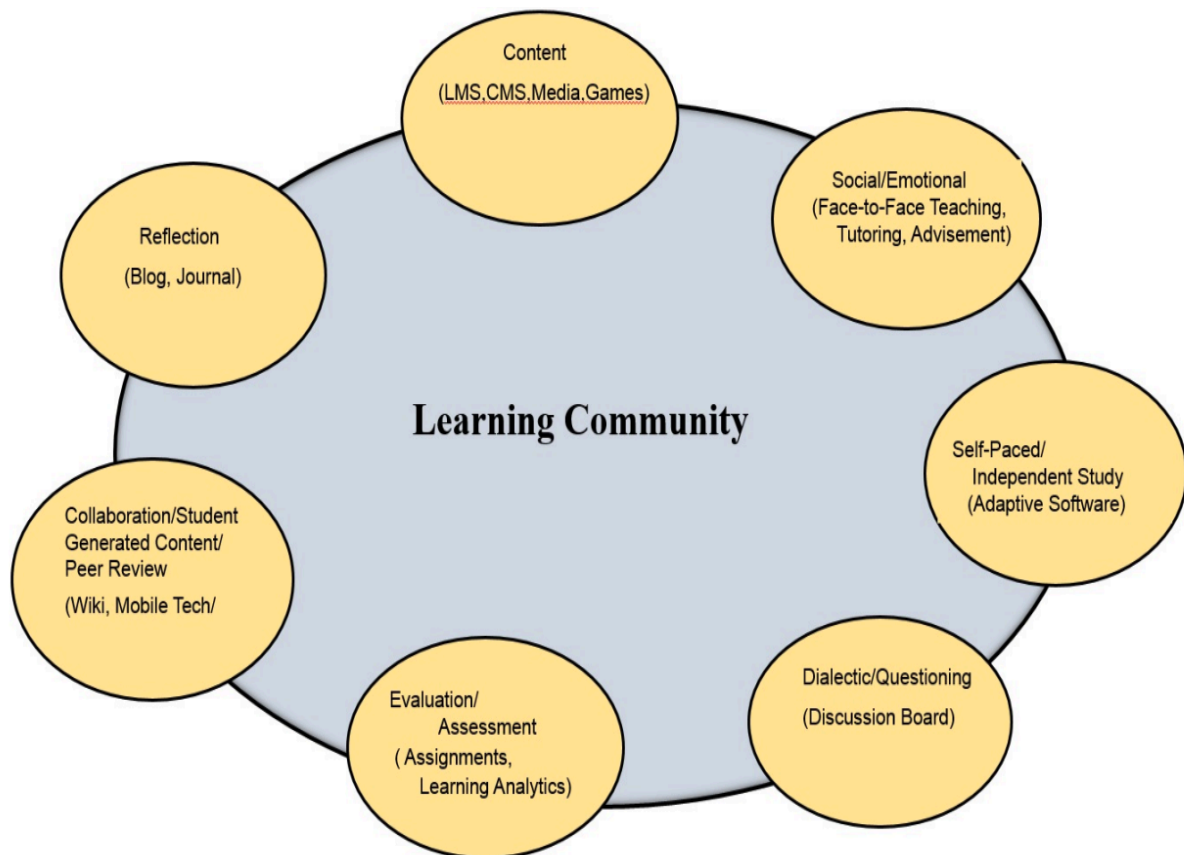


Figure 4 - Multimodal Model for Online Education. Picciano, Anthony G (2017). *Theories and Frameworks for Online Education: Seeking an Integrated Model*. *Online Learning*, 21(3), 166-190. doi: 10.24059/olj.v21i3.1225

6.5.7 INTERACTION AND COMMUNICATION: *How do students and tutors interact with each other? Please explain with reference to virtual learning or both virtual and traditional in case of a blended provision.*

See 6.4.3 above

6.5.8 ACCESS: *What technical resources provided by the entity are needed by tutors and students to access the virtual learning environment and engage in teaching and learning?*

No specific technical resources are required by the tutors. Content to be delivered fully online will be prepared and uploaded directly by UYL. For blended programmes, tutors / educators / coaches will require a valid e-mail address and login details to access the platform and run live tutorials, webinars or Q&A sessions. A functional webcam for live sessions is the only required hardware.

6.5.9 INSTRUCTIONAL RESOURCING: *Please state the type of resources that will be made available to tutors and students, including resources which are both in virtual and physical format. How will the quality of the resources be ensured?*

Tutor resources include the content of the programmes they will be responsible for delivering (in the case of live and blended programmes). Students will have full access to programme content throughout the duration of the programme.

6.5.10 ASSESSMENT: *What is your approach to minimize plagiarism and cheating? Please explain what arrangements are in place for assessment in the virtual learning environment. How is the identity of the students checked when they submit their coursework, engage in virtual communication or sit for online assessments? (e.g: verification methods)*

Plagiarism will be checked using various tools available to the tutors where written submissions are requested (Grammarly, Turnitin, etc). In terms of identity verification this is based on the login details provided by the learner.

6.5.11 ARCHIVING: *Indicate how records (including students' records, assignments, assessments, employment rates and career paths when the course states an orientation towards employment etc.) are going to be archived in Malta.*

All data will be stored digitally on cloud servers in the EU.

6.5.12 REVIEW: *Explain how you will monitor, review and update programmes to benefit from the latest technologies available for virtual teaching and learning.*

7 Registry Functions

The Head of Administration is responsible for all registry functions which include:

1. Student information and application process
2. Acceptance and payment
3. Data storage and monitoring
4. Performance in programme assessment
5. Certification

Information on programmes of UP academy will be disseminated in the public domain on the website and through social media (facebook and linkedIN). Interested students will be given all the information pertaining to the programme (as explained in section 5 - public information) before they apply by means of an online application.

The HOA will conduct all the necessary checks on the student application in order to ensure that they possess the required entry criteria as established in the programme accreditation process. Students who fail to possess these entry criteria will be informed by means of an electronic mail of this result. Students who have the necessary entry requirements, will be informed of this result and are asked to conduct the necessary payments online.

Students who pay their fees, will be admitted to the programme they have applied for. Student information will be stored on cloud servers, and if physical documentation applicable, these will be safely kept in main business office of UP academy and will be registered in student database. Within the database, details of students will be maintained and updated throughout their learning journey at UYL academy.

As students progress in their programme, the results of the assessments undertaken will be stored as part of the registry database. Certification is awarded to students who successfully reach all the assessment criteria as established in the respective programme. As per commitment already made to the MFHEA all certificates for accredited programmes will include information related to the course on the successful completion by the participant. Such documentation shall include the following information:

- MFHEA licence number
- Second Schedule Category, e.g. Further Education Institution;
- The accredited status of the course or programme: e.g. VET Award / Further

Education Programme;

- The MQF/EQF level for programmes provided at the Institution, e.g. Level 4, for example: 'MQF/EQF Level 4';
- The number of ECTS/ECVET credit, for example: 'Learning Credits: 60'.

8. Information Management

UP academy will develop an information management system that is student-centred. For each student registered with UYL academy, a dedicated student profile will be maintained which will have the following information:

- Student details
- Programmes enrolled in
- Attendance rates
- Assessment performance
- Issues/Cases
- Student reports
- Lecturer's feedback
- Student evaluation and feedback
- Employment rates and career paths

All this data will be collected by the Head of Administration at different stages of the learning life cycle. Such profiles will serve as important information for in-depth analysis by the teaching staff at the academy. Dedicated meetings will be conducted specifically to monitor and analyse the performance of the students. Such meetings will be led and facilitated by the academy's Manager, with the support of the Head of Administration.

Where applicable information will be provided to potential students on possible career paths following graduation and updated statistics showing graduate success rate in gaining employment

All records will be stored digitally with the necessary data protection means as outlined in our Digital Data and recovery policy. All completed initial assessment forms for both accepted and rejected applicants, are retained in hard copy or electronic format (scanned files) for a minimum of two years from the date of application.

The Head of the Academy is responsible to ensure that backups of the Student Record Database are regularly maintained to preserve storage and retrieval of student information.

Individual student records are to be retained for a minimum of 5 years following completion of the specified course.

Maintenance of archives will be done according to MFHEA requirements and student names, surnames and academic records for transcripts and certificates will be stored on archive for minimum period of 40 years

Personal data will be stored and protected as per the statutory provision of the Data Protection Act & GDPR.

After the delivery and implementation of each programme, dedicated information management and analysis sessions will be conducted. As explained in section 3, the ongoing and periodic review of programmes will require important information and data coming from students, teaching staff and employers to be collected and evaluated in order to continuously improve the quality of programmes offered by UP academy.

Privacy and Data Protection Policy

This policy is in place to ensure that UP Academy is aware of their responsibilities under data protection laws. Protecting the confidentiality and integrity of personal data is a key responsibility of everyone within UP Academy and as such we are obliged to comply with this policy at all times to minimise the potential risk of damage and distress to Individuals (Data Subjects) and also the risk of penalties, fines, legal action and reputational damage to our organisation.

All those within UP Academy must comply with this policy and:

- Must ensure that they keep confidential all personal data that they collect, store, use and come into contact with during the performance of their duties.
- Must not release or disclose any personal data to anyone not authorised to access the personal data internally or outside UP Academy (this includes phone calls and emails).
- Must take all steps to ensure there is no unauthorised access to personal data whether by others within UP Academy who are not authorised to see such personal data or by people outside the organisation.

How we use your personal data

Under data protection law, individuals have a right to be informed about how we use any personal data we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about our workforce, this includes anyone who is employed by us for example on a permanent, temporary, casual or hourly paid contract.

UP Academy, is the 'data controller' for the purposes of data protection law. The personal data we hold Personal data and where appropriate Special Categories of Data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details such as first name, middle names, surname, address, personal and work email addresses, personal and work telephone numbers
- Financial details e.g. bank details, salary details, tax/national insurance details, pension details, credit/debit card details and purchase history
- Lifestyle information such as dietary preferences, hobbies, other likes/dislikes/preferences etc.
- Location e.g. Academy/building location
- Online/Unique identifiers such as staff codes, online/website details e.g. usernames, passwords, session IDs, geo locations, device/pps ID, IP and MAC addresses, cookies, RFI tags.
- Special Categories of Data which may include information about racial and ethnic origin, religion, politics, trade union membership, genetic and biometric data (e.g. fingerprints used for ID purposes), health, mental health, physiological and disability information, sexual orientation, behavioural characteristics, social identity, cultural background, facial Images, philosophical beliefs and economic data
- Personal non-contact details e.g. date of birth, age, gender, photographs, video imaging, passport details, visa details, driving licence details
- References and Employment Details • Information about business and pecuniary interests (where applicable)
- Employee Contract Details such as employment history, job title, staff ID cards and ID no, teacher ref no, hours worked, start/leave dates, annual leave details, absence/sick leave details/reasons, performance details, disciplinary details, references
- Academic and staff development information subjects taught, exam results/qualifications/academic achievement/mandatory and voluntary professional body memberships/ accreditations/ certifications / training records
- Complaints/Grievances details e.g. trainee, staff, public and other complaints to which you are a named party or involved in the investigation process
- Health and Safety information such as accident records, risk assessments, occupational health records, personal protective equipment records, industrial disease monitoring, insurance and legal claims
- Criminal and Conviction Information

Collecting this information

Whilst the majority of information you provide to us is mandatory or necessary to enable us to provide services to you or conduct our business activities, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide information to us or if you have a choice in this.

Collecting this data enables us to comply with our various legal and contractual obligations and conduct our business activities for example:

- Administration and management of the employment relationship (pre, during and post-employment);
- Enabling individuals to be paid and the payment of income tax and national insurance contributions
- Enable us to collect and make payments in relation to the contract, expenses, provision of goods etc.
- Processing statutory payments such as sick pay, maternity pay, paternity pay and redundancy pay
- Enabling us to administrate workplace pensions – this includes payments to local authorities, specific pension funds
- The collection or and provision of employment references
- To enable us to provide staff benefits and wellbeing opportunities
- Performing pre and post-employment checks which include References, Qualification/Academic checks, Qualified Teacher Status, Visas, Right to Work in Malta, Business Driver Checks.
- Providing access to HR, Occupational Health and Health and Safety related systems
- To allow the conduct of UP Academy for example processing your personal information in connection with your work related activities for example access to organisation wide and department specific systems and applications e.g. Outlook, Network Logins, EBS, Portals, 4Insight, SharePoint.
- Providing a safe and secure workplace through provision of Health and Safety, Occupational Health and Safeguarding services
- To hold next of kin/ emergency contacts details
- To assist in the detection, investigation and prevention of crime
- Fundraising initiatives
- Comply with our Data Subject Access Request and Individuals' Rights obligations under the GDPR
- Statistical and research purposes to;
 - Complete and return Government and other funding body or awarding/validating body Data Collection Returns
 - enable the development of a comprehensive picture of the workforce and how it is deployed
 - monitor Equality and Diversity
 - collate data collection/statistical returns to the government, funding bodies, validating/awarding bodies and partnership agreements.

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

The purpose of processing this data is to enable UP Academy to:

- Establish and maintain effective governance
- Meet statutory obligations
- Facilitate a safe environment and as part of our safeguarding obligations
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for those who require them

The majority of the processing we carry out in relation to UP Academy is necessary to comply with various legal and contractual requirements.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data. Where we ask you for information for which we do not have a contractual or legal basis for processing, we will either tell you the legitimate basis for processing or obtain your consent. How we store this data We are required to retain some information in accordance with statutory retention guidelines, for example, Health and Safety records and financial records. We will only retain what is necessary in accordance with prescribed retention guidelines set out in our Information Records Management Policy.

Personal data is stored in accordance with our Information Records Management Policy and Retention Schedules. We maintain files to store personal information about specific groups of people as necessary for example Governors and volunteers. The information contained in these files is kept secure and is only used for purposes directly relevant to your work with UP Academy. When your relationship with us has ended, we will retain and dispose of your personal information in accordance with our Information Records Management Policy and Retention Schedules.

Use of your personal information for marketing purposes

Where you have given us consent to do so, we may send you marketing information by e-mail or text promoting events, campaigns, charitable causes or services that may be of interest to you. You can "opt out" of receiving these texts and/or e-mails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting our data protection officer.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. To enable us to comply with our legal and contractual obligations, we may at times need to share some of your personal information (and in some instances special categories of data) as follows;

- Revenue and Customs
- Local Authority/Local Safeguarding Board/Social Care Teams
- Pension providers
- Occupational Health Service
- External Training Providers
- Previous and future employers
- Disclosure and Barring Service – to obtain a check to check for criminal convictions and offences
- Police and Enforcement Agencies – to assist in the detection, investigation and prevention of crime this includes the Courts and Coroner Service
- Recruitment and Employment Agencies
- Suppliers and service providers and professional advisers and consultants – to enable them to provide the service we have contracted them for
- Business system providers e.g. Microsoft Outlook/365 e.g. Login details/file storage
- Previous and future employers/referees – pre and post contract and governor checks
- External Training Providers – booking and administration purposes
- Internal and External Auditors (e.g. Financial Accountants/IR Inspectors)
- Accreditating/validating bodies
- Government departments or agencies for government audits, reviews, comply with funding requirements, and data collection requirements e.g. research /analysis/statistics/equality & diversity, benchmarking purposes

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

Under the General Data Protection Regulation, you have various rights in relation to your personal information:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Please note, exemptions may apply when making a request to exercise your rights, for example where we have to retain or process information for legal purposes.

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing – routine requests for changes to information you provide us with such as changing your contacts details etc. can be directed to HR.
- Claim compensation for damages caused by a breach of the data protection regulation.

9. Programme Monitoring & Review

The objective of the internal monitoring and review process is to ensure all programmes offered by the UYL Academy meet our own expectations, those of the learners, as well as, those we are required to adhere to as part of our accreditation obligations.

The process involved continues from where the process outlined under section 3 and section 4 above on Curriculum development and review, and teacher training respectively.

The four-stage process involves:

Process Stage	Responsibility	Actions
Planning	Academy Manager	<ul style="list-style-type: none"> - Research topic, industry needs and appetite for programme - Design and accreditation (if applicable) of programme - Schedule and promote
Implementation	Educator / Teacher / Coach	<ul style="list-style-type: none"> - Programme delivery by educator / teacher / coach or through self-learn option
Evaluation	Educator / Teacher / Coach	<ul style="list-style-type: none"> - Evaluation of programme through analysis of student results, feedback and evaluation surveys - Review of research and market / sector requirements on topic.
Review	Academy Manager	<ul style="list-style-type: none"> - Review of data - Internal discussion with HoA and respective educators / teachers / coach on topic to introduce necessary changes

10. IQA Policy – Process and Review

The UYL Academy IQA Policy process is a reflection of our purpose, our vision and mission. This ensures both the subject matter, and the quality of the programmes align with our methodology for delivery.

Our ethos is to enable individuals, organisations and communities unleash their full potential to bring about more positive change. This is reflected in our methodology, programme design and delivery. At the core is our FIRE philosophy that allows anyone following our courses find alignment between their individual personal and professional objectives in life, so that they can eliminate conflict between the two and lead a much more fulfilled lifestyle, whether in business, socially or with loved ones.

Our FIRE philosophy is based on four core elements that require consistent, daily attention; not at the expense of each other, but rather in a complimentary manner. Like a puzzle, they only work as a whole in a pragmatic way that can achieve results quickly and effectively. The philosophy comes to life as individuals engage with each of the four elements as reinforcing links of a chain and not as elements in competition with each other. This is where we achieve great change in our vision of what needs to be done and by when. Thanks to our model, learners will start to understand how everything they are engaged in has an important contribution to their holistic development, and the decisions that one needs to take in relation to their areas of focussed are determined, not by time, but by what is most important for them towards achieving their overarching objective, and the value this is going to bring to their life.

The UYL Academy's philosophy is to purport the FIRE ethos across the programmes it delivers. It is our unique Intellectual property (IP) that can become a great asset to those who participate in and complete our programmes. The staff employed with the Academy are all fluent in the FIRE methodology and ethos, and lead by example as a main reference point for all learners.

The UYL Academy and FIRE ethos has been created to help anyone become who they could truly be. The method is exemplified in a simple matrix allowing learners to identify areas of development that are unique to each and every one.

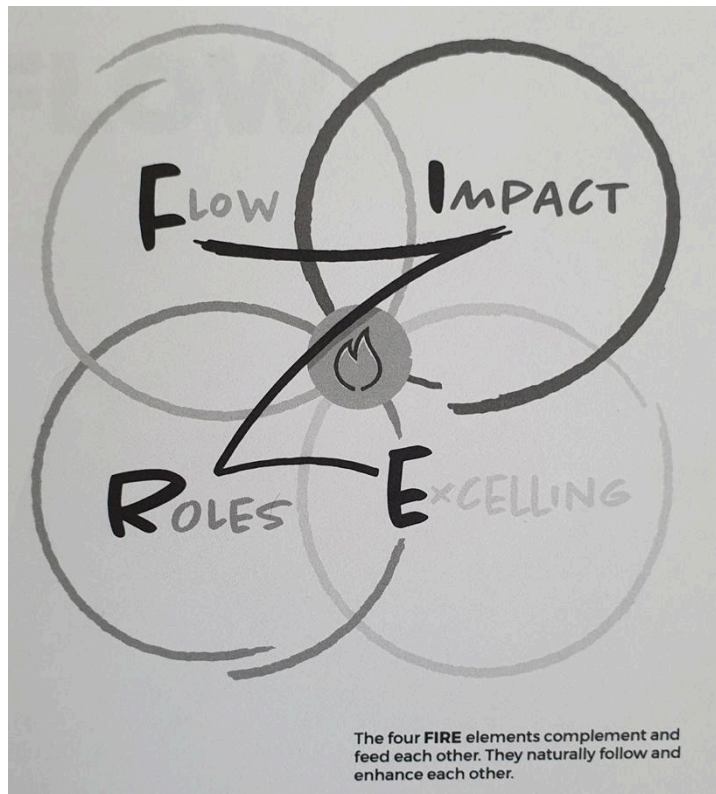


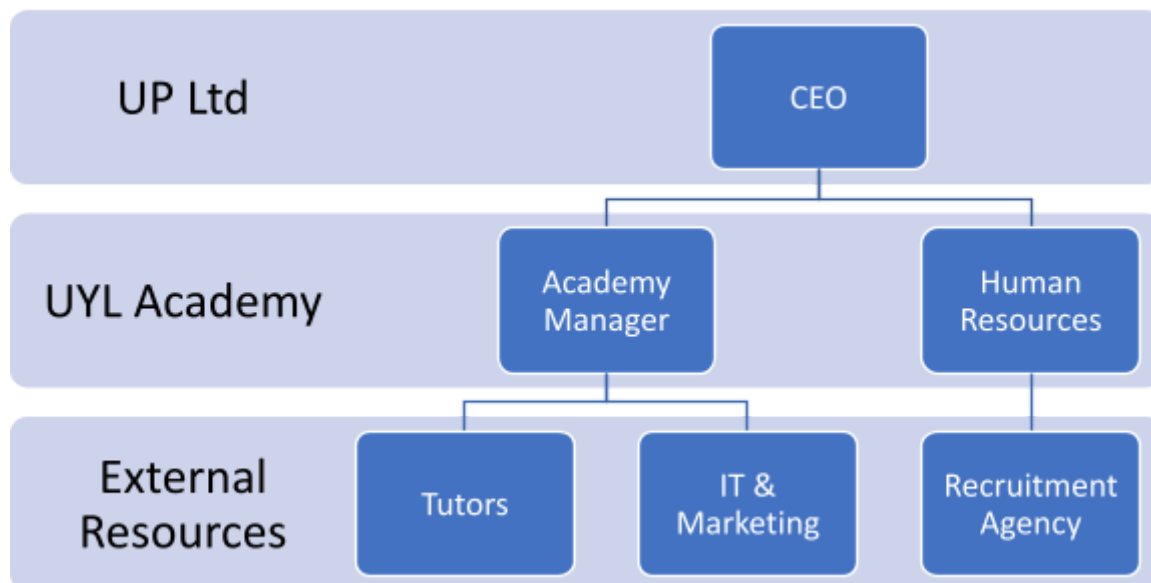
Figure 5 - The FIRE Matrix ©

Whether delivered face-to-face, entirely online or through a blended approach, the FIRE methodology has the capability to engage and cause catalytic reflections that will empower learners to take more conscious control of their limitations and turn these into opportunities. Given the digital age that is rapidly evolving due to varying circumstances, being able to communicate and offer this opportunity to individuals across continents, cultures and belief systems will not only help the learners expand their knowledgebase, but also provide additional insights to how to extend the impact of our FIRE methodology.

All digital delivery options will follow the exact same process we would if we were to deliver programmes face-to-face. We are constantly upgrading our digital software to ensure learners get the best possible access to the content, tutors and resources at their convenience, which will allow for a more seamless and effective learning process. Through a digital footprint we are able to provide learners permanent access to our IP and the

instructional strategies for them to continuously improve their own experiential learning process. We encourage sharing so as to illicit insights that would not be available via individual learning, which replicates the environment and methodology utilised during face-to-face instruction.

Organisational structure



Safeguard against fraud, malpractice, plagiarism and cheating

Malpractice and fraud

All UYL Staff, tutors, students, third party suppliers or service providers will adhere to the UYL code of conduct and ethos that determines how these are to behave during their time at the UYL.

Malpractice is defined as any deliberate activity, neglect, default or other practice that comprises the integrity of the running of the UYL Academy or maintenance of relationships with the UYL Academy. This includes favouritism, defrauding the UYL Academy or students from financial or academic gains, inappropriate behaviour, distribution and use of UYL

resources, false records, inappropriate relationships between UYL staff and students, collusion in assessments, cheating of staff or students, deliberate failure to report any abuse, whether academic, physical, emotional of staff or students, bullying whether in person or online, selling of academic support other than that provided by UYL Academy, results, certifications, threatening of physical or emotional or intellectual harm to UYL staff or students, deliberate mishandling profiteering of student and academic records.

This is not a finite list and will be continuously updated. All students and staff will be notified of any updates and expected to adhere to such policy at all times.

Plagiarism and cheating

All students (and tutors) are expected to submit original work of their own learning, thoughts, research and self-expression. Instances of plagiarism or cheating identified by tutors, other students or members of UYL will be investigated thoroughly, including by interviewing the suspected party. A result of plagiarism will be penalised by a Fail in the programme and also potential expulsion from the programme without right for refund of fees already paid.

In the case of members of staff or teaching staff being found guilty of plagiarism or copying third party original work, these will be brought before the Academy Manager for review. In the case of confirmed and intentional plagiarism, the Academy Manager and the CEO may, depending on the gravity of the offence, within the parameters of the law, and following appropriate legal advice, may recourse to the provision of verbal and written warnings that are kept on the said tutor's employment records, temporary suspension of, termination of services of the said tutor or final dismissal.

Diversity and Inclusion Commitment

UYL Academy is fully committed to Diversity and Inclusion at all levels of the organisation, whether through the recruitment of staff, registration of students and partnerships with third party entities. UYL has a strict no discrimination ethos that is applicable across the board. In line with this no prospective candidates (staff or students) will be deterred or hindered from applying to work with or participate in UYL recruitment processes or programmes. UYL will follow the relevant legal standards in recruitment to ensure all candidates are of good repute and fit for purpose. All UYL staff will commit to adhere to the Diversity and Integration policy and all complaints will be dealt with according to the respective legal parameters.

Complaints of anti-discriminatory behaviour will be addressed directly by the Academy Manager and CEO with the necessary support of legal counsel. Any staff or student found guilty of anti-discriminatory behaviour – following the process of due diligence, and within the allowed parameters of the respective legal framework – these will be removed from their posts or programmes forthwith.

Appeals process

Any appeal or complaint by staff or students will be addressed with the utmost of seriousness.

Complaints from students on unfair grading or treatment will be addressed directly by the Academy Manager and CEO (if necessary). Students may appeal directly to the Academy Manager following directing these complaints to the respective tutor have not been addressed. The Academy Manager will then investigate the complaint directly and independently with the student and tutor, while also assessing any documented material supporting the complaint. An administrative decision will then be taken by the Academy Manager in conference with all parties. Should the decision not satisfy the parties, the issue will be escalated to the CEO and if necessary, external legal advice will be sought.

All UYL Policies and Procedures will be made publicly available on request.

Version History

Version	Date	Description of changes
1	04.11.2021	Document created
2	26.02.2022	Document updated following initial MFHEA review.
3	13.06.2022	Document updated following MFHEA review in March 2022.