



NOBLE ARC BUSINESS SCHOOL STUDENT HANDBOOK

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Introduction

The School thanks all students who have chosen Noble Arc Business School for their further studies.

The purpose of this handbook is to provide students with vital information regarding policies as well as procedures adopted by the School. These policies and procedures represent the regulatory and disciplinary framework of the School. Students enrolled and registered with the School have the responsibility of abiding to these policies and procedures.

Please note that this handbook may be amended from time to time and any changes to the policies and procedures will be communicated to the students.

Welcome Note from Director

Dear Students,

It is with immense pleasure that we welcome you to Noble Arc Business School.

As you begin your academic journey with us, we look forward to helping you achieve your highest potential. We acknowledge that a strong collaboration with us will make a great difference in your education.

Noble Arc Business School values academic achievement and excellence and we are dedicated to fostering a respectful, tolerant and supportive community. We are here to guide you every step of the way in your educational journey and career development.

Furthermore, we would like to encourage you to take advantage of every opportunity to grow academically. This includes making use of the many student resources available as well as reaching out to your lecturers whenever you require assistance.

In light of the Covid-19 pandemic, we want to assure you that health and safety are one of our top priorities. Ergo, we made sure that our policies and procedures, (such as the compulsory vaccination of our staffs and students, the use of masks and hand sanitizers, etc.) are on par with the guidelines of the Ministry of Education.

We also look forward to hearing from you throughout the semester, where you will have the opportunity to share feedback and ideas about your experience with us.

Thank you for entrusting Noble Arc Business School with your education and we wish you all the best on your academic journey with us.

Sincerely,

Dr Guillaume Babet

Head of School

Our Vision



The vision of Noble Arc Consulting (NAC) registered in February 2019 is to be a professional institution offering academic and professional expertise to businesses and personal development programme to corporate enterprise's staffs.

Our Mission

Education is not only a means to deliver content but a system to help all learners reach their full potential and enter the workplace as highly knowledgeable and skilled individuals. At Noble Arc, we emphasize on quality education by providing learners with all the skills to become productive citizens, ready to lead the future.



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Helpful contacts

Not sure who to call?
Reach out to our staffs at Noble Arc Business School

Director

Mobile: 54993003

Email: guillaume@noblearcconsulting.com; info@noblearcconsulting.com

Admin and student support executive

Phone: 4288080

Email: narvada@noblearcconsulting.com

Commercial Executive

Phone: 4288080

Email: laura@noblearcconsulting.com

Digital Specialist

Phone: 4288080

Email: tania@noblearcconsulting.com

EQUAL OPPORTUNITIES AND DIVERSITY POLICY

Purpose and Context

The purpose of our Equal Opportunities and Diversity Policy is to meet the legal obligations as well as provide our commitment to equality of opportunity and diversity. A Learning Centre is a place where students and staffs hold common

values with regards to human rights as well as differences and diversity.

We believe in fairness and equality of treatment for all. We are committed to fairness in our practices and in meeting the needs of our diverse students and staff bodies. Noble Arc Consulting Ltd is committed to ensure that all employees and students are treated in a fair manner, feel respected and can achieve their full potential regardless of their nationality, age, caste, colour, creed, ethnic origin, religion and belief, pregnancy, impairment, marital status, place of origin, political opinion, race, sex and sexual orientation.

Noble Arc Consulting Ltd operates strictly within the framework of the Equal Opportunity Act of 2008, enforced by the Equal Opportunities Commission, to follow the guidelines of the Equal Opportunities Commission <https://eoc.govmu.org/eoc/>

Policy

1. Our Centre will seek to create an open, trusting environment, in which there is an absence of prejudice, discrimination and harassment.
2. A positive climate of respect and co-operation, with open and tolerant discussion of important issues, is promoted. Our centre expects its members to respect each other as fellow human beings and treat one another with dignity.
3. Our Centre deplores all forms of unlawful or unfair discrimination and seeks to provide an environment free from discrimination against students, staffs and others on the grounds of gender, race, sexual orientation, religion/belief, disability or any other protected characteristic.
4. NAC will promote cross-cultural contacts between different communities at all levels, foster understanding and respect, and seek to break down barriers.
5. NAC will seek diversity of knowledge, background and experience in recruiting staff and students, and will value flexibility in working patterns.
6. Initiative, creativity and innovation will be encouraged in order to help staff and students be open to new ideas, to learn, to share good practice, and to succeed.
7. The Equal Opportunities and Diversity Policy will be drawn to the attention of staff and students regularly, and everyone will be helped to understand same and each and every one will be held accountable for adherence to its values.
8. Relevant policies and procedures will be reviewed regularly to ensure that

they are up to date.

9. All staff and students of the Centre have a personal responsibility for the practical application of this Equal Opportunities and Diversity Policy. Noble Arc Consulting Ltd requires all students and staff to ensure that their conduct conforms with this policy whilst on the Centre's premises or undertaking any business related to the Training Centre. This policy applies to all functions associated with recruitment and admission of students, teaching and learning, assessment, research, course development, reach out, employment, provision of facilities/ services, procurement, funding, provision of advice and working in partnership.

Noble Arc Consulting Ltd will monitor the policy and reserves the right to make amendments to the Equal Opportunities Policy in line with the authority requirements.

CONFLICT OF INTEREST POLICY

Introduction

This conflict of interest policy supports the Noble Arc Consulting (NAC) ethics code. This policy applies to all NAC staffs, students, stakeholders, towards the awarding body and national institutions. The Centre is committed to integrity, by encouraging the declaration of conflicts of relevant interests so that they can be identified, and managed accordingly.

Purpose

The purpose of this policy is to ensure that all members at Noble Arc Consulting Ltd recognize, disclose, and manage any Conflict of Interest they may have, and also act in a manner which is consistent with their responsibilities and duties at work.

This procedure is to encourage the disclosure of actual, potential or perceived conflicts of interest in order to protect the integrity and reputation of the Centre and its members. The Centre acknowledges that there are various situations in which conflicts of interest may arise and strongly encourages all members of the Centre to seek advice where necessary.

All those concerned with the policy will be made aware of the policy and will be encouraged to report any conflict of interest between the interest of the Centre and the personal, professional and business interests of the members of the Centre.

Each individual related to the Centre has the responsibility to recognize situations in which questions of conflict of interest on their part might be raised and they should disclose such situations to the Centre so that appropriate measures can be taken.

Staff/Centre/Learner/Awarding Body Obligations

1. An employee has the responsibility of disclosing to his or her Head of the Centre any situation in which the employee has a real or potential conflict of interest.
2. The unit head shall determine an appropriate way to manage any conflict of interest that may exist and ensures that Centre operations are not improperly influenced or adversely affected. In the event that the unit head concludes that there is no reasonable way to manage a conflict of interest, then the employee may be prohibited from participating in related Centre affairs. In other words, employees have a responsibility to immediately disclose any real or potential conflicts of interest, and unit heads have a duty to manage the conflicts in the best interests of the university.
3. Staffs must not accept any gift, benefit or hospitality from any students/learners that could reasonably be interpreted as a real, perceived or potential conflict of interest.
4. A potential for a perceived or actual conflict of interest exists where a learner is a relative to a staff member or member of that person's household. As such the staff has the responsibility of informing his/her head of unit about same so that

necessary arrangements can be made with respect to that particular learner and another staff is given the responsibility of dealing with that learner.

5. Personal relationships between staff and students must not afford an undue advantage or disadvantage because of the existence of such personal relationship.
6. The Centre shall ensure that a proper working environment is established and maintained so that employees are encouraged to ask questions about any real or potential conflict of interests.
7. A staff member must disclose any perceived, potential or actual conflict of interest or conflict of commitment arising from an engagement or activity he/she may have outside the institution and devise a conflict management plan in consultation with his/her head of unit to resolve or manage such conflict.
8. In case of an academic staff member, the latter must not teach, supervise or assess the work of a student with whom he/she has a personal relationship.
9. All new employees shall formally acknowledge the conflict of interest policy of the institution.
10. Awarding bodies shall be informed about any conflict of interest between the Centre or staff members.
11. In case a staff member is taking qualifications which includes internally assessed units at the Centre, the latter should disclose this fact to the Awarding body.
12. Whenever any amendments will be made to the Conflict of Interest policy, all concerned parties will be informed of same and provided with a copy of this policy. They will be required to complete and sign the acknowledgement and disclosure form. Annexed 1.
13. Refer to Annex 2: Conflict of Interest declaration form

ANNEX 1

CONFLICT OF INTEREST POLICY ACKNOWLEDGEMENT FORM

I hereby acknowledge and agree:

1. That I have received and read a copy of the Conflicts of Interest policy and agree to abide by this policy
2. That I comply with the rules and regulations outlined in this policy.
3. That this original acknowledgement will be kept in my file and maintained by my department.

Name: _____

Signature: _____

Date: _____

ANNEX 2

Conflict of Interest Declaration Form

Please complete this form if you believe that you may be involved in a conflict of interest situation or if you are unsure and seek to disclose a potential or perceived conflict of interest. Please read the Noble Arc Consulting Conflict of Interest Policy.

SECTION 1: PERSONAL DETAILS

NAME:

JOB TITLE (staffs only):

[Click here to enter text.](#)

LEARNER REGISTERED
PROGRAMME(learners only):

PHONE: [Click here to enter text.](#)

EMAIL: [Click here to enter text.](#)

SECTION 2: DISCLOSURE DETAILS

The actual, potential or perceived conflict of interest relates to: *(tick all appropriate box/s)*

- | | |
|---|---|
| <input type="checkbox"/> Relationship with family or friends or staff | <input type="checkbox"/> Staff recruitment |
| <input type="checkbox"/> Outside work activities (paid/unpaid) | <input type="checkbox"/> Relationship with external parties |
| <input type="checkbox"/> Financial interest | <input type="checkbox"/> Disposal of the Centre's assets |
| <input type="checkbox"/> Gifts/benefits | <input type="checkbox"/> Provision of external consultancy services |
| <input type="checkbox"/> Provision of private tutoring | <input type="checkbox"/> Other (if you selected other please provide details) |
| <input type="checkbox"/> Procurement of goods and services | |

The following actual, potential or perceived conflict of interest has been identified. *(please insert all relevant details)*
[Click here to enter text.](#)

SECTION 3: TO BE COMPLETED BY THE DIRECTOR

In my opinion the details provided: *(tick appropriate box)*

- ☐ do not constitute a conflict of interest, and I authorise the employee to continue the activity/the learner to continue the studies
- ☐ do constitute an actual, potential or perceived conflict of interest

If the situation does constitute a conflict of interest, please ensure that the following actions have been considered:

- ensure all information surrounding the conflict has been disclosed and documented
- inform likely affected persons of the conflict, seeking their views where relevant as to whether they object



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- reformulate the scope of work or restricting access to certain information
- recruit a third party to oversee part or all of the process
- recommend to relinquish the interest that is causing the conflict
- temporarily remove the person from the process or responsibilities
- monitor the person's activities closely in relation to the conflict of interest
- take no further action because the conflict is minimal.

I have reviewed the above considerations and request that the Employee/learner takes the following action to eliminate/manage the conflict:

I will ensure this action plan is reviewed:

☐ Within 1 month

☐ Within 3 months

☐ Within 6 months

☐ Within 12 months

☐ Other – specify

☐ N/A: the conflict is one-off or short duration

SECTION 4: EMPLOYEE'S / LEARNER'S DECLARATION

To the best of my knowledge and belief any actual, perceived or potential conflicts between my duties as an employee/learner and my private and/or business interests have been fully disclosed in this form in accordance with the requirements of Noble Arc Consulting Conflict of Interest Policy.

I acknowledge, and agree to comply with, any approach identified in this form for removing or managing an actual, perceived or potential conflict of interest.

SIGNATURE:

DATE:

SECTION 5: EMPLOYER

The actions described in the approach outlined in Section 3 have been put in place to effectively manage any actual, potential or perceived conflict of interest disclosed in Section 2. The approach outlined in Section 3 ensures that the Centre's public interests and reputation is adequately protected.

NAME: [Click here to enter text.](#)

SIGNATURE:

DATE:

COMPLAINTS AND APPEALS POLICY

Purpose Statement

This policy applies to all complaints and appeals received by the Centre from learners, members of staffs and stakeholders. The policy outlines the management process undertaken by Noble Arc Consulting for receiving and responding to complaints and appeals in a transparent, fair and timely manner. The Centre understands that on some occasions, there may be instances of dissatisfaction and acknowledges that the cause(s) must be addressed and rectified promptly.

Noble Arc Consulting therefore invites feedback from the dissatisfied party so that a resolution can be found and as an opportunity to consolidate the feedback into a review and improvement of the organization's policies, practices and processes.

The Centre endeavours to address any and all complaints in a fair, constructive and timely manner. The complainant has the right for their complaint to be heard and for an impartial decision to be made at no cost to themselves. Complainants have the right to appeal a decision.

This policy and associated procedures supports Noble Arc Consulting to provide a process for complaints and appeals to be heard and actioned. All complaints and appeals received by the Centre will be viewed as an opportunity for further improvement and review.

Types of Complaints

Some of the activities which may give rise to academic and non-academic grievances covered by this policy include, but is not limited to:

- o The content and structure of academic programs;
- o Module enrolment, delivery, assessment, learning environment;
- o Outcomes, access to resources; student service or employee conduct;
- o Students believing that they have been treated unfairly;
- o Occupational health and safety concerns related to subject delivery and/or assessment;
- o Administrative action/inaction, procedure or decision;
- o Discrimination, harassment and bullying appeals;
- o Course advice and enrolment;
- o Fees and charges;
- o Suspension and/or cancellation or deferral of enrolment;
- o Issue of statement of results/certificates;
- o Personal safety;
- o Candidates progress and academic progress decision;

General Procedures

A complaint box is made available to students if ever they want to lodge a formal written complaint.

Both verbal and written complaints received from a student will be considered and proper and timely action will be taken.

A complaint can be raised informally with the student support officer and if ever the student support officer is not able to resolve the complaint, the matter is taken to the appropriate manager.

Upon receipt of a formal complaint, proper investigation will take place and a formal interview or meeting with the student will be scheduled as soon as possible.

If ever the complaint is not resolved by the manager, a meeting including the managers, board of directors and the student will take place so that an agreement is reached on an appropriate resolution.

Any action taken in response to the complaint is formally informed to the student.

All appeals regarding academic results, examinations or assignments are dealt with following the Appeals policy of the Awarding body, unless otherwise stated by the Awarding body.

Complaint and Appeals Process

Noble Arc Consulting may receive complaints from learners, staffs or stakeholders through a variety of means e.g.: verbally, written documentation, electronically (email). If an informal complaint is received, the Centre will try to resolve these issues through advice, discussions and general mediation and all concerned parties can be involved in this informal process. On receipt of a formal complaint, the Centre's director will acknowledge receipt of the complaint in writing to the complainant, and will seek to identify and resolve the issue so as to avoid any further disruption to the complainant (where applicable). The Centre encourages all concerned parties, staffs, complainants to approach the complaint openly and honestly so as to resolve the problems through fair and reasonable means.

- o The Complaints and Appeals policy & procedure, and forms are made available to all Students and other stakeholders by directly contacting NAC, and Student handbook.
- o As per policy, all formal complaints are to be made in writing by the complainant using the complaints and appeal form or email.
- o The Centre should review all complaints upon receipt and acknowledge receipt of complaint no later than within 5 working days in writing by sending a letter or an email to complainant.
- o A register is kept to record all details of the complaints.
- o Once a complaint or appeal is received and checked for, it will be forwarded to the appropriate personnel for review.
- o The Review Personnel may gather evidence and constitute a review committee as they see fit.

- o This process must start within 10 working days after the complaint or appeal has been lodged (and receipt of all supporting evidence) and should be completed within a reasonable time period, usually 10- 15 working days.
- o If further evidence is requested, then the Review Personnel must communicate with the complainant or appellant as soon as possible requesting evidence to be submitted within 5 working days. The process will be put on hold until the evidence is received.
- o The decision taken by the review personnel will be communicated to the complainant in written, through email or letter.
- o In case of complaint, if the complainant is not happy with the decision he/she may appeal. That appeal is based on the fairness and objectivity of the decision taken by the Centre.
- o All documentation relating to a formal complaint or appeal MUST be recorded on the Student file, in case of Student. This must include the initial form, supporting evidence, meeting minutes, copy of correspondence with all concerned parties. This information will be kept confidentially and stored securely.
- o All formal complaints or appeals must be logged in the Complaints and Appeals Register.
- o All staff members are encouraged to raise issues that are of concern to them as soon as possible.
- o The Centre ensures that no staff members are penalized or disadvantaged resulting from the raising of a complaint.
- o Any complaint received by a staff either formally or informally will be dealt with in all transparency and fairness and in a timely manner.

Complaints to Awarding body

All learners on regulated qualifications have the right to complain to the awarding body. An awarding body (if stated in their policy) will deal with complaints about:

- Assessment – in the broadest sense, including the conduct of, preparation for, and environment for, assessment
- Dissatisfaction with the way in which the learning Centre has handled the complaint.
- Issue of results and certificates

All complaints, as per the policy of the awarding bodies, will be dealt by either the awarding body or if otherwise stated, the complaints will first be dealt by the Centre and then if need be, it will be forwarded to the awarding body for further action.

Appeals to Awarding body

All appeals regarding examination results, assessments, assignments marks have to be made to the awarding body (subject to appeals policy and procedures of awarding body).

Appeals to the awarding body can be made by the Learning Centre on behalf of a learner or group of learners.

A registered learner is entitled to appeal directly to the awarding body unless it has been specified otherwise by the awarding body that the learner has to first appeal to the Centre, and if ever the learner is not happy with the appeal decision, only then the learner submits the appeal through the Learning Centre to the awarding body.

The appellant will be informed of the decision of the awarding body once all investigations have been conducted with relation to the appeal made by the learner. The decision will be informed either to the Learning Centre or directly to the learner depending on who submitted the appeal.

All appeal should be made on reasonable grounds and all evidence related to the appeal should be submitted to the Awarding body.

All appeals will be dealt with as quickly and thoroughly as possible.

MALPRACTICE POLICY

Introduction

This policy applies to the malpractice of the Learning Centre staffs and learners and details the procedures to be followed if an allegation of malpractice is made.

For the purpose of this document 'malpractice' is defined as:

Any act, or failure to act, that threatens or compromises the integrity of the assessment process or the validity of training offered by Noble Arc Consulting or formal qualifications and their certification. This includes the failure to maintain appropriate records or systems; the deliberate falsification of records or documents; acts of plagiarism or other academic misconduct; and/or actions that compromise the reputation or authority of Noble Arc Consulting or the awarding bodies it works with, their officers and employees.

Noble Arc Consulting will report all relevant cases of suspected malpractice to the relevant awarding body, accepting that in certain circumstances the awarding bodies may take action of their own, including imposing sanctions.

All suspected cases of malpractice will be subject to investigation to ascertain whether malpractice has occurred and each case will be treated very seriously by the Centre. The suspected individual is informed about reasons and details of the investigation, following which necessary actions will be taken accordingly.

It is the responsibility of all staffs of the Centre and learners to be vigilant with regard to any events which may lead to malpractice occurring, and report promptly to the Learning Centre where they suspect malpractice has or may occur so that appropriate action can be taken to address this in line with the Student Conduct Policy and the Staff Disciplinary Policy.

Relevant awarding bodies will be notified of cases of alleged/actual malpractice to ensure the appropriate action may be taken. All cases will be dealt with in accordance to the policy of the awarding bodies unless otherwise stated by the awarding body.

Objectives:

- To minimize the risk of malpractice by students;
- To minimize the risk of malpractice by staffs;
- To standardize and record any investigation to ensure openness and fairness;
- To impose appropriate penalties and/or sanctions on students and/or staffs where incidents (or attempted incidents) are proven;
- To protect the integrity of the Centre and awarding bodies;

In order to do this, the Centre will:

- communicate the Malpractice Policy to students at offer, during induction, on website, in programme handbooks;
- communicate the Malpractice Policy to staffs during induction;
- show students the appropriate formats to record cited texts and other materials or information sources;
- ask students to declare that their work is their own;
- conduct any investigations in a form commensurate with the nature of any allegation;
- ensure the handling of individual cases takes account of the needs of the individual, including those arising from protected characteristics.

Expectations

All Students are expected to:

- attend induction
- attend study skills sessions that are relevant to developing their note-taking, paraphrasing, synthesizing and referencing skills;
- avoid sharing electronic versions of their work and passwords with other students;
- only submit work for assessment that is their own original work.

All Trainers are expected to:

- declare conflict of interest;
- communicate the Malpractice Policy to students during course induction with emphasis on plagiarism;
- keep candidate coursework/portfolios of evidence secure;
- work within the professional teaching standards in relation to assessment practices;
- check for malpractice when assessing or moderating work;
- comply with awarding bodies procedures;

All Centre Staff are expected to:

- declare conflict of interest;
- comply with the invigilation code of practice;
- communicate the Malpractice Policy to newly recruited staffs (including agency staff) during induction;

- comply with awarding bodies procedures;

Examples of Malpractice by Students

This list is not exhaustive and other instances of malpractice may be considered by Noble Arc Consulting at its discretion:

- Plagiarism of any nature, including submissions from suspected essay mills;
- Collusion by working collaboratively with other students to produce work that is submitted as individual student work;
- Deliberate destruction of another's work;
- Fabrication of results or evidence;
- False declaration of authenticity in relation to the contents of a portfolio or coursework;
- Impersonation by pretending to be someone else in order to produce the work for another or arranging for another to take one's place in an assessment/examination/test;
- Inappropriate behaviour during an internal assessment that causes disruption to others. This includes shouting and/or aggressive behaviour or language and having an unauthorized electronic device that causes a disturbance in the examination room;
- Inclusion of inappropriate, offensive, discriminatory or obscene material in assessment evidence. This includes vulgarity and swearing that is outside of the context of the assessment, or any material of a discriminatory nature;
- Frivolous content - producing content that is unrelated to the examination paper/question in scripts or coursework;
- Unauthorized aids - physical possession of unauthorized materials (including mobile phones, electronic devices, etc) in the examination room, unless a concession has been agreed in advance.

Examples of Malpractice by Trainers

This list is not exhaustive and other instances of malpractice may be considered by the Centre at its discretion:

- Failure to communicate Malpractice Policy to students during induction;
- Failure to communicate to students the risk of using essay mills;
- Failure to provide information on improper assistance to candidates;
- Inventing or changing marks for internally assessed work (coursework or portfolio evidence) where there is insufficient evidence of the candidates' achievement to justify the marks given or assessment decisions made;

- Failure to keep candidate coursework/portfolios of evidence secure;
- Assisting students in the production of work for assessment, where the support has the potential to influence the outcomes of assessment, for example where the assistance involves trainers producing work for the student;
- Producing falsified witness statements, for example, for evidence the student has not generated;
- Allowing evidence, which is known by the staff member not to be the student's own, to be included in a student's assignment/task/portfolio/coursework;
- Misusing the condition for special student requirements e.g. support;
- Falsifying records/certificates, for example by alteration, substitution, or by fraud;
- Failure to comply with awarding organizations procedures for managing and transferring accurate student data.

Examples of Malpractice by Staff members of the Centre

This list is not exhaustive and other instances of malpractice may be considered by the Centre at its discretion:

- Failure to communicate the Malpractice Policy to staff members during induction;
- Facilitating and allowing impersonation;
- Misusing the condition for special student requirements e.g. support;
- Falsifying records/certificates, for example by alteration, substitution, or by fraud;
- Fraudulent certificate claims, that is claiming for a certificate prior to the student completing all the requirements of assessment;
- Failure to comply with awarding organizations procedures for managing/transferring and storing accurate student data;

Reporting alleged malpractice

All the staffs of the Centre have a responsibility for reporting any alleged malpractice of staff to the Head of the Centre.

All staff members of the Centre have a responsibility for reporting any alleged malpractice of students to the Head of the Centre.

Alleged malpractice may be reported to the Centre by awarding bodies.

The Centre will consider allegations that are made verbally but will request in all cases that allegations are put in writing with any supporting evidence that is available.

Investigations

All investigations will adhere to the following principles:

- Confidentiality – by their very nature, investigations usually necessitate access to information that is confidential to a centre or individuals. All materials collected as part of an investigation must be kept secure.
- Rights of individuals – where an individual is alleged of malpractice they should be informed of the allegation made against them (preferably in writing) and the evidence that supports the allegation. They should be provided with the opportunity to consider their response to the allegation and submit a written statement or seek advice, if they wish to. They should also be informed of what the possible consequences could be if the malpractice is proven and of the possibility that other parties may be informed e.g. the regulators, the police, the funding agency and professional bodies. The appeals process should also be communicated to them. All investigations will be done taking into consideration the locally in force legal framework, otherwise if no legal framework is in force, Centre will follow the policy of the awarding body wherever needed.
- Candidate Interview - students may request that they are accompanied by a friend or colleague.
- Retention and storage of evidence and records – all relevant documents and evidence should be retained in line with awarding organizations policy and procedures.
- Decisions and action plans – all conclusions should be based on evidence. A course of proposed action should be identified, agreed between the Centre and awarding bodies.
- Proportionality – any decision on the outcome must reflect the weight of evidence and the nature of the case – the staff member or student does not have to admit malpractice.
- Sanctions – any sanctions applied should be proportionate to the extent of malpractice identified (and evidenced) during the investigation.

Investigation of alleged malpractice by Trainers/Centre Staff

If malpractice is alleged by Trainers/Centre staffs, there will be a process of investigation, to establish the full facts and circumstances of any allegations or evidence. Such an investigation will usually be made given the potential seriousness of the matter.

In order to avoid conflicts of interest, investigations into alleged malpractice should not be delegated to the person, team or department involved in the alleged malpractice.

Any disciplinary investigation which will proceed will include provision for:

- The member of staff to be informed about the concerns and possible consequences;

- Possible suspension depending on the circumstances of the case;
- The member of staff to be allowed to be accompanied to interviews;
- Collection of evidence related to the alleged malpractice;
- The review of evidence and production of a report;
- A decision to be made on whether or not to proceed to a formal disciplinary hearing;
- If necessary a formal hearing with a right of representation.

Possible Actions Taken by the Centre

In cases where it is believed, following an investigation and hearing, that there is clear evidence of malpractice:

- The appropriate awarding body will be informed by the Centre of the malpractice and they will be given the supporting evidence;
- The Centre may take internal disciplinary action in line with Staff Disciplinary Policy. This action will be commensurate with the seriousness of the malpractice.

Investigation of alleged malpractice by Students

If malpractice is alleged by students, there will be a process of investigation undertaken by the Nominated investigator to establish the full facts and circumstances of any allegations or evidence. Investigations will proceed through the following stages:

- The student will be informed about the issues, possible consequences and right of appeal;
- Collection of evidence related to the alleged malpractice;
- The review of evidence and production of a report;
- A formal interview between the responsible party and the student against whom an allegation has been made.

Possible Actions Taken by the Centre

In cases where it is believed that there is clear evidence of malpractice:

- The appropriate awarding body(as per the awarding body policies and procedures) will be informed by the Centre of the malpractice and they will be given the supporting evidence. The Centre may take internal disciplinary action in line with Student Conduct Policy. This action will be commensurate with the seriousness of the malpractice.

Reporting alleged malpractice to Awarding Bodies

The Centre accepts the responsibility to report any staff or student assessment malpractice to the appropriate awarding body, where needed. The only exception to this relates to assessment malpractice in coursework or controlled assessment which is discovered prior to the student signing the declaration of authentication. In these cases the incident need not be reported to awarding bodies, but will be dealt with in accordance with the Centre's Student Conduct Policy.

Any work which is not the student's own will not be given credit. In addition a note will be added to the cover sheet to detail any assistance that has been given. In all other instances of alleged malpractice the nominated investigator will submit the fullest details of the case at the earliest opportunity to the relevant awarding bodies as per awarding bodies' regulations. It is understood that in certain cases, awarding bodies may wish to allocate their own staff to join or lead an investigation.

Appeals

Trainers and Centre Staffs have the right to appeal against the decision/trainers and any penalty imposed as a result of a malpractice investigation.

Students have the right to appeal against the decision and/or any penalty imposed as a result of a malpractice investigation. Appeals should be made within 20 days of the date they were notified of the decision detailing the fact that they are appealing and their grounds for doing so. Appeals will be dealt with within 20 days. All appeals will be done in line with the awarding bodies.

ATTENDANCE POLICY

Noble Arc Business School lays emphasis on students' attendance. Students are informed that attendance includes both face to face classes as well as online classes.

In cases where a student is absent from a session, he/she is required to inform the School so that the latter can send him/her the lecturer notes for the missed classes. In case of high level of absenteeism, a student is advised to inform the School of a valid reason for the absences, supported by a medical certificate, if on medical ground, or any other documents for any other compelling personal reasons.

As a responsible student, the latter is required to be always punctual to all classes. Attendance will be taken in the class by the lecturer at the beginning of the session as well as at the end of the session.

In cases where online classes will be scheduled, the timetable will be sent to the students by email and students are therefore notified that it is their duties to duly check their emails regularly to keep abreast with any School communicate.

Any misses classes be a student, whether face to face or online will not be replaced.

COMMUNICATION POLICY

This policy applies to all employees and students. It is a policy which states that the School must be able to communicate quickly and efficiently with employees and students.

Due to the unpredictability triggered by COVID-19, the School emphasizes on the importance of communication between the institution and students. The main source of communication will be phone calls, emails and whatsapp.

During registrations, students are required to provide their email addresses to the School which is used then by the School to send any correspondence as and when

required to the student during his/her time of study at the School. Therefore the School stresses upon the need for students to check their emails regularly so that they do not miss any communication from the School. In the event a student changes his/her email address or his/her phone number, he/she is required to update the Institution of same within the briefest delay possible.

The School is not responsible for any liability arising out of any loss and/or disadvantage

suffered by the student due to his/her own failure to verify his/her email or due to his/her omission to update the School of any change in his/her email address or any other contact details.

Emails will be sent to students in cases where classes will be held online due to the COVID-19 pandemic. Students should bear the responsibility to ensure that they keep abreast with the online classes' timetable by checking their emails regularly. Emails shall remain the primary form of communication.

PANDEMIC – COVID 19 POLICY

Noble Arc Consulting aims to adopt a responsible and preventive approach towards all its students and staffs by taking all necessary precautionary measures. The School makes it a priority to ensure the security and well-being of all its students, staffs, visitors and any other stakeholder.

Some precautionary measures taken by the School in the context of the Covid-19 Pandemic are as follows:

- ☐ Social distancing on the school premises
- ☐ Providing lectures, workshops and seminars online as and when required
- ☐ Restricting the number of students permitted on the School premises
- ☐ Requiring students to wear masks at all times whilst being present on the School's premises
- ☐ Respecting social distancing measures

- ☐ All students in possession of their Covid-19 vaccination card at all times during their presence at the School
- ☐ Being in possession of a negative PCR test dating not later than 7 days for those who have not been vaccinated
- ☐ Temperature to be taken and regular sanitization of hands to be done
- ☐ Students who are unwell (those with flu symptoms and fever) are expected not to come on the School campus

All these measures taken by the School is in accordance with the Quarantine Act 2020 of Mauritius. In case of any amendments to the Quarantine Act 2020 of the Covid-19 pandemic, same will be applied and updated in the Student's handbook.

Those students who cannot get vaccinated due to any listed contradictions to the Covid-19 vaccine are required to get a medical certificate from a medical practitioner attesting same. In such cases, whenever the student is coming to the School, he/she will need to provide a negative PCR test not dating more than 7 days in order to be allowed access on the School's premises.

The School reserves the right to take such reasonable measures which are fundamental to reduce any risk of contamination of the infection or illness

REFUND POLICY

Refund of Fees upon Withdrawal

If a student has already registered for a Programme of Studies and then decides not to pursue his/her studies, reimbursement of fees paid will be treated as per the table below:

General Fees

Receipt of Request for Refund	Refund
(i) Before or within one week after start of first semester	75%
(ii) Above one week and up to two weeks after start of first semester	50%
(iii) Above two weeks and up to five weeks after start of first semester	25%
(iv) Above five weeks from start of first semester	No Refund

Should any of the programme offered be rescheduled or cancel for which ever reason 100% of the fees shall be refunded to students.

STUDENT CODE OF CONDUCT

The Student Code of Conduct of Noble Arc Consulting sets out the standards of behaviour expected from students from the time of their enrolment till the completion of their course with the School.

The aim behind this code is to create a harmonious, disciplined, respectful and law abiding community at the School. Each student is expected to always treat each and every member of the School's community with respect.

Students are expected to:

- ☐ Respect the School's property and not to damage or use it for inappropriate purposes;
- ☐ Be decently dressed when they are on School' premises so that a professional academic esteem is maintained at the School;
- ☐ Always act in a responsible and respectful manner towards other fellow students, staff members or any third party in the School;
- ☐ Have on them at all times, their identity card and their vaccination card and produce same whenever requested by the School's staff;
- ☐ Have and maintain personal hygiene at all times;
- ☐ Properly wear a face mask at all times;
- ☐ Maintain social distancing;
- ☐ Inform the School of any criminal proceeding(s) or conviction(s) that they have been or might be subjected to;
- ☐ Not to disrupt any activities, such as teaching, learning, online classes, examinations, or any other activities undertaken by the School;
- ☐ avoid discriminatory conduct on grounds such as gender, sexuality, race, ability, cultural background, religion, age or political conviction

The School is an alcohol restricted premise. All students and staff members are restricted to the use, consumption, possession, distribution, purchase, sale or offer of alcohol within the School's confine.

Compliance with this policy forms part of each student's conditions of admissions and enrolment at the School.

Any person caught contravening these regulations will be in breach of the student code of conduct and thus liable to sanctions by the School.



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DATA PROTECTION POLICY

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DEFINITIONS

In this policy, the following definitions apply:

- **Act:** The Data Protection Act 2017, which is the law governing the protection of personal data in Mauritius.
- **Consent:** Any freely given specific, informed and unambiguous indication of the wishes of a data subject, either by a statement or a clear affirmative action, by which he signifies his agreement to personal data relating to him being processed.
- **Data Subject:** An identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **Data processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Data Commissioner:** The Data Protection Commissioner referred to in Section 4 of the Data Protection Act 2017.
- **Data Controller:** Determines the purpose for which personal data is processed and has decision making power with respect to the processing.
- **Data Processor:** Any individual or organisation who processes personal data on behalf of and according to the purposes defined by the data controller.
- **Digital Archive:** The designated repository in which digital records are retained for their long term preservation.
- **Records:** Records of personal data can be both digital and non-digital. In case where personal information is recorded in digital form, it then requires a computerised system to access or process.
- **Personal Data:** Any information relating to a data subject.
- **Special Categories of personal data (including Sensitive Personal Data):** In relation to a data subject, means personal data pertaining to:
 - a) his racial or ethnic origin;
 - b) his political opinion or adherence;
 - c) his religious or philosophical beliefs;
 - d) his membership of a trade union;
 - e) his physical or mental health or medical condition;
 - f) his sexual orientation, practices or preferences;
 - g) his genetic data or biometric data uniquely identifying him;
 - h) the commission or alleged commission of an offence by him;
 - i) any proceedings for an offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in the proceedings;
 - j) such other personal data as the Commissioner may determine to be sensitive personal data.

LIST OF ABBREVIATIONS

DPIA	: Data Protection Impact Assessment
GDPR	: General Data Protection Regulations
ICT	: Information and Communication Technology
PIA	: Data protection impact assessment
NAC	: Noble Arc Consulting

1. Policy Statement

The Data Protection Act is designed to protect the privacy of individuals. It requires any personal information about an individual to be processed securely and confidentially. Noble Arc Consulting Ltd has a duty to ensure that the Centre complies with the Data Protection Act 2017 promulgated in Mauritius. The Data Protection Act 2017 came into force on 15 January 2018. The Data Protection Act of Mauritius is a legal framework that sets the guidelines which have to be understood and abided by all educational institutions in Mauritius.

Noble Arc Consulting commits to comply with the provisions of the Data Protection Act 2017 (also referred to as 'Act').

As a tertiary education institution, an employer and a service provider, Noble Arc Consulting is an organization which shall be committed to:

1. Processing data fairly and legally;
2. Supporting the fundamental rights of individuals;
3. Keeping personal data secure; and
4. Designing and incorporating privacy into systems and processes.

This Data Protection Policy sets out the guidelines and procedures adopted at Noble Arc Consulting for Data Protection.

2. Scope

Noble Arc Consulting has the responsibility of controlling data associated with its academic activities, administrative functions and processes and any other business services. NAC determines the purposes and means of the processing of personal data and has decision making power with respect to such processing.

3. Purposes and Objectives

The purpose of this policy is:

- To assist NAC staffs in fulfilling their responsibilities with respect to the processing of personal data in compliance with the legal and regulatory framework in force;
- To ensure accountability for retaining certain personal data for as long as is required. While treating personal data, NAC shall not keep such data for any longer than is necessary.

4. Principles

In accordance with the Act, NAC has the obligation to and shall process data according to the data protection principles as set out in the table below:

Principles	Application of the principles by NAC
------------	--------------------------------------

Lawfulness, fairness, and transparency	NAC explains to its staff, students, suppliers and other stakeholders how it processes personal data at the point of collection and for what purposes.
Purpose limitation	NAC uses the personal data it has only for the purposes that it was collected.
Data minimisation	NAC only collects personal data which is adequate, relevant and limited to the purposes it is required for.
Accuracy	NAC ensures that the data is accurate, updated and is able to rectify any mistakes at the earliest.
Storage Limitation	NAC does not retain personal data for longer than needed for the purposes for which the personal data is processed.
Integrity and Confidentiality	NAC protects all personal data collected against unauthorised access, loss or destruction by a range of security measures.

5. Collection of personal data

Collection of personal data is governed by Section 23 of the Act. The collection shall be driven by a lawful purpose connected with a function or activity of the NAC and where such collection shall be warranted for that purpose.

Upon collection of data, NAC shall ensure that the data subject be informed of:

- The purpose of collecting the data;
- The intended recipients of the data;
- Whether supply of the data is mandatory or voluntary (voluntary data shall be marked as 'optional' on the relevant form;
- The rights as a data subject;
- The retention period applicable (paragraph 7 of the policy shall prevail)
- Any further information necessary to guarantee fair processing in respect of the personal data collected.

The types of data collected at NAC, from data subject are if the following nature:

1. Name;
2. Postal address;
3. Telephone number;
4. E-mail address;
5. Date of birth;
6. Gender
7. Qualification;
8. Medical report and records;

9. References;
10. Identity numbers;
11. Results and transcripts of examinations;
12. Assignments;
13. Bank details;
14. Parents' details;
15. Exam papers/ Scripts; and
16. Social Background.

This list is not an exhaustive one

6. Data Protection and Data Disclosure

The data collected is processed on the basis of the data subject's consent for the purposes as described in the following two tables. In certain circumstances, in line with the Act, NAC may also allow personal data to be shared among public sector agencies without the consent of the data subject. Such organisations and circumstances are included in the tables.

6.1 Legal Basis for Processing - Personal Data

NAC shall ensure that it processes personal data on one of the following basis:

Legal basis	Contextual Application
Necessary for the performance of a contract	The majority of processing for NAC students, staff and stakeholders.
Data subject has given consent to the Processing	Mailing lists, marketing and other optional services for staff, students and other stakeholders.
Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Retention of students' results list, transcript information for award and verification, and information, regarding staff members, sent to the Mauritius Revenue Authority (MRA).

Necessary for the purposes of legitimate interests pursued by the NAC or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data	Activities involving students, alumni, staff, faculty, and marketing of charitable works and commercial services for NAC.
Necessary for the performance of contract, historical, statistical or scientific research	University monitoring of student progress and achievement; Organisations wishing to recruit NAC graduates or students for placements.

6.2 Legal Basis for Processing - Special Categories of Personal Data

In line with Section 29 of the Act, NAC processes special categories of personal data on the following basis:

Legal basis	Contextual Application
Necessary for the purposes of carrying out the obligations and exercising specific rights of the data subject in the field of employment and social security and social protection law	Sickness absence Exams Results Results References
Relating to personal data which are manifestly made public by the data subject	For research purposes; or Particular group donation assessments
Necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee	Occupational therapy assessments Doctors' reports and records
Necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes	Analysis and reporting of equality and diversity information, research outcome and the impacts on society and the country, the employability of the graduates

7. Retention of Personal Records

In accordance with the Act, NAC shall retain the personal data of employees and other members for a period of time as referred to in the Retention Schedule. The

retention will be effective following the member's departure or resignation from NAC and will be governed by legal and financial considerations.

Data held by NAC shall be retained as long as the purpose underlying the collection of the data continues. Upon expiry of the purpose, the data shall then be destroyed; unless its retention is required to satisfy legal, regulatory or accounting requirements or to protect the interests of NAC.

Under this policy, the nature of the records required that consideration to given to:

- Security;
- Authenticity;
- Accessibility;
- Version control; and preservation (e.g back up of digital records)

The records identified for destruction shall not be recoverable.

7.1 Data Retention Schedule

The Act does not provide for a specific time period for retaining personal data. The provisions indicate that personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

From this perspective, a Data Retention Schedule will provide the guidance on how long different categories of records are to be held and when same may be destroyed.

Unless defined as permanent preservation and once retention periods have elapsed, all records shall be destroyed.

All documents are to be held permanently except for the ones which are enumerated in the table below:

Sn	Class of Documents Containing Personal Data	Timeframes
1	Documents relating to previous freehold ownership of property	Ten (10) years after ownership has been transferred
2	Any expired lease agreements	Ten (10) years subject to there being no litigation; otherwise ten (10) years after litigation has ended
3	Agreements with periodic payment	Ten (10) years subject to there being no litigation; otherwise ten (10) years after litigation has ended

4	Banking documents and all financial statements	Ten (10) years after utilisation
5	Unsuccessful application to undergo any courses at the NAC; except for reason of fraud or previous misconduct at NAC	Twelve (12) months as from date of the decision communicated subject to there being no litigation; otherwise three (3) years after litigation has ended
6	Unsuccessful job application; except for reason of fraud or previous misconduct at NAC	Twelve (12) months as from the date the application has been unsuccessful; except where there is an ongoing litigation/dispute regarding the application

The table describes the retention periods as applicable to the different classes of documents which relate to the data collected and processed.

Note:

- Documents which have nothing to do with personal information, such as course guidelines, syllabi, workshop documents, are not governed by the Data Protection Act.
- Documents that are to be destroyed as per the policy should have the approval of the National Archives Department under the National Archives Act 1999.
- The generality of the approach of the Retention Schedule aims at an increased accessibility and usability among members of NAC.
- For Finance issues, the Retention Schedule shall be in line with the Financial Management Manual.

7.2 Retention of Personal Data for Students

Section 27 of the Act governs the time frame for retaining personal data for students. Under this policy, the time frame for retention for such personal data shall be maintained at the minimum allowed, which shall aid in the management of large stores of data.

The underlying considerations with respect to students' personal data handling are:

- (i) Long term records – the classification as 'Long Terms Records' results from the fact that life of student is counted as being 120 years from the date of birth;
- (ii) There is an expectation by students, employers, Government bodies and members of the public that Universities should retain a permanent core record of student names, the modules studied, qualifications and the outcomes;
- (iii) Data required for management, development and research may be retained outside the student records systems for the long term. When storing this data, the name and address of a student will be removed and in line with the Act, the data will not be used to support any actions or decisions that affect or cause distress or damage to the individual. The exception will be

research data which requires the student's agreement for follow-up contact.

8. Rights

Data subjects (NAC students, staff, customers, suppliers and other stakeholders) have a number of rights under the Act. These include:

Rights	The context for NAC
Right of access	Data subjects have the rights to find out what the NAC is doing with their data, check whether the data is held correctly and to obtain a copy thereof.
Rights to rectification	NAC shall endeavour to ensure that the data held is accurate. It shall also provide the opportunity to data subjects to request rectification of their personal data in the event that the data is incorrect. Subject to provisions of Section 39(4) of the Act, NAC shall make the necessary amendments without undue delay.
Right to erasure	A Data subject has the right to ask NAC to remove or delete data held on him/her. After consideration of a request from a data subject, NAC will proceed with any erasure of data held, in line of section 39 of the Act.
Right to restriction of processing	<p>Data subjects may, in the course of a dispute with NAC about the use of their data, request NAC to stop using their data if certain criteria apply.</p> <p>The NAC shall, at the request of a data subject, restrict the processing of personal data where:</p> <ol style="list-style-type: none"> 1. The data subject challenges the data accuracy 2. There is no need for the personal data for the purpose of the processing, but the data subject requires them for the establishment, exercise or defence of a legal claim 3. The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; or 4. The data subject has objected to the processing pursuant to section 41 of the Act, pending verification as to whether the legitimate grounds override those of the data subject.
Right to data portability	<p>Data subjects have the right to request NAC to provide them with a re-usable electronic copy of their data in order to allow them to transfer the data to another provider.</p> <p>This shall be applicable to data submitted to NAC by the data subject or data observed from the subject's use of a service.</p> <p>Wherever it shall be technically possible, NAC will consider transferring the data held directly to another provider.</p>

Right to object	Data subjects have the right to object to processing. The relevant grounds of objection shall be based on legitimate interests, legal obligation or for the purposes of direct marketing or for "scientific or historical research purposes or statistical purposes", NAC will assess the request against any compelling legitimate grounds for the processing and respond accordingly.
Automated decision making, including profiling	<p>Data subjects hold a right of appeal against decisions of NAC, with regards to the data subjects and which have been taken through automated means such as computer algorithm.</p> <p>NAC shall ensure a fair treatment of the data subjects, allowing them the opportunity to express their point of view.</p> <p>Further, NAC shall delegate a member of staff to provide a review and explanation of the decision to the data subject.</p>

Data subjects shall thus have the right to access their data, to obtain a copy of the data held, to request its erasure or rectification and the right not to be subject to a purely automated decision without having their views taken into consideration. The data subject also has the right to object to processing, withdrawing their consent and lodging a complaint with the Data Protection Office should they consider that the processing is in violation with the law.

9. Data Security

NAC is committed to ensuring the security of personal data in order to prevent unauthorized access, accidental deletion and malicious hacking attempts.

NAC's overarching ICT Policy supports compliance around the integrity and confidentiality principles of the regulation, in ensuring that appropriate technical measures are in place to protect personal data. In the event of a personal data breach:

- The Data Protection Officer shall be contacted without delay for immediate action; and
- In case such an officer is not in place and/or not available, the Data Protection Commissioner should be informed of the breach within 72 hours.

10. Data Protection by Design

NAC is committed to ensure that privacy is built into its processes and outcomes. New projects involving personal data are required to carry out a data protection impact assessment.

The data protection impact assessment aims to identify privacy risks and plan appropriate mitigation.

Data Protection Impact Assessment

Section 34 of the Act provides for the instrument for a data protection impact assessment (DPIA). This refers to the obligation to conduct an impact assessment and to document it before starting the intended data processing. Such an assessment may bundle several processing procedures.

A DPIA shall always be conducted where processing operations are likely to result in a high risk to the rights and freedoms of data subjects by virtue of their nature, scope, context and purposes.

11. Training and Awareness

NAC is committed to ensure that its staffs have the requisite training and awareness on data protection. All members of the staff are required to undertake the compulsory 'Data Protection' training.

Further resources and training are provided on the intranet and on request from the Data Protection Officer. Breach of data protection law due to unauthorized access, misuse or loss may result in disciplinary action, including dismissal.

12. NAC as Processor

Where NAC acts as a processor in the course of its academic research and/or commercial activities, it is subject to the provisions of Section 21 of the Act and will:

- process the personal data only on documented instructions from NAC;
- ensure that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- take all measures required pursuant to Section 31 of the Act (Security of processing);
- not engage another processor without prior specific or general written authorisation of the controller;
- assist the controller by appropriate technical and organisational measures, in so far as this is possible, for the fulfillment of the controller's obligations to respond to request for exercising the data subject's rights
- make available to the controller all information necessary to demonstrate compliance.

13. Academic Research

Academic research which involves the processing of personal data is subject to Section 28 of the Act and any other policy and contractual obligations. As per the Act, it is important to request for the consent of students before using their personal information to carry out any academic research.



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14. Responsibilities of NAC Employees for Managing the Learning Centre Records

Operational responsibility for the implementation of this policy rests upon the staffs of NAC.

Each staff shall be called upon to:

- abide to this policy
- ensure that all Records Management practices are consistent with this policy
- destroy inactive records that have no archival value upon expiry of the applicable retention period

Additionally, each staff shall have to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information. The confidentiality of information within records must be safeguarded at all times.

Once records have been retained by the creating offices for the requisite time as stipulated in the attached retention schedule, they must be destroyed or archived for permanent retention as set out below:

- When scheduled for destruction, records must be disposed of securely. The manner of destruction of records must be appropriate to the level of confidentiality of the records;
- in the case of in-house destruction, the department/ section should document and retain the date and manner of destruction of records

In the case of third-party destruction, a certificate confirming destruction should be received and retained as proof of destruction.

15. Links to Another Website

The website of the NAC may contain links to other websites of interest. However, once these links have been used to leave the site, NAC shall not have any control over the other website. Therefore, NAC cannot be responsible for the protection and privacy of any information which data subjects provide while visiting such sites. Such websites are not covered by this policy.

16. Non-Compliance under the Policy

Deliberate failure of employees to comply with this Policy may entail disciplinary action.

17. Conclusion

This policy has been developed in line with the requirements of the Act which complies with the GDPR.

The Policy is to be reviewed every two years in the light of the changes in NAC operations. Further it may be updated as and when required to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Act and other existing laws.

18. References

Data Protection Act 2017. Available from:

<http://dataprotection.govmu.org/English/Publications/Documents/Act%20No.%202020-%20The%20Data%20Protection%20Act%202017.pdf>

Disclaimer

This policy is for general guidance only. It does not include all possible situations and it cannot substitute the Law or take the place of legal advice. Readers are advised to consult the DPA 2017 and to seek legal advice in case of doubt.

The NAC will not bear any responsibility for any legal damages arising from action or absence of action of any person on account of the contents of the policy.