

Annex C: Template for producing a self-assessment on guidance on consumer protection law

Provider's name: City of London College (CLC)

Provider's UKPRN

City of London College (CLC) overall approach to ensuring compliance with consumer protection law

CONSUMER PROTECTION PLAN

As an alternative provider of higher education in the UK, City of London College demonstrates it is compliant with consumer protection law through aligning its documentation with the Consumer Rights Act (2015) and Competition and Markets Authority (CMA) requirements and carries out its statutory duties to protect the rights of students and all stakeholders who benefit from our service.

This statement has been developed with oversight from the CLC Executive Committee with the approval process undertaken through the Public Information Committee, Executive Committee and the Board of Governors. On-going oversight of College's approach to consumer protection law is undertaken at the Quality Assurance Committee and Academic Board and is subject to scrutiny during the Annual Monitoring Review process prior to consideration at the Board of Governors.

In line with the Competitions & Markets Authority guidance, CLC ensures that students are given full accurate and comprehensive information about the educational opportunities on offer including course content, structure and duration, the location of study and the award given successfully completing the course.

This information includes:

- Entry requirements (both academic and non-academic) and an indication of the standard/typical offer level criteria;
- Core modules for the course and an indication of likely optional modules, including whether there are any optional modules that are generally provided each year;
- Information about the composition of the course and how it will be delivered, and the balance between the various elements. This will include the number and type of contact hours expected – for example, lectures, seminars, work placements, and feedback on assignments. It will also include expected workload, such as the expected self-study time, and details about the general level of experience or status of the staff involved in delivering the different elements of the course;
- Overall method(s) of assessment for the course, for example by exams, coursework or practical assessments, or a combination of these;

CLC provides information about its programmes and provision to stakeholders and students through the website, prospectuses and a wide range of marketing & recruitment material. Students also have access to the VLE, student handbooks and induction packs which have information about their chosen programmes of studies, the support available to them and the College's policies and procedures.

The College's Public Information Policy confirms that all information produced and disseminated or made available to students and members of the public by the College or any of its associated campuses, is accurate, transparent, easily accessible and complete, in accordance with the requirements set by CMA guidance on Information provision, ensuring that prospective students are given the information they need in order to make informed decisions. The policy seeks to ensure that procedures for the dissemination of information to students and the public, whether direct or via those representing it, are

conducted in line with the CMA – UK higher education providers (advice on consumer protection law), OfS – Regulatory Advice 3: Registration of new providers and the UK Quality Code for Higher Education.

The policy confirms that the College's procedures align with the above and:

- employ rigorous vetting and key stakeholder sign-off procedures to all forms of publicity, marketing materials, promotions and student guidance information to ensure that they are accurate, timely, transparent and focused on the needs of the intended audiences.
- ensure that all terms and conditions related to recruitment, admissions and refunds are clear to students and available and accessible at the appropriate time in the enrolment process.
- ensure that all publications both for students and for publicity purposes, conform to guidelines set by individual external partners.
- ensure that any promotions and offers relating to courses are clear in terms of the terms and conditions and validity of the promotion.
- accommodation information where applicable;
- employability and careers information where applicable;
- responses and views published by CLC or any of its associated institutions in the media are accurate and not misleading.

Scrutiny at the Public Information Committee, ensures effective control over the accuracy of all public information, publicity and promotional activity relating to marketing, recruitment, admissions, enrolment, induction, learning opportunities and student support activities in their widest sense. Information produced for prospective and current students will not be approved for release until signed off as fit for purpose, accessible and trustworthy.

To enable prospective students and their advisors to make informed decisions about learning opportunities on offer from the College and its associated campuses, information published will include:

- CLC's strategy, mission, values and 'academic signature';
- Programme/course detail including curriculum, learning and assessment information;
- course locations and dates;
- eligibility requirements, admissions criteria and process;
- fees and fee liability; terms and conditions, payment options;
- awarding body partner policies, with a user-friendly introduction, setting out the framework for managing academic standards and quality assurance and enhancement;
- data protection and privacy policies, giving clear information on how information collected from staff students or other parties will be used;
- disability support information;
- the policy is designed to assure the quality and accuracy of public information provided by CLC, and not intended to limit in any way the freedom that staff have within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions.

While the academic freedom of individual members of staff to express and publish individual opinions

is not affected by this policy, it does establish procedures and operational controls that limit and regulate the publication of information for and on behalf of CLC. The Marketing Department is responsible for managing all internal and external publications for CLC and its associated campuses. It works closely with all key stakeholders and academics (where appropriate) and its work is closely integrated with that of the Executive and Public Information Committees, as applicable, to ensure consistency of information. The department is responsible for a range of functions, including the production of:

- Brand guidelines, copy creation, ensuring brand consistency for all CLC materials
- Online and Offline Advertising
- Printed Publications
- E-shots
- Website and landing page content and design
- Internal signage
- Corporate presentations
- Events & Open Days
- Social Media (aligned with the Communications and Engagement Team)

The Marketing Department is the primary 'owner' and manager of the CLC brand and provides graphic design, copy, PR and marketing services. In addition, the Marketing Department is responsible for the branding aspects of profiles on the website. The individual owner of the profile and the relevant academic lead are responsible for the accuracy of the information contained within that profile.

Examples of the communications produced by the Marketing Department include:

- Prospectus, factsheets and website content, including information about courses and entry requirements for potential students, as specified by the partner awarding body and confirmed internally by the relevant Programme/Campus Manager.
- Information about fees and terms and conditions for potential students based on information provided by College Heads /key stakeholders and the Legal Department and implemented across all materials/channels online and offline;
- Information about scholarships for potential students, based on information provided by the Executive Committee and implemented across all materials/channels online and offline;
- Promotional materials for public events sponsored or supported by CLC;
- The graphic design of student handbooks and induction packs, relevant to each course of study with content provided by the relevant stakeholder as and when an item is requested.

The principles guiding the Marketing Department in producing or editing any external communication is to ensure the information is:

- Valid, reliable, useful and timely clear, timely and transparent;
- Readily accessible to the relevant target audience;
- Updated in accordance with the amendment schedule for that publication;
- Updated in response to changes from the external environment;

- Clear in terms of the period it covers and when it was super-ceded by a subsequent version.

In addition, wider information on fees and additional study costs as well as our Refunds and Compensation Policy and Complaints Policy are available on the website.

Enrolment Stage

The College has a reliable, fair and inclusive admissions system, underpinned by clear policies and procedures for the recruitment, selection and admission of students, which ensures that admissions decisions are fair, open and transparent and clearly communicated to prospective students in a timely manner.

Evaluation is used to identify suitable actions to enhance the admissions process, for example increased use of academic interviewers to speed up application times and implementing processes to help ensure applicants provide all relevant documentation to reduce delays to decision making. The College provides detailed information for prospective students to help them make decisions about the College's programmes and support staff contact applicants who have incomplete applications and invite them in for guidance

The robust admissions system includes a consistent approach to the admissions process across each campus which involves agreed entry criteria, admissions teams responsible for the provision of:

- applicant advice
- support for applicants
- initial assessment of applications and entry qualifications by the admissions officers
- an on-line application form and assessments including tests for Maths and English ability and ...
- interviews for all applicants.

These requirements are well defined in the Admissions & Recruitment Policy that is accessible to applicants.

All students are informed that they are required to undertake language and maths tests, where appropriate, and undertake an interview to confirm both academic suitability and motivation to their course.

Post induction and end of module surveys note that Students confirmed that after making their initial enquiries their experiences of the admissions process were the same, including the processes for conducting the tests, and that they had all been interviewed. They further reported that the interview process was helpful in providing guidance regarding the suitability of appropriate courses for them. They found the information they received during the admissions process was clear, helpful, accessible and that their experience of the course matched their expectations

Roles and responsibilities in relation to the recruitment, selection and admission of students are also defined in the Admissions & Recruitment Policy including those of both academic and support staff, and are well understood by staff, in particular the role of campus & academic managers in assessing the applications. Academic and professional services staff involved in the admissions process receive training including updates on the College's admissions policies and training in interviewing. The College's commitment to equality and diversity is reflected in the reliable, fair and inclusive admissions system and confirmed in Equality & Diversity Policy.

Admissions decisions on standard applicants, as described in the approved course documentation are made by the relevant senior academic & campus management staff of each campus. Applicants with non-standard qualifications or experience, needing a discretionary decision are referred to the admissions team. In addition, applications that fall outside of standard admissions processes eg. those students with special educational needs, safeguarding concerns are appropriately considered, and a

decision made on the course of action and any reasonable adjustments that may be required.

The College's Admissions & Recruitment Policy is readily available to prospective students who are signposted to the CLC website. Admissions policy and procedures adhere to the principles of fair admission and are underpinned by appropriate organisational structures and processes. In addition, the documentation sets out the College's procedures for handling complaints and appeals in relation to the admissions process which are distinct from those specified in the College's Student Complaints Procedures and Appeals Policy and Procedures.

Unsuccessful applicants are given details of the complaints and appeals process and signposted to the guidance for making such appeals or complaints which is clear and accessible on the website. Admissions complaints and appeals are reviewed by the Programme/Course Committee/s.

CLC has a history of working closely with awarding partners to ensure that processes align with their requirements and that admissions decisions are based on agreed entry requirements.

Admissions staff are aware of the admissions policies and procedures and are supported to fulfil their role through internal training, workshops with external experts, access to resources including webinars and guidance on judging new or non-traditional qualifications.

At the enrolment stage, applicants are fully informed of the requirements of enrolment prior to their actual enrolment day, ie. payment of fees, and the CLC Tuition Fees and Refunds and Compensation Policy. This is achieved through the sending of standardised letters to all applicants which is overseen by the Admissions Officer.

Where previously unforeseen changes in course information occur (for example, an increase in cost of an external visit), these changes are communicated to students via letter, email and in person to ensure the message is received. Responsibility for this process lies with the Course/Programme Leaders and is overseen by their relevant line manager.

CLC ensures that students are given full and comprehensive information about the educational opportunities on offer including course content, structure and duration, the location of study and the award given on successfully completing the course.

Detailed information includes:

- Entry requirements (both academic and non-academic) and an indication of the standard/typical offer level criteria;
- Core modules for the course and an indication of likely optional modules, including whether there are any optional modules that are generally provided each year;
- Information about the composition of the course and how it will be delivered, and the balance between the various elements. This will include the number and type of contact hours expected – for example, lectures, seminars, work placements, and feedback on assignments. It will also include expected workload, such as the expected self-study time, and details about the general level of experience or status of the staff involved in delivering the different elements of the course;
- Overall method(s) of assessment for the course, for example by exams, coursework or practical assessments, or a combination of these;

In addition, wider information on fees and additional study costs as well as our Refunds and Compensation Policy and Complaints Policy are available on the website.

The College confirms it has a reliable, fair and inclusive admissions system, underpinned by clear policies and procedures for the recruitment, selection and admission of students which ensure that admissions decisions are reliable, fair and inclusive. Senior admissions staff ensure that there is central oversight and consideration of the admissions processes confirming that admissions systems are reliable, fair and inclusive are robust and credible. Additionally, staff involved in the admissions process

understand their roles and receive regular training.

CLC's current approach to compliance with consumer protection law involves the following mechanisms of assurance:

- General Data Protection Act May 2018
- Freedom of Information Act 2000, www.legislation.gov.uk/ukpga/2000/36/ contents.
- Data Protection Act 1998, www.legislation.gov.uk/ukpga/1998/29/contents.
- Equality Act 2010, www.legislation.gov.uk/ukpga/2010/15/contents.
- The Equality Act 2010 (Specific Duties) Regulations 2011, www.legislation.gov.uk/uksi/2011/2260/contents/made.
- The Information Commissioner's Office, www.ico.gov.uk.
- The Information Commissioner's Office, guidance for the education sector, [www.ico.gov.uk/for organisations/ sector guides/education.aspx](http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx).

In addition, the College is mindful of, and pays due regard, to the following:

<https://www.gov.uk/government/organisations/competition-and-markets-authority>

<https://www.gov.uk/government/publications/higher-education-guide-to-consumer-rights-for-students>

<http://www.qaa.ac.uk/en>

<https://www.aoc.co.uk/>

<http://www.oiahe.org.uk/>

Summary

CLC confirms that it has a reliable, fair and inclusive admissions system aligned with consumer protection requirements. This is underpinned by clear policies and procedures for the recruitment, selection and admission of students which ensure that admissions decisions are reliable, fair and inclusive. Approaches to admissions is consistent and robust and the admissions requirements are consistent with the College's policies. There is central oversight and consideration of the admissions processes which is evidence-based confirming that systems are reliable, fair and inclusive are robust and credible.

The admissions records procedures operate according to the College's policies and procedures and staff involved in the admissions process understand their roles and receive regular training. Outcomes of recent student surveys indicated that they were very satisfied with their experiences of the admissions process which they found to be fair, inclusive, timely and supportive, and also were satisfied with the accuracy and helpfulness of information provided to them. The College concludes, in its self-assessment of the recruitment and admissions process, that the Quality Assurance Agency's new Quality & Standards Review (QSR) Core practice is met.

CLC's contract terms and conditions

See first section- Compliance with Consumer Protection Law

Your complaint handling processes and practices

Whilst CLC proactively seeks to avoid any instance of misleading or erroneous public information through adherence to this policy, it is acknowledged that corrective action may be necessary in response to complaints or feedback. Complaints or feedback relating to public information is likely to be generated via the following sources:

- Student comments and complaints;
- Comments or complaints from partner awarding bodies or universities and/or accreditation and regulation bodies;
- Comments or complaints from third party stakeholders, e.g. Trading Standards, the Advertising Standards Agency, members of the public.

In the case of student feedback and complaints relating to public information, these are passed onto the Quality Office via the published complaints procedure (which can be found on the website). The complaint is then investigated with the involvement of the relevant area and/or any other persons directly involved in the issue. Where necessary remedial action is carried out as per the complaints procedure. Where complaints or comments are received from a programme's Awarding Body, these are delivered to the Academic Director for that Awarding Body. The issues are investigated and addressed as above and a formal response is conveyed to the awarding body with revised text, as required. Whenever a complaint is received, the vetting processes is reviewed and evaluated to assess and mitigate the risks of reoccurrence.

The College's responsibilities for handling student complaints and appeals are set out in the Complaints and Appeals policies and the regulations of the different awarding bodies. In the first instance, students must exhaust the College's internal processes for handling complaints and academic appeals but may then seek redress from the University, should they remain dissatisfied.

Students submit formal complaints to the College but must submit academic appeals directly to the awarding body partner. Students may appeal to the awarding body should the outcome of any formal complaint be unsatisfactory. Should a student exhaust the processes outlined above, they may still seek remediation from the Office of the Independent Adjudicator. Where applicable, student complaints are handled as part of the College's Complaints Policy, whereas academic appeals are dealt with under the College's Student Appeals Policy. Each policy document outlines the scope, processes, and likely timescales for each, including clear details as to what constitutes the grounds for an appeal or complaint.

Information for complainants and appellants is clear and transparent with the Student Complaints Policy available via the College's VLE and signposted in the relevant Course Handbooks. Recent meetings with students confirmed that they considered that the complaints and appeals procedures were easily understood and accessible. Students are encouraged to resolve issues informally via their personal academic tutor, the Students' Representative Co-ordinator, or the College's Student Support staff, however, where this is not possible, students may submit a formal complaint or academic appeal to the College's Executive Committee.

Academic appeals are heard by an Appeals Panel that can make recommendations to appropriate persons or decision-making bodies within the College. The College's plans and approaches to the implementation of fair, transparent and accessible complaints and appeals procedures are robust and credible and are aligned with the regulations and procedures of the respective partner universities.

The College has established processes for monitoring complaints and appeals via the Programme/Course Committee/s, which maintains a log of the complaints and appeals that have been lodged in the distributed campuses, Quality Enhancement Committee and, ultimately, via the Academic Board which reports to the

Governing Body.

CLC aims to provide a high standard and quality of service in respect of its academic provision, As part of its commitment to enhancing the student experience, this procedure has been established to deal with academic complaints from students. CLC will follow the UK quality Code chapter B 9 in terms of students' complaints and appeals.

Students who have a complaint to make regarding academic provision should follow the procedure below:
For minor matters in relation to module or programme design and delivery students should speak with the module lecturers or the Course/Programme Leader in the first instance.

For matters of significance relating to any CLC staff member or tutor, students are advised to contact the Principal.

Students who wish to make a complaint about a fellow student: if the matter cannot be resolved student to student, the student who wishes to make the complaint should contact the Course/Programme Leader.

As matters that are dealt with informally at an early stage have the best chance of being resolved effectively, the formal stage of this procedure will only be applied if informal procedures have been exhausted and the complainant remains dissatisfied. It is recognised however that there may be occasions when an informal approach is not appropriate. In such instances the student may wish to proceed to a formal stage in the procedure, giving reasons for doing so. In such situations the recipient of the complaint should decide at which stage in the procedure set out below the complaint should most appropriately be considered, taking account of its particular nature and circumstances

Scope of the Procedure

The procedure is designed to encompass complaints from students concerning their experience as an CLC student on the Common Awards programmes.

Academic complaints' can relate to any aspect of the approved academic provision including (but not restricted to) complaints from students concerning their experience of

- the arrangements for, or delivery of, teaching or assessment for the academic programme;
- the adequacy of supervision for modules that are a formal and assessed part of the academic programme;
- the academic support that is part of the academic programme;
- assessed placements that are a formal part of the academic programme;
- administrative or support services that relate to the academic programme;
- information or publicity in relation to the academic programme;
- the infrastructure for academic programmes, including learning resources and teaching spaces

The above is not a definitive or exhaustive list and academic complaints may relate to other areas of academic provision or support where these are perceived to have had a negative impact on the student's academic programme or progress.

This procedure does not extend to 'academic appeals' (i.e. appeals relating to examinations or assessments or to academic progress or against expulsion or exclusion on academic grounds). Information on Academic committee's approach to academic appeals is available in the CLC appeals.

Stages of the Process

The complaints process has 3 Stages:

Stage 1: Informal resolution

Most complaints can be resolved informally and, where practicable, a complaint should be dealt with as

close as possible to the point at which it arises. A student who wishes to complain should, therefore, initially discuss the matter with those directly responsible. If the student is unhappy about approaching the person directly responsible, they may seek counsel from their personal tutor, or another member of the CLC staff.

The Principal, or designated officer, should, if possible, have a face-to-face discussion with the student concerned, to come to an understanding of the exact nature of the student's dissatisfaction and to explore what outcome the student seeks. If appropriate, the Principal, or designated officer, should initiate mediation as part of the informal resolution. Wherever possible, it is expected that student complaints should be resolved at Stage 1, without the need to resort to formal proceedings. A student should normally expect to receive a written or verbal acknowledgement within five working days and a full response within fifteen working days of receipt of the complaint. At the conclusion of any informal resolution attempts, the student will be informed of the formal complaint procedure (Stage 2)

Stage 2: Formal resolution

If the Stage 1 procedures have been exhausted and the student is not satisfied with the response, he or she may initiate a formal complaint to the Principal.

If a complaint is received at Stage 2, without prior consideration at Stage 1, CLC will normally try to resolve the complaint using informal mechanisms in the first instance where appropriate.

The information to be included in the complaint by the student is as follows:

- details of the complaint;
- a statement of the action already taken to try and resolve the complaint informally and why the response given is considered unsatisfactory;
- any supporting information or evidence;
- the form of resolution or redress sought.

CLC will acknowledge receipt of the complaint within five working days. The person dealing with the formal complaint must be independent of the source of the complaint and will either investigate the matter him or herself or will delegate responsibility to another appropriate person to undertake the investigation on his or her behalf. The person dealing with the formal complaint will seek resolution of the complaint by a means appropriate to its nature and circumstance. Such means may include

- correspondence between the parties;
- negotiation with the student or with appropriate members of staff or with both;
- facilitation of a conciliation meeting between the student and student/staff concerned;
- facilitation of a mediation meeting between the student and student/staff concerned.

If the person dealing with the formal complaint decides to investigate the complaint via correspondence, the student bringing forward the complaint will be sent a copy of any comments obtained during this process and will be invited to submit a response. This will be done prior to a decision being reached in relation to the complaint

Stage 3: Executive Committee review

If the student is dissatisfied with the outcome of Stage 2, and believes that the complaint has been handled improperly or unfairly according to this policy, the student may request that the complaint is reviewed by the Executive Committee.

The student can request a review by writing to the Chair of the committee no later than 10 working days after the date of the Stage 2 response.

The student must provide the following information:

- details of the complaint (including relevant correspondence from Stages 1 and 2, and any further new supporting documentation);
- details of why the student remains dissatisfied;
- details of the form of resolution or redress sought

The committee will determine whether to review the complaint to ascertain whether CLC 's policy and processes had been implemented correctly.

The possible outcomes include:

- if procedural irregularities are identified: the complaint will normally be referred back to CLC staff for re-investigation;
- if the complaint is deemed to be outside the parameters of an 'academic complaint', the complaint will be referred back to CLC for investigation as a complaint that is out with the CLC policies;
- if CLC policies and processes have been implemented correctly: the complaint will normally be dismissed, the reasons for dismissal will be provided to the student in writing, and a completion of procedures letter will be issued.

The student will be notified of the committee's decision within 28 days of the awarding body's receipt of the request for a review.

If the committee dismisses the review request there shall be no further opportunity for the complaint to be pursued within the committee.

The committee's formal response at the completion of Stage 3 will advise the student that they can refer their complaint to the Office of the Independent Adjudicator.

Office of the Independent Adjudicator

If Stages 1-3 have been completed and the student remains dissatisfied with the outcome, the student may complain to the Office of the Independent Adjudicator (OIA) within 3 months of the issue of a completion of procedures letter by the academic committee.