

## Annex C: Consumer Protection Self-Assessment

Provider's name: The University of Buckingham

Provider's UKPRN: 10007787

### Your overall approach to ensuring compliance with consumer protection law

The Competition and Markets Authority confirmed that the University's practices were compliant with all consumer protection-related legal requirements in July 2016. The University is satisfied that the work undertaken in the lead up to this confirmation has led to consumer protection being well embedded in the University's cultural, strategic and policy frameworks.

During the period 2015-2017, the University, through its Competition and Markets Authority Compliance Committee, reviewed and updated its recruitment and admissions procedures in order to ensure they were in line with the guidance provided by the Authority and thus in compliance with consumer protection law. This review supported the University's efforts to ensure that its admissions procedures remain transparent, reliable and valid, notably in respect of the information provided to students, the terms and conditions of registration and complaints handling processes and practices.

The Director of Admissions and Recruitment, in conjunction with the University's academic teams and the Quality Assurance Office, is responsible for the accuracy of the information presented on the website and in the *University Prospectus*; ratification of the University's information is undertaken by the Executive Committee on behalf of the Senate. The University's approach to information is governed by its *Public Information Policy*; a definitive record of the University's policies and procedures (including their authors, approving committees and dates of approval and forthcoming review is maintained by the Quality Assurance Office in the form of a *University Policy Matrix*.

The University's *Admissions Terms and Conditions for Prospective Students* make clear students' rights and responsibilities in relation to consumer law and are updated regularly and iteratively in response to changing regulatory requirements, sector practices or internal needs. Draft amendments are authored by the Director of Recruitment and Admissions and/or the Head of Academic Services and are approved by the Executive Committee.

Updates to programme and module specifications are authorised through the *New Programmes and Modules Approval* or *Making Changes to Programmes and Modules* procedures and are only operationalised following ratification by the Senate. Once changes have been authorised, updates to the *University Handbook* are coordinated by the Quality Assurance Office. Updates to the University's management information system and website are coordinated by the Registry and Central Marketing Offices respectively. The three teams are in regular contact to ensure that the utmost congruity of information is maintained at all times.

The *Making Changes to Programmes and Modules* procedure requires academic staff to categorise proposed changes as either 'Editorial', 'Minor' or 'Major' and, in the case of the latter, to carry out consultations with affected staff and students. Where changes are significant enough in scope or scale to warrant a full review, they are then treated in accordance with the *New Programmes and Modules Approval* procedure. All proposals for change must be accompanied by complete paperwork outlining the nature of the change and rationale for it, the outcome of consultations with other staff, students, external examiners and reviewers; and any professional body, regulatory and resource implications.

Proposals for programmes and modules to be discontinued are approved in accordance with the *Closure of Programmes* procedure. Programme Directors submit a request for the closure of the programme, outlining the rationale for the closure and the arrangements for the teaching-out or transfer of affected students or applicants. The University's *Closure of Programmes* procedure makes clear the requirement

for the University's approvals committees to ensure students affected by the closure of a programme are consulted and their interests protected.

The University ensures a *Contingency Plan* exists for each collaborative partner which considers the best means to allow students to continue their studies in the event of the failure of a collaboration. In most cases, a 'teaching-out' arrangement is the preferred option as it is in the best interest of the students, although the worst-case scenario (sudden closure) is also considered.

In the cases of the collaborative partnerships that have ended thus far, all students have been able to complete their courses – with the 'official' acknowledgement of the partnerships' cessation concluded after the final graduation. The University *Contract* reflects the need to include a provision relating to termination or withdrawal of validation.

### **Your approach to providing information to applicants and students: research and application stage, offer stage and enrolment stage**

The University of Buckingham publishes a significant quantity of material on its website ([www.buckingham.ac.uk](http://www.buckingham.ac.uk)), including information pertaining to governance, the history of the University, student life, academic provision (both taught and research), the research environment and policies and procedures. Narrower in scope, the *University Prospectus* showcases the University's academic provision and supporting services.

The Director of Admissions and Recruitment, in conjunction with the University's academic teams and the Quality Assurance Office, is responsible for the accuracy of the information presented on the website and in the *University Prospectus*; ratification of the University's information is undertaken by the Executive Committee on behalf of the Senate. The University's approach to information is governed by its *Public Information Policy*; a definitive record of the University's policies and procedures (including their authors, approving committees and dates of approval and forthcoming review is maintained by the Quality Assurance Office in the form of a *University Policy Matrix*.

The Central Marketing Office is responsible for operational oversight of the information published on the website, for advertising and for promotional activities. It is also responsible for liaison with, and oversight of overseas recruitment agents. Via the Key Information Set, the University publishes detailed information on all courses, fees and other information considered relevant for prospective students to the *Unistats* website.

The University's website also provides details of both admissions and examinations procedures for disabled students. Where additional needs are disclosed via the application form, or in one-to-one discussion with the University, the Central Admissions Office records the information on a spreadsheet that is shared with the Student Welfare Department and applicable Admissions Tutors; an assessment of whether the University is in a position to make the adjustments necessary to support the student can then be undertaken *prior to any offer of a place being made*.

Full course information, including the programme specification and all current calendar entries, is accessible from the *Course Info* tab within each course page on the website. Entry requirements and admissions processes are clearly specified on the website and are accessible from the *Entry Requirements* tab within each course page. In line with GMC requirements, the School of Medicine operates a separate *Code of Practice for Selection*, as well as information regarding medical students' professional responsibilities and guidance on health and disability issues, that is provided to all applicants.

Prospective and incoming students are made aware of the University's student services through the website, the *University Prospectus*, open days (at which interested applicants can meet face-to-face with members of the various student services' teams), the *New Students' Welcome Handbook* (provided in soft copy to all incoming students prior to Registration) and dedicated brochures and flyers. Students receive further information about the University's services at *Registration* and through their Personal Tutor or, in the case of *MBCbB* students, the School of Medicine's Support Team.

The University maintains a central register of programmes and awards, as well as a repository of current programme specifications, at both institutional and school level. To supplement school-level record keeping, the University is currently developing, through its management information system, a central register and repository of current module specifications at institutional level. As of 2017, all undergraduate modules were thus stored, with taught postgraduate modules due for addition to the platform in 2018.

*Programme Specifications* and calendar entries are published in the *University Handbook* and made available via the website. *Module Specifications* are made available to staff and students at the commencement of each module either via *Moodle* or in hard copy.

The University aims to ensure applicants receive all the information they require in order to make an informed choice of institution and programme of study. The *Offer* letter includes a copy of the relevant calendar entry showing the modules to be studied each term and a personalised fee sheet. Admissions staff build up a rapport with applicants through regular contact by email, telephone and SMS text messages prior to *Registration*. Before students arrive, Departmental administrators contact them regarding their induction and upcoming timetable.

The University maintains a record of current collaborative partners and validated programmes on its website. In addition to this, since 2014, the Collaborations Department has maintained a *Collaborations Register*, updated and presented to the University Collaborations Committee on a termly basis, that records the number of students enrolled with collaborative partners, as well as the programmes on which they are enrolled and the due dates of annual and periodic review.

Collaborative partners are required to provide the University with marketing and publicity material for checking before it is published. Staff from the Collaborations Department routinely check the integrity of the information available during visits, and through general inspection of public platforms such as the website and social media.

Collaborative partners are required to make it clear to both prospective and current students the nature of the relationship between the University (as the validating / awarding body) and the partner (as the delivery body).

Collaborative partners are provided with the University's entry requirements (including English language proficiency) and must ensure that local requirements are in line with those of the University; this requirement also applies even in the case of SSST where students receive both a UK award and a Bosnian diploma. Where applicants fall outside of the given guidelines, approval for their admission must be sought from the University. Collaborative partners must also use the University's forms where an application for credit exemption or transfer is made.

The Collaborations Department also maintains a record of programme and module specifications for all provision across its collaborative partnerships. A database of student records is maintained by the Collaborations Coordinator and records of Boards of Examiners and other meetings are also kept.

### **Your contract terms and conditions**

The University's *Admissions Terms and Conditions for Prospective Students* represent the contractual agreement between the University and its students. Applicants are informed that by accepting the University's offer of a place that they accept the *Admissions Terms and Conditions for Prospective Students* in full (Clause 1.2). The form of the contract between the University and its students is made explicit and constitutes the following (Clause 1.3):

- (i) the *Admissions Terms and Conditions for Prospective Students*;
- (ii) the *Offer* letter from the University (including, where applicable, details of the offer on UCAS);
- (iii) the University's rules, regulations, policies and procedures located at <http://www.buckingham.ac.uk/handbook> (as amended from time to time);
- (iv) the *Prospectus* as at the date of the *Offer*.

Where applicable, applicants are made aware that some courses may require them to agree to the terms and conditions of professional bodies or third-party providers; details of these requirements are set out in the Offer and applicants are made aware that, by agreeing to the University's terms and conditions, they also agree to abide by any relevant professional bodies' terms and conditions (Clause 1.4).

Applicants are made aware that any questions or concerns about the terms and conditions or the Contract can be directed to the University's Central Admissions Office (Clause 1.3).

The University's *Admissions Terms and Conditions for Prospective Students* make clear students' rights and responsibilities in respect of: their conduct and the potential consequences of misconduct (Clause 1.5), the format, accuracy and integrity of their application (Section 2), immigration and Tier 4 visa compliance (Section 3), registration (Section 4), deposits, fees, bonds and charges (Sections 5, 6 and 7), cancellation (Section 8), educational provision (Section 10), disability support (Section 11), complaints (Section 12), liability (Section 13), termination for breach of contract – including the wilful neglect of studies (Section 14), data protection (Section 15) and intellectual property (Section 16).

The University's *Admissions Terms and Conditions for Prospective Students* were updated in August 2016 to reflect Competition and Markets Authority guidance regarding students' rights in respect of changes to provision and includes information for students outlining their rights and responsibilities in relation to changes that may occur post-registration (Section 9). The *Admissions Terms and Conditions for Prospective Students* were further updated in May 2017 to include a new provision reflecting the requirements of the Key Information Set to specify the reasons that optional modules may not be available (Clauses 9.2.3, 9.2.4 and 10.3). The Competition and Markets Authority confirmed that the University's practices were compliant with all legal requirements in July 2016 and the University has continued to embed these practices as part of its ongoing curriculum review.

The University's *Admissions Terms and Conditions for Prospective Students* are updated regularly and iteratively in response to changing regulatory requirements, sector practices or internal needs. Draft amendments are authored by the Director of Recruitment and Admissions and/or the Head of Academic Services and are approved by the Executive Committee.

The University's *Admissions Terms and Conditions for Prospective Students* make clear the need for prospective and current students to be informed of the discontinuation of courses at the earliest opportunity and of their right to withdraw with refund should this be the case. The *Admissions Terms and Conditions for Prospective Students* also articulate the University's policy of completing teach-outs wherever possible or of offering students placements in suitable alternative programmes either at the University or elsewhere.

The University's template *Collaborations Contract*, as well as its *Collaborations Delivery Plan* make clear that the responsibility for admissions is delegated to the collaborative partner; however, guidelines for admitting students to programmes are included in the *Collaborations Handbook* and partner admission practices are subject to random audit at the discretion of the University. Collaborative students are required to enrol with the partner institution first and are then recorded by the University.

### **Your complaint handling processes and practices**

The University of Buckingham operates dedicated complaints, academic appeals, academic misconduct appeals, general misconduct appeals, fitness-to-practise and admissions complaints and appeals

procedures. The University employs a dedicated Student Complaints Officer whose role is to ensure, under the direction of the Head of Academic Services, that the University's practices are consistently in line with its published procedures. Finally, the University subscribes to the OIA and references its procedures to the Good Practice Framework.

Underpinning the University's commitment to the staff / student partnership is the right of the University's students to raise matters of concern without disadvantage. This right is made explicit in the University's *Complaints* procedure; however, it is guaranteed in all cases by the diffusion of responsibilities between academic and administrative staff at all levels and by the routine involvement of Schools other than the one that is the subject of concern.

The University's *Complaints* and *Appeals* procedures are published to the website via the University Handbook and are characterised by the use of plain English and a low level of bureaucracy. The University's *Complaints* and *Appeals Forms* ensure students are able to make their case in the most coherent manner possible; however, the University maintains a pragmatic approach to students' use (or non-use) of the forms. Early dispute resolution is included as part of the *Complaints* procedure; however, all academic appeals are handled formally and individually for reasons of probity.

In addition to the published procedures, students may obtain general advice regarding the formalities of making an appeal or complaint from either the Registry Office and/or School administration staff. Students may also seek the assistance of the Students' Union in completing the requisite forms and/or approaching the requisite academic and/or administrative staff. Likewise, academic staff have access to advice from the Registry and/or Quality Assurance Offices in appeals and complaints handling.

The University's *Complaints* and *Appeals* procedures include timescales for the instigation and completion of each stage. Conformance with published timescales is monitored by the Registry Office in the case of complaints and by Schools in the case of academic appeals. Where the demands of equity, probity and/or the objective, subjective and logistical complexities of individual cases mandate the need for additional time, the Registry Office continues to monitor the situation and ensure that any delays are adequately communicated to affected students. To this end, the University's procedures indicate that where delay has been unavoidable, students can expect to be kept informed.

Where follow-up action is required in response to issues raised in an appeal or complaint, lines of communication are kept open to ensure all interested parties are aware of the actions to be taken and by when and by whom they will be taken.

The number, generalised outcomes and thematic issues of complaints and appeals are reported to the Senate. Where the outcome of an appeal or complaint suggests potential for enhancement, this is shared with the Dean of the School of the complainant/appellant and/or with the University Learning & Teaching or Research Committees as appropriate.

The University's *Applicant Appeals and Complaints Policy and Procedure* is administered by the Schools of Study. In line with GMC requirements, the School of Medicine operates a separate procedure for appeals and complaints for undergraduate admissions.

Collaborative partners are also required to make their policies and procedures, including those pertaining to complaints and appeals, are easily accessible to students.