



# **CONSUMER PROTECTION POLICY 2023-24**

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CONSUMER PROTECTION POLICY		
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Kathryn Edmonds, BA Administrator	Principal/CEO, Senior Leadership Team	
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Summary/Description:		
This document sets out the principles of consumer protection compliance at All Nations Christian College to ensure that all consumers' rights are protected.		
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# **ALL NATIONS CHRISTIAN COLLEGE**

To train and equip men and women for effective participation in God's mission to His multicultural world.

## **CONSUMER PROTECTION POLICY**

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### **2. INTRODUCTION**

This policy document applies to prospective and current students at All Nations Christian College wishing to study or studying on undergraduate and/or postgraduate programmes. Consumer protection law is an important aspect of the College's relationship with both groups of people, as is the existence of a supportive learning and pastoral environment within our academic community.

The College complies with consumer protection law to:

- i. protect enquirers', applicants' and students' rights;
- ii. maintain student confidence in the education and other services provided by the College;
- iii. maintain the reputation of the College as a provider of high quality tertiary education; and to
- iv. help the College compete for and retain students.

### **3. LEGISLATIVE FRAMEWORK**

This policy has been developed in accordance with the following regulations, policies and procedures. This list is not exhaustive:

- Competition and Markets Authority advice UK Higher Education Providers – advice on consumer protection law 2015
- Consumer Rights Act 2015
- Consumer Protection from Unfair Trading Regulations 2008
- Consumer Contract (Information, Cancellation and Additional Charges) regulations 2013
- Unfair terms legislation (at the date of publication, the relevant legislation is the Unfair Terms in Consumer Contracts Regulations 1999 (UTCCR)).
- QAA Quality Code Part C: Information about HE Provision

#### 4. POLICY PRINCIPLES

The College is committed to ensuring that:

- i. Prospective students have access to clear, transparent, timely and accurate information to enable them to make informed choices about where they wish to study.
- ii. Promotional material is not knowingly misleading and is monitored and updated regularly for its accuracy and deliverability.
- iii. Staff are trained to understand the importance of providing clear, transparent, timely and accurate verbal and written information, whether in conversation with applicants/students or in marketing or website publications.
- iv. It does not promise to deliver a service which it cannot reasonably expect to provide.
- v. Information regarding access by those from a vulnerable group (bearing in mind the characteristic of that group e.g. accessibility information for disabled students etc.) is clear, transparent, accurate and easily accessible.
- vi. Prospective students are made aware of any changes to material information as soon as possible. This includes but is not limited to changes to course fees or costs, accreditation, course delivery etc.
- vii. The total costs of programmes of study, including tuition fees and any additional costs associated with it, are easily accessible and accurate.
- viii. Payment terms are clear, transparent, fair and accessible.
- ix. Pre-contract information is provided before the agreement is entered into.
- x. Pre-contract information includes the conditions of the offer, the details of the course, the duration of the contract, cancellation rights (see below), the total cost, any anticipated changes, information about the College complaints processes (academic and non-academic) or other redress open to them.
- xi. Information about cancellation rights include, confirmation that:
  - applicants do not need to give any reason for the cancellation
  - any refund of monies already paid, other than the application fee which is non-refundable, will only be made if it is due to the College making a material change in what is being offered;
  - any payment received after the student already knew and accepted the material changes, will not be made.
- xii. Any changes made to the pre-contract information between the offer being made and the acceptance of the offer, must be made with the student's clear, written agreement to the change.
- xiii. After an offer has been accepted the student will be provided with a digital pdf copy of the contract and that a paper copy will be stored in their student file.
- xiv. Terms and conditions (which will be set out in a number of documents), including any rules and regulations that students are bound by are clear and transparent, striking a fair balance between the College's and the students' rights and obligations.
- xv. Terms and conditions shall be provided in a timely manner, easily accessible and give a student sufficient time to read them before reaching a decision whether to accept the offer of a place on a programme of study. Students who make a late application will be provided with a copy of the terms and conditions as soon as an application form is received to ensure they have sufficient time to make an informed decision before being offered a place.

- xvi. Student contracts are fair, transparent and quantifiable, setting out the salient rules, terms and conditions and expectations of both parties, which underpin the relationship between them.
- xvii. Students and Staff are informed of the College's complaints processes, including any right to escalate internally and externally to The Open University, the Office of the Independent Adjudicator or the Office for Students.
- xviii. Student concerns are addressed in a fair and timely manner.
- xix. Complaints handling processes are fair, transparent, easily accessible and with clear and reasonable timescales.
- xx. The education provided continues to be of a high standard (as evaluated by the students and the Quality Assurance Committee internally and by The Open University and the Office for Students externally).

## 5. INFORMATION PROVISION:

Prospective Students will be given the information they need in order to make informed decisions during each stage of the application process. This will include but is not limited to:

<b>STAGE 1: ENQUIRIES &amp; APPLICATION STAGE</b>	
<b>Information</b>	<b>How it will be given</b>
Courses on offer, course structure, delivery and mode of delivery, module information, fees/costs and financial support, award titles and awarding body, term dates, placement information, entry requirements, teaching, learning and assessment approach, visa information, resources and support, employment prospects, important and surprising rules and regulations highlighted in the <a href="#">Student contract</a> , <a href="#">Admissions Policy</a> , application process, <a href="#">Academic Appeals Policy</a> ; College <a href="#">Handbooks</a> .	Website, prospectus, handbooks, verbally at Enquirers Days and in response to email/phone queries etc. At promotional opportunities such as Christian conferences/events including College events
<b>STAGE 2: OFFER STAGE</b>	
Letter outlining course offer, award title and dates; <a href="#">Student Terms and Conditions</a> , which has surprising and important terms highlighted; <a href="#">Student Agreement</a> , any potential and/or anticipated changes which may impact a student's decision to accept an offer, <a href="#">Student Payment Plan</a> , <a href="#">Student Protection Plan</a> , <a href="#">Academic Regulations</a> , <a href="#">Validating Partner Academic Regulations</a> , <a href="#">Programme and Student Handbooks</a> and <a href="#">Admissions Policy</a>	As an attachment to an email.
<b>STAGE 3: ACCEPTANCE STAGE</b>	
Letter confirming place and registration and acknowledging payment of deposit. Links to <a href="#">Student Terms and Conditions</a> , <a href="#">Student Agreement</a> , <a href="#">Term Dates</a> . Information regarding when they will be enrolled, and when they will be sent pre-reading material, pre-arrival and orientation information. Informed of any changes that affect material information they have received.	As an attachment to an email.
<b>STAGE 4: PRE-COMMENCEMENT/PRE-ARRIVAL STAGE</b>	
Pre-reading information, pre-arrival information, orientation information, enrolment information; informed of any changes that affect material information they have received.	As an attachment to an email.

<b>STAGE 5: ENROLMENT STAGE</b>	
Informed as soon as possible of any changes that would affect the material information they have already received; Accommodation Contract if relevant, Terms and Conditions, Student Agreement, Student Protection Plan, Student Payment Plan, Academic Regulations, Programme and Student Handbooks, Validating Partner Regulations, Policies and Procedures.	As an attachment to an email

## 6. COMPLAINTS

### Internal

- 6.1. If an enquirer, applicant or registered student feel that the College may not have met its obligations under consumer law they may want, in the first instance, to discuss this with the College. As a Christian College, we always urge complainants to firstly stop and pray about the situation and their response before deciding how to proceed.
- 6.2. Enquirers and applicants may find it helpful in the first instance to speak with the Enquiries or Admissions Team with whom they have already been conversing.
- 6.3. Registered Students may wish to speak with Head Students who can bring the issue up at their weekly meeting with members of the Senior Leadership Team. They may also seek advice from their Personal Tutor or from the Head of Consumer Protection Compliance. In this way potential misunderstandings can be clarified and errors hopefully resolved to everyone's mutual satisfaction, with no further action being necessary.
- 6.4. If a concern has not been resolved informally, or if the student has chosen to make a formal complaint the complainant should follow the [Complaints Policy](#) by submitting the formal complaints form to the College General Administrator at [info@allnations.ac.uk](mailto:info@allnations.ac.uk) making it clear that the complaint relates to a Consumer Protection issue.
- 6.5. The College will acknowledge receipt of the complaint within 7 calendar days and the student will be informed of the names of the person who has been appointed as complaint administrator (if appropriate), and the name of the investigator within 14 calendar days.
- 6.6. The [Complaints policy](#) contains the procedure for lodging an internal review. The only grounds for requesting a review of the decision are if the complainant feels they were treated unfairly/prejudicially or if they have material information they were unable or, with valid reason, unwilling to divulge to the original investigator when it made its decision. Disagreement with the outcome of the procedure is not a valid reason for review.
- 6.7. It will usually only be possible to appeal against the College's final decision if the College has either not followed its own procedures properly or it has not dealt with a complaint fairly.

### External

- 6.8. If, after concluding the College internal procedures, the complainant feels they have grounds for appeal, they may appeal to **The Open University** and, after that, the **Office of the Independent Adjudicator**. Further information is available in the [Complaints Policy](#).
- 6.9. **Citizen's Advice** consumer helplines and website are staffed by trained consumer advice advisers ([www.citizensadvice.org.uk](http://www.citizensadvice.org.uk) or phone 03454 04 05 06). They will be able to advise individuals whether the College appears to have met their legal obligations to enquirers, applicants and registered students or not. The Citizens Advice consumer service can also help individuals report a problem to Trading Standards.
- 6.10. Complainants can also report these types of concerns to the **Competition and Markets Authority** ([www.gov.uk/government/organisations/competition-and-markets-authority](http://www.gov.uk/government/organisations/competition-and-markets-authority)). The CMA is unable to offer advice or intervene in individual disputes. However, the information received will be used to provide intelligence on potential problems. The CMA also works with other agencies, including the Office for Students in relation to consumer law.

**6.11. The Office for Students** ([www.officeforstudents.org.uk/](http://www.officeforstudents.org.uk/)) does not resolve individual complaints against HE institutions and is unable to provide redress or compensation to any individual submitting a complaint to it. However, it can look at individual complaints for evidence of broader failings in the management of academic quality and standards. The OfS can investigate a concern that relates to at least one of the following:

- i. The standards and quality of HE provision at the College.
- ii. The information that the College produces about our HE programmes.
- iii. The lack of fair, accessible and timely procedures for handling student complaints.

## **7. DATA PROTECTION**

**7.1.** All records of an investigation into a complaint, which contain personal data will be kept in accordance with the Data Protection Act 2018 and UK GDPR and the College [Data Protection Policy](#).

**7.2.** In line with the terms of the Data Protection Act 2018 and UK GDPR, data subjects have a number of rights. They can:

- access and obtain a copy of their data on request;
- require the College to change incorrect or incomplete data;
- require the College to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of their data where the College is relying on its legitimate interests as the legal ground for processing.

**7.3.** Should a data subject wish to exercise any of these rights, they should contact the College Data Protection Officer at [cta@allnations.ac.uk](mailto:cta@allnations.ac.uk). Every effort will be made to respond to such communications within 7 days; data access requests will be met within 30 days. If a data subject believes that the College has not complied with their data protection rights, they can complain to the data protection supervisory authority, The UK Information Commissioner's Office (ICO) who can be contacted at <https://ico.org.uk/concerns/handling> .

## **8. ROLES, RESPONSIBILITIES, POLICY APPROVAL AND REVIEW**

**8.1.** The **Board of Trustees** have legal oversight and responsibility for all College policies, providing leadership and active support for them and being responsible for ensuring that:

- A legally compliant and fit for purpose Consumer Protection Policy is in place and approved by them.
- Satisfactory arrangements are made for its effective implementation, including the provision of resources.
- The Senior Leadership Team, monitors, evaluates and periodically reviews this policy and recommends any changes to first the Governance committee for approval.
- Complaints brought under the terms of this policy are managed satisfactorily by the Senior Leadership Team.
- Decision making complies with all relevant legislation and regulatory bodies.
- They receive details from the Senior Leadership Team of reported incidents and outcomes of cases (particularly where a significant impact on someone has occurred or lessons need to be learned), or of a serious incident or one which could be of reputational risk to the College which should be reported to either the Office for Students and/or the Charity Commission.

**8.2.** The Governance Committee are responsible for reviewing and approving amendments to this policy and obtaining approval from the Board of Trustees where significant revisions are made.

- 8.3. The Principal/CEO and Senior Leadership Team** are responsible for:
- The implementation and management of this policy; ensuring that procedures are implemented consistently and with clear lines of authority and actively and visibly leading the College's consumer protection policy and practice.
  - Ensuring this policy is continually improved in consultation with students and staff.
  - Monitoring, evaluating and periodically reviewing this policy and obtaining approval from the Governance Committee and, when revisions are significant, the Board of Trustees for any changes made.
  - Ensuring that the principles of this policy are incorporated into all aspects of the College's marketing management including through the College website, marketing material, media communications and promotional events such as Open Days etc.
  - The management of complaints.
  - Ensuring decision making complies with all relevant regulatory bodies.
  - Reporting details to the Board of Trustees of reported incidents of outcomes of cases (particularly where significant impact on someone has occurred or lessons need to be learned), or of a serious incident or of one which could be of reputational risk to the College.
- 8.4. The Principal/CEO and Senior Leadership Team, Vice-Principal (Academic) and Head of Finance** are responsible for ensuring
- the accuracy of all documentation which forms part of the Student Contract with the College.
  - That the College website and other marketing materials are clear, transparent and accurate.
- 8.5. The Director of Communications and Fundraising and the Communications and Fundraising Team** are responsible for ensuring all promotional material, regardless of its format, is clear, transparent and accurate.
- 8.6.** Through their ongoing regular meetings, the **Head Students** and the **Principal/CEO** are responsible for disseminating any subsequent relevant information to others i.e. the Head Students will inform the student body and Principal/CEO will inform the Board of Trustees.
- 8.7. The Admissions Team** are responsible for:
- Ensuring they provide clear, transparent, timely and accurate verbal and written information, whether in conversation or writing with enquirers/applicants/students;
  - informing prospective students of any changes to material information as soon as possible;
  - managing the administration of any complaints process.
- 8.8. All Staff and those involved in Promotional Events** or the production of promotional/marketing material are responsible for:
- familiarising themselves with this policy on appointment/at induction/orientation;
  - demonstrating active commitment to this policy by:
    - ensuring any marketing material, regardless of its format, and for which they are responsible is clear, transparent and accurate at all times;
    - ensuring any verbal information they provide about the services provided by the College are clear, transparent and accurate at all times;
    - acting to remedy errors in the clarity, transparency and/or accuracy of promotional information where this has occurred.
  - if **involved in a complaint**, whether those making an allegation or those being accused of failings according to the terms of this policy, ensuring they present their case with integrity and in a timely fashion and/or ensuring they comply with any investigation and the procedures in this policy.
- 8.9.** The College entrusts **all individuals across the institution** to take a pro-active role in improving the College's Consumer Protection Policy and practice.

## **9. POLICY COMMUNICATION**

- 9.1.** This document, together with all other college policy documents can be found on the College website: [www.allnations.ac.uk](http://www.allnations.ac.uk) and in the student area on the College VLE.
- 9.2.** The College General Administrator will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to [info@allnations.ac.uk](mailto:info@allnations.ac.uk)
- 9.3.** This policy will be included in staff and student induction.

## **10. RELATED DOCUMENTS**

- All Nations Christian College [Complaints Policy](#)
- All Nations Christian College [Academic Appeals Policy](#)
- All Nations Christian College [Admissions Policy](#)
- All Nations Christian College [Equality and Diversity Policy](#)
- All Nations Christian College [Data Protection Policy](#)