

HE Consumer Protection Law Self-Assessment 2023-24

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Implementation:	Finance
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Pat Brennan-Barrett

Principal

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1. INTRODUCTION

A part of our application to the Office for Students, Northampton College conducted a self-assessment of our college's adherence to consumer protection law. Through the assessment process, Northampton College has identified that we are compliant with consumer protection law.

Northampton College delivers and is developing a range of HNC / HNDs primarily aimed at providing a progression route for its Level 3 students. Since 2019-20 these have been Pearson validated qualifications. Although small, Northampton College provision is important in that it provides a progression route for local, largely vocationally qualified students who will benefit from the closer support and small group sizes the College can offer. Northampton College is committed to providing high quality, low cost programmes and as such will not charge in excess of the Basic Fee amount, £6,165 for 2022-23 and 2023-24 for a full-time programme. As such the Northampton College offer is straightforward and this is reflected in its policies and procedures.

Northampton College has a member of staff who is responsible for consumer protection law issues and compliance within the college. The Deputy Principal Finance and Corporate Affairs utilises the support of our Director of HE, Vice Principals (Quality), Quality Manager, Head of Marketing and Northampton College's awarding bodies to develop and revise policies and procedures related to consumer protection law. These policies and procedures have been peer assessed to confirm the College's view that it is compliant with consumer protection law. Consumer protection law issues are discussed at the HE Strategy and Implementation Group meetings, chaired by the College Deputy Principal, and at the College's Policy & Strategy Group, chaired by the Deputy Principal, Finance & Corporate Affairs. The application to the Office for Students resulted in a review of our policies and processes as relating to consumer protection law. This review will now be conducted with each policy review, usually annually, with any actions monitored through the HE Strategy and Implementation Group. In addition to the above, Northampton College takes legal advice as appropriate when developing new contracts.

2. RESPONSIBILITY

The College has a Higher Education Strategy and Implementation Group (HESIG) which takes the lead on all issues relating to the College's niche HE programme. This group formulates HE policy, which is reviewed at the Policy & Strategy Group (P&S) which reviews and approves all college strategies, policies and key performance measures. P&S meets fortnightly and comprises all college senior managers. The HESIG, which meets termly specifically monitors progress on all actions relating to HE

3. DATA PROTECTION

The Data Protection Officer oversees compliance in relation to the protection of data held by Northampton College of our current and potential students. Data Protection is subject to regular external review by the College's internal auditors and the college has a Data Protection policy which is reviewed annually and posted online for students to access.

4. INFORMATION TO PROSPECTIVE STUDENTS/APPLICANTS

Northampton College ensures that applicants, prospective and current students provided with accurate information about their course, fees and other relevant costs and about our institution, and that such information is accurate, clear, timely and accessible.

The college website is the main mechanism for providing detailed information to students and potential students. Course information that is given is reviewed regularly, at least annually, so that it is up to date and is benchmarked to check it meets the requirements set out in the CMA document "UK education providers – advice on consumer protection law", and is fully compliant. The Director of HE, Vice Principals (Quality), the Head of Marketing and Enrolment Centre Manager oversee the production and communication of information to current and prospective HE students. The Marketing manager oversees the development of the College's website which the main source of HE course and support information. A Higher Education summary 'sales' brochure has been developed which lists courses, highlights case

studies and sign-posts to the College website, for full course and College details. All applicants to the College's Full Time HND programmes are given the opportunity to visit the college and meet teaching staff either as part of our open events or on an informal individual basis once an offer has been made. This ensures that full information about the course is given, any support needs identified at an early stage and any questions answered. All applicants also have a virtual tour of the College made available so that they are fully aware of the environment they will be joining, the staff they will be taught by and the facilities and equipment available to them. The Director of HE, together with other staff, gives presentations to all College Level 3 students about the opportunities for progression to the College's HNC/D programmes. There are also a series of school visits to promote these opportunities to local school students and attendance at a number of Higher Education fairs.

All applicants to full time HE courses receive a formal written conditional or unconditional offer to study at the College. The letter also directs them to the College's HE Terms and Conditions and other key policies, on the College website. All College policies relevant to the College's HE students can be found on the HE page of the College's website:

<http://www.northamptoncollege.ac.uk/higher-education.html>

5. TERMS & CONDITIONS

Once an offer has been accepted by the applicant a contract has been entered into between the College and the student.

Northampton College has a HE Terms and Conditions document that relates to Higher Education level students. The document sets out the expectations of the students at Northampton College and the policies that relate to a student's educational life at Northampton College. The Deputy Principal Finance & Corporate Affairs and Director of HE oversee the HE Terms and Conditions that are approved by the College's Policy & Strategy Group and the Corporation Board and relate to our current and potential HE students.

The College's HE Terms and Conditions can be found on the HE page of the college website:

<http://www.northamptoncollege.ac.uk/higher-education.html>

6. COMPLAINTS PROCESS

Northampton College strives to resolve quickly and informally concerns that may arise from students and will, in the first instance, make every effort to deal with issues locally through discussion with personal tutors and course leaders. Where this is not possible, or does not result in a satisfactory solution, complaints can be submitted in writing according to the College's Complaints Policy and Procedure which can be found on the College website and intranet. A student may submit a 'Compliments and Complaints' form at any main campus reception. The form is available at all campus receptions. Complaints may also be emailed.

Once a complaint has been received by a member of staff, it goes to the Quality team office where the Quality Co-ordinator will:

- acknowledge it in writing within 2 teaching days (if not resolved within this time period)
- forward it to an investigating officer (normally the Head of HE) or relevant manager for investigation
- the procedure includes time limited processes to resolve complaints with an appeals process
- if complainants remain unsatisfied they will be referred to external complaints processes:

i. **FE complaints:** The Complaints Adjudicator, Education & Skills Funding Agency,

Cheylesmore House, Quinton Road, Coventry CV1 2WT complaintsteam@sfa.bis.gov.uk

ii. **HE complaints:** Office of the Independent Adjudicator for Higher Education (OIAHE). <http://www.oiahe.org.uk/making-a-complaint-to-the-oia/how-to-make-a-complaint.aspx>

iii. **Consumer Credit Service disputes** : Financial Ombudsman. <http://www.financial-ombudsman.org.uk/consumer/complaints.htm>

iv. **Complaints relating to Freedom of Information**: requests are made to the Information Commissioner <https://ico.org.uk/concerns/>

The Assistant Principal Teaching, Learning and Quality oversees the college's complaints policy and procedure. These relate to all complaints and compliments received by the College, including complaints from current and prospective HE students. Northampton College currently has several awarding bodies and their individual complaints' processes can be accessed by students although students will be advised to exhaust the college's own process first. The Complaints Policy can be found on the HE page of the College's website.

<http://www.northamptoncollege.ac.uk/higher-education.html>

7. TRAINING NEEDS

To support staff in understanding Consumer Protection Law, Northampton College utilised the training resources made available by Supporting Professionalism in Admissions. The toolkit of PowerPoint presentations have been used to inform all key staff, particularly admissions, advice and guidance staff, HE curriculum managers and staff. Presentations have also been given to the College's Policy and Strategy Group and also to College governors. This training and briefings will help ensure the College remains compliant with all aspects of consumer protection law and will be repeated annually

8. WORKING GROUPS

In 2019 a working group led developed the College's application to the Office for Students and to review and develop relevant HE policies and procedures, prime amongst these being the College's compliance with consumer protection law. The working group reported to the HE Strategy and Implementation Group with policies and procedures approved by the Policy & Strategy Group. Any future consumer protection issues will be owned by the Deputy Principal Finance & Corporate Affairs, addressed utilising the experience of the working group members, reporting to the HE Strategy and Implementation Group. Changes to policy and procedure will be approved by the Policy & Strategy Group. Policy and processes will be updated annually or as required.

9. REVIEWS

All College Higher Education policies and procedures are reviewed regularly, usually annually, tracked by the Head of Higher Education within the Quality Department. As such, all policies related to information management and provision, complaint handling, and terms and conditions are reviewed and monitored for updating through a central body within Northampton College. All policies are available on our intranet for staff and policies relevant to students are available on the College website.

10. APPROVAL PROCESS

The Deputy Principal Finance & Corporate Affairs (DPFCA) has overall responsibility for consumer protection law compliance at Northampton College

11. LINKED POLICIES

Key policies relevant to HE students can be found on the College website:

- Anti-Harassment and Anti-Bullying Policy and Procedures
- BYOD (Bring Your Own Device) Policy for Staff and Students
- Complaints Policy and Procedure
- Consumer Protection Law Self-Assessment
- Data Protection & Privacy Policy
- Dignity, Diversity and Equal Opportunities Policy
- E-safety Policy
- Fitness to Study Policy & Procedure
- [HE Academic Misconduct Policy](#)
- [HE Refund and Compensation Policy](#)
- [HE Students Terms and Conditions](#)
- [HE Assessment Appeals Policy](#)
- [Mitigating Circumstances Policy](#)
- [Request for Mitigation Form](#)
- [Basic guide to Mitigating Circumstances](#)
- HE Student Protection Policy
- HE Access policy
- Health & Safety Policy Statement
- ICT Security Policy
- ICT Student Printing Policy
- Library User Agreement
- Plagiarism Policy
- Safeguarding Policy
- Student ICT Acceptable Use Policy
- Student Alcohol and Substance Misuse Policy
- Student Assessment Policy
- Student Attendance and Punctuality Policy and Procedures
- Student Code of Conduct
- Student Behaviour & Disciplinary Policy
- Student Bursaries and Financial Support Policy
- Sustainability and Environment Policy

‘Undergraduate students: your rights under consumer law’

12. Appendices:

Appendix 1: EQUALITY & DIVERSITY IMPACT ASSESSMENT

This template has been designed to help you take action to improve services and practices which affect staff, students and other service users at Northampton College. By completing this template, you would have considered the impact that your policy, practice or service might have on particular social groups within the college community. The exercise will also provide you with the opportunity to demonstrate, where possible, that the College promotes equity, diversity and inclusion.

Once this Equality Impact Assessment has been created, please include on the last page of your policy document.

Policy Details	
What is the policy?	HE Consumer Protection Law Self-Assessment
Is it new or existing?	Existing
Department	Finance
Policy Author (postholder title, name)	Julian Wood
Author of Equality Analysis	
Date of completion	

Aim and Objectives
Briefly describe the aims and objectives of the policy
A part of our application to the Office for Students, Northampton College conducted a self-assessment of our college's adherence to consumer protection law. Through the assessment process, Northampton College has identified that we are compliant with consumer protection law.

Policy Assessment				
Consider whether your policy might have an impact on various groups identified within the categories listed below and explain why you have reached this conclusion. Please tick (v) the identified level of impact (positive, negative, or no impact) and provide details of your findings.				
	Positive Impact	Negative Impact	No Impact	Findings
Race			✓	
Religion and/or belief			✓	
Sex (Gender)			✓	
Gender Identity			✓	
Disability			✓	
Age			✓	
Sexual orientation			✓	
Marriage and/or civil partnership			✓	
Pregnancy and/or maternity (including surrogacy and adoption)			✓	
Other identified group (e.g. carers)				

Action Planning		
How do you intend to mitigate or eliminate any negative impact identified?	If a positive impact is identified, how do you intend to promote or develop this opportunity?	Where negative impact has been identified, can it be justified? If so, explain how.

Monitor and Review
How will you monitor the impact of your policy once it has been put into effect?
The policy will be monitored through feedback from services users gathered via:

Names and position of Impact Assessment Team (min of 3 preferably from areas across the College):

Name	
Mark Owen	
Jan Hutt	
Ashok Dave	

Equality Analysis Sign-Off Signature and Date:

Review Date:

Appendix 2: DATA PROTECTION IMPACT ASSESSMENT

Data Protection Impact Assessment

Does this Policy

- require the collection and use of data in addition that normally collected by the College?

Yes / No (if Yes complete Assessment point number 1)

- require the sharing of data with partners?

Yes / No (if Yes complete Assessment point number 2)

1. Is additional data being collected? If so please detail:

Is data collected personal and/or sensitive?

How will you collect, use, store and delete data?

2. Will you be sharing data with anyone? Please detail what data, with who and confirm a **Data Sharing Agreement** is in place

Describe the purposes of the processing / sharing: What are the benefits of the processing/sharing – for you, and more broadly?

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

Describe compliance and proportionality measures, in particular:
What is your lawful basis for processing?

How will you ensure data quality and data minimisation?

What information will you give individuals?

Please attach a Risk Assessment if there are significant risks to data protection

Signed by Data Protection Officer

Name:

Date:

Appendix 3: COMMUNICATIONS PLAN

TITLE OF COLLEGE POLICY: HE Consumer Protection Law Self-Assessment	DATE APPROVED BY Date:
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AUDIENCE (select appropriate with √)			
Managers		Curriculum teams	Business Support teams
All staff		Suppliers	Partners
Other - Students			

CHANNEL (select appropriate with √)			
Policy & Strategy Team (PST)		Quality Improvement Network (QIN)	Marketing team
Meeting		Meeting	NC Update Intranet Website
Individual team		Suppliers	Partners
Document Library Noticeboards Team meeting Email		e.g. Letter or email Meeting	e.g. Letter or email Meeting
College Management Team (CMT)		JCNC	CORPORATION
Meeting		e.g. Meeting Email	e.g. Meeting Email

COMMUNICATIONS PLAN ACTIVATED BY:		
Name: Department	Job title:	Date: