

# Consumer Protection Law

## UKPRN: 10007164

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

Provider's name: University of the West of England, Bristol

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

UWE seeks to be compliant with consumer protection legislation and has taken steps to implement the guidance issued by the Competition and Markets Authority (CMA) on the application of consumer protection legislation within the higher education sector.

The University's approach to compliance with consumer protection legislation is overseen by Academic Board and the Board of Governors, through consideration of the Annual Report at its Strategic Planning and Performance Committee and then at the main Board meeting. The Pro Vice-Chancellor (Student Experience) leads on the consumer protection agenda and how the University operationalises this in practice. This has included (but is not limited to):

- Dedicated communications about the importance of, among other things:
  - Providing transparent, prominent, accurate, comprehensive, unambiguous and timely information to prospective and current students;
  - The need for terms and conditions that apply to students to be fair;
  - The need to ensure complaint handling processes and practices are accessible, clear and fair to students;
  - An annual report to the Board of Governors which includes commentary on CMA compliance and any related complaints.
- As part of our approach to support the University's compliance with consumer protection legislation, the University:
  - established a fees group that advises the Directorate;
  - consults with students on key documents (e.g. terms and conditions);
  - sought legal reviews of our approach;
  - identified CMA experts within the organisation to support development of good practice and as named contacts for enquiries;
  - provides, in durable PDF format, at the time of offer, information on terms and conditions, fees, additional costs and programme structure;
  - amended key University policies to include the addition of "key facts" which ensure students can quickly access material information (e.g. for our regulations). All key policies are also published and available to prospective students and stakeholders as well as current students and staff;
  - undertakes regular reviews of published information about the University's programmes;
  - has defined approaches to consultation where material changes are proposed to programmes which are embedded in wider quality assurance and enhancement processes;
  - has adopted a cross-institution collaborative approach to ensure actions are coordinated and compliant.

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

#### **Research and application stage**

Although UWE publishes a prospectus, the University adopts a digital first ethos which enables the most accurate information to be available to prospective students so that they are given the information they need to be able to make an informed decision about entering into a contract with UWE. This is then confirmed at the point of offer with the provision of information in durable PDF format about the applicant's chosen programme and key University policies. This information forms part of our contract with students.

UWE is transparent in the information it provides to students with:

- information on programmes and their structure that is clear and accessible on the University's website. This includes fee information (including academic non-tuition fee "additional" costs), information on typical offers and Unistats data (via the widget);
- broader information on our approaches to learning and teaching, the learning environment, employability and careers, research, living in Bristol, accommodation, support services, and sources of advice including those available via the Students' Union;
- information on the wider support and facilities available to students, accessible via the website.
- extensive money and budgeting advice, including costs of living in Bristol.

The University's published information policy specifies the key principles which underpin how public information is managed. It provides a framework to inform how both Faculties and Professional Services publish and maintain accurate materials which form part of the University's public information landscape. The policy ascribes ownership of all published material through a published information and web owners' register.

Faculties and Professional Services publish information in a timely manner that is accurate, fair, and reasonable to ensure that internal and external audiences gain access to reliable information about the University and that they are able to form an accurate impression of the institution.

Primary sources of public Information, such as the University prospectus, programme specifications and the programme directory on the UWE website are maintained centrally within the University. Information is reviewed by appropriate Faculty and Professional Service staff prior to publication.

Where information is produced and published by third parties (e.g. as part of an academic partnership) with whom UWE has a contractual relationship, UWE routinely checks the validity of information provided on its behalf.

### **UWE website**

The University has clearly defined processes for publishing and maintaining information this includes:

- a clear process for the development and approval of new programme entries prior to publication on the website;
- defined processes for approving and implementing changes to the programme information on the web pages and for informing applicants/offer holders and students on changes in pre-contract information
- in both cases above, accreditation information is held centrally and only used with express consent of the accrediting body.

The University is investing in a curriculum management system which will provide significant benefits to the University for the management and provision of curriculum information in the future, which will in turn, provide students with even better access to information about their programmes.

## Offer stage

At the point of offer we provide each applicant, with durable PDF copies of the Terms and Conditions, key facts documents on the academic regulations, the student privacy notice and other key policies via the University's Welcome portal, in a space that is personal to them. Each applicant is made aware of the importance of this information.

External feedback, including the last QAA Higher Education Review (2016) confirms the comprehensive and clear information available on the website:

*"The University website is a comprehensive source of information for prospective and current students and other stakeholders and is overseen by the marketing team. The website is easily navigable and makes a wide range of information available to the public in an accessible format, including its mission and vision, strategic plan, structure, and academic, corporate and other policies..."*

*"For prospective students the website is the main source of information and guidance. This is easily accessible, clearly presented and provides all the key information on the application and admission process. Details of the University's programmes are provided in a summary of the programme specification under six easily navigable tags and a link to the full document. Each programme has key information set information included with a link to the Unistats website."*

*"Students found the website an extremely useful resource pre-application and prior to enrolment"*

*"Overall, the University has clear and robust procedures to ensure that the information provided for their intended audiences is fit for purpose, accessible and accurate, meeting the Expectation of Part C of the Quality Code. The team concludes that Expectation C is met and the associated level of risk is low."*

## Enrolment stage

The University's Terms and Conditions are provided to students again at the point of registration as part of the registration process.

## Your contract terms and conditions

Our Terms and Conditions form our contract with students. Students sign up to the Terms and Conditions at registration and it is at this point that the Terms and Conditions start to apply.

We ensure that our terms and conditions and regulations are clear and understandable to students by using language that is accessible. We have received legal advice on these Terms and Conditions and have prepared these to take account of our obligations under consumer law.

We have taken the following further steps to ensure our terms are fair:

- We highlight important terms through the key facts documents
- we developed our Terms and Conditions using the CMA guidance
- we do not impose academic sanctions against students for non-payment of non-tuition fee debts

The University regularly undertakes a review of its academic regulations and procedures to ensure they remain clear, understandable and fair to students.

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

UWE has a published student complaints process which applicants are made aware of at the point of offer and through our Terms and Conditions. The policy aligns with the Good Practice Framework for Handling Complaints and Academic Appeals, as published by the Office of the Independent Adjudicator (OIA). We comply fully with OIA recommendations in relation to any individual case. Our complaints policy uses accessible language and is published prominently on our website and intranet. Alongside the policy we highlight additional sources of advice and support (e.g. via the Students' Union).

The process is maintained and supported by a central team within the University that provides overarching guidance, supporting and coordinating colleagues' responses to complaints at stage one; and investigation and resolution at stages two and three. It is important to the University that complaints are used to support service enhancement. As a result both Academic Board and the Board of Governors review the annual report on complaints and appeals which highlights both good practice and areas for improvement.

Our sub-contractual (franchise) agreements with partner organisations include provision on complaints, notably that:

- there are clear terms covering the obligations and responsibilities of the University and the Partner
- It is made clear to students that the University's complaint procedure is accessible to all, regardless of location of study.

We are confident that we have made every attempt to pay due regard to our students' consumer rights in our contractual relationship with them. Having a transparent relationship with our students is integral to everything we do and is one of our core values.