

LONDON ACADEMY FOR APPLIED TECHNOLOGY (LAAT)

CONSUMER PROTECTION, TREATING STUDENTS FAIRLY, TRAINING AND LEGAL REVIEW POLICY

Document control and approval

Field	Controlled detail
Document title	LAAT Consumer Protection, Treating Students Fairly, Training and Legal Review Policy
Document reference	LAAT-GOV-C5-TR-001
Policy owner	SMT Committee
Operational custodian	Governance Manager (policy maintenance, approval record, committee reporting); Quality and Compliance Manager (C5 document register, legal-review commissioning and closure, published-information audits — role in appointment, named on confirmation; held by the Accountable Officer until appointed); HR Manager (drafting owner for Section 7 onward — training architecture, curriculum, assessment and the training register, as this policy informs LAAT's CMA/C5 training programme), supported by Quality
Executive sponsors	Executive Leadership Team (ELT): Accountable Officer, Chief Finance and Operations Officer and Dean
Implementation forum	Senior Management Team (SMT): ELT plus key managers, including HR, Finance, Quality and Compliance, Student Experience, Admissions, Registry/Data, Marketing, Operations/IT and other relevant managers
Primary scrutiny	Student Interest Committee (SIC)
Specialist advice	Academic Board for academic/course matters; Audit, Risk and Finance Committee (ARFC) for fees, refunds, compensation, financial controls, agents/commissions and financial detriment; Policy, Audit and Compliance Committee (PAC) for policy implementation, training deliverability and compliance evidence.
Approving body	Board of Governors

Field	Controlled detail
Version / status	v1.1 - revised draft for governance scrutiny and Board approval. Submitted for OfS registration purposes on 30 June 2026 with interim confirmation by the Chair; scheduled for the next Policy, Audit and Compliance (PAC) cycle and Board approval.
Effective date	Date of Board approval
Review cycle	Annual, and earlier after material legal, regulatory, partnership, organisational, course, campus, delivery-mode, fee, agent or control change
Supersedes	Consumer Protection (CMA) Staff Training Policy v1.0, on approval
Classification	Internal institutional control and OfS registration evidence; staff/third-party training content may be issued in accessible operational formats

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Approval record

Body	Required action	Evidence
Interim submission confirmation (Chair)	Confirms the policy framework is fit for submission as part of LAAT's OfS registration pack, pending full PAC scrutiny and Board approval below.	Bola Makinde, Chair — confirmed 30 June 2026
ELT	Confirm executive ownership, resources, urgent escalation and implementation feasibility.	25 th June 2026
SMT	Test operation across all relevant functions, systems, campuses, modes and third parties.	24 th June 2026
Student Interest Committee	Scrutinise fairness, detriment, accessibility, communication, consultation and student-interest controls.	May 2026
Academic Board	Advise on academic/course information, validation, changes, complaints/appeals interfaces and academic remedies.	May 2026
ARFC	Advise on financial information, fees/costs, refunds/compensation, agents/commissions and financial control.	19 th June 2026
Board of Governors	Approve the policy and receive implementation/readiness assurance.	June 2026

1. Purpose, status and intended outcomes

1.1 This policy establishes LAAT's mandatory institutional framework for consumer protection, fair treatment, role-appropriate training, competent legal review, approval of student-facing information, control of third parties, monitoring, correction and assurance. It supports LAAT's application under OfS initial condition C5 and its continuing consumer-protection responsibilities if registered.

1.2 The policy is designed to ensure that LAAT can demonstrate not only that relevant documents have been drafted, but that the people, systems, approvals, evidence and governance needed to treat students fairly operate in practice.

1.3 This policy is not itself a student contract or a substitute for any student-facing key document. Training completion does not make an unfair term, misleading statement, unreasonable decision or

defective process lawful. Where a document, practice or communication is inconsistent with law or a binding regulatory requirement, the underlying issue must be corrected and affected students considered for an appropriate remedy. For the purposes of LAAT's OfS registration evidence pack, this policy is a supporting institutional control document rather than one of the principal C5 student-facing documents; it sits alongside, and is evidenced by, the student contract, refund and compensation policy, complaints procedure and course-change policy referenced throughout.

1.4 Intended outcomes are:

- prospective, current and former students receive accurate, clear, timely, accessible and substantively consistent information;
- student contracts, change policies, complaints, refunds/compensation and related documents are fair, lawful and operable;
- staff, Governors, agents, contractors and other representatives are competent before undertaking relevant activity;
- consumer-law and C5 risk is identified before publication, contract, decision or change rather than only after a complaint;
- misleading information or unfair conduct is stopped, corrected, communicated and remedied promptly;
- LAAT maintains an auditable evidence pack for OfS, students, the Board, Plymouth Marjon University and other authorised reviewers;
- lessons from complaints, incidents, audits, student voice and legal review improve documents, training and practice.

2. Legal, regulatory and governance basis

2.1 Legal and regulatory framework

This policy must be applied consistently with the live requirements, as amended or replaced from time to time, including:

- Office for Students initial condition C5 (Treating students fairly), its prohibited behaviours and the C5 registration submission requirements;
- ongoing OfS condition C1 (consumer protection), condition C2 (student complaints scheme), condition C4 (student protection directions and market exit), relevant governance conditions and reportable-events guidance after registration;
- the Consumer Rights Act 2015, including reasonable care and skill, binding pre-contract information and fairness/transparency of consumer terms;
- the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013, including pre-contract information and distance/off-premises cancellation requirements;
- the Digital Markets, Competition and Consumers Act 2024 and current CMA guidance on unfair commercial practices, misleading actions/omissions, pricing and fake reviews;
- the Higher Education and Research Act 2017 and the Office of the Independent Adjudicator scheme and Good Practice Framework;
- the Equality Act 2010, UK GDPR, Data Protection Act 2018 and accessibility requirements relevant to information, decision-making, evidence and student support;

- Student Loans Company requirements and any relevant funding, advertising, intellectual-property and contract law.

CMA higher-education guidance issued before the DMCCA remains a useful sector reference for the student journey, but current legislation and current CMA/OfS guidance take precedence where the framework has changed. LAAT will seek competent independent legal advice where the position is uncertain or the risk is material.

2.2 C5 application context

For an application made on or after 28 August 2025, initial condition C5 replaces the former initial conditions C1 and C3. The C5 assessment covers actual, proposed and likely conduct connected with higher education and ancillary services, including information, contracts, policies and activities undertaken by or on behalf of LAAT. “Student” includes prospective, current and former students.

The OfS may find the condition unsatisfied where LAAT engages in a prohibited behaviour or causes actual or likely detriment that is not reasonable in all the circumstances. The relevant test is therefore substantive fairness, not simply whether a document uses compliant terminology.

2.3 Governance hierarchy and conflict rule

Applicable law and binding regulatory requirements take precedence. Subject to those requirements, LAAT's Articles of Association are the fixed constitutional base. The Management and Governance Framework and Scheme of Delegation define bodies, reserved powers and delegated authority. This policy gives operational effect to those sources and prevails over subsidiary training instructions or templates where inconsistent.

Plymouth Marjon University requirements apply where relevant to validated provision, awards, student regulations and partnership responsibilities, but do not displace LAAT's own legal and regulatory duties. Any material conflict or ambiguity must be escalated to Governance and Compliance and the Accountable Officer, with Academic Board, ARFC, SIC and Board involvement according to subject and materiality.

3. Scope and application

3.1 This policy applies across every LAAT campus, course, cohort, level, mode, timetable pattern, recruitment channel, ancillary service, partnership, proposed activity and student journey stage. It covers information and conduct before application, during application and offer, at contract, during study, at change/withdrawal/completion and after study where a live right or issue remains.

3.2 It applies to:

- the Board of Governors, committee members, the Accountable Officer, ELT, SMT, all employees and workers;
- permanent, fixed-term, sessional, casual, temporary, agency and visiting staff;
- Community Heads, recruitment and admissions leads, programme and module teams, tutors, assessors, student-support, registry, finance, quality, governance, HR, IT/website and communications personnel;
- consultants, contractors, suppliers, outsourced service providers, marketing or recruitment agents, introducers and sub-agents where authorised;

- student ambassadors, student representatives, alumni, employers or other persons when communicating or acting for/on behalf of LAAT;
- persons drafting, approving, translating, publishing, presenting, emailing, telephoning, posting or otherwise communicating information about LAAT or its provision.

3.3 The policy covers all channels and formats, including websites, application portals, prospectuses, course pages, offer letters, contracts, handbooks, fee schedules, emails, messaging, telephone scripts, social media, paid advertising, search listings, events, webinars, presentations, videos, testimonials, reviews, agent materials, VLE/portal notices and draft/proposed versions intended for use.

3.4 Where a person or organisation is not an employee, LAAT will impose proportionate contractual, due-diligence, training, approval, monitoring, record and suspension/termination controls. Responsibility cannot be avoided by delegating an activity.

4. Definitions

Term	Meaning for this policy
Ancillary service	A service connected with higher education that is provided or arranged by LAAT and may influence a student's decision or contractual rights, including accommodation, transport, equipment, short courses or other services where applicable.
C5 key documents	Terms and conditions and other contractual documents/notices; policies about changes to courses, qualifications/validation, mode, location/facilities, fees/charges; refund and compensation policies; complaints policies; and any other student-facing document treated as key by the OfS.
Detriment	Actual or likely disadvantage, loss, harm, inconvenience or impairment of rights, including financial, academic, practical, wellbeing, accessibility, caring, travel, immigration, time and opportunity impacts.
Durable medium	A format that enables the recipient to store information addressed personally to them, access it for an adequate period and reproduce it unchanged, such as an email or downloadable document.
ELT	Executive Leadership Team: Accountable Officer, CFOO and Dean.
Fair treatment	Treatment that complies with applicable law and regulation, avoids prohibited behaviours and does not cause unreasonable actual or likely detriment in all the circumstances.

Term	Meaning for this policy
High-risk activity	Drafting, approving, publishing or communicating material student information; recruitment/admissions; contract/offer decisions; fee/cost setting; course/material changes; complaints; refunds/compensation; agent management; or any activity capable of materially affecting student rights or decisions.
Legal review	A documented review by a person with appropriate and demonstrable consumer-law competence and sufficient independence for the risk, identifying issues, required changes, residual risk and closure evidence.
Material change	A change a reasonable student could regard as important to applying, accepting, studying or continuing, including content, qualification/validation, mode, location/facilities, timetable pattern, duration, fees/costs, specialist resources, support or other core features.
Material information	Information an average member of the relevant student audience needs to make an informed transactional decision, taking account of context and any vulnerability reasonably foreseeable.
Prohibited behaviour	A behaviour identified by the OfS C5 prohibited behaviours or by applicable consumer law as unfair, misleading, aggressive or otherwise unlawful.
SMT	Senior Management Team: ELT plus key managers, including HR, Finance, Quality and Compliance, Student Experience, Admissions, Registry/Data, Marketing, Operations/IT and other relevant managers. SMT is collective, not an individual.
Student	For this policy, a prospective, current or former student within the scope of C5 and consumer law.
Student-facing information	Any communication capable of reaching or influencing a prospective, current or former student, including information supplied through agents or third parties.
Training tier	The risk-based level of consumer-protection learning, assessment and refresher activity assigned to a role or person.

Term	Meaning for this policy
Working day	A day on which LAAT administrative offices are open, excluding weekends, public holidays and published closure days.

5. Policy principles

Principle	LAAT application
Student interests first	Recruitment, commercial, growth, timetable, campus, partnership, cost or income objectives must not override fair treatment, accurate information, quality, continuity or student rights.
One source of truth	Provider/partner, programme, award, validation, location, mode, timetable, fees/costs, resources, support and responsibilities must reconcile across every controlled source.
Evidence before publication or decision	Material information and high-risk decisions require verified facts, named ownership, proper approval and retrievable evidence.
Clarity and accessibility	Information and processes must be prominent, intelligible, legible, accessible and suitable for the relevant audience; important qualifications must not be hidden.
No unfair discretion	LAAT will not rely on wide, vague or retrospective powers to change, terminate, charge, retain payments, interpret rights or avoid responsibility.
Proactive prevention and redress	LAAT will act on institutional facts without requiring each student to prove the same issue and will provide appropriate correction, alternatives, refunds, compensation or other remedies.
Independence and conflicts	A conflicted person will not approve, assess or review their own decision or exercise incompatible preparation and final-authorisation roles.
Proportionality and individual circumstances	Controls and remedies will reflect risk, seriousness, duration, mitigation and the student's circumstances, including accessibility and caring impacts.
No retaliation or unlawful waiver	A person raising a concern or claim must not be disadvantaged. Undisputed remedies will not be conditioned on surrendering statutory or OIA rights.

Principle	LAAT application
Continuous improvement	Training, legal review, audits, complaints, student voice, partner feedback, incidents and outcomes must change practice and evidence closure, not merely produce records.

6. Governance and responsibilities

Role / body	Responsibility
Board of Governors	Ultimate accountability. Approves this policy, ensures adequate resources, receives annual effectiveness assurance and immediate escalation of material C5/student-interest risks.
Student Interest Committee	Primary scrutiny of fair treatment, detriment, accessibility, consultation, student communications, material-change gateways and themes from complaints/remedies. Provides Article 54 reports where applicable.
Academic Board	Assures academic/course information, curriculum/assessment claims, validation/award statements, academic changes, complaints/appeals interfaces and academic remedies.
Audit, Risk and Finance Committee	Assures fees/costs, refunds/compensation, liquidity/provision, financial detriment, agent commissions, financial controls, audit trails and material control failures.
Accountable Officer	Executive accountable lead for OfS compliance, material escalation, reportable-event assessment and ensuring independent legal review where required. Material escalation, reportable-event assessment and ensuring independent legal review where required.
CFOO	Executive assurance for fees, costs, contracts, refunds/compensation, financial controls, agents/commissions, resources and financial implementation.
Dean	Academic assurance for course/award/validation information, programme delivery, academic changes, staff competence and appropriate academic remedies.
ELT	Coordinates urgent executive response, resources and cross-functional decisions; escalates material risks.

Role / body	Responsibility
SMT	Implements the policy across functions, tests operational coherence, resolves cross-functional gaps and reviews monthly performance. SMT does not replace Board or committee approval.
Governance and Compliance	Custodian; maintains policy, source register, C5 document register, legal-review register, approvals, incidents, reporting schedule and regulatory-change process.
HR	Maintains the role population, assigns training, records completion/assessment, issues reminders, supports restrictions and reports compliance.
Quality and academic leadership	Maintain academic/course training content, check course information and changes, sample implementation, coordinate PMU verification and act on quality/student feedback.
Admissions and recruitment	Use only approved information and criteria; provide material information at the correct stage; retain communications; identify misleading claims; control Community Heads and recruitment activity.
Marketing, communications and IT/website	Publish only approved current content; apply version control, prominence, accessibility, pricing and review/testimonial controls; stop and correct content when instructed.
Student Experience, Registry and complaints staff	Give accurate advice, route complaints and claims clearly, coordinate support and adjustments, identify cohort-wide issues and record outcomes.
Finance	Maintain verified fees/costs/refund information, payment and SLC records, dual controls, calculations and evidence; escalate inconsistencies promptly.
Line managers	Assign correct tier; ensure completion before duty; supervise application; restrict high-risk work when overdue or competence is in doubt; verify remedial action.
All covered persons	Complete training, use controlled information, seek advice when uncertain, preserve evidence, report errors/concerns promptly and cooperate with correction and review.

Role / body	Responsibility
Agents and third parties	Comply with contracts and approved materials; complete required training/attestation; keep evidence; permit monitoring; stop activity and correct information when directed.
Partnership lead	Confirms PMU responsibilities, approvals, entitlements, escalation routes and consistent student-facing information; coordinates partner notification and action.

7. Training architecture and covered population

7.1 Risk-based training tiers

Where a person falls into more than one tier, the highest applicable tier is delivered as one integrated learning route that incorporates the relevant lower-tier content, rather than as multiple duplicate modules.

Tier	Population	Minimum content	Deadline / refresher	Competence evidence
Tier 1 - Foundation awareness	All Governors, committee members, staff and workers, and others with institutional contact who may communicate about LAAT.	Core fair-treatment awareness, reporting route, approved-information rule and personal responsibilities.	Within 20 working days of appointment and before making unsupervised material claims; refresher every two years or earlier trigger.	Attendance, case exercise and written acknowledgement for governance-only audiences. An 80% scored assessment applies only where the individual also performs Tier 2 operational, student-facing duties.

Tier	Population	Minimum content	Deadline / refresher	Competence evidence
Tier 2 - High-risk operational	Recruitment, Community Heads, admissions, marketing, communications, website, programme leaders, student support, registry, finance, quality, complaints, refunds, course-change implementers and relevant contractors.	Full C5/CMA curriculum plus role scenarios and controlled procedures.	Before any unsupervised high-risk activity or relevant system/publication access; annual refresher.	80% pass plus scenario sign-off.
Tier 3 - Decision-maker/approver	ELT, relevant SMT members, document owners, publication approvers, material-change decision-makers, committee members receiving C5 assurance and legal-review action owners.	Advanced workshop: prohibited behaviours, detriment reasoning, conflicts, governance, legal advice, incident/redress and assurance.	Before approval/decision role and annually; immediate briefing after material change.	Attendance, case exercise and written acknowledgement .

Tier	Population	Minimum content	Deadline / refresher	Competence evidence
Tier 4 - Agents/third parties/ambassadors	Recruitment/marketing agents, introducers, approved sub-agents, outsourced services, student ambassadors and others acting for/on behalf of LAAT.	Role-limited module, approved materials/scripts, prohibited claims, records, complaints, data and escalation.	Before activity; at renewal; annually for continuing high-risk relationships; targeted briefing before each major campaign/intake.	Assessment or documented attestation proportionate to role; no activity until passed/accepted. Admissions or the contract owner holds the detailed third-party evidence; HR holds central assurance data.

7.2 Assignment and restriction rules

- HR and the line manager assign a tier at appointment, role change, campaign/intake assignment, agent appointment/renewal and after a material incident.
- Where a role spans more than one tier, the highest applicable requirement applies.
- No person may undertake unsupervised high-risk activity, approve student-facing information, make an offer/contract decision, manage a material change, decide a complaint/remedy or represent LAAT through an agent channel until required learning is complete.
- Temporary supervision is not a device to avoid training. The supervisor must be competent, available, accountable and able to check the activity before it affects a student.
- Reasonable adjustments and accessible formats will be provided for training and assessment without reducing the required learning outcomes.
- External qualifications or prior learning may be recognised only after Governance and Compliance has mapped currency and coverage; LAAT-specific induction remains mandatory.

7.3 Trigger-based learning

Additional training or briefing is required after a material legal/OfS/CMA/OIA change, new or amended C5 document, new programme/campus/mode/partner/ancillary service, fee or cost change, new campaign, material complaint/incident, legal-review finding, audit failure, agent breach, role change or evidence that knowledge is not being applied.

8. Mandatory curriculum

The curriculum below may be delivered as a core module plus role-specific supplements, so that no single oversized session has to be delivered to every audience. Each population receives the core content with the supplements relevant to its tier and duties.

8.1 Foundation outcomes

Every covered person must be able to explain LAAT's fair-treatment commitment, recognise a possible consumer-protection concern, use only approved information, avoid making unauthorised promises, preserve evidence and report an issue immediately through the published route.

8.2 Full Tier 2 and Tier 3 curriculum

Module	Required coverage
A. Regulatory map	C5 fairness and detriment tests; prohibited behaviours; prospective/current/former scope; ongoing C1/C2/C4 interfaces; C5 key documents; LAAT governance and escalation.
B. Student journey and material information	What information is material, when it must be provided, audience/context, vulnerable or diverse audiences, prominence, clarity, accessibility, durable records and no misleading omission.
C. Provider, partner, award and status claims	Accurate LAAT/PMU roles; awarding/validating body; qualification; accreditation; OfS registration status; “university” and degree claims; logo/endorsement controls; future approval not presented as certain.
D. Course and service information	Title, content/core and likely options, duration, level, mode, location, timetable pattern, attendance expectations, assessment, resources, specialist facilities, support, digital/library/careers entitlements, entry requirements and realistic availability.
E. Fees, charges and costs	Tuition fees, fee liability, SLC/sponsor context, resit/reassessment fees, compulsory/material optional costs, likely study costs, future changes, total-price prominence, no drip pricing or hidden charges.
F. Contract formation and cancellation	Application, offer and acceptance; binding pre-contract information; durable medium; terms before contract; 14-day cancellation standard; express request to start services; lawful deductions/refunds; no waiver of statutory rights.

Module	Required coverage
G. Fair contract terms	Transparency; reasonable care and skill; no wide termination/change powers, disproportionate penalties/retentions, unilateral interpretation, transfer disclaimers, retrospective price changes, hidden terms, unlawful exclusions or barriers to complaints/legal action.
H. Course/material changes	Valid specific reasons, authority, partner approval, consultation, detriment/equality/accessibility assessment, alternatives, consent where required, cancellation/refund/compensation and clear records.
I. Unfair commercial practices	Misleading action/omission, professional diligence, pressure/aggression, false scarcity, persistent contact, language-of-delivery disclosure, legal rights not presented as special benefits, paid advertorial disclosure, “free” claims, rankings/comparisons and availability claims.
J. Reviews and testimonials	No fake or purchased positive reviews, undisclosed incentives, misleading editing/selection/suppression, fabricated student/alumni status or failure to take reasonable steps to prevent/remove fake reviews on controlled channels.
K. Admissions and recruitment conduct	Approved criteria, no guarantees outside authority, no manipulation of English/identity/eligibility, fair RPL information, no improper inducement, accurate records and separation from agent commission pressure.
L. Complaints, OIA and academic interfaces	No unreasonable barriers, clear LAAT/PMU responsibility, accessible submissions, reasonable timescales, appeal/review, Completion of Procedures by correct OIA member, academic judgement boundaries and no disadvantage for complaining.
M. Refunds, compensation and remedies	When refunds/compensation may be due, calculation principles, cooling-off, withdrawal, undelivered provision, additional loss, non-financial impact, proactive cohort remedies, SLC adjustment, no arbitrary caps or general waiver.
N. Equality, accessibility and support	Reasonable adjustments, alternative formats, digital/language/caring impacts, differential detriment, accessible consultations, supported complaints and avoidance of unsupported wellbeing/service claims.

Module	Required coverage
O. Agents, third parties and ambassadors	Due diligence, contracts, approved scripts, sub-agent restrictions, fee handling, prohibited claims, evidence, monitoring, complaints, immediate stop/correction and termination.
P. Incidents and evidence	Contain, correct every channel, preserve versions, identify affected cohorts, communicate, remedy, assess partner/OfS reporting, root cause, retrain, assure closure and maintain audit trail.

8.3 LAAT-specific casework

Tier 2 and Tier 3 activity must include realistic LAAT scenarios, including:

- an applicant asks whether LAAT is already registered with the OfS or is a university;
- an agent describes a future programme/approval, funding or admission as guaranteed;
- a course page and offer letter give different locations, timetable patterns, fees or partner services;
- PMU validation, award, library, digital or careers access is described inaccurately or without eligibility caveat;
- a delivery mode, campus, timetable, module or specialist facility may change after offer or enrolment;
- an additional or resit cost appears late in the journey;
- a review/testimonial is incentivised, selectively edited or cannot be verified;
- a cohort-wide teaching/system failure may require correction, complaint handling and redress;
- a student has disability, caring, travel, digital or language impacts that change the detriment assessment.

9. Assessment, retraining and competence

9.1 Tier 1 and Tier 2 knowledge assessments must be controlled, versioned and mapped to learning outcomes. The minimum pass mark is 80%. Tier 2 assessment must include scenario questions; rote recall alone is insufficient. Tier 1 (governance-only audiences) and Tier 3 may use attendance, a case exercise and written acknowledgement where proportionate, rather than a full scored assessment, unless the individual also performs Tier 2 operational student-facing duties.

9.2 A person who does not pass must:

1. stop or remain excluded from unsupervised high-risk activity;
2. review the relevant learning and receive targeted support on failed outcomes;
3. retake an approved assessment using a controlled alternative question set;
4. receive manager or specialist sign-off where repeated failure or practical concern indicates a competence risk.

9.3 Repeated failure, evidence of unsafe practice, a material error or a serious complaint may require supervised practice, additional training, removal of approval rights, role reassignment, formal capability/performance action or contractual action for a third party.

9.4 Completion means both passing the assessment and applying the learning. Sampling, observation, audit, case quality, complaints and incident data may demonstrate that retraining is required even where a certificate is current.

9.5 Question banks, answer keys and scenario materials must be access-controlled to preserve integrity. Changes must be approved by Governance and Compliance with relevant legal/academic/financial input and recorded in the module change log.

10. C5 document assurance and legal review

10.1 Controlled C5 document suite

Governance and Compliance will maintain a single C5 Document and Information Register covering all key documents and principal student-facing sources. Each entry must identify owner, purpose, audience/cohort, programme/campus/mode, version, approval, effective date, publication location, PMU dependency, legal-review status, consistency check, accessibility check, archive and next review.

10.2 Documents requiring review

- student contract/terms and conditions and contractual notices;
- offer letters, pre-contract course information and admissions communications;
- fee, additional-cost, resit/reassessment, cancellation, withdrawal and fee-liability information;
- course, qualification/validation, mode, location/facilities, timetable and fee/charge change policies;
- complaints, refunds/compensation and student-protection/market-exit information;
- ancillary-service contracts and information where applicable;
- marketing, website, social media, events, scripts, agent materials, testimonials/reviews and key handbooks;
- Plymouth Marjon University responsibilities and entitlements presented to LAAT students.

10.3 Legal-review standard

A competent and sufficiently independent consumer-law review is required:

Ownership: Commissioning the legal reviewer, agreeing scope and tracking findings to verified closure is owned by the Quality and Compliance Manager, consistent with that role's custody of the C5 document register under Section 10.1. Until that role is filled, this responsibility is held directly by the Accountable Officer, consistent with Section 6.

- before submission of the C5 suite for initial registration;
- before first publication or use of a materially new student contract or key document;
- after a material legal/OfS/CMA/OIA change or significant partnership/operating-model change;
- after a serious complaint, incident, audit finding or evidence of systemic unfairness;
- where Governance and Compliance cannot confidently resolve a high-risk or novel issue;
- at least as part of the annual whole-suite consistency review, with external input determined by risk.

The reviewer's competence, independence, scope, documents/versions, assumptions, findings, risk rating and advice must be recorded. Legal review is not complete until required amendments are implemented, related documents and systems are checked, affected information is corrected and closure is independently verified.

10.4 Finding and closure rules

Rating	Meaning	Required response
Critical	Likely unlawful/prohibited behaviour, material misleading information, wide unfair term, serious student detriment, status/award/validation misrepresentation or systemic control failure.	Stop use/publication immediately; AO/ELT and relevant chairs notified; legal advice; affected-student/redress and OfS/partner assessment; verified closure before reuse.
High	Material weakness likely to affect decisions/rights or create inconsistency across a cohort.	Correct before publication/contract/decision; named owner and deadline; partner/committee escalation as relevant; independent closure check.
Medium	Important clarity, consistency or process weakness with limited immediate detriment.	Time-bound correction; sample related sources; confirm implementation and training update.
Low	Minor drafting, presentational or record improvement not changing substantive rights.	Correct through controlled editorial process; retain change evidence.

10.5 No reliance on disclaimers

A disclaimer, “subject to change” statement, hyperlink, staff script or student acknowledgement will not be used to cure a substantively unfair or misleading term, omission, representation or practice. Important information must be prominent and provided at the correct stage.

11. Published information and communication controls

11.1 Approval before use

No material student-facing information may be published or issued without documented approval by the content owner and an independent checker from Governance/Quality or another authorised function. Finance must verify fees/costs; academic leadership verifies course/assessment/delivery; Partnership Lead verifies PMU/award/entitlement claims; Governance verifies regulatory/status/legal wording. Higher-risk information may require legal review or committee/Board approval.

11.2 Minimum approval tests

- source facts are current, evidenced and reconcile to the approved programme/location/mode/timetable/fee schedule;
- LAAT, PMU, awarding/validating, OfS, OIA and service responsibilities are described accurately;
- all material fees, compulsory and material optional costs are prominent and not drip-fed;

- claims about resources, support, employability, library/digital access, wellbeing, funding, outcomes or future approval are supportable and appropriately qualified;
- important limitations are prominent and not contradicted elsewhere;
- language, images, rankings, comparisons, scarcity, urgency, “free”, discounts, testimonials and reviews are fair and verifiable;
- the content is clear, legible, accessible, dated/versioned and identifies the cohort/time period where necessary;
- a durable copy, screenshot/PDF or archive record is retained with approval evidence.

11.3 One source of truth and propagation

Each material fact must have an authoritative owner and source. When a fact changes, the change owner must identify every dependent document, system, agent pack and communication; secure required approvals; update all sources within the agreed window; archive replaced versions; and verify that no contradictory source remains.

11.4 Reviews, testimonials and social proof

- LAAT will not create, commission, purchase or publish a fake review or conceal a material incentive.
- Any incentive for feedback must not depend on positive sentiment and must be disclosed where material.
- Reviews/testimonials must not be edited, selected, ordered, suppressed or presented in a way that creates a misleading overall impression.
- Identity, student/alumni status, consent and the basis of outcome claims must be reasonably verified and recorded.
- LAAT will take reasonable and proportionate steps to prevent, detect, investigate and remove fake or misleading reviews on channels it controls or commissions.

11.5 Translation and language

Where marketing or recruitment communication is in a language other than English, the language of teaching, assessment, support and contractual documentation must be stated clearly. Translation must preserve material meaning and be approved; the English legal text must not be hidden from a person expected to contract on that basis.

12. Agents, third parties and partnership controls

12.1 Due diligence and appointment

Before appointment or renewal, LAAT will conduct proportionate due diligence on identity, ownership/controllers, competence, reputation, regulatory/adverse history, conflicts, proposed territories/channels, sub-agents, remuneration/commission, data access, student-money handling and ability to comply with LAAT materials and controls. Higher-risk appointments require explicit CFOO and Accountable Officer approval under the Scheme of Delegation.

12.2 Contract requirements

- use only current LAAT-approved information, scripts, branding and application routes;

- no guarantee of admission, OfS registration, funding, visa outcome, award, employment, placement, service entitlement or future approval;
- no unauthorised sub-agent, translation, advertisement, discount, payment collection or change to material information;
- mandatory training/attestation, accurate records, complaint cooperation, data protection and prompt incident notification;
- LAAT audit, monitoring, mystery-shopping/sample-contact and information-removal rights;
- immediate suspension and correction where risk arises, and termination/remedy for material or repeated breach;
- transparent commission and conflict controls; recruitment decisions remain independent of commission pressure.

12.3 Monitoring

The responsible manager will sample agent websites, social media, advertisements, scripts, messages and applicant feedback at a frequency proportionate to risk and at least before/within each major recruitment cycle. Findings, corrections, retraining and closure must be recorded. Serious or repeated issues are escalated to the Accountable Officer, CFOO, SMT and relevant committee/Board chair.

12.4 Plymouth Marjon University and other partners

LAAT will maintain a controlled responsibility map covering programme approval, award/validation, student registration, academic regulations, complaints/appeals, OIA membership, library/digital/careers access, student support, data, course changes, market exit and communications. No partner service or entitlement may be advertised until eligibility, access method, capacity and responsibility are confirmed. Material partner-dependent information requires partner verification before use.

Where a concern affects PMU responsibilities or students registered with PMU, LAAT will coordinate promptly under the partnership agreement while preserving LAAT's own duties. Students must not be sent between organisations without a clear owner, route, timeframe and outcome.

13. Material changes and student detriment

13.1 No material change may be proposed, approved or communicated solely through a wide “right to change” clause. The decision record must establish:

5. the specific proposed change, affected cohort(s), reason, evidence and authority;
6. whether the reason is valid, foreseeable and sufficiently reflected in existing terms/information;
7. PMU and other external approval/notification requirements;
8. alternatives considered, including no change and less detrimental options;
9. academic, financial, practical, travel, timetable, accessibility, caring, digital, wellbeing and other detriment;
10. equality impact and reasonable adjustments;
11. student consultation/representation and how views changed the proposal;
12. required notice, consent where necessary, right to decline/cancel/transfer and continuity support;

13. refund, compensation, cost reimbursement or other remedy where detriment cannot reasonably be avoided;

14. communication, complaints/review route, records, approvals and post-implementation review.

13.2 Material student-interest decisions must follow the Articles, Scheme of Delegation and Student Interest Committee/Article 54 route where applicable before Board decision, subject only to urgent protective action rules. Urgency does not remove the duty to record, communicate, mitigate and review.

13.3 Silence, continued attendance or use of services will not automatically be treated as consent where law or fairness requires express agreement. A student who reasonably declines a material change will be offered fair alternatives and remedies.

14. Incidents, correction, remedies and escalation

14.1 Reportable concerns

Any person who becomes aware of inaccurate, outdated, inconsistent, inaccessible or potentially unfair student-facing information, a prohibited practice, an agent breach, an unfair term, a defective process or actual/likely student detriment must report it immediately to Governance and Compliance and the relevant manager. Serious concerns must not wait for routine reporting.

14.2 Minimum incident response

Stage	Minimum action
1. Contain	Pause publication, campaign, agent activity, decision or use of the affected term/process where continuing risk may arise.
2. Preserve	Retain screenshots, versions, messages, scripts, approvals, affected records and decision evidence.
3. Assess	Identify legal/C5 issue, severity, channels, dates, cohorts, decisions, contracts, partner responsibilities and individual/differential detriment.
4. Correct	Amend every controlled source and instruct agents/third parties; verify propagation and archive replaced content.
5. Communicate	Give affected persons a clear, accurate and accessible explanation, correction, options and route for questions/complaint/claim.
6. Remedy	Provide cancellation, alternative provision, fee adjustment, refund, compensation, cost reimbursement or non-financial remedy where due; proactively assess cohort-wide impact.

Stage	Minimum action
7. Escalate	Notify AO/ELT and relevant chairs; assess PMU, OfS reportable event, OIA, CMA, SLC, data or other notification as applicable.
8. Learn and close	Root-cause analysis, control correction, retraining, legal re-review, sampling and documented independent closure.

14.3 Severity and timing

Critical matters - including false OfS/university/award/validation claims, systemic unfair terms, ongoing misleading campaigns, significant cohort detriment or deliberate concealment - require immediate AO/ELT escalation and same-day containment where practicable. Numerical reporting thresholds are not waiting periods; LAAT must act sooner where seriousness or student impact requires.

14.4 Complaints and refunds/compensation

A consumer-protection concern may be raised through complaints, refunds/compensation, admissions, student support, whistleblowing or another reasonable route. LAAT will coordinate the correct procedure without disadvantaging a person for choosing a reasonable route in good faith. Where LAAT already holds institutional facts, students will not be required to prove them individually. The Refund and Compensation Policy governs detailed calculations and decision controls.

15. Records and evidence

15.1 Training register

HR will maintain a controlled register containing, at minimum: person/organisation; role; function; manager/contract owner; training tier; module/version; assignment date; deadline; completion date; score/attempts; pass/attestation; practical sign-off; expiry/refresher; restrictions; adjustments; exception authority; remedial action; and evidence location. Where a reasonable adjustment is provided, the register records only that an adjustment was made; the underlying medical or personal reason is not recorded in the training register.

15.2 Legal-review and action register

Governance and Compliance will record: document/source and version; reviewer and competence; date/scope; finding; legal/regulatory basis; risk rating; affected sources/cohorts; owner; required action; deadline; implementation evidence; independent closure; approval; publication; residual risk and next review.

15.3 Information and incident evidence

- publication approval forms and authoritative source records;
- dated screenshots/PDFs or archived copies of websites, campaigns, agent materials and communications;
- agent due diligence, contracts, training, monitoring and breach records;
- material-change assessments, consultation, approvals, communications and remedies;

- incident, complaint, refund/compensation, correction, redress, notification and closure records;
- committee papers, minutes, dashboards, assurance statements and action tracking.

Records will be retained under LAAT's Records Retention Schedule, taking account of contract/consumer limitation periods, regulatory evidence, former-student needs, data minimisation, litigation holds and partnership requirements. Current and superseded C5 student-facing versions must remain retrievable for the cohorts to which they applied.

16. Monitoring, reporting and assurance

16.1 Operational dashboard

Domain	Minimum measures
Training	Population coverage; completion/pass; overdue/expired; attempts; restrictions; refresher due; agent/third-party compliance; equality/accessibility issues.
Documents and legal review	C5 suite completeness; documents due/reviewed; findings by risk; overdue actions; closure verification; inconsistent or outdated sources.
Published information	Audit samples; approval exceptions; time to correction; website/campaign/offer/agent defects; review/testimonial control findings.
Students and remedies	Complaints, claims, refunds/compensation, affected cohorts, themes, timescales, differential impact and proactive redress.
Agents/partners	Due diligence/renewals; monitoring samples; breaches; sub-agent issues; PMU verification and unresolved responsibility conflicts.
Governance and risk	Material incidents; reportable-event assessments; residual high risks; overdue actions; resourcing/capacity; lessons and effectiveness tests.

16.2 Reporting rhythm

Frequency	Required reporting
Monthly	SMT reviews operational dashboard, overdue high-risk actions, planned campaigns/intakes and cross-functional inconsistencies.
Quarterly	SIC receives fair-treatment, detriment, communication, accessibility, complaints/remedy and material-change assurance. Academic Board and ARFC receive relevant sections.

Frequency	Required reporting
By exception	AO, ELT, relevant committee chairs and Board Chair receive immediate material incident/control failure escalation.
Annually	Board receives an effectiveness report covering implementation, assurance testing, independent review, residual risks, student/partner feedback and improvement plan.

16.3 Assurance testing

Governance and Compliance will coordinate risk-based testing, including samples across campuses, courses, modes, cohorts and channels. Assurance must test outcomes and consistency, not only the presence of a policy or certificate. The annual plan should include website/course-page sampling, offer/contract packs, fee/cost information, agent outputs, material-change cases, complaints/remedies, legal-review closure and staff application of learning.

17. Non-compliance and restrictions

Stage	Action
Stage 1	Reminder and immediate manager/contract-owner notification; high-risk activity remains restricted if the deadline or prerequisite is breached.
Stage 2	Targeted support, completion/retraining plan and defined short deadline; supervision or removal of approval/system rights.
Stage 3	Formal escalation to HR, Governance and Compliance and relevant senior owner; competence/risk assessment and remedial monitoring.
Stage 4	Where there is material risk, suspend duties, campaign, publication, agent activity, decision authority or contract performance pending correction.
Stage 5	Persistent or serious failure may be managed under probation, performance, capability, disciplinary, contract, agent suspension/termination or other applicable procedure.
Incident overlay	Where conduct may have harmed students or breached law/regulation, the incident/redress process applies regardless of training status or disciplinary action.

No manager may waive a mandatory prerequisite merely to meet recruitment, publication, intake, operational or commercial deadlines. Any time-limited exception must be lawful, risk-assessed, documented, approved by the Accountable Officer or delegated unconflicted authority, supported by effective supervision and reported to Governance and Compliance.

18. Equality, accessibility, data and confidentiality

18.1 LAAT will provide accessible training, information, consultations, complaint/claim routes and alternative formats. Reasonable adjustments will be implemented promptly. Accessibility is a substantive fair-treatment control, not a post-publication formatting check.

18.2 Reviews and decisions will consider differential impact across relevant student groups and individual circumstances. Aggregated metrics must not obscure a serious impact on a smaller group or individual.

18.3 Personal data used for training, monitoring, complaints, legal review, incidents and redress will be processed lawfully, fairly, securely and only as necessary. Access will be role-based. Reports will normally use anonymised or appropriately aggregated data unless identifiable information is necessary for action or oversight.

18.4 Legal advice and privileged material must be handled under the advice of the Accountable Officer/Governance and legal adviser. The existence of confidentiality or privilege must not be used to avoid correcting student-facing information or providing students with a fair explanation and remedy.

19. Review, amendment and publication

19.1 Governance and Compliance will review this policy annually and earlier after any trigger in section 7.3 or evidence of control failure. The review will test current official sources, the C5 prohibited behaviours, the live OfS submission checklist/declaration, CMA guidance and the consistency of all related LAAT documents.

19.2 Editorial changes that do not alter rights, responsibilities, governance or controls may be approved under the Scheme of Delegation and reported at the next review. Substantive amendments require the same scrutiny and Board approval route as this policy.

19.3 This internal policy may be published for transparency after approval, but publication is not a substitute for publishing the required student-facing C5 document suite. Any public version must be accessible, current, clearly status-marked and free of confidential operational or legal material.

19.4 Before approval and at each review, role titles, committee names, reporting routes, partner responsibilities, document references and operational contacts must be verified. The policy must not be described as approved or effective until the approval record is complete.

Appendix A. Role-based training matrix

Population	Tier	Required focus	Deadline / refresher	Evidence	Owner
Board and SIC members	Integrated Tier 3 route (includes relevant Tier 1 content)	C5 duties, prohibited behaviours, detriment, Article 54/student interests, assurance, escalation	Before role; annual workshop	Completion + case exercise	Governance
Academic Board / ARFC members	Integrated Tier 3 route (includes relevant Tier 1 content)	Relevant academic or financial C5 risks, documents, remedies, assurance	Before relevant decision; annual	Completion + workshop record	Governance / committee secretary
ELT and relevant SMT	Integrated Tier 3 route (includes relevant Tier 1 and Tier 2 content where applicable)	Full curriculum, executive decisions, incidents, legal review, reporting	Before role; annual; trigger briefings	80% + workshop + acknowledgement	AO / Governance
Governance and Compliance	Integrated Tier 3 route (includes relevant Tier 1 and Tier 2 content where applicable)	Full curriculum, document/legal review, regulatory change, registers, closure	Before duty; annual and ongoing CPD	80% + professional competence evidence	AO
HR and line managers	Integrated Tier 1 route plus role-specific supplement	Tier assignment, records, restrictions, performance/contract routes	Before administration/management; annual update	80% or role attestation	HR

Population	Tier	Required focus	Deadline / refresher	Evidence	Owner
Marketing/comms/webs ite/IT publishers	Integrated Tier 2 route (includes relevant Tier 1 content)	Material info, pricing, claims, prohibited practices, reviews, approval/archive, correction	Before access/publication; annual; campaign briefing	80% + practical approval exercise	Marketing / Governance
Admissions/recruitment /Community Heads	Integrated Tier 2 route (includes relevant Tier 1 content)	Pre-contract info, offers, criteria, partner/status claims, agents, records, no pressure/guarantees	Before contact/decision; annual; intake briefing	80% + scenario sign-off	Admissions
Agents/introducers/sub- agents	4	Approved script, prohibited claims, fees, status/award, evidence, complaints, stop/correct	Before activity; renewal; annual/high-risk campaign	Assessment/attestation	Contract owner / Admissions
Programme leaders/module teams/academic staff	Integrated Tier 1 route plus role-specific supplement; Tier 2 route for approvers	Course/assessment/reso urces/support claims, changes, VLE communications, student advice	Before relevant duty; annual update	80% for Tier 2; acknowledgement otherwise	Dean / Quality
Student Experience/Registry/Dat a	Integrated Tier 2 route (includes relevant Tier 1 content)	Accurate advice/records, engagement/withdrawal , complaints routing, accessibility, partner/OIA, incidents	Before duty; annual	80% + scenario	Function lead

Population	Tier	Required focus	Deadline / refresher	Evidence	Owner
Finance/refund/fee staff	Integrated Tier 2 route (includes relevant Tier 1 content)	Fees/costs, liability, cooling-off, SLC, refunds/compensation, controls, communications	Before duty; annual	80% + calculation/decision scenario	CFOO / Finance
Complaints/appeals/case reviewers	Integrated Tier 2 route (includes relevant Tier 1 content)	Accessible routes, timescales, independence, PMU/OIA, remedies, cohort issues	Before case role; annual	80% + case exercise	Governance / Quality
Student ambassadors/representatives speaking for LAAT	4	Boundaries, approved information, no promises, disclosure, escalation	Before activity; each campaign/term as needed	Attestation / short check	Student Experience
Other contractors/outsourced services	Risk assigned	Role-limited content and contract duties	Before activity; renewal/trigger	Attestation/assessment	Contract owner

The institutional mandatory-training matrix may contain other topics (safeguarding, data, health and safety, etc.), but those topics are controlled separately. This appendix is intentionally limited to consumer protection and fair treatment.

Appendix B. C5 document and legal-review register

Field	Minimum record
Document/source ID	Unique controlled identifier.
Title/channel	Document, webpage, email template, script, advert, agent pack, etc.

Field	Minimum record
Owner/checker	Accountable content owner and independent verifier.
Audience/cohort	Prospective/current/former; programme/campus/mode/intake; agent territory if relevant.
Authoritative facts	Approved sources for programme, partner, award, location, mode, fees/costs, services and dates.
Version/status	Draft/approved/effective/superseded; dates and approval route.
Publication/use location	URL/system/channel and archive/screenshot reference.
C5 category	Contract, material info, change policy, complaint, refund, agent, review, other.
PMU dependency	Responsibility, approval/verification, service entitlement or regulation.
Accessibility/equality check	Method, findings and action.
Legal review	Reviewer/competence, date, scope, findings and advice reference.
Consistency check	Related sources sampled and result.
Actions/closure	Risk, owner, deadline, evidence and independent closure.
Next review/trigger	Scheduled date and event triggers.
Retention	Record category and disposal/review date under schedule.

Appendix C. Student-facing information approval checklist

Control	Approval test
Status and identity	LAAT/PMU roles, legal/provider identity, OfS status, university/degree/validation/accreditation claims verified.

Control	Approval test
Course facts	Title, award, level, content, options, duration, mode, location, timetable, start, attendance, assessment and progression accurate.
Resources and support	Staff/facilities/VLE/library/digital/careers/wellbeing/disability claims available, eligible, accessible and not overstated.
Fees and costs	Tuition, additional/optional/compulsory/resit costs, payment/fee liability, future change and total-price prominence verified.
Entry/admissions	Requirements, English, RPL, identity/eligibility, application process and decision authority accurate; no guarantee or pressure.
Terms and change	Contract/change/cancellation/refund/complaint links prominent and consistent; no wide disclaimer or hidden qualification.
Commercial practice	No misleading omission/action, fake scarcity, drip pricing, misleading “free”, undisclosed advertorial/incentive or persistent contact.
Reviews/testimonials	Authenticity, consent, incentive disclosure, context, editing/selection and outcome basis verified.
Accessibility	Plain language, legibility, headings, alternative text/format, translation accuracy and reasonable audience needs checked.
Cohort/version	Applicable intake/course/campus/mode and date clearly stated; superseded information removed/archived.
Approvals	Content owner, Finance/Academic/Partner/Governance/legal checks completed as relevant.
Evidence	Source documents, approval form and dated archive/screenshot retained; propagation list completed.

Appendix D. Consumer-protection incident workflow and record

Record stage	Minimum evidence
Report	Date/time, reporter, channel, content/practice, affected programme/cohort, immediate risk.
Contain	Who paused/removed/restricted what; date/time; agents/partners instructed.
Evidence	Screenshots, versions, communications, contracts, approvals, student/agent records preserved.
Triage	C5/prohibited behaviour/consumer-law issue; severity; legal advice; owner; conflicts.
Impact	Dates/channels, number/cohorts, individual/differential detriment, decisions/contracts affected.
Correction	Every source/agent/system corrected; verified; archive retained.
Communication	Affected students/applicants/former students contacted; accessible explanation and options.
Remedy	Cancellation/alternative/refund/compensation/cost/non-financial remedy; SLC/fee adjustment.
Notifications	PMU, AO/Board/committees, OfS reportable event, OIA/CMA/SLC/data/other as applicable.
Root cause	People/process/system/document/third-party cause and control failure.
Prevention	Policy/process/system change, retraining, agent action, legal re-review, sampling.
Closure	Independent verification, approver, date, residual risk and follow-up test.

Appendix E. Minimum C5 training and legal-review evidence pack

Evidence group	Minimum contents
Governance	Approved policy; approval record; implementation plan; owners; committee minutes; Board assurance.
Population	Role inventory; tier assignment rationale; new starter/role/agent controls; exceptions/restrictions.
Learning	Controlled modules, scenarios, trainer notes, accessibility, version/change log and mapped outcomes.
Assessment	Question bank control, scores/attempts, practical sign-off, retraining and competence interventions.
Legal review	Scope, reviewer competence/independence, findings, amendments, related-source checks and verified closure.
C5 suite	Register, current/superseded versions, approvals, publication locations, cohort scope and consistency results.
Information audits	Course/website/offer/campaign/social/agent samples, screenshots, defects, correction and closure.
Agents/partners	Due diligence, contracts, training, monitoring, PMU verification and breach/remediation evidence.
Students/remedies	Complaints, claims, material-change consultation, corrections, refunds/compensation and accessibility evidence.
Assurance	Dashboards, annual effectiveness review, independent testing, residual risk and improvement plan.

Appendix F. Related LAAT documents and official references

F1. Related LAAT documents

- Articles of Association; Management and Governance Framework; Scheme of Delegation; Board and committee terms of reference;
- Risk Management Policy and Framework; reportable-events process; business continuity and student-protection arrangements;
- Student Contract / Terms and Conditions; offer-letter and pre-contract information templates;
- Fees, Additional Costs, Resit Fees, Fee Liability and Debt Management arrangements;
- Course Changes, Closures and Material Changes Policy, including qualification/validation, mode, location/facilities and fees;
- Student Complaints Procedure; Academic Appeals Policy; Refund and Compensation Policy;
- Admissions and Recruitment Policy; agent appointment, management and monitoring arrangements; anti-bribery and conflicts controls;
- Marketing and Published Information Approval Procedure; Information Control Procedure; website/content register;
- Equality, Diversity and Inclusion Policy; Reasonable Adjustments arrangements; accessibility and data-protection documents;
- Staff Training and Continuing Professional Development Policy and Learning, Teaching and Professional Development Framework — this policy's Section 7 training architecture, curriculum and assessment must be read consistently with, and cross-referenced from, both documents, given all three now address aspects of mandatory training; Quality Plan; VLE expectations; Access and Participation Statement; student voice;
- Plymouth Marjon University partnership agreement, operational schedules, programme information, regulations and service entitlements;
- Records Retention Schedule; Whistleblowing and Speak-Up Policy; Financial Regulations; Value for Money Statement and Framework.

F2. Official reference points

Authority	Reference
Office for Students	Condition C5: Treating students fairly; prohibited behaviours; Regulatory Notice 7 and C5 declaration/checklist; condition C1/C2/C4 and reportable-events guidance as applicable.
Competition and Markets Authority	Higher education: consumer law advice for providers; current unfair commercial practices guidance under the DMCCA; unfair contract terms, pricing and fake review guidance.

Authority	Reference
Legislation	Consumer Rights Act 2015; Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013; Digital Markets, Competition and Consumers Act 2024; Higher Education and Research Act 2017; Equality Act 2010; UK GDPR/Data Protection Act 2018.
Office of the Independent Adjudicator	OIA Rules and Good Practice Framework, including complaints handling and Completion of Procedures.
Student Loans Company	Current provider requirements for student status, fee liability and adjustments/refunds.