

**ISTITUTO MARANGONI LONDON
CONSUMER PROTECTION LAW
SELF-ASSESSMENT**

ACADEMIC YEAR 2019 – 2020

IML's overall approach to ensuring compliance with consumer protection law

At every stage of the student lifecycle; from enquiries, to admissions, enrolment and through to completion of study, the London School commits to ensure:

- a) prospective students and students are given up front, timely, clear, accurate and comprehensive information;
- b) the contracts it uses to govern relationships with students are fair and have transparent terms and conditions; and
- c) its complaints handling practices are clear, accessible and fair.

Such commitment is demonstrated in our Foundation, BA (Hons) and MA Collaborative Agreements with Manchester Metropolitan University (Manchester Met), it is made explicit that the London School:

- 'Shall in their dealings with applicants and students comply with the Consumer Laws, taking particular account of the Competitions and Marketing Authority (CMA) Guidance;
- Shall provide to applicants, prospective students and/or students any information that Manchester Met reasonably requires IM to deliver concerning the University's role as validating organisation;
- Shall not engage in any activity, practice or conduct which could constitute an offence under the Consumer Laws (whether such act was committed in the UK or not);
- Shall endeavour to ensure that all its employees, contractors and agents who are performing services in connection with this Agreement shall comply with its obligations under Consumer Laws'

Also, as demonstrated within the terminated (August 2019) Collaboration Agreement with Bellerbys Educational Services Limited (trading as Study Group) in relation to students studying on the Foundation programme delivered by Study Group, it is made explicit that:

- 'Study Group shall be responsible for the production and distribution of all marketing materials for the ISC [International Study Centre] and the Foundation courses...provided that all marketing materials shall be subject to the prior written approval of Marangoni [the London School]...'
- 'Study Group shall comply with all reasonable and lawful instructions of Marangoni from time to time and all guidelines and protocols provided by Marangoni from time to time concerning the marketing and promotion of the ISC, the Foundation awards and awards to prospective students'.

In February 2019, Study Group notified Istituto Marangoni that it did not wish to renew the existing agreement (in place to 31 August 2019), allowing current students to complete their Foundation programme and closing recruitment for future cohorts. Since receipt of this notification, Istituto Marangoni has worked with Study Group to agree formal teach out arrangements and to ensure applicants, current students and other relevant stakeholders are provided with accurate and up-to-date information compliant with consumer protection law.

CMA compliance and consumer protection law issues are annually monitored and reviewed through:

- a) the Audit Committee, the School Board, Programme Committees and CPL working group; including by way of the Student Survey and student feedback analysis relating to student information
- b) specific staff & agent training activities (such as NARIC, UCAS, SLC, CMA and UUK)
- c) seeking legal advice when confirming the School collaborative agreements, reviewing student terms and conditions and complaint handling
- d) themed Istituto Marangoni Away Days and London School Management Away Days

The London School's Business Development Manager (who oversees Admissions, PR and Communications for the School) is responsible for managing consumer protection law issues on behalf

of the School. Equally, in relation to consumer protection law issues the Business Development Manager also works closely with the Director of Education and the Registrar, with oversight ensured by the School Director and the London School Board that ultimately reports to the Board of Governors.

School staff representatives also make use of sector training events and networks in relation to CMA and consumer protection law (such as GuildHE, CHEAD and WonkHE). This has led to, for example: internal use of Supporting Professionalism in Admissions (SPA) guidance and training; interview mapping checklists; complaints and appeals register monitoring; and Continuous Improvement Plan complaints analysis.

To ensure that the School remains fully compliant and responsive to consumer protection issues, the Consumer Protection Law (CPL) Working Group, reporting directly to the School Board, was operationalised in 2018/19.

The CPL Working Group's membership includes: the Business Development Manager as chair, the Registrar, the Director of Education, a Programme Leader Representative, and a Student Governor (by initiation for relevant items, i.e. student terms and conditions). It reports quarterly to the School Board on compliance monitoring activities ensuring any consumer protection law issues are identified and acted upon in a timely manner. The CPL Working Group considers, for example: compliance-related staff and student development and training needs; admissions and complaint handling responses; terms and conditions; information published on the website and the student intranet; student survey and complaint analysis and actions; and efficacy of student representation in raising awareness and in identifying issues.

Also, the Board of Governors' termly agenda (in place from academic year 2018/19) will be revised to include a regular item relating to the School's compliance with consumer protection law.

IML's approach to providing information to applicants and students: research and application stage, offer stage and enrolment stage

Material Information is provided to applicants prior to decision-making/ submission of application. The information provided at this stage details key information on the programmes we deliver, such as:

- the programme's title and structure
- the relevant fees/costs (including total programme costs and additional costs)
- entry requirements (including English language requirements and visa requirements)
- teaching, learning and assessment methods
- location of study
- length of programme
- programme regulations
- placement opportunities and information
- final award
- the awarding body
- regulatory body
- terms and conditions

Key information on the London School's programmes is advertised on the official Istituto Marangoni website. The website includes information on programme structure, admission requirements, links to the validated programme specifications, fees, other relevant costs, student loans, scholarships, cross-school experiences and possible career paths.

Istituto Marangoni (as a group entity) also publishes a prospectus available to all applicants that contains information on all programmes delivered at each School location, alumni destinations, industry engagement opportunities and tutor profiles. The London School ensures that the information provided

in the wider group prospectus is clear and accurate via regular School review and formal approval by the School Director.

The London School also provides clear and concise programme and school information through offer letters to applicants and pre-arrival information. Through audit review and School Board reporting, the information provided at research, application and offer stage is appropriate in terms of 'pre-contract information' as defined under the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013.

In order to ensure accuracy, consistency and currency with regard to the information that applicants receive, the School takes the following actions:

- the Admissions team are provided with compulsory induction, internal and sector training that includes information compliance provided to applicants and students;
- quarterly meetings between the Admissions team and Programme Leaders to maintain consistency of published course information;
- Open Days in which trained subject tutors and enrolled students are available to meet with applicants;
- Taster Workshops based upon current teaching delivery provide applicants with a real insight into study at the London School.

The Business Development Manager (responsible for managing consumer protection law issues and CMA-trained) also provides one to one inductions for Agents contracted to represent the School. Agents attend training undertaken by the School within the region, including a School (virtual or onsite) tour and also a presentation on admissions, programme content, School facilities and entry requirements. Furthermore, Agents are in turn monitored, reviewed and managed by Istituto Marangoni Regional Managers who are employed by the group to ensure currency and consistency of information communicated to applicants in compliance with legal regulation.

The London School regularly reviews information provided to applicants and students to ensure currency and clarity of information. The primary means of review is through the annual School review (undertaken in Spring Term in preparation for new recruitment cycle). The Business Development Manager also regularly seeks professional legal advice, particularly when reviewing the student terms and conditions with outcomes reported to the School Board.

The London School engages student representative focus groups to consider information provided, its timeliness, its format and clarity. In April 2019, the student representative focus group provided further feedback on the clarity and accessibility of the student terms and conditions.

Information relating to programmes is outlined within the website, prospectus, validated programme specifications, unit specifications, unit handbooks and the student handbook. The London School's Quality Assurance department monitors and reviews these sources of information quarterly to ensure consistency and that no changes are made to the validated programmes, unless via the School's (and Manchester Met's) formal modification procedures. In these instances, students are consulted regarding proposed changes, with express consent received (if applicable). Subsequently relevant documents are amended and published (where agreed) as soon as possible and prior to the next intake of students.

In summary, to comply with the CMA requirements and consumer protection law best practice, the School ensures that applicants and students are provided with all necessary 'pre-contract' and 'material information' related to their programme(s) of interest in a timely manner. The School monitors and reviews information regularly to ensure accuracy, clarity and accessibility. When any approved modification has been made to a programme, the Admissions team and Quality Assurance department makes sure that applicants are made fully aware of these changes and provide express consent before they accept an offer. In addition to this, students are made aware of this information again subsequently during their Induction briefing and are able to access material information through the Student Intranet.

Finally, Programme Leaders and the academic faculty continually refer students to approved sources of information confirmed by the Quality Assurance department (i.e. unit/ student handbook, unit specifications).

IML's contract terms and conditions

The London School has the following contracts which govern relationships with students: validated programme and unit specifications, Istituto Marangoni Student Handbook, Manchester Metropolitan University Collaborative Partner Handbook and Collaborative Agreements (Foundation, BA (Hons) and MA students), Study Group Collaboration Agreement (ISC Foundation students, expired 31 August 2019) and the London School student terms and conditions.

The London School's student terms and conditions, including all applicable rules and regulations, are made readily available to applicants and students: through the admission portal, pre-arrival and enrolment and admissions pack. Upon receipt of an offer, students are advised of the time period by which they have to consider the terms and to accept or decline their offer. At the point of annual re-enrolment, students are again provided with a copy of the terms and conditions to which they have agreed and signed.

As previously mentioned, the School ensures that terms and conditions are fair and legally compliant through obtaining legal advice, annually.

The London School ensures that terms, conditions and regulations are clear, fair and understandable to students. This is achieved by monitoring of complaint themes and outcomes relating to information and services and soliciting feedback from students within Programme Committee meetings and Student Representative focus groups. In order to ensure that the terms remain clear, fair and understandable to both applicants and students, the London School engages students as follows:

- through invitation of a student representative to the CPL Working Group where student terms and conditions are considered;
- through annual review of terms and conditions at CPL Working Group and School Board;
- through appointment of a Student Governor to the Board of Governors.

IML's complaint handling processes and practices

Students and applicants can access the Manchester Metropolitan University Complaint Policy via the Manchester Met website, or the London School Student Intranet. Students are informed about the complaints policy: during the application stage, at the point of induction, via student representative training, within the Student Regulations Handbook, and ongoing through discussion at Programme Committees.

When annually reviewing and updating the complaints procedures, the London School refers to and incorporates the guidance of the Office of the Independent Adjudicator (OIA), as outlined in its 'Good Practice framework for handling complaints and academic appeals'. In addition, School staff regularly attend external training and refresher workshops.

The London School takes the following actions in order to ensure our complaints process is clear, accessible and fair:

- termly Continuous Improvement Plan complaints analysis undertaken at School level;
- monthly School Director reports to the Board of Directors;
- yearly focus groups with Student Representatives to discuss emerging complaint trends;
- annual training for the staff relating to the complaints process and register;
- School periodic management review of complaint investigation and outcome decisions; and
- reports to the Audit Committee (for example, review of OIA submission);

- regularly obtaining legal advice regarding our complaint handling processes

In addition after conclusion of the London School's internal complaints progress, students are able to progress complaints to Manchester Met, where London School decisions can be reviewed for fairness and reasonableness.

The complaints process is reviewed annually with any arising procedural updates actioned by the School Board. Complaints procedures are detailed within the Student Handbook and the Student Representative Handbook that are both available on the School's Student Intranet. In addition, students are briefed on the complaints procedure during the induction week and during annual Student Representative training workshops.

These actions enable the School to monitor trends, make sure complaints are closed within the timeframe specified within OIA guidance, and to take actions to prevent similar issues being raised again.

The London School ensures that all staff know, and are competent with, complaints processes through annual compulsory trainings and workshops provided at the start of each academic year and also periodic management review of complaint investigation and outcome decisions.

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