



# **UCFB\***

## **Competition and Markets Authority (CMA)**

### **Compliance Policy**

|                              |                                        |
|------------------------------|----------------------------------------|
| <b>Owner:</b>                | Director of Global Student Recruitment |
| <b>Author:</b>               | Head of Marketing and Admissions       |
| <b>Version Number:</b>       | 3.1                                    |
| <b>Approved By:</b>          | Board of Directors                     |
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| <b>Date of Last Review:</b>  | May 2026                               |
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## **1. Introduction**

University Campus of Football Business, recognise the role and importance of the Competition and Markets Authority (CMA) in ensuring that relevant consumer laws are acknowledged and applied to the recruitment of students across the higher education sector.

This document outlines how UCFB, as a higher education institution, will comply with CMA guidance, recognising the importance of clear, accurate, unambiguous and timely information for students, ensuring terms and conditions are fair and outlining a fair and accessible complaints handling process.

UCFB also recognises its regulatory obligations under the Office for Students (OfS) Condition C5: Treating Students Fairly. The Office for Students Condition C5 requires higher education providers to ensure their courses are delivered and assessed in a way that is transparent, accurate, and fair to students, aligning with Competition and Markets Authority expectations on consumer protection so that students receive what they were promised and are not misled about the quality or outcomes of their qualification. This policy therefore supports UCFB's compliance with both CMA expectations and OfS regulatory requirements

## **2. Applicable Laws**

- Consumer Rights Act 2015
- Consumer Protection from Unfair Trading Regulations 2008 (CPRs)
- Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013 (CCRs)
- Office for Students (OfS) Condition C5 (Treating Students Fairly)

## **3. Key Areas of Compliance**

UCFB has identified the following key areas of compliance, aligned with CMA guidance and the requirements of OfS Condition C5.

1. Information provision
2. Ensuring Terms & Conditions are fair
3. Ensuring that complaint handling processes are accessible, clear and fair

### **3.1 Information Provision**

Information will be provided to students through the entire student recruitment journey, from the research and application stage, through to the offer stage and enrolment.

#### *A. Student research and application stage*

Students will be provided with material information which is accurate, clear, unambiguous and timely. This information includes:

- (i) course title;
- (ii) entry requirements/criteria (both academic and non-academic), and an indication of the standard/typical offer level criteria;
- (iii) core modules for the course and an indication of likely optional modules, including whether there are any optional modules that are generally provided each year;
- (iv) information about the composition of the course and how it will be delivered
- (v) the overall method(s) of assessment for the course, e.g. by exams, coursework and practical assessments;
- (vi) the award to be received on successful completion of the course and, if relevant, the awarding body or institution;
- (vii) location of study or possible locations, including work placements;
- (viii) length of the course;
- (ix) tuition fees and other costs associated with the course. e.g. DBS checks;
- (x) whether the course and provider are regulated and by whom, e.g. OfS;
- (xi) whether the course is accredited, e.g. by a professional, statutory or regulatory body;
- (xii) any particular terms that may be seen as surprising.

#### *B. Offer stage*

UCFB will provide, and continue to provide, important information to prospective students to help inform their decisions during the decision-making process. UCFB will:

- (i) bring our terms and conditions (T&Cs) to the attention of students and highlight anything that may be found particularly surprising;
- (ii) Provide students with the necessary pre-contract information prior to acceptance. To include tuition fees (including if any known fee increases are planned) and, where applicable, information about the total cost of any associated costs, and whether these extra costs are mandatory or optional

#### *C. Student enrolment*

UCFB will provide all appropriate information to students during the enrolment stage. UCFB will ensure that:

- (i) pre-contract information given to students at the offer stage is still accurate on enrolment. In the situation where it is no longer accurate, UCFB will inform students at the earliest opportunity and get consent to the change;
- (ii) T&Cs are accessible, drawing the attention of students towards them along with any other relevant rules and regulations.

### **3.2 Ensuring T&Cs are Fair**

UCFB will ensure that:

- (i) our terms can be easily located and students have the chance to review our terms before acceptance;
- (ii) UCFB will highlight any terms that are particularly important or those

- that may be deemed as surprising;
- (iii) our terms are written in plain and intelligible language;
- (iv) our terms are not drafted in a way such that their effect could be unfair.

### **3.3 Ensuring That Complaint Handling Processes are Accessible, Clear and Fair**

UCFB will ensure that:

- (i) our complaints procedure is easily accessible;
- (ii) UCFB provide students with information about our complaints procedure before they accept an offer;
- (iii) UCFB provide students with clear and accurate information regarding our complaints procedure;
- (iv) UCFB do not create unreasonable barriers for students pursuing a complaint;
- (v) UCFB provide the ability for students to escalate the matter if they are unhappy, and to appeal;
- (vi) UCFB follow any guidelines which may be applicable to our institution e.g. Office of the Independent Adjudicator's (OIA) Good Practice Framework;
- (vii) our staff are trained in and follow our published complaints handling procedure.

## **4. Ensuring our compliance with CMA guidance and OfS Condition C5**

- 4.1 UCFB maintains systems and processes to ensure ongoing compliance with CMA guidance and OfS Condition C5 requirements.

### **4.2 Audited Materials**

A number of materials produced by UCFB will undergo an audit process to ensure CMA compliance. These materials include:

- Our institution website
  - [ucfb.ac.uk](http://ucfb.ac.uk)
- Our prospectuses
  - UCFB undergraduate and postgraduate
- Marketing collateral
  - Emails
  - Social media posts
  - Event banners

### **4.3 Amendments to Materials**

When material amends are required to be made to the materials outlined in 4.1, they will enter into an approvals process that is governed by the following staff members:

|                                                                                                        |                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <b>Institutional lead on public information provision</b>                                              | Head of Marketing and Admissions – lead approver of all materials and responsible for consulting with the below contacts as required. |
| <b>Institutional lead on student admissions</b>                                                        | Head of Marketing and Admissions                                                                                                      |
| <b>Institutional lead on academic quality</b>                                                          | Head of Academic Quality                                                                                                              |
| <b>Chair of the institution's Academic Board</b>                                                       | Academic Dean                                                                                                                         |
| <b>Chair of the institution's Academic Board subcommittee on Marketing, Recruitment and Admissions</b> | Director of Global Student Recruitment                                                                                                |

External approval of public information is sought from the institution's partners, where applicable:

- For academic information, approval is sought from our university partner at the University of East London
- For approval of information regarding student experience that involves a third- party partner, approval is sought from that partner. E.g. Facility information from a stadium campus partner

Committees where documented approval of public information will be minuted include:

- The institution's Marketing, Recruitment and Admissions sub-committee of Academic Board, which is then reported by sub-committee chair at Academic Board
- An annual letter of assurance will be provided to the institution's Governing Body

#### 4.4 **Compliance Checks**

The frequency of compliance checks and approvals are as follows:

|                            |                                                                                                                                   |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Website                    | Biannual full review, completed every March and October                                                                           |
| Prospectuses               | Biannual full review, completed every March and October in line with reprinting dates                                             |
| Other marketing collateral | Approved by the Head of Marketing and Admissions as and when required, in consultation with appropriate staff members or partners |

#### 4.5 **Approval Tracking and Storage**

Audit and approval checklists and storage:

- Checklists allow for the processing of the review of each item by the institution's Marketing & Communications team
- [The Public Information Policy](#) seeks to ensure that all public information is published in a timely manner, reflecting the needs of its target audience, and that its continued accuracy is regularly reviewed by the institution
- Documentation of item reviews are stored in a shared folder with shared access for stakeholders
- UCFB's completed OfS self-assessment on Consumer Protection Law will also be stored in this shared folder

#### 4.6 **Additional Information**

All queries regarding this document and UCFB's CMA compliance should be directed to the Head of Marketing & Admissions in the first instance at [marketing@ucfb.ac.uk](mailto:marketing@ucfb.ac.uk).