



5. Non-Academic Debts

Terms that employ the use of academic sanctions for non-academic related debts (such as accommodation or travel costs) will be open to challenge under unfair terms legislation. OCRPL has amended its terms and conditions to bring practice into line with these requirements.

6. Proposed changes to courses

6.1 Where a proposed change to a course would effect a course-level learning outcome or material information, student feedback from the cohort(s) to be affected by the proposal should be sought. Ideally, this would be via a direct e-mail to individual students affected, giving them an opportunity to respond with feedback by a given date, after which feedback would be considered and any alterations to planned changes made to accommodate reasonable feedback. The affected cohorts should then be notified of the effective date of the changes originally proposed. Where further changes have been made in the light of feedback, these should also be communicated.

6.2 Where an approved change to an advertised course will affect a course-level learning outcome or previously published 'material information', current applicants should be informed.

Complaints Handling

All information relating to complaints handling processes should be easy to locate, accessible and clear to all parties. It should be made available to prospective students before the contract is concluded and made available to students in a durable medium along with the remainder of the "material information". Any other opportunities open to students for redress with third parties (such as the OIA) should also be made clear.

OCRPL should ensure that responsibility for complaints handling where there is partnership/collaboration/sponsor/award from another provider is made clear, available and easily accessible to all relevant students/prospective students.



The remit and time limits within complaints handling processes should be fair, and made clear and easily accessible to all students/prospective students. No barriers should be put in the way of students/prospective students exercising their rights under their contract with OCRPL and no pressure should ever be brought to bear to dissuade a student from bringing a complaint.

OCRPL has a duty to ensure that all staff are trained in, and follow its complaints procedure. Considerable work has been undertaken over the last 12 months by colleagues in the Academic Registrar's Office and Legal Counsel to enable appropriate front-line staff to be trained in complaints-handling. Given the size of the organization, this has been easy to implement and carry out.

CMA guidance describes 'compliant' complaints procedures as setting out clear and reasonable timescales for each stage of the process, feedback and requests for further information and evidence; providing an avenue for students to escalate the matter further if they remain unhappy with the outcome and ultimately to appeal, and following guidelines on complaints handling published by a third party complaint or redress scheme of which the HEI is a member, in this case the Office of the Independent Adjudicator (OIA).

Within the complaints process, stage 1 complaints are the preserve of the department in which the source of the complaint takes place. It is also critical in terms of central monitoring and reporting of complaints that accurate information on levels of complaints by areas and theme is available in order for OCRPL to take appropriate steps to address shortcomings.

What has OCRPL done to ensure compliance with CMA Guidance?

1. In June 2019 OCRPL established a Working Group with membership as set out below, which met on a monthly basis and which included representation from academic departments as well as a number of central service areas with a particular remit to take forward compliance with consumer protection legislation.



The CMA Working Group was dis-established in January 2020, and CMA matters are now under the aegis of the office of the Legal Counsel of OCRPL.

CMA Working Group consisted of:

- Dr Dermot O'Callaghan, (Chair)
 - Dr Christopher Sugden, (Secretary)
 - Mr Hendrik Storm, (Treasurer)
 - Mr Noel Frost, (Legal Counsel)
 - Dr Patrick Sookhdeo, (Director of Studies)
 - Ms Caroline Kerslake, (Member of Board)
 - Dr. Joshva John, (Dean of OCRPL)
 - Mr Andre Lombard, (Academic Registrar and Administrator)
 - Mr. Jorge Coelho, (Head of Student Finance)
 - Mrs Rosemary Kerslake, (Member of Board)
 - Dr Vinay Samuel, (Member of Board)
2. OCRPL's formal postgraduate student terms and conditions for acceptance of a place on a course of study have been revised and updated.
 3. 'Material information' for courses of study has been developed and has been sent out to all candidates made an offer of a place on a course of study since 2018/2019 cycle.
 4. Information on additional costs has been gathered, and is made available on both internal and external facing web pages.
 5. Work has been undertaken to develop the online Student webpage and app, providing a user-friendly interface to academic regulation, studies, interaction and other provisions governing the student experience, accompanied by information about related sources of information advice and guidance.

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6. OCRPL's Good Practice Guide on Information for Students was updated in 2019 in the light of CMA guidance.
7. Information on consumer protection law was communicated across OCRPL, and a number of generic and bespoke events will be provided during the course of 2020 to further ensure ongoing development and compliance.
8. Guidelines for University staff working in marketing have been produced.