

Provider's Name: Birmingham Christian College (BCC)

Provider's UKPRN: 10007810

BCC's approach to ensuring compliance with consumer protection law

Introduction

1. The Birmingham Christian College (BCC) was founded as Birmingham Bible Institute until it re-branded itself as Birmingham Christian College when it became a formal member of the Selly Oak Colleges Federation. BCC moved to the Crowther Hall campus; a purpose-built missionary training centre previously used by the Church Mission Society (CMS). Newman University validates Birmingham Christian College's degree programmes. Their mission is to make high quality education accessible to all who can benefit from it and to deliver research and scholarship that has a positive impact on society. Their students become independent thinkers with ambition, empathy, and a lifelong love for learning.
2. Birmingham Christian College is an approved NCFE Investing in Quality (IIQ) centre. NCFE is an awarding organisation recognised by the qualification regulators for England (Ofqual), Wales (Qualification Wales) and Northern Ireland (CCEA Regulation). The College is also accredited by Accreditation Service for International Colleges (ASIC) an independent body providing accreditation services for independent, further, and higher education colleges in the UK. ASIC accreditation helps students and parents make a more informed choice and will also help a school, college, university, training provider or distance education provider, demonstrate to the international student body that they are a high-quality institution.
3. BCC has delivered university accredited programmes in theology at undergraduate since 2020 and will start postgraduate levels in 2022. BCC's accredited programmes are validated by Newman University. While maintaining a focus on a core undergraduate BA (Hons) Theology degree, BCC has successfully integrated this with other vocational disciplines through the provision of CertHE/DipHE/BA Theology (Biblical & Pastoral Theology) & CertHE/DipHE/BA Theology (Theology & Missional Leadership)
4. BCC's Masters level programmes will start in May 2022, and this include postgraduate taught programmes (MA qualifications Pentecostal/Charismatic Missions) and MA in Practical Theology and Strategic Leadership to provide progression routes for undergraduate students as well as postgraduate opportunities for students studying in a professional or vocational context. The postgraduate programmes are validated by Newman University.
5. BCC is well equipped with modern facilities and very highly qualified and experienced staff for both administrative and academic roles. Our lecturers have many years of teaching and research experience at HE levels from other HE institutions before joining us. Many of them are practitioners, who bring the practical experience of church planting, running churches and nurturing disciples, into contemporary discourses and relevant theological reflections in class to enrich students' learning experience. Other facilities such as IT and Wi-Fi connectivity, library and classrooms on campus are adequate for the student numbers envisaged over the next 5 years. There is more room for the expansion of any facility on campus and BCC will carry out development of facilities as student numbers grow.

Documents available for review:

- Newman University BA Validation approval letter – April 2020
 - Partnership/collaboration Agreement between BCC and Newman University.
 - Newman University and BCC Annual Programme annex-2020/2021
 - Newman University MA Validation approval letter – Dec 2021
6. Over the years, most of the BCC students studied on campus until the COVID19 pandemic which made us switched our programmes online. We have however resume blended learning approach in this academic year. The following are the range of study modes that are offered:
- On-campus – face-to-face.
 - Online (MS Teams) – with input from a lecturer and the Virtual Learning Environment (VLE).
 - Intensive Sessions (Weeks) – condensed on-campus delivery with the possibility of earning academic credit.
 - Blended – students studying through a combination of on-campus and on-line delivery.

Size

7. The following data sets the above in context (2022-2023):
- Number of faculty staff – FTE (including visiting lecturers): 2 FT employee+ 2 part time + 1 FT on secondment + 26 VLs.
 - Number of administrative staff – 2 FT and 1PT
 - Number of students (all students): For current students on 2022/23 academic year (please see the table below).
 - Turnover: £1,212,254 (as of 31st Dec 2022)
 - Total Net Assets: £2,149,850

Compliance assessment

8. In preparation for this submission, Birmingham Christian College (BCC) Senior Management Team reviewed its policies, processes, regulations, formal documents and materials against the guidance and requirements of:
- a) UK higher education providers advice on consumer protection law, published by the Competition & Markets Authority (March 2015). BCC ensures compliance with CMA by using the four key principles in instilling a compliance culture. Firstly, Risk Identification: this is where senior members of staff look at the business model and identify areas where we might be at risk of breaking Competition Law. Secondly, risk assessment where the college takes a critical look into addressing potential risks.

Thirdly, risk mitigation where actions are determined by any risks identified. And finally, a review of the first three steps. This is done frequently to ensure compliance.

- b) Regulatory Advice 3: Registration of new providers for 2019-2020 published by Office for Students (February 2018).
 - c) Consumer Protection from Unfair Trading Regulations 2008.
 - d) Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013.
9. This self-assessment document was produced as evidence that the review had been undertaken. Currently the designated staff allocated for consumer protection law issues is the Director of Trust Administration.
10. The result of the review is that BCC believes the institution to be compliant with Consumer Protection Law. However, in the context of continuing enhancement activities within the institution and with a view to providing additional and independent assurance, this self-assessment identifies areas of compliance but also areas of development.
11. **The areas of development** include implementing processes to provide independent and evidenced compliance assurance through external legal advice and student feedback. Also provide staff training on consumer protection law.

Information for prospective students

12. Information about the courses BCC offers, the structure of courses and the fees/costs are provided to a student before a student decides about whether to study at BCC. This information is provided:
- a. Verbally - through discussions with members of BCC's Admissions Team who undertake student recruitment, through discussions at open days and through informal discussion with the Academic Dean.
 - b. In writing - through the BCC prospectus and other documents (see Table 1 below).
 - c. Visually – on the BCC website, admission portal and on social media and through advertisements and published periodicals.
13. Information provided is accurate, clear and unambiguous although BCC is reviewing its website and other materials to ensure that content is refreshed for the 2021-2022 recruitment cycle. In this regard, Programme Leaders will take on the responsibility of ensuring that new programmes and programme content on the website is up-to-date and relevant for prospective and current students. In addition, BCC is currently producing a new prospectus in which programmes across the institution are more consistently described.
14. Information is easily accessible through verbal, written and visual communications. This includes through the website, VLE, programme handbooks and open days. Improvements have now been made by replacing programme information sheets with a prospectus that describes, in one place and in the clearest terms, the BCC programme offer.

15. **Area for development:** To identify 'important' and 'surprising' rules and regulations and bring these to the attention of students during the recruitment phase.

Information in the offer stage

16. BCC appreciates that when an offer is accepted by the student that there then exists a contract between BCC and the student. During this period, BCC continues to provide important information to prospective students to inform decision making. This is in compliance with Consumer Protection from Unfair Trading Regulations 2008 (CPRs). Should information be changed from that previously notified, then BCC notifies the applicant/student and requests express agreement to the change. Where BCC anticipates changes then this is made clear. While it is important that students receive what they expected after deciding which course to study, this does not rule out all changes to the course offer, however CMA legislation allows BCC to make adjustments, for example, that may be necessary to reflect changes to the theory in an area of research or practices around the subject or its delivery. Material changes are more likely to be considered fair under CMA legislation if they are restricted to allowing minor adjustments that are unlikely to negatively impact students, are driven by developments in the field of study or its delivery, or are changes required by necessity (e.g. due to accreditation requirements).
17. BCC has now set up terms and condition document that requires a student to enter a signed contract in respect of Terms & Conditions, (link to terms and condition and fee payment Plan on BCC website).
18. Students are notified of the requirement to abide by the terms of the following policies and procedures at the time of offer so students can read this before offer can be accepted by the student:
- a. Academic Prospectus (Link below) and the BCC's CMA's guidance (Link to website).
 - b. Students Terms & conditions (Link below)
19. **Area for development:** With effect from 2022-2023, BCC will require students to enter into a written contract that will set out the full terms and conditions of study at BCC – including abiding by the policies and procedures set out above. These terms and conditions will draw students' attention to 'important' and 'surprising' rules and regulations and students will be required to evidence written consent. We will appoint a member of the management team who will be responsible to monitor BCC's compliance with Consumer Protection Law. In addition, BCC will seek legal advice to independently assure the Senior Management Team that the institution follows Consumer Protection Law and will seek specific student feedback in this respect.

Information in the enrolment stage

20. BCC appreciates that any changes made following the acceptance of an offer and prior to student enrolment must be agreed with the student otherwise this may be a 'misleading

omission' under the CPRs. **Area for development:** Record keeping in respect of 'misleading omissions' will be improved during 2022-2023; new processes will be implemented.

21. BCC currently enrolls most of its students online (due to COVID). Therefore, BCC appreciates that the CPR requirements for on-premises contracts apply. **Area for development:** Formal processes to ensure compliance with the CPR will be implemented during 2022-2023.
22. For students enrolled 'at a distance' BCC appreciates the need to comply with the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013 (CCR) requirements for distance contracts. **Area for development:** Formal processes to ensure compliance with the CPR requirements will be implemented during 2022-2023.
23. Upon enrolment all students have access to:
 - a. <https://bccoll.classter.com> -BCC's intranet for faculty, administrative staff, and students.
 - b. VLE – BCC's virtual learning environment.
 - c. Student Handbook.
 - d. **Area for development:**

Terms and conditions

24. As stated above, BCC currently has terms and conditions and are being issued to prospective students at the point of offer. In respect of these two agreements, the following can be noted:
 - a. The Fee Payment Plan is made available to the student upon in an offer letter.
 - b. The Terms & Conditions document is made available to the student as part of the offer acceptance and enrolment process. **Area for development:** BCC students will be made to evidence a signed copy of the Terms and condition to for safe keeping upon enrolment.
25. As stated above, students are notified of the requirement to abide by the terms and the following policies and procedures:
 - a. Relevant Students' Handbook.
 - b. Policies and processes referenced in the relevant Students' Handbook and on BCC website.
26. BCC believes that these documents are fair in that they:
 - a. Include clear rules and regulations.
 - b. Are accessible and available to students at the appropriate time.
 - c. Are written in plain English and comprehensible language so that students understand them.
 - d. Are not drafted with the intention that their effect could be unfair.
 - e. Drafted in a way to strike a fair balance between the rights and obligations of BCC and those of the student.

Information for applicants and students

27. Information is communicated to applicants and students as follows:

- a. Verbally - through discussions with members of BCC admission Team who undertake student recruitment, through discussions at open days and through informal discussion with the Academic Dean.
 - b. In writing - through the BCC prospectus and other documents.
 - c. Visually – on the BCC website, on social media and through advertisements and published periodicals.
28. Most applications to BCC are dealt with in accordance with the following cycle:
- a. Applicant registration Form on admission portal via BCC website.
 - b. The applicant receives a personalised email from BCC’s Admissions Team in which applicant will be able to log in to the admission portal to start the application process.
 - c. If the applicant has provided consent, then the Admission Team keep in contact with the applicant and provide information as requested.
 - d. Applicant completes online Application Form and Disabilities Form and provides references which are taken up.
 - e. Application goes to Admissions Committee for a decision before offer is made or otherwise.
 - f. Applicant either accepts or rejects offer.
 - g. Applicant pays deposit if applicable when offer is accepted.
 - h. BCC stays in contact with the applicant.
 - i. Accommodation is offered/confirmed when face-to face applies.
 - j. Student signs Residency Terms & Conditions when face-to-face applies.
 - k. Student receives the Programme Handbook.
 - l. Student is granted access to the Virtual Learning Environment and BCC students’ portal upon enrolment (intranet).
29. BCC has currently redesigned its website to create a one-stop-shop for information on advice and guidance for students. This new page currently has all of BCC’s policies, procedures, handbooks, and other key documents for reference purposes.
30. **Area for development:** Programme Handbooks refer to BCC policies and procedures. However, it is not known whether students read all of the Handbook. Therefore, during the induction process, more explicit reference will be made to the importance of the Programme Handbook and to the key policies and procedures relevant to most students.
31. Applicants and students receive specific information from BCC in accordance with the following timing and delivery methods:

Table 1 – Information schedule

Information	Timing and method of delivery To the applicant / student
BCC prospectus (link below)	At Open Days and other public events and, accessible to all potential applicants on BCC website.

Fee Sheet (Link below)	This is readily available on the BCC website. Prior to the applicant/student being required to accept the Fee Payment Plan provided in the offer letter.
Fee Payment Plan – (Link below)	Discuss with students on case-by-case basis at the same time as references are taken up and prior to a place being offered.
Student Finance England information document (Student finance website)	Currently not being offered but will do upon successful registration with OfS, at this time the information will be issued prior to application, the same time as references are taken up and prior to a place being offered.
Students' terms and conditions and Residency Terms & Conditions (link below)	When offer letters are sent to students they are directed to the terms and condition on BCC website to read. When student accept an offer, it is expected that the terms and conditions will have been read by the student before acceptance of the offer. Also, when a student accepts a room that has been offered if face-to-face applies, student will be sent a copy of the Protected Licence Agreement at the time of offer so they could see what they were signing up to. Accommodation (on-campus) is not offered until students have satisfactorily completed the Application Process.
On-line Application Form – link below	Completed by the applicant as part of the Application Process. Prior to applying, potential applicants are able to complete an online Enquiry Form at any stage in their engagement with BCC; the Admission Team respond to Enquiry Forms submitted online through the BCC website (https://bccoll.uk/courses/). All applications are completed on the BCC admission portal.
Disabilities Form – online application form link below	Completed by the applicant as part of the Application Process
Acceptance of offer	This is completed on the BCC admissions portal
Programme Handbook: Cert HE/Dip HE/ BA (Hons) Theology (Appendix 6)	Sent to the student at enrolment, also available on the VLE for all students.

Linked documents

BCC prospectus: <https://bccoll.uk/wp-content/uploads/2021/05/BCC-Prospectus-2021.pdf>

Fee Sheet: <https://bccoll.uk/courses/course-fees/>

Fee payment plan: <https://bccoll.uk/wp-content/uploads/2021/11/Students-Finance-Fee-payment-plan.pdf>

Fee refund policy: <https://bccoll.uk/wp-content/uploads/2021/11/Policy-for-Handling-Fees-Deposits-and-Refunds.pdf>

Online Application Form:

<https://customersapi.classter.com/Admission?redirectUrl=https://bccoll.classter.com>

Disabilities Policy: <https://bccoll.uk/wp-content/uploads/2021/11/Student-Disciplinary-Procedure.pdf>

Terms & Conditions: <https://bccoll.uk/wp-content/uploads/2021/11/BCC-Students-Terms-and-conditions.pdf>

Residency Terms & Conditions: <https://bccoll.uk/wp-content/uploads/2021/11/BCC-Students-Terms-and-conditions.pdf>

Student Academic Appeal Policy & Procedure: <https://bccoll.uk/wp-content/uploads/2021/11/Students-Academic-Verification-Appeal-Policy.pdf>

Student Academic Complaint Policy & Procedure: <https://bccoll.uk/wp-content/uploads/2021/11/Student-Complaints-Policy-Procedure.pdf>

Academic Prospectus: <https://bccoll.uk/wp-content/uploads/2021/05/BCC-Prospectus-2021.pdf>

Complaint handling processes and practices

32. BCC has several complaints policies and procedures which are brought to the attention of students through the Programme Handbooks and by faculty and administrative staff in receipt of complaints:
- a. Student Academic Appeal Policy & Procedure (see link documents).
 - b. Student Academic Complaint Policy & Procedure (see link documents).
 - c. Non-Academic Complaints Procedure (see students handbook in Appendix 6).
33. BCC believes that its complaints policies and procedures are accessible, clear, and fair to students and that they provide students with clear and accurate information about the complaint handling process. The following is also noteworthy:
- a. Where a student raises a complaint through an informal stage, the student is notified that the formal stage can be followed. This is in accordance with the policies.
 - b. At the conclusion of a process, a student is notified of their ability to raise the complaint with BCC's validating partner, Newman University, or with the Office of the Independent Adjudicator.
 - c. The complaint handling process sets clear and reasonable timescales which are always applied for the benefit of the students.
 - d. Unreasonable barriers are not put in place to prevent a student pursuing a complaint.
 - e. The policies and procedures provide the ability for a student to escalate the matter if they are unhappy with the outcome and to appeal the matter if not satisfactorily resolved. Board of Trustee members are involved with hearing appeals in respect of student complaints.

- f. Student complaints are handled by senior members of staff including the Principal, Director of Trust Administration, Academic Dean and Director of Finance Business & Operations.

- 34. Even though BCC has not had any formal or informal complaints in the past, we do have a system in place to keep comprehensive records of each complaint and the progress of each complaint are to be kept by the Director of Trust Administration.

- 35. **Area for development:** BCC's Student Academic Complaints Policy & Procedure and Student Non-Academic Complaints Policy & Procedure were not made available to prospective students in the application /offer stage; this is currently available on our website which is now accessible to all prospective students from 2022.

- 36. **Area for development:** BCC will refresh the training of its staff regarding complaint handling and will improve student feedback mechanisms to ensure that dissatisfaction is addressed before it becomes an informal or formal complaint.

- 37. **Area for development:** BCC currently has CMA guidance and policy but will enforce the need for all staff to study and comply with the Consumer Law Policy document that briefs staff about Consumer Law obligations, including the importance of providing information to applicants and students, and will back this up with training; this will be completed in 2022-2023.