



Fairfield School of Business

# Student Recruitment & Admissions Policy

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**Version 10.0**

Approved by the Board of Governors

For Public Use

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## 1. Introduction

- 1.1. This Policy has been developed to ensure that the School practices a clear, fair, explicit, and consistent with good practice for admissions procedure and has been guided by the UK Quality Code for Higher Education<sup>1</sup> and by Schwartz Principles of Fair Admission to Higher Education<sup>2</sup>. Due regard is given for the following legislation:
- *The Equality Act (2010)*
  - *General Data Protection Regulation (GDPR)*
  - *CMA Guidelines for Providers of Higher Education*
  - *Offender Rehabilitation Act (1974)*
  - *Criminal Rehabilitation Act Exceptions Act (1974)*
  - *UK Consumer Protection Act*
- 1.2. The Fairfield School of Business (FSB) recognises that program achievement and continuity are ensured by recruiting and recognising prospective students whose willingness, ability, and motivation to learn is no longer the goal of achieving an academic program. However, they fully engage with the school to collectively improve the nature of learning opportunities.
- 1.3. FSB Student Admissions and Recruitment Policy is consistent with the school's mission to support people of all backgrounds, abilities, and aspirations to reach their potential through learning, achievement, and development.
- 1.4. FSB's Student Admissions and Recruitment Policy serves as a guide for anyone involved in enrolling students in the school's higher education programs and for prospective students who wish to better understand the school's admissions procedures and procedures.
- 1.5. FSB's higher education provision is validated by Bath Spa University and De Montford University. This policy is based on the Admissions policy and practice of the School and is approved by our partner universities and FSB's Board of Governors.

## 2. Guiding Principles

- 2.1. FSB offers Higher Education programmes that lead to awards validated by its university partners; specific student admissions criteria and procedures may vary between programmes offered under different validation agreements.

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<sup>1</sup> <https://www.qaa.ac.uk/quality-code>

<sup>2</sup> <https://dera.ioe.ac.uk/5284/1/finalreport.pdf>

The following guiding principles underpin all admissions to study at the School:

- i. The School values and strives for diversity in the student community and will work to ensure that all students have the opportunity to reach their potential in relevant subjects at an appropriate level. In line with this goal, the School strives to recognise the academic and other related achievements of each applicant.
- ii. The School accepts applications from motivated applicants of all ages and origins. We strive to recruit students with the best academic abilities and exceptional ability in the curriculum of their choice. We understand that a student's potential is not always manifested through formal academic qualifications, and we welcome the underrepresented individuals, especially in higher education.
- iii. The School strives to effectively recognise potential applicants who are expected to excel in the chosen program of study. Our admissions policy supports applicants to achieve this goal at every stage of the admissions process.
- iv. The School is committed to providing equal opportunities to its students. We know that School life is enriched by a diverse student body that reflects the wider community.
- v. In accordance with our commitment to fair recognition, the selection is made based on several criteria. Evidence of academic aptitude includes academic achievement, professional and personal experience, and the likelihood of successful completion of the intended program of study.
- vi. Support prospective students throughout the admissions process and remove unnecessary learning barriers that can prevent specific groups from submitting successful applications.

### 3. Admissions Principles

- 3.1. The school has developed recruitment, selection, and recruitment policies and procedures. Underpinned by organisational structures and processes. The school aims to students with the determination, motivated and eagerness to learn to complete their chosen FSB program.
- 3.2. This policy takes into account of the Office for Students requirement that 'students are recruited to courses for which they have the capability to achieve a successful outcome'.
- 3.3. FSB has a robust procedure for handling appeals and complaints which are fair, honest, and accessible. The school's appeals and complaints procedures are carried out promptly and in line with the agreed timescale. (*Chapter B2 and indicator 2 of the Quality Code*).

- 3.4. FSB will notify prospective students as soon as possible of any changes to the program they applied for. Applicants will be informed of the alternative immediately. (*Chapter B2 and indicator 7 of the Quality Code*).
- 3.5. FSB's recruitment activities provide information to prospective students in a timely manner and the school ensures that the information provided is accurate, reliable, and valid. This allows prospective students to make a formed decision about higher education. (*Chapter B2 and indicator 3 of the Quality Code*).
- 3.6. Recruitment activities may include:
  - i. advertisements
  - ii. School website and prospectus
  - iii. digital or printed media including leaflets, banners and brochures
  - iv. social media campaigns
  - v. word of mouth and student referrals via FSB Referral Scheme
  - vi. open days
  - vii. collaboration with job centres and other employment organisations
  - viii. team of student ambassadors that work with BAME communities
- 3.7. FSB defines how decisions and reasons for decisions are recorded and passed on to the applicant.
- 3.8. FSB determines how decisions and the reasons for those decisions are recorded and conveyed to prospective students via the school's student management system.
- 3.9. FSB monitors, reviews, and updates its recruitment, selection, and recruitment policies; Procedures to improve and continuously maintain the school's mission and strategic goals.
- 3.10. Selection processes for entry into FSB programs are underpinned by transparent entry requirements, both academic and non-academic, in line with awarding body requirements and present no unnecessary barriers to prospective students.

## 4. General Admissions Regulations

- 4.1. Admission criteria and admission requirements are prepared for each program in accordance with the requirements of the partner universities. The School and its university partners work together to ensure that admission requirements meet national standards and practices.
- 4.2. All the selection procedures follow the Equality and Diversity Act (2010).

### **Entry Requirements**

- 4.3. Prospective students that are **under the age of 21**, the entry profile for higher education programs is likely to include one of the following:
- i.* BTEC Level 3 qualification in a relevant subject,
  - ii.* An Access to Higher Education Certificate awarded by an approved further education institution,
  - iii.* Other Related Level 3 qualifications
- 4.4. Prospective students that are **over the age of 21**, and do not have the above qualifications can apply via the School's assessment-based entry. The School will consider the prospective student's prior experiences (work, voluntary, life, and other experiences that are relevant to the course).

### **Submitting an application**

- 4.5. All prospective students are required to complete the school's electronic application which can be found on the FSB website. Prospective students are required to read the School's Terms and Conditions and acknowledge they have read and understood the conditions before submitting the application.
- 4.6. Applicants are required to attend a one-to-one consultation with a member of the Admissions team before starting the application process.
- 4.7. The School will ensure that all material information provided to students about the learning opportunities offered by the school at the point of application, including all pre-contract information, complies with the requirements of the *UK Consumer Protection Act*. The School demonstrates the principles of openness and accountability with respect to public information set forth in the *CMA Guidelines for Providers of Higher Education*.
- 4.8. The School requires prospective students to input their personal, professional, and educational experience on the School's electronic application that provides an indication of an applicant's ability to meet the demands of the program.
- 4.9. Applicants with any special requirements should make these known to the School as soon as possible to ensure that reasonable adjustments can be made to the admissions process accordingly.

### **Supporting Documents**

4.10. Prospective students are required to provide the following documents in support of their application:

- i.* Valid identification
- ii.* Proof of address
- iii.* Evidence of previous qualifications; where required, these will be cross-checked against relevant databases or NARIC.
- iv.* Personal Statement (500 words)
- v.* Supporting funding documents

The school may need additional evidence or documents to make a decision. In this case, prospective students will receive a clear explanation of why this information is needed and how it will be used in the admissions process.

### **Student Finance Interview**

4.11. Prospective students must attend a student finance interview with either the Admissions Officer or Student Finance Officer. The purpose of this interview is to provide candidates with the opportunity to discuss their affordability and eligibility for financial support.

### **Diagnostic Tests – English and Maths**

4.12. In addition to academic entry guidelines, FSB requires all higher education applicants to demonstrate a sufficient level of English and Maths to allow successful completion of their chosen course of study.

4.13. Prospective students are also required to demonstrate a standard of literacy in the English language and a standard of numeracy sufficiency through compulsory English and Maths tests.

4.14. FSB's programs are delivered in English. The grading of the English entry test will align with the International English Language Testing System (IELTS); applicants must achieve a minimum IELTS score of 6.0 for undergraduate degree programs starting at Level 4 and a minimum IELTS score of 5.5 for degrees with Foundation Year.

### **Screening for Accreditation of Prior Experience (SAPE)**

4.15. Applicants who cannot present relevant qualifications in their application will be considered for admission based on prior education gained through personal and professional experience such as training that may take place at work, at home, or in personal time and if it is measurable and relevant to the course, candidates may complete the SAPE.

- 4.16. Re-applying students and applicants who have previously completed a SAPE assessment will not be required to complete this again unless they are changing course.
- 4.17. Applicants that provide a BTEC Level 3 (90 credits) or equivalent in the relevant subject will be exempt from completing a SAPE.

### **Academic Interview**

- 4.18. Academic Interviews are conducted by an appropriate Programme Academic / Lecturer. During the interview, the information contained in the application is considered such as the application form detailing the applicant's experience and personal statement.
- 4.19. Applicants must demonstrate that they have the necessary skills to successfully complete the course. Interviews assess candidates based on their communication skills, motivation, suitability for the chosen program of study, commitment and self-discipline and evidence of knowledge and understanding of the subject area.
- 4.20. The academic interviewer may further request additional interviews for the applicant with a more senior academic staff member, senior admissions officer, or the student support department. (See Section 6 for additional interviews).
- 4.21. Applicants applying for degrees awarded by Bath Spa University will be interviewed via audio recording. The academic interviewer requests permission from the candidate before the recording starts and during the recording. Applicants are informed of this requirement at the start of their application.
- 4.22. No application will be deemed complete until all steps of the Admissions process have been completed.
- 4.23. Applicants are expected to be actively involved in the admissions process and may have various application deadlines. Candidates may be excluded from the admissions process if they miss key deadlines or are deemed not to respond to communications with the Admissions team.
- 4.24. The applicant will be notified in writing. If an applicant has been withdrawn from the application process by a member of the Admissions Team, they may re-apply for the next available intake.

## **5. Equality of Opportunities and Widening Access**

Prospective students may be required to undertake additional interviews. The additional interviews are explained below:

## **Assessing applicants with Disabilities and Special Educational Needs (SEN)**

- 5.1. The School welcomes applications from all disabled applicants, those with specific learning difficulties and special needs.
- 5.2. Early disclosure permits the School to offer prospective students suitable and reasonable adjustments as early as possible. This can be done on the School's application form, during the academic interview, or verbally to a member of the School staff.
- 5.3. All prospective students that have disclosed a disability or special need must attend an interview with a Student Support Officer to discuss the nature of the disability or special need.
- 5.4. All prospective students who declare a disability or special need will be advised of the support available to them via Student Support, including the process for applying for Disabled Students' Allowances.
- 5.5. Applicants must provide appropriate evidence from an accredited body or medical professional confirming the nature of the identified need.
- 5.6. Applicants unable to retrieve the required medical evidence from their GP or medical professional can complete a consent to access form. This enables the School to contact the applicants' GP or medical professional on their behalf. The consent to access form is available upon request from the Admissions Office and can be emailed electronically, if required.
- 5.7. If an applicant is at a disadvantage because the School cannot meet certain application requirements or is forced to apply at the expense of the learning experience, the School will promptly notify the applicant as soon as the situation becomes apparent.

## **Applicants with Criminal Convictions**

- 5.8. A previous conviction does not necessarily preclude admission to FSB and the school complies with the *Offender Rehabilitation Act (1974)*. Applications from applicants with a criminal record will be considered carefully.
- 5.9. Applications must declare their previous criminal history on the School's application form. School reserves the right to deny admission to an applicant if he/she has a criminal record that may endanger the safety of students and staff.
- 5.10. Applicants must declare all convictions, cautions, reprimands, warnings, and prohibitions if they intend to study a Health program involving students who come into contact with

vulnerable members of society, as recognized under the *Criminal Rehabilitation Act Exceptions Act (1974)*.

- 5.11. Applicants must provide full details of an unspent conviction upon request, after which they will be invited for an interview with the Senior Admissions Officer and/or Head of Admissions.
- 5.12. Depending on the nature of the applicants' criminal history, applicants may be asked to provide a reference from their previous/current employer, probation worker, or an individual in good standing.
- 5.13. After the interview, the application will be reviewed by the Admissions Panel to assess the risk to other students, to staff, and to School property. (See 7.2 on Admissions Panel).
- 5.14. The Admissions panel is responsible for meeting the school's obligation to care for its staff and assessing the risk of admitting applicants with an unspent criminal record.
- 5.15. Applicants may be expelled from the School without prior notice if it is later found that the applicant has not reported any unspent and unfiltered convictions, cautions, reprimands, warnings, and bind-overs.
- 5.16. The School retains the right to refuse entry to any applicant with a previous criminal conviction which may jeopardise the security, safety, or reputation of the School.

### **Access and Participation**

- 5.17. The School maintains an honest and transparent admissions process, professionalism to promote maximum participation and equality of opportunity; Special attention is given to adults and others returning to studies and looking for opportunities through higher education.
- 5.18. The School's recruitment and admissions strategies are guided by a commitment to upholding equality of opportunity and fostering diversity.
- 5.19. FSB will make sure that no applicant is dealt with much less favourably or deprived at some stage in the admissions process for motives in their race, ethnicity, belief, gender, sexual orientation, gender identity, gender reassignment, marital or civil partnership status, pregnancy, maternity, age or disability, including mental health.
- 5.20. The School positively encourages applications from candidates from a diverse range of backgrounds, experience and ages, including those with disabilities. The School ensures that applicants participate in a fair and equal process for selection, regardless of gender, sexual orientation, race, ethnic origin, age, disability, religious beliefs, or socio-economic background.

## 6. Offers and Decision-Making Process

- 6.1. FSB's decision-making procedure has been designed in accordance with *the Quality Code*.

### **The responsibility of the Dean (or a Senior Programme Academic nominated by them):**

- i. Reviewing applications to study with all supporting documentation and approving, rejecting, or referring applications to the Admissions Panel.
- ii. Participating in any secondary candidate interviews where specified by the Admissions Panel.
- iii. The final decision on standard applications shall rest with the Dean or Senior Programme Academic nominated by the Dean.
- iv. If the application is deemed unsuccessful, applicants can appeal the decision. (See section 10 for Appeals)

### **The responsibility of the Admissions Panel:**

- i. The Admissions Panel reviews all study applications that require discretionary contributions from senior academics and those with particular expertise; it considers chiefly matters relating to students with special educational needs, safeguarding concerns, other cases which fall outside of the standard admissions procedure.
- ii. The final decision to admit an applicant that falls outside of the standard admissions procedure shall rest with the Admissions Panel.
- iii. The Panel additionally considers appealed decisions of refusal (see Section 9)

### **Acceptance of an Offer**

- 6.2. Applicants can accept their offer by logging into their online application. Applicants are required to complete four steps when accepting an offer:
- i. Funding Section
  - ii. Select Timetable

- iii.* Agree to the Student Enrolment Terms and Conditions
- iv.* Complete the Admissions Satisfaction Survey

6.3. Accepted applicants will receive an offer sent which is published on their online application. The offer letter contains important information such as:

- i.* Duration of course
- ii.* Awarding body
- iii.* Code ID and title of course
- iv.* Duration of the course
- v.* Awarding body
- vi.* Course start and end dates
- vii.* Total tuition fees for the course
- viii.* Duration of validity of offer
- ix.* Student Enrolment Terms and Conditions
- x.* Privacy Notice

6.4. Once all steps have been completed, the applicant is deemed to have accepted their offer. The Admissions team will provide information on the enrolment and induction process the student must attend to formally begin their studies.

6.5. Applicants have the right to cancel their acceptance of the offer any time up to 14 days after the acceptance. If the applicant cancels within this period, they will not be bound to the Enrolment Terms and Conditions.

6.6. Places for FSB's foundation year programmes are limited and offers cannot be made to every applicant that meets our typical entry requirements. If an offer cannot be made due to the capacity being full, the applicant is notified in writing and offered an alternative program (if available)

6.7. It is the responsibility of the applicant to provide full and accurate information as part of the admissions process and to notify the School of any changes or corrections to their original applications.

6.8. Applicants are required to accept their offer within 14 days of the offer issue date. Applicants that fail to accept their offer will be deemed as cancelled.

6.9. The Head of Admissions manages the fairness and consistency of offer making.

6.10. If the school intends to deny an application, the applicant will explain the reason for the denial, along with information about the appeals process and how to successfully reapply in the future. (See 9 for appeals).

## 7. The Assessment of Advanced Standing and Direct Entry

- 7.1. Applicants who have previously completed a qualification at level 4 or 5 or who can demonstrate relevant experience may be eligible to start a programme at a different entry point.
- 7.2. Applicants wishing to apply for advanced standing must provide original transcripts and proof of previous education with their application. Applicants who are eligible for advanced standing with specific credits will be notified after deliberation by the Admissions Panel and in consultation with the awarding body.
- 7.3. Applicants applying for advanced standing need not to complete the diagnostic tests. Applicants will be required to submit all required documents set out in section 4.5 and complete the academic interview.
- 7.4. More information regarding the assessment of advanced standing and direct entry can be found on the School's website: <https://fsb.ac.uk/how-to-apply>

## 8. Re-applications from previously registered students

- 8.1. FSB understands that some applicants may wish to interrupt their studies due to personal reasons or unforeseen circumstances.
- 8.2. The Re-admission Process applies to former FSB students who were previously enrolled on a course and have requested permission to be readmitted to study.
- 8.3. This process applies only to students who previously withdrew from a course or were withdrawn by the School.
- 8.4. Students are required to provide documentary evidence to explain why they were unable to complete their previous course, and their activity since leaving the School.
- 8.5. Applying for Re-admission can be done by completing the Re-admission form which can be found on the FSB website <https://fsb.ac.uk/readmission-process>.
- 8.6. Former students wishing to apply for Re-admission are encouraged to complete the Re-admission form one month before the start date of their new chosen course. Any applications submitted after this time may not be processed in time.
- 8.7. Former students who have been approved by the Re-admission Panel will be required to re-apply as a new student and follow the standard admissions process and meet any conditions outlined by the Re-admission Panel, if any.
- 8.8. Former students that have been deemed unsuccessful for Re-admission would not be able to re-apply at FSB for any future cohorts or appeal against the decision of the Re-admission Panel.

- 8.9. If an applicant has had previous study terminated, or was in poor academic standing at the point of their withdrawal, the school reserves the right to not consider their application to any programme of study.

## 9. Feedback, Appeals and Complaints

- 9.1. FSB is committed to providing a fair, transparent and consistent procedure for handling feedback, appeals and complaints which is accessible to all applicants. However, we acknowledge that there may be cases where you are dissatisfied with the admissions process, and in this case, the appeals and complaint procedure has been designed in line with *chapter B2 and indicator 10 and 11 of the Quality Code*.

### **Informal Complaint Procedure**

- 9.2. FSB is devoted to solving admission queries fast and informally. Firstly, the applicant must discuss their complaint informally with the Admissions Officer. If the applicant is unsatisfied, then the formal complaints and appeals process will apply.
- 9.3. Applicants should normally raise the matter within 10 working days of the action.

### **Formal Complaint Procedure**

- 9.4. If the complaint is not resolved to the satisfaction of the applicant through this informal means with the Admissions Officer, the complainant should by all means submit the Admissions complaint form which be made on the School's website:  
<https://fsb.ac.uk/appeal-complaints>
- 9.5. The complaint form should be completed and submitted correctly and should include copies of all previous correspondence; and explain why the applicant remains dissatisfied and the intended outcome.
- 9.6. The Head of Admissions shall investigate the complaint with relevant staff, if it is deemed necessary, and reply within 10 working days.
- 9.7. If the applicant continues to be dissatisfied with the Head of Admissions' response, the applicant may then write to the Director of Admissions and Marketing. The Principal will be made aware of complaints escalated to this level.
- 9.8. The response from the Director of Admissions and Marketing is considered final.
- 9.9. Complaints must only be made by applicants, except in special circumstances.

9.10. If the complaint procedure is not followed correctly by the complainant, the complaint may be considered inadmissible.

9.11. The complaints procedure cannot be used to appeal against the outcome of an application (See 10.4 for appeals).

*NB: the Admission complaints procedure is distinct from the Student Complaints Procedure.*

### **Making an appeal on a rejected application**

9.12. Where an application has been rejected, the applicant may appeal in writing to the Admissions Panel.

9.13. Applicants can submit an appeal by completing the Admissions Appeal Form available on the School website: <https://fsb.ac.uk/appeal-complaints>

9.14. Applicants must appeal within 20 business days of receiving a decision on their application. The Admissions Panel will consider an appeal if the applicant proves that:

- i.* In case of a dispute between the published admission criteria and the admission decision
- ii.* Administrative or procedural errors when processing the application
- iii.* Emergence of information that may have influenced the decision and was not available at the time of the initial decision or was provided by the applicant but was not considered by the School
- iv.* The School has not followed its normal procedures (as outlined in this policy), or applied them fairly, and this has had a material impact on the decision of refusal.

9.15. The Admissions Panel responds to the applicant's appeal in writing, usually within 10 business days. If a response is delayed, the applicant will be notified of the reason for the delay.

9.16. The applicant is notified of the appeals process when the outcome of their application was published.

9.17. If the appeal is granted, the response will be communicated to the applicant and will indicate the results of the school's application review.

9.18. The decision of the Admissions Panel is final.

*NB: the Admission appeals procedure is distinct from the Student Appeals Procedure.*

## Requesting feedback on a rejected application

- 9.19. The Feedback procedure has been designed in accordance with the UK Quality Code
- 9.20. All FSB applicants should expect and receive fair and equitable treatment from all FSB employees in the application and registration process.
- 9.21. Decision-making will be fair and transparent and applicants have the right to receive detailed decision feedback on their application upon request by emailing [admissions@fairfield.ac](mailto:admissions@fairfield.ac)
- 9.22. The applicant is required to request feedback on a rejected application within 10 working days of the School's communication of the unsuccessful application.
- 9.23. The Head of Admissions will provide general feedback to the applicant within 10 working days from the date of the request.

## 10. Student Induction

- 10.1. FSB will offer an inclusive and suitable induction to all new students as a part of their formal enrolment onto the School's programmes.
- 10.2. The purpose of School's induction is primarily to:
  - i.* To prepare students for rigorous study and to adjust to academic life
  - ii.* Introducing the school campus layout, facilities, support services, and virtual learning environment.
  - iii.* To provide students with the information and resources they need to begin learning (eg, reference books and timetables),
  - iv.* Formally introduce key staff to students
- 10.3. The School generally informs students of the induction details at least 14 days prior to the date of induction, unless they are notified as soon as possible due to late enrollment in the program.
- 10.4. Students enrolling on a franchised/validated course under a collaborative partner will be asked to complete the university/School's enrolment/registration form which is then forwarded to the relevant partner.
- 10.5. New students must attend the School's induction day. (In case the student misses the induction day or time slot, one to one induction may be provided on arrival as part of the registration process).

- 10.6. The School reserves the right to cancel and withdraw any application if the student does not attend the induction and there is no formal communication with the Admission Team. *More information about student inductions is given in the School's Student Induction Policy*

## 11. Prospective Students Personal Data

- 11.1. FSB complies with the *General Data Protection Regulation (GDPR)* and ensures that the applicant data is not released to any third party without their consent, including to parents, spouses or family members.
- 11.2. The School collects and stores certain types of data in various forms about applicants and students. This enables FSB to fulfil its functions as an education provider.

## 12. False Information

- 12.1. The School reserves the right to withdraw or reject any application found to contain misleading or false information. This information may also be shared with the external patrons for further investigation and may result in the application being withdrawn entirely.
- 12.2. The School will take responsible steps to check that documents provided by the applicant are genuine documents; they do not contain any obvious alterations; and they relate to the applicant. Where there are any doubts about the authenticity of the documents further checks will be made through the issuing authority. Evidence of further checks will be placed on the applicant's file.

## 13. Review and Update

- 13.1. Responsibility for reviewing and evaluating the effectiveness of the Student Admissions and Recruitment Policy resides with the Academic Board. Updates to this policy will be coordinated by the Head of Admissions, all revisions and amendments will be reviewed by the School's Executive Committee and ratified by its Board of Governors.



### **Version Tracking:**

Version	Author / revisions by	Changes summary	Approved by	Date
1.0 - 8.5	Director of Marketing and Admissions	Executive Committee	Executive Committee	Sep 2016 - Sep 2018
9.0 – 9.1	Director of Marketing and Admissions, Quality Audit Manager	Amendments to document structure and guiding principles to align with Revised UK Quality Code for Higher Education and to reflect procedural changes effective form 2019.	Board of Governors	Sep 2019
9.2 – 9.3	Director of Marketing and Admissions	Minor amendments to student consultation process and SAPE information. Clarification of grounds for appealing refusal of admission	Board of Governors	May 2020
9.4	Director of Marketing and Admissions Quality Audit Manager	Annual review and update. Clarification on role of re-admission panel added.	Board of Governors	Oct 2020
10	Director of Marketing and Admissions Quality Manager	Substantial re-write to all sections to redact and streamline policy	Board of Governors	January 2022