



UKMC Compliance Policy

Date	Author	Summary of Changes	Version	Authorised
16/08/2024	Head of Quality and Compliance	Consolidated procedures for due diligence and recruitment partner onboarding	1	Academic Board
10/11/2025	Head of Quality and Compliance	Updates to refer to sub strategies and overarching frameworks. Inclusion of references to due diligence processes.	2	Academic Board
Policy/Procedure Management and Responsibilities				
Policy/Procedure Owner	<p>This policy is owned by the Head of Quality and Compliance and maintained through the Quality and Standards Committee.</p> <p>Day to day operations are distributed across the Quality and compliance team and other departments Heads as appropriate.</p> <p>The policy provides reference points for important compliance areas of higher education institutions.</p>			
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Linked Documents and Policies Internal	UKMC Strategic Plan 2025-2030			
Linked Documents and Policies External	<ul style="list-style-type: none">The Equality Act 2010, ensuring equitable access and representation for under-represented and disadvantaged groups.The Data Protection Act 2018 (UK GDPR),safeguarding applicant information and transparency.The Consumer Protection from Unfair Trading Regulations 2008, ensuring accuracy in marketing and communication.OfS Conditions of RegistrationFreedom of Information Act 2000 (FOIA)			
Dissemination Plan	Recruitment Partner Training Compliance Overview Trainings with Departments Other internal UKMC trainings			
Accessibility	Alternative formats available on request quality@ukmc.ac.uk			

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1. Introduction

- 1.1. The UK Management College (UKMC) has a duty to withhold standards and practices within legal and fair manner. These standards have been regulated and agreed upon by stakeholders of the College.
- 1.2. The responsibilities are outlined in governance templates, frameworks, and clear terms of reference for committees to ensure consistent reporting and expectations.
- 1.3. This Compliance policy outlines the College's requirement to comply with certain legal and regulatory frameworks. It should be read in conjunction with other policies of the College which will be mentioned.

2. Scope

- 2.1. This policy applies to all members of staff of the College or anyone who has been granted use of the Colleges facilities.
- 2.2. All staff have a responsibility to follow processes correctly and adhere to legal frameworks in line with the Colleges legislation.
- 2.3. All staff have a duty to report any instances where someone might not be adhering to the College policies to the Compliance Office (compliance@ukmc.ac.uk).

3. Key Contacts

- 3.1. **Data Protection Officer (DPO):** dataprotection@ukmc.ac.uk
- 3.2. **Quality and Compliance Team** (compliance@ukmc.ac.uk)

4. Definition of Terms

- 4.1. **Examination:** may be generically defined as a formal assessment which takes place in a specified venue, on a specified date, at a specified time, has a prescribed time given in which to complete it and takes the form of a written response to written questions (in this context “written” may include other media such as use of a PC/laptop), which requires continuous invigilation and needs to be conducted under exam conditions.
- 4.2. **Candidate is** used to describe a student undertaking an examination.
- 4.3. **Student Academic Office (SAO):** is used to describe the team and/or office at UKMC that has designated responsibility for the administration of examinations.
- 4.4. **DSL/DDSL** The term ‘Designated Safeguarding Lead (DSL)’ is used to describe the person at UKMC who is responsible for safeguarding and child protection. DDSL is the Deputy Safeguarding Lead.

4.5. **Personal data:** Data which relates to a living and identifiable individual, including computerised data and some manual data (i.e., paper-based records, microfiche, etc.).

4.5.1. When the DPA was first passed into law, it covered data held in a "relevant filing system", which is defined in the DPA as a "set of information" which "is structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible". However, the Freedom of Information Act 2000 (FOIA) modifies and extends the DPA to apply to "unstructured personal data". Unstructured personal data are any personal data which falls outside the definition of the relevant filing system given above. The difference may be illustrated as follows. Personnel records are clearly part of a "structured filing system" as they are arranged by surname or employee number. However, a member of staff may serve on a college committee, and that person's name will appear in the minutes of that committee. The minutes are not structured by names, but by the dates of committee meetings. Under the modification to the DPA, such data now falls within its remit.

4.5.2. **Data controller:** A person or organisation which controls the purposes and manner in which data is processed. UKMC is a data controller, and the point of contact is the Head of Quality and Compliance or dataprotection@ukmc.ac.uk

5. Policy Statement

5.1. For student or public facing policies or information, it will be available on the UKMC website at [UKMC | Policies and Legislation](#). Other documents may be internal, such as policies, procedures, frameworks, and intellectual property.

5.2. This UKMC Compliance Policy is to enable the identification and a threshold of core compliance areas that are monitored at UKMC.

5.3. This is not exhaustive, and the reader should also refer to departmental policies, frameworks, and strategies for the accuracy of information and procedure.

5.4. The policies which are mentioned below do not cover every policy which the College has.

5.5. A suite of other policies sitting within institutional frameworks highlight core requirements for departments, and guidelines to operate department processes and reporting.

5.6. In depth reviews of each policy can be requested.

5.7. Legal framework and legislation frequently change and are regularly reviewed.

- 5.8. The Compliance Office does everything within their ability to keep up to date with these changes, and also requires the support and expertise of departments and individuals to ensure that policies accurately reflect the processes in place.
- 5.9. Departments are responsible for delivering training as the policy owners.
- 5.10. Departments may wish to request support from Quality and Compliance office for training, or to provide details of wider contexts in the higher education landscape.

6. Admissions Compliance Procedures

- 6.1. See the Admissions Policy, and other admissions procedures for more information.
- 6.2. The College is committed to ensuring an inclusive approach to people aspiring to higher education and aims to provide higher education to anyone with the potential to benefit. We accept students with a wide range of educational experiences and qualifications.
- 6.3. The process of admissions is followed by all admissions staff in line with the awarding partner admissions criteria, which is free of prejudice and encourages equality and diversity.
- 6.4. Admissions staff will be expected to use professional judgement in assessing the academic potential of individual candidates.
- 6.5. Admissions selectors treat each application to the College individually and will normally consider the following information when suggesting undergraduate study, including:
 - 6.5.1. Academic ability and potential as shown in the qualifications section on the application form.
 - 6.5.2. Predicted grades for qualifications yet to be taken.
 - 6.5.3. The Personal Statement and Reference as indications of ability, motivation and potential, alongside information about personal circumstances and contextual social and cultural information.
 - 6.5.4. Related work or volunteer experience showing commitment to a chosen career (particularly important for courses with a vocational route).
 - 6.5.5. Extenuating circumstances, whereby factors beyond the student's control have caused the student to perform less well in their coursework or examinations than they might otherwise have been expected to do
 - 6.5.6. Portfolio/audition/interview performance where applicable.
 - 6.5.7. To ensure that applicants for admission are appropriately qualified for their programme of study and to ensure high standards of fairness and consistency,

the College maintains a record of minimum entry requirements for all courses at undergraduate level. All admissions staff will be required to adhere to these requirements which will be frequently checked by the Compliance Office and the Head of Admissions.

- 6.5.8. If applicants are required to undertake a verbal examination as part of their entry requirements for the course which they would like to study, then this can be done on campus following the interview policy. The verbal examination will take no longer than 15 minutes and is recorded by video which is frequently reviewed by the Compliance Office. Interviewers are trained by more experienced interviewers and can receive random observations by the Compliance Office in order to ensure that the interviews taken place is standardised.
- 6.5.9. If applicants are required to undertake an English exam for their entry assessment, then this will be done using the UKMC Academic proficiency test.
- 6.5.10. The purpose of this is to check an applicant's level of English through reading, writing, spelling and grammar. Applicants must pass this exam in order to be admitted to the College. Interviewers reserve the right to request any applicant to complete an English test if they so feel the need to. Further information regarding this can be found under the 'Invigilated Examinations Policy'.
- 6.5.11. Offer letters can be made if the applicant has met all of the entry requirements of the course. Until all of the requirements have been met the letter cannot be given to the applicant, so it is vital that an applicant keeps in contact with the admissions team throughout the application process.
 - 6.5.11.1. A conditional offer may be offered with clear conditions and expectations relating ultimately to the awarding partner accepting the documentation.
 - 6.5.11.2. In the case of UKMC courses, a conditional offer can be provided to the course which has no ties to other entry requirements, and no guaranteed progression routes, and should be explicitly worded for clarity.
- 6.5.12. The Quality and Compliance Office is responsible for checking and auditing that the admissions department and any other screening processes are in place.
- 6.5.13. The admissions department is responsible for screening and considering that applicants have provided truthful and accurate information as part of the application process and are eligible for entry.

6.5.14. Admissions Department is also responsible for providing admissions officer training to ensure regular update of information and understanding of processes.

6.5.15. Admissions perform cross checks and appropriate background checks to ensure that all files are legitimate. If any files are found to be falsified, then the applicant can be at risk of being barred from the College and the franchised university and will be flagged.

6.5.16. Any recruiter or referrer of the student will also be flagged

6.5.17. Quality and compliance team will keep records of audits and checks for audit purposes and training.

7. Safeguarding Procedures

7.1. See the Safeguarding and Prevent Policy for more information.

7.2. UK Management College the College aims to adopt the high standards and take all reasonable steps in relation to the safety and welfare of children, young people, adults at risk and others who study at, work at and visit the College.

7.3. The Safeguarding and Prevent policy applies to all College students and staff employed by the College, staff who teach on college programmes, and volunteers, who may be working with the following groups whom the College encounters through its teaching activities as well as through its outreach activities:

7.4. Children and young people aged under 18 years

7.5. Adults at risk (as defined by section 42 of the Care Act 2014)

7.6. Any person who may be at risk of being radicalised by any extremist group or ideology under the terms of the Counter Terrorism and Security Act 2015 (Section 26(1)) and as defined in the Prevent Duty guidance, 2015. Except where necessary to specify, hereafter these groups will be collectively referred to as 'at risk groups' or 'at risk individuals'.

7.7. The Compliance Office takes all matters around safeguarding extremely seriously and will support the Designated Safeguarding Lead (DSL) and Deputy Safeguarding Leads (DDSL) in investigation and training needs, or support to develop record keeping systems to facilitate their work.

7.8. Based on the nature of the work which is carried out by the team there could be grounds for needing to report any safeguarding concerns to the Designated Safeguarding Lead (DSL) regarding both students and staff.

7.9. The Compliance Office will follow the same procedures as the Safeguarding Policy and report concerns to the correct people. Any disclosures made to the Quality and Compliance Office will also be reported to the DSL as well.

8. OfS and E6

- 8.1. See the range of governance and framework documentation, or E6 Report and Support Webpages on the UKMC website, for more information.
- 8.2. A full suite of governance, academic, and support frameworks provide the basis for transparent decision making and record keeping across departments through reporting structures.
- 8.3. The Quality and Compliance team, in collaboration with other departments, support the maintenance of the E6 Report and Support (single source for harassment, sexual misconduct, safeguarding and prevent) webpage in collaboration with the Head of HR and DSL.

9. Equity, Diversity, and Inclusion

- 9.1. See the Equity, Diversity and Inclusion Policy for More information.
- 9.2. Quality and Compliance are committed to an inclusive approach to the delivery of Higher Education. Quality and Compliance are working to ensure that the College is open and accessible to all those wishing to participate in and capable of benefiting from Higher Education.
- 9.3. Quality and Compliance value all of the different people studying and working at the College and we are committed to developing policies and processes and approaches to teaching, learning and assessment that tackle inequality and exclusion.
- 9.4. The Quality and Compliance team strives to embrace the inclusion policy of the College throughout normal day-to-day investigations and work. All investigations carried out by the Compliance Office are fair and equal and only are carried out when there are grounds for the investigation, such as a report of concern.
- 9.5. Quality and Compliance will support the Equity Diversity and inclusion committee to enact responsible decision making in line with governance and regulatory conditions.
- 9.6. Head of Quality and Compliance or nominee with attendance the EDI committee.

10. Invigilated Examination Policy

- 10.1. See Preparation of Examinations and other academic policies for further information.
- 10.2. The College has a duty to maintain academic standards by ensuring the integrity of assessment processes. These Regulations apply to all applicants and all enrolled students at the UKMC.
- 10.3. Invigilated exams are done under exam conditions which are ensured by Proctor of the Test Centre on campus. Random visits by the Compliance Office are expected to make sure that exam conditions are put into place.
- 10.4. The Academic Department must have policies in place to ensure consistent exam procedures and data storage solutions are in place.

11. Ethical Recruitment

- 11.1. See Recruitment and Compliance Policy for more information.
- 11.2. A suite of policy and guidance is provided for the Business Development Recruitment) teams to follow due diligence checks on external agreements for recruitment.
- 11.3. Governance and reporting templates are provided to provide transparent reporting into the Marketing and Admissions Committees.
- 11.4. The Quality and Compliance department will support training conducted by the Business Development team, and provide additional training and Q&*A sessions as required
- 11.5. Quality and Compliance will support the audit and monitoring of application quality, as well as flag any suspicious activity in line with the due diligence procedures.
- 11.6. Suspicious activity will be monitored to ensure an evidence basis for continuation or termination.
- 11.7. Quality and Compliance department will drive for robust training and expectations of recruiters.
- 11.8. Business Development teams are responsible for ensuring external recruiters sign the appropriate contracts, policies, and receive training to fulfil the Competition Market Authority requirements and provide accurate information.
- 11.9. Business Development are responsible for flagging any improper use of UKMC branded materials or any activities that may bring UKMC reputation into disregard.

12. Terms and Conditions of A Students Offer

- 12.1. See Student Learner Agreement and Code of Conduct for more information.
- 12.2. An offer from the College and any subsequent enrolment is made on the basis that the information supplied in an application is true and complete, and that an applicant discloses any relevant information relating to current or previous study.
- 12.3. It is the student's responsibility to provide full and accurate information and to notify the College of any changes or corrections.
- 12.4. The information provided in an application will form part of your student record after you have enrolled.
- 12.5. The College will communicate with you by email, letter, phone or text based on the contact information provided on an application.
- 12.6. Applicants must regularly check all forms of communication as detailed by you on an application and inform UKMC if there are any changes to this information, such as contact, proof of address, etc.
- 12.7. It is the applicants responsibility to comply with deadlines/ communication sent to you by The College and/or UCAS associated with your application.
- 12.8. Unless otherwise agreed in writing between the parties, the student learner Agreement shall be subject to and construed and interpreted in accordance with English Law and shall be subject to the jurisdiction of the Courts of England.
- 12.9. The Student Code of Conduct is applicable to all students at the college and breach will result in disciplinary action.
- 12.10. The Compliance Office will cross check and investigate applications to ensure that the terms and conditions of offer letters and the admissions process has been complied with.
- 12.11. Any member of staff who has any concerns regarding the legitimacy of any application should be brought to the attention of the Compliance Office by emailing compliance@ukmc.ac.uk.
- 12.12. Should there be any false information supplied or failure to disclose any relevant information relating to the current or previous study could result in the offer being withdrawn.
- 12.13. Students who may have a criminal conviction during studies should report to the academic registrar for safeguarding risk assessment and access to any reasonable support if eligible to return to study.

13. Data Protection

- 13.1. See IT Data Protection and Security Policy for more information.
- 13.2. The College's policy on data protection and data security and is based on the following principles:
 - 13.2.1. The Institution will comply with all relevant legislation, particularly the Data Protection Act 1998, and base its policies and practices on compliance with the eight Data Protection principles contained therein.
 - 13.2.2. Ensuring compliance is a corporate responsibility of the Institution requiring the active involvement of, and appreciation by, all staff at all levels of the organisation.
 - 13.2.3. The Institution will strive to ensure best practice with regard to data protection and data security processes and procedures.
 - 13.2.4. The Institution will strive to improve practices and procedures using external guidance, monitoring of jurisprudence in the relevant areas, and adopting examples of best practice elsewhere.
 - 13.2.5. The Institution will provide support and services to enable staff handling personal data to remain compliant with the legislation and the Institution's requirements in respect of data security.
 - 13.2.6. As data input comes with risks to intellectual property, commercial sensitivity, and potential output to other users through its learning. All departments are responsible for the confidentiality and security of student, staff, and other organizational data.
- 13.3. Under the Data Protection Act (DPA), personal data must be processed in accordance with the following eight Data Protection Principles. These principles are contained within Schedule 1 of the Act and are the fundamental obligations imposed by the Act with regard to the processing of personal data. The term processing has a wide application which includes the mere fact of holding data about a living individual, as well as the alteration, disclosure, and destruction of personal information. The eight Data Protection Principles state that data must:
 - 13.3.1. Be obtained and processed fairly and lawfully and only if certain conditions are met
 - 13.3.2. Be obtained for specified and lawful purposes
 - 13.3.3. Be adequate, relevant, and not excessive for those purposes
 - 13.3.4. Be accurate and up to date
 - 13.3.5. Not be kept for longer than is necessary
 - 13.3.6. Be processed in accordance with the rights of data subjects

- 13.3.7. Be kept safe from unauthorised access, loss, or destruction
- 13.3.8. Not be transferred to countries outside the European Economic Area (EEA), unless to
 - 13.3.9. countries with equivalent levels of data protection.
- 13.3.10. Information should not be transferred to a third party unless such a transfer is authorised by the Act itself, by other statute, or by the College Data Protection Notice. The Act authorises release to third parties without notice to the data subject under certain limited circumstances such as:
 - 13.3.11. Detection or prevention of crime, apprehension of offenders.
 - 13.3.12. Protection of the vital interests of the data subject.
 - 13.3.13. Pursuant to a contract to which the data subject is a party.
 - 13.3.14. Pursuant to a legal obligation imposed upon the Institution.
 - 13.3.15. Where necessary for the pursuit of the legitimate interests of the Institution or any
 - 13.3.16. third party safe where such processing is unwarranted by prejudice to the rights,
 - 13.3.17. freedoms, or legitimate interests of the data subject.
- 13.4. Where it is legitimate to share personal data with external organisations, the following hierarchy of actions should be adhered to:
- 13.5. Data should be uploaded via a secure portal wherever possible; most organisations using this method publish details of security systems on their websites.
- 13.6. Where there is no secure portal, data should be transmitted electronically (for example, as files, databases, PDF files, images) over secure networks. These files should be encrypted and, if so, then email is acceptable for such transmission. Where the transmission of large sets of data is unavoidable, IT Services can advise how this is best achieved.
- 13.7. Data should be accessed through the host information system directly (if working away from the office, this may be done via a remote connection).
- 13.8. If it is unavoidable to share paper copies of sensitive data, they should be mailed in securely sealed envelopes and sent by courier or registered post. An individual's personal data in the form of, for example, assessment results or letters of appointment, may be sent in sealed envelopes using normal postal systems.
- 13.9. Particular care should be taken when transmitting sensitive data to unfamiliar recipients. Wherever possible the authenticity of the recipient should be checked with a known contact at the recipient organisation.

13.10. It is relatively common for staff or students to request access to personal references written at the time of their application for employment or study at the College, or for employment or study elsewhere. This is an area where a specific exemption is written in the DPA: references given by the College (the data controller) are exempt from the subject access provisions. Thus, students and staff cannot apply to see references provided by the College staff and sent to another organisation. They may, however, apply to the organisation to which the reference has been sent.

14. Induction, Student Finance, and Course Information

- 14.1. The applicant must declare any previous student finance obtained during the admissions process and prior to any enrolment.
- 14.2. If the applicant has intentionally misled, omitted, or provided false information in the application the applicant or student (depending on the time of identification) will be withdrawn and the student record flagged.
- 14.3. Admissions, Academic Registrar may be required to report the individual authorities for fraudulent practices.
- 14.4. The individual may be required to self fund for the period of education that has been obtained at the college and/or become a debtor of the college or awarding partner where reasonable measures may be taken to recover the funds in relation to appropriate tuition fee policies of the college or awarding partners.
- 14.5. The Academic Services team and colleagues delivering induction are responsible for communicating the Full or part time study responsibilities of a student (expectations of being available on site, course timetables subject to changes, attendance and engagement expectations).
- 14.6. Academic departments are responsible for ensuring students have access to course information, handbooks, academic timetables, calendars, and are signposted to procedures.

15. Retention and Engagement

- 15.1. See Attendance and Engagement Policy for more information.
- 15.2. The Academic Registrar is responsible for managing the attendance and engagement processes and reporting in the college, working with the Academic Services Offices.
- 15.3. The Retention Manager works in collaboration with Student Success Tutors and other departments to monitor attendance and engagement activity, which provides insights to early interventions and support.

15.4. The Retention manager provides training to Student Success Tutors, Academic Services, and other departments.

16. Student Surveys

- 16.1. See student feedback and voice policies for more details.
- 16.2. Student Surveys provide insights into the student experience and are key drivers of quality and enhancement.
- 16.3. Quality and compliance support the maintenance of surveys and work closely with departments to ensure surveys are consistently delivered, and align with regulatory reporting requirements, and also provide feedback that has meaningful impact to academic and non academic practices at the college.
- 16.4. Quality and Compliance collate insights and data reporting, which in turn is distributed to committees, and Academic Departments to action departmental, programme level, training, or integrated departmental enhancements.

Anti-Bribery Procedures

- 16.5. See Anti Bribery and other financial and governance policies for more details.
- 16.6. UK Management College (UKMC) requires all individuals acting on its behalf to conduct business honestly, fairly, and professionally.
- 16.7. The College is committed to the prevention of bribery and does not tolerate bribery, corruption, fraud, or dishonesty in any of its activities.
- 16.8. The College is committed to abide by all legislation relevant to the prevention of bribery and corruption in all nation states in which it operates and is bound by the UK Bribery Act 2010 in respect of its conduct both in the UK and overseas.
- 16.9. All members of the College and third parties must abide by the College's policies across the range of its activities and ensure transparency and openness in their dealings on its behalf.
- 16.10. Any allegation that a member of the College has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously and will be investigated by the Compliance Office. The College reserves the right to terminate its contractual arrangements with any third-party providing services for or on behalf of the College where there is reasonable evidence that they/their staff have committed an act of bribery.
- 16.11. Bribery is defined under the UK Bribery Act 2010 as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so, to gain an

advantage, whether personal or commercial. Specifically, the Act makes it an offence to:

- 16.11.1. Offer, promise, or give a bribe.
- 16.11.2. Request, agree to receive or accept a bribe.
- 16.11.3. Bribe a foreign public official to obtain or retain business, or a business advantage.

16.12. All members of the College are encouraged to report concerns they may have of potential breach of the Anti-Bribery Policy whether on the part of other College members or third parties, as soon as possible. This includes any instances where they may be the victim of attempted bribery. In turn, the College is committed to ensuring that its members have a safe and confidential way of reporting suspected wrongdoing. Concerns may therefore be raised directly with the Compliance Office in the first instance or, where this is not felt to be appropriate, to the Group Finance Director or their nominee.

16.13. The College's Whistleblowing Policy also permits staff, and anyone contractually associated with the College to raise concerns of serious malpractice in the College. Heads of Department/Centre/Activity or their representative must report any suspected instances of fraud, including bribery, undertaken by members of the College to the Finance Director.

16.14. Any allegations of misconduct under this Policy within the jurisdiction of the College will be taken seriously. Should it be alleged that any member of the College has acted in contravention of this Policy or the related UK legislation, action may be taken under the College's Disciplinary Policy as determined by the principal or nominated representative. Attempted bribery or acceptance of a bribe may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

16.15. The Compliance Office enforces the policy of the College regarding Bribery and Corruption. On a day to day the Compliance Office will investigate accusations of bribery or corruption and look into any suspicious activity.

16.16. All actions by the Compliance Office will be recorded and will follow the Colleges Anti Bribery policy to ensure precision. The policy is available on the UKMC website.

16.17. These reports will be passed onto the relevant management, such as HR, and the police in cases where the law is being broken.