



Riseladder School of Business and Technology

Refund Policy

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Document Control

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1. Introduction

Our Centre is committed to providing clear, fair, and transparent arrangements for the management of tuition fees and refunds. This Refund Policy ensures that students, sponsors, and funding agencies understand the circumstances in which refunds may or may not be granted.

This policy aligns with:

- **Consumer Rights Act 2015** and CMA guidance on consumer contracts.
- **Office for Students (OfS) Regulatory Advice on Student Protection and Refunds.**
- **OTHM and Pearson Centre Approval Criteria** requiring documented refund arrangements.
- **UK higher education sector practice**, including fair treatment of students and sponsors.

2. Purpose and Scope

2.1 Purpose

The purpose of this Refund Policy is to:

1. **Protect student rights and expectations** – by ensuring that learners are fully aware of their financial obligations and of the limited circumstances under which refunds may be granted. This protects students against uncertainty and supports their consumer rights.
2. **Ensure compliance with legislation and external requirements** – particularly the **Consumer Rights Act 2015**, **Competition and Markets Authority (CMA)** guidance, and the **OfS Regulatory Advice on Refunds and Compensation**, which require transparency, fairness, and clear communication.
3. **Align with awarding body standards** – both OTHM and Pearson require centres to hold a documented Refund Policy. This policy demonstrates our compliance and readiness for external quality assurance audits.

4. **Safeguard the financial sustainability of the Centre** – by applying fair but consistent rules that prevent unreasonable financial loss to the institution, while ensuring students are treated equitably.
5. **Promote accountability and transparency** – by establishing clear roles, responsibilities, and timelines for refund requests, appeals, and decision-making.
6. **Enhance trust and student experience** – by ensuring learners, sponsors, and funding bodies can access a clear framework for refunds, thereby reducing disputes and complaints.

2.2 Scope

This policy applies to all learners enrolled at the Centre, regardless of mode of study (online, blended, or face-to-face). It applies to the following categories:

a. Self-funded students

- Students who pay tuition and associated fees directly to the Centre.
- These students are covered under standard consumer protection law.

b. Students funded by the Student Loans Company (SLC)

- Students whose tuition fees are paid directly to the Centre via SLC arrangements.
- In such cases, refunds must comply with SLC regulations and timelines.

c. Employer/Sponsor-funded students

- Students whose tuition fees are fully or partially paid by their employer, sponsor, or another third party.
- Refunds will be made directly to the funding body and not to the student, unless otherwise agreed.

d. Students in receipt of bursaries, scholarships, or discounts

- Refunds for students in this category will be calculated only on the actual fees paid, after deductions of bursaries, scholarships, or discounts.

2.3 What is covered by this policy

This policy covers:

- Tuition fees (course fees).
- Compulsory programme-related fees directly charged by the Centre.
- Deposits paid at enrolment.
- Compensation for costs incurred due to Centre-led changes (e.g., relocation or programme cancellation).

2.4 What is not covered by this policy

This policy does **not** cover:

- Awarding body registration fees (Pearson, OTHM, or other awarding organisations) once paid.
- Examination entry fees already submitted.
- Administrative charges (e.g., ID card replacement, late submission fees, document reprints).
- Voluntary student expenses such as travel, accommodation, or equipment not supplied by the Centre.

2.5 Communication and Accessibility

- The policy will be published on the **Centre's website** and in the **Student Handbook**.
- Hard copies or accessible formats (e.g., large print, audio) are available on request.
- Staff involved in admissions, enrolment, and finance will receive training to ensure consistent communication of refund rules to prospective and current learners.

3. Principles

The Refund Policy is governed by the following principles:

3.1 Transparency and Clarity

- All fees, deposits, and refund rules will be communicated clearly at the point of enquiry, admission, and enrolment.
- Students will be directed to the Refund Policy during induction and asked to acknowledge understanding as part of their enrolment contract.
- Information will be displayed on the Centre's website, Virtual Learning Environment (VLE), and Student Handbook.

3.2 Fairness and Equity

- Refunds will be applied consistently across all students, regardless of mode of study, background, or funding source.
- The Centre will balance the interests of learners with the need to maintain financial sustainability.
- Refund decisions will be evidence-based, considering documentation provided by students (e.g., medical certificates, employer letters).

3.3 Compliance with External Standards

- Refund processes will comply with the **Consumer Rights Act 2015**, ensuring that learners are treated as consumers with enforceable rights.
- The Centre will act in accordance with **CMA guidance** on fair treatment in higher education contracts.
- The Centre will adhere to **OfS Regulatory Advice 2** on refunds and compensation, ensuring a safety net for students in the event of Centre-led disruption.
- The Centre will meet the **OTHM and Pearson Centre Approval Criteria**, which require a documented refund policy.

3.4 Student Responsibility

- Students must familiarise themselves with this policy before committing to payment.

- Students are responsible for submitting refund requests promptly and supplying all necessary evidence.
- Where the Student Loans Company or a sponsor pays tuition fees, students must ensure that their funding applications are accurate, timely, and up to date.

3.5 Institutional Responsibility

- The Centre will process refund requests within the stated timelines (acknowledgement within 7 working days, payment within 14 working days if approved).
- Refunds will only be issued via **bank transfer** for audit and accountability purposes.
- The Centre will maintain accurate records of refund requests, approvals, refusals, and payments for a minimum of **three years**, in line with OTHM quality assurance expectations.
- Any updates to the Refund Policy will be subject to approval by the Academic and Quality Oversight Board and communicated promptly to students.

3.6 No Detriment Principle

- Students will not be disadvantaged in situations where refund eligibility arises from Centre action (e.g., cancellation of a course, error in enrolment, or administrative mistake).
- Where refunds are due in such cases, they will be processed automatically without requiring students to make a formal request.

3.7 Confidentiality and Data Protection

- All refund requests and supporting evidence will be treated in confidence.
- Personal and financial data will be handled securely, in compliance with the **UK Data Protection Act 2018** and **GDPR**.
- Information will only be shared with those directly involved in the decision-making process.

4. Criteria for Refunds

Refunds are considered only in accordance with the conditions outlined in this section. Each request will be reviewed on a case-by-case basis, considering evidence provided by the student and the Centre's obligations under law, awarding body agreements, and funding contracts.

4.1 Exceptional Circumstances (Full Refunds)

Students are automatically entitled to a **full refund of tuition fees paid** if any of the following apply:

- a. **Programme cancellation:** The Centre cancels a programme before it commences and is unable to offer a suitable alternative.
- b. **Significant change in provision:** The start date, delivery mode, or location of the course is substantially changed in a way that renders it unsuitable for the student, and no acceptable alternative arrangement can be made. *Example: a course advertised as fully online is changed to on-site delivery requiring attendance in London.*
- c. **Administrative error by the Centre:** For example, the student is charged the wrong fee or incorrectly enrolled on a programme.
- d. **Pre-start withdrawal:** A student withdraws in writing **prior to the official course start date**. In such cases, a full refund will be made **minus any administrative charges or awarding body registration fees**.

4.2 Withdrawals and Deferrals

a. Before Course Start Date

- Students who withdraw before the course begins may be entitled to a refund, less non-refundable costs such as awarding body registration, administrative charges, or deposits clearly stated as non-refundable at enrolment.

b. After Course Start Date

- Refunds will **not normally be issued** once teaching has commenced.
- Exceptions may apply in the case of documented serious illness, bereavement, or other compassionate grounds supported by strong evidence.

c. Deferrals

- Students who defer with prior approval may have fees **transferred** to a future intake, provided that:
 - The request is made within the first 4 weeks of the course.
 - The deferral is for the same programme and is taken up within 12 months.
 - Awarding body registration fees may need to be paid again if the original registration has expired.

4.3 Relocation or Centre Transfer

a. Centre Relocation

If the Centre relocates to premises that impose significant additional travel or childcare costs, the Centre will:

- Consult students prior to the move.
- Consider reasonable compensation (e.g. reimbursement of additional transport costs).
- Only apply compensation where the relocation constitutes a **substantial disadvantage**.

b. Transfer to Another Provider

If a student is required to transfer to another institution (e.g. due to course closure or teach-out arrangements):

- Tuition fees already paid for undelivered teaching will be refunded.
- Compensation may be offered for unavoidable additional costs (e.g., re-registration fees).

4.4 Non-Refundable Circumstances

Refunds will **not** be granted in the following cases:

- A student withdraws after teaching has commenced (except in cases allowed under 4.2b).
- A student leaves due to changes in personal circumstances such as employment, relocation, or family commitments.
- A student is excluded or withdrawn due to disciplinary action or academic misconduct.
- Awarding body registration, assessment, or examination fees have already been paid to OTHM, Pearson, or other awarding organisations.
- Voluntary costs incurred by the student (e.g., travel, accommodation, laptops, software) that are not charged directly by the Centre.

Example: A student who decides after three weeks that the course is “not the right fit” is not entitled to a refund, as teaching services have already been delivered.

4.5 Partial Refunds

Partial refunds may be considered in limited situations, such as:

- Where a student withdraws early in the programme and has paid fees in advance covering later periods not yet delivered.
- Where an employer or sponsor withdraws funding support before teaching commences, provided written evidence is supplied.

All partial refunds will deduct non-refundable items (administrative and registration fees).

4.6 Evidence Requirements

Students requesting a refund under sections 4.2 or 4.3 must provide documentary evidence.

Examples include:

- Medical certificate (for illness).
- Employer letter (for redundancy or relocation).
- Death certificate (for bereavement).

- Official correspondence (for visa refusal).

Requests without evidence will not be considered.

5. Refund Process

Refunds will only be considered if requested in line with the procedure below. The process has been designed to ensure transparency, accountability, and timely resolution.

5.1 Step-by-Step Procedure

Step 1 – Submission of Request

- The student (or sponsor, where applicable) completes a **Refund Request Form**, available from the Finance Office, Registry, or Centre website.
- The form must include:
 - Student details and enrolment ID.
 - Reason for refund request.
 - Evidence in support of the claim (see Section 4.6).
 - Bank details of the original payer (student, sponsor, or SLC).

Step 2 – Acknowledgement

- The Finance Office will acknowledge receipt of the request within **7 working days**.
- If the form is incomplete or evidence is missing, the request will be placed on hold until the necessary documents are provided.

Step 3 – Review and Decision

- The request will be reviewed jointly by the **Finance Office** and **Registry**.
- If the case relates to exceptional circumstances (Section 4.1), automatic approval will apply.
- For other cases, the Finance Office will consult with the **Head of Finance** and, if necessary, the **Head of Quality**.

- A written decision will be issued within **10 working days** of receipt of a complete request.

Step 4 – Payment of Refund

- Approved refunds will be processed by the Finance Office and issued within **14 working days** of approval.
- Refunds will only be made via **bank transfer** to the original payer (student, sponsor, or SLC).
- No refunds will be issued in cash, cheque, or to third-party accounts.

Step 5 – Record-Keeping

- All refund requests (approved or rejected) will be logged in the **Refund Register**.
- Records will be retained for a **minimum of three years**, in line with OTHM and Pearson quality assurance expectations.

5.2 Roles and Responsibilities

- **Students/Sponsors:** Submit request with complete evidence.
- **Registry:** Confirm enrolment details, dates, and awarding body registration status.
- **Finance Office:** Verify payments received, calculate eligible refund, issue acknowledgement, and process payments.
- **Head of Finance:** Approve or reject refund requests and oversee compliance.
- **Head of Quality:** Ensure the process aligns with OTHM, Pearson, and OfS requirements; review patterns to inform continuous improvement.

5.3 Communication of Outcomes

- Students will receive the refund decision in writing via email or letter.
- Where a request is refused, reasons will be clearly explained, and the student will be advised of the right to appeal (see Section 6).

5.4 Processing Timelines

- **Acknowledgement of request** – within 7 working days.
- **Decision issued** – within 10 working days of complete submission.
- **Refund payment (if approved)** – within 14 working days of approval.

Note: These timelines exclude periods where additional evidence is awaited from the student.

5.5 Audit and Monitoring

- Refunds will be subject to **internal audit checks** as part of the Centre's financial controls.
- The Academic and Quality Oversight Board will review the Refund Register annually to ensure compliance, fairness, and sector alignment.
- Patterns of refund requests will be analysed to identify risks (e.g., high withdrawals in a specific programme) and fed into quality improvement planning.

6. Appeals

The Centre recognises that students may not always agree with refund decisions. To ensure fairness, transparency, and compliance with sector standards, students are entitled to appeal against refund decisions through the following structured process.

6.1 Right of Appeal

- Any student or sponsor whose refund request has been refused, or only partially approved, may lodge an appeal.
- Appeals must be based on one or more of the following grounds:
 - a. **Procedural irregularity** – The policy or process was not correctly followed.
 - b. **new evidence** – Relevant evidence has become available which was not reasonably accessible at the time of the original decision.

- **c. Unfair or unreasonable decision** – The decision appears inconsistent with the published Refund Policy.

6.2 Submission of Appeal

- Appeals must be submitted in writing within **10 working days** of receiving the refund decision.
- Appeals should be addressed to the **Head of Finance** and copied to the **Head of Quality**.
- The appeal must include:
 - Student/sponsor details.
 - Date of the original refund decision.
 - Grounds for appeal.
 - Supporting evidence.

6.3 Acknowledgement of Appeal

- Appeals will be acknowledged by the **Finance Office** within **5 working days**.
- Where necessary, students may be asked to provide additional evidence before the appeal can proceed.

6.4 Review and Consideration

- Appeals will be reviewed by an **Appeals Panel**, comprising:
 - Head of Finance (Chair).
 - Head of Quality (independent oversight).
 - A senior member of the Academic and Quality Oversight Board (not previously involved in the original decision).
- The Panel will ensure impartiality by excluding anyone directly involved in the original refund decision.
- The Panel will meet (virtually or in person) and consider:
 - Whether procedures were followed correctly.

- Whether the decision was reasonable in light of the evidence.
- Whether new evidence justifies a different outcome.

6.5 Outcome of Appeal

- A written decision will be issued within **15 working days** of the receipt of a complete appeal submission.
- Possible outcomes include:
 - a. Upholding the original decision (appeal denied).
 - b. Overturning the decision and authorising a full or partial refund.
 - c. Referring the case back to the Finance Office for further investigation.
- The decision of the Appeals Panel is **final** within the Centre.

6.6 Escalation Beyond the Centre

- If a student remains dissatisfied after the internal appeals process, they may escalate their complaint to the awarding body (Pearson/OTM) in accordance with its published procedures.
- Students in receipt of Student Loans Company (SLC) funding may also raise the issue with the SLC.
- As a last resort, students may refer the case to the **Office of the Independent Adjudicator (OIA)**, provided the Centre is a member and the case meets OIA eligibility.

6.7 Record-Keeping and Monitoring

- All appeals and outcomes will be logged in the **Appeals Register**, maintained by the Quality Office.
- Records will be retained for **a minimum of three years**.
- The Academic and Quality Oversight Board will review appeals data annually to identify trends, ensure consistency, and implement any required policy improvements.

7. Complaints

The Centre recognises that, in addition to formal refund appeals, students may wish to raise a **complaint** if they believe the refund process was handled poorly, communication was inadequate, or they are dissatisfied with the customer service received. Complaints are therefore distinct from appeals, which relate specifically to the **decision outcome**.

7.1 Definition of a Complaint

A refund-related complaint may include, but is not limited to:

- Delay in processing a refund request.
- Lack of clear communication during the refund process.
- Perceived unprofessional or unfair treatment by staff.
- Administrative errors or failure to follow the published timelines.

7.2 Distinction from Appeals

- **Appeals** challenge the **decision itself** (whether a refund was rightfully refused or approved).
- **Complaints** challenge the **process or service** (how the refund request was handled).
- A student may pursue both an appeal and a complaint if appropriate, but they will be handled under separate procedures.

7.3 Submitting a Complaint

- Complaints must be made in writing using the **Complaints Form**, available from the Student Services Office, Registry, or Centre website.
- Complaints should be submitted within **20 working days** of the event giving rise to the dissatisfaction.
- Complaints should be sent to the **Registrar** or **Student Services Manager**.

7.4 Acknowledgement of Complaint

- Complaints will be acknowledged within **5 working days** of receipt.
- Where additional information is required, the student will be contacted promptly.

7.5 Investigation of Complaint

- The complaint will be investigated by the **Registrar** (or nominee), who will:
 - Review relevant documents, correspondence, and timelines.
 - Seek statements from staff involved in the refund process.
 - Contact the student if clarification is needed.
- The investigation will be conducted objectively and confidentially.

7.6 Outcome and Resolution

- A written response will be provided within **10 working days** of acknowledgement.
- The response will include:
 - Findings of the investigation.
 - Any corrective actions to be taken (e.g., apology, revised communication processes, staff training).
 - Information on further escalation routes if the student remains dissatisfied.

7.7 Escalation of Complaints

- If a student is not satisfied with the outcome, they may escalate the complaint to the **Head of Quality** for independent review.
- If still dissatisfied, the student may escalate to the **Academic and Quality Oversight Board**, whose decision will be final at Centre level.
- Students may also raise complaints externally with:
 - The awarding body (Pearson or OTHM), if the issue relates to assessment-linked fees.
 - The **Office of the Independent Adjudicator (OIA)**, if eligible and applicable.

7.8 Monitoring and Continuous Improvement

- All refund-related complaints will be logged in the **Complaints Register**, maintained by the Quality Office.
- The Quality Office will monitor the timeliness of complaint handling and track recurring themes.
- An annual report will be submitted to the **Academic and Quality Oversight Board** to identify systemic issues and drive improvements.

8. Responsibilities

Clear roles and responsibilities are essential to ensure that the Refund Policy is applied fairly, consistently, and in line with regulatory and awarding body requirements. The following table and descriptions outline responsibilities at each level.

8.1 Students and Sponsors

- Read and understand the Refund Policy at the point of enrolment.
- Ensure tuition fee payments are made in line with enrolment agreements.
- Submit refund requests promptly using the official **Refund Request Form**.
- Provide valid documentary evidence to support refund claims (see Section 4.6).
- Co-operate with staff during the review of refund requests.
- Lodge appeals or complaints within published timelines if dissatisfied with outcomes.

8.2 Registry

- Verify student enrolment status, course start dates, and attendance records.
- Confirm whether awarding body registration fees have been paid.
- Provide accurate information to Finance regarding student eligibility for refunds.
- Maintain secure records of enrolment agreements, registration confirmations, and correspondence relevant to refund decisions.
- Support communication of refund procedures to students during induction.

8.3 Finance Office

- Receive and log all refund requests in the **Refund Register**.
- Acknowledge requests within 7 working days.
- Review requests for completeness and request additional evidence if needed.
- Calculate the amount of refund due in line with this policy.
- Process approved refunds via secure bank transfer within 14 working days of approval.
- Maintain accurate financial records for audit purposes (minimum 3 years).

8.4 Head of Finance

- Provide final authorisations for all refunds.
- Chair refund appeals panels (see Section 6).
- Ensure refund processes are applied consistently across all cases.
- Report refund activity, appeals, and financial implications to the Academic and Quality Oversight Board on a termly basis.
- Liaise with external funding bodies (e.g., SLC, sponsors) to ensure compliance with their refund requirements.

8.5 Head of Quality

- Provide independent oversight of refund decisions to ensure compliance with **Consumer Rights Act 2015**, **CMA guidance**, and awarding body requirements.
- Monitor appeal and complaint cases to ensure fairness, transparency, and consistency.
- Review patterns in refund requests, appeals, and complaints as part of the annual quality assurance cycle.
- Ensure the Refund Policy is reviewed annually and updated to reflect regulatory changes.
- Present monitoring reports to the Academic and Quality Oversight Board.

8.6 Academic and Quality Oversight Board

- Approve the Refund Policy and any subsequent revisions.
- Monitor refund, appeal, and complaint data for emerging risks or patterns.

- Ensure that policy application does not disadvantage students or breach consumer protection law.
- Recommend strategic improvements where systemic issues are identified.
- Provide assurance to external regulators and awarding bodies that the Centre has robust financial fairness policies in place.

8.7 External Reference and Oversight Bodies

While not directly responsible for daily implementation, the following external stakeholders hold oversight responsibilities:

- **Pearson and OTHM** – may review refund records during External Quality Assurance (EQA) visits as part of centre monitoring.
- **Student Loans Company (SLC)** – oversees cases where tuition fees are paid through student finance.
- **Office for Students (OfS)** – requires registered providers to maintain transparent refund and compensation arrangements.
- **Office of the Independent Adjudicator (OIA)** – provides external redress in eligible cases where students have exhausted the Centre’s internal processes.

9. External Reference Points

This Refund Policy has been developed in accordance with, and benchmarked against, external reference points to ensure compliance with UK higher education sector standards, consumer law, and awarding body requirements.

9.1 Consumer Rights Act 2015 & CMA Guidance

- **Requirement:** Students must be treated as consumers; information about fees, contracts, and refunds must be clear, accessible, and fair.
- **Alignment:**

- Refund rules are communicated transparently in enrolment contracts, Student Handbooks, and on the Centre website (Section 3.1).
- Students are entitled to refunds in cases of Centre error, cancellation, or significant changes to provision (Section 4.1).
- Timelines for processing refunds are clearly defined (Section 5.4).

9.2 Competition and Markets Authority (CMA) – Higher Education Guidance

- **Requirement:** Students must receive accurate information before and after enrolment; unfair terms and hidden charges are prohibited.
- **Alignment:**
 - Non-refundable items (e.g., awarding body registration fees) are explicitly listed (Section 4.4).
 - Refund conditions are set out in advance, ensuring no hidden rules.
 - Appeals and complaints processes provide redress if students believe the refund terms have been misapplied (Sections 6 & 7).

9.3 Office for Students (OfS) – Regulatory Advice 2: Refunds and Compensation

- **Requirement:** Providers must publish clear refund and compensation arrangements as part of their Student Protection Plans.
- **Alignment:**
 - Exceptional circumstances entitling students to refunds are clearly stated (Section 4.1).
 - Relocation and transfer scenarios are covered, with provision for compensation (Section 4.3).
 - Refund timelines and processes ensure that students are not left disadvantaged (Section 5.4).
 - Policy monitoring and annual review ensure alignment with OfS regulatory updates (Section 10).

9.4 OTHM – Centre Approval Criteria

- **Requirement:** Centres must have documented policies, including a Refund Policy, to protect learner interests and demonstrate quality assurance.
- **Alignment:**
 - The Centre has a standalone Refund Policy, approved by the Academic and Quality Oversight Board (Section 8.6).
 - Refund processes are embedded within wider quality assurance and student protection mechanisms (Sections 3 & 8).
 - Refund records are securely maintained for audit and monitoring (Section 5.5)

9.5 Pearson – Centre Approval and Compliance Requirements

- **Requirement:** Pearson requires centres to publish transparent policies covering fees, refunds, and learner protection, and to ensure awarding body fees are non-refundable once paid.
- **Alignment:**
 - Policy explicitly states that **Pearson registration and examination fees are non-refundable** once paid (Section 4.4).
 - Refund arrangements are communicated to students during enrolment, in line with Pearson audit expectations (Section 3.1 & 8.2).
 - Refund requests and decisions are fully documented and available for review by Pearson External Quality Assurers (EQAs) (Section 5.5).

9.6 Student Loans Company (SLC)

- **Requirement:** Refunds must be aligned with SLC rules and notification requirements when students withdraw from funded programmes.
- **Alignment:**
 - Students funded by SLC must notify the Centre in writing at least **14 days before the start of the course/term** to avoid triggering loan payments (Section 4.2).
 - Refunds and repayments to the SLC are managed directly by the Finance Office (Section 8.3).

- Registry and Finance coordinate to ensure accurate reporting of student withdrawals (Section 8.2).

9.7 Office of the Independent Adjudicator (OIA)

- **Requirement:** Eligible students must have access to independent redress where internal appeals and complaints are exhausted.
- **Alignment:**
 - Escalation routes beyond the Centre are explicitly identified (Sections 6.6 and 7.7).
 - Students are informed of their right to take unresolved issues to the OIA, where applicable.

9.8 Sector Best Practice (HEIs and FE Colleges)

- **Requirement:** Refund and compensation arrangements should be fair, sector-consistent, and designed to protect the student experience.
- **Alignment:**
 - Policy design is benchmarked against university and FE provider refund practices (Section 4).
 - Commitments to transparency, fairness, and record-keeping mirror wider sector expectations (Sections 3 & 5).

10. Monitoring and Review

The Refund Policy will be subject to regular monitoring and formal review to ensure it remains compliant with legislation, awarding body requirements, and sector best practice.

10.1 Annual Review Cycle

- The **Head of Quality** and **Head of Finance** will jointly review the Refund Policy **annually**.
- The review will consider:
 - Changes in legislation (e.g., consumer protection, data protection, or financial regulations).
 - Updates to awarding body requirements (OTHM, Pearson).
 - Revised guidance from regulators such as the **Office for Students (OfS)** and the **Competition and Markets Authority (CMA)**.
 - Trends identified through appeals and complaints relating to refunds.
 - Feedback from students, staff, and external auditors.

10.2 Oversight and Approval

- The revised policy will be submitted to the **Academic and Quality Oversight Board** for review and approval.
- Any material changes will also be reported to awarding bodies during External Quality Assurance (EQA) visits.
- Once approved, updates will be:
 - Published on the Centre website.
 - Communicated to current students via email and VLE announcement.
 - Incorporated into the Student Handbook and Admissions materials.

10.3 Continuous Monitoring

- The **Refund Register** (Section 5.5) will be monitored quarterly by the Finance Office and Quality Office to:
 - Track the number and types of refund requests.
 - Identify patterns or recurring issues.
 - Ensure timelines for acknowledgement, decisions, and payments are met.
- Summary reports will be submitted termly to the Academic and Quality Oversight Board.

10.4 Internal Quality Assurance Links

- Refund-related appeals and complaints data will be reviewed during **internal audits** as part of the Centre's wider Quality Assurance Framework.
- Outcomes will feed into the annual **Self-Assessment Review (SAR)** and the **Quality Improvement Plan (QIP)**.
- Findings will be cross-referenced with related policies such as:
 - Complaints Policy
 - Appeals Policy
 - Admissions and Enrolment Policy
 - Student Protection Plan

10.5 External Scrutiny

- External Quality Assurers (EQAs) from awarding bodies may review refund records during monitoring visits.
- The Centre will ensure that all documentation (refund requests, decisions, appeals, complaints) is securely stored and readily available for inspection.
- The policy will also be referenced in the Centre's **Student Protection Plan**, in line with OfS requirements.

10.6 Responsiveness to Change

- Interim reviews may be conducted outside the annual cycle if:
 - Regulatory changes are introduced by OfS, CMA, or government.
 - Awarding bodies (Pearson, OTHM) update centre approval requirements.
 - Internal monitoring identifies systemic issues requiring immediate action.

10.7 Version Control

- Each version of the Refund Policy will be logged in the **Policy Version Control Register**, including:
 - Date of approval.
 - Nature of changes.
 - Reason for revision.
 - Author(s) of update.

- Outdated versions will be archived but retained for audit trail purposes for a minimum of **five years**.