

ITALIA CONTI

Accuracy of Information Policy

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This policy will be reviewed by the Policy Steering Group annually and before each recruitment cycle, or earlier where legislative or regulatory changes require.

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1. Purpose

- 1.1. This policy sets out Italia Conti's arrangements for ensuring that student-facing information regarding its Higher Education ('**HE**') provision and ancillary services is accurate, current, clear, accessible, evidence-based and appropriately controlled in accordance with the guidance set for HE providers by the Competition and Markets Authority ('**CMA**')
- 1.2. Italia Conti continues to comply with the Consumer Rights Act ('**CRA**') 2015, Consumer Protection from Unfair Trading Regulations ('**CPR**') 2008 and the Digital Markets, Competition and Consumers ('**DMCC**') Act 2024.
- 1.3. This policy supports Italia Conti's compliance with OfS initial condition C5: treating students fairly. It is intended to ensure that information pertaining to Italia Conti, its courses, fees, ancillary services, course changes, student-facing documents and communications does not contain or lead to any behaviour that may be considered unfair under condition C5, including the OfS prohibited behaviours list or any action or omission giving rise to actual or likely detriment to students.
- 1.4. Italia Conti recognises that students are entitled to make informed decisions based on factual, evidence-based and transparent information.
- 1.5. This policy should be read alongside Italia Conti and subcontracting partner's Terms and Conditions, Refunds and Compensation Policy, Complaints Policy, Internal Curriculum Review, Course Change and Programme Development Procedure (in Italia Conti's Quality Manual). It does not, by itself, constitute Italia Conti's complete consumer protection compliance framework, and should not be read as such.

2. Scope

- 2.1. This policy applies to:
 - Marketing and promotional materials;
 - Prospectus guidance;
 - Website content and digital advertising;
 - Offer letters and admissions communications;
 - Course information provided verbally or in writing;
 - Social media and recruitment activities, including Open Days and Outreach events;
 - Communications regarding tuition fees and the student experience.
- 2.2. This policy applies to all staff currently employed with Italia Conti, and agents or third parties acting on behalf of Italia Conti.

3. Definitions

- 3.1. The following are definitions for key terms used within this policy:

Student: current, prospective and former students, where relevant to OfS condition C5, including applicants, offer holders and former students with unresolved complaints, claims, or concerns relating to higher education at Italia Conti.

Information about the provider: website, prospectus, advertising, open day material, admissions communications, social media, offer information, course pages and proposed or draft information.

Ancillary services: library services, disability support packages, scholarships, accommodation, non-direct-course related facilities or other services with a student contract.

4. Policy Principles

4.1. Italia Conti has an obligation to ensure that all information provided to Students is:

- Accurate and factually correct;
- Evidence-based and capable of substantiation;
- Clear, accessible and not misleading;
- Presented in good faith and without omission of material information; and
- Compliant with CMA guidance for HE providers.

4.2. Italia Conti endeavours to act in good faith and in accordance with the appropriate legislation, including the CRA 21015, CPR 2008, and DMCC Act 2024.

5. Accuracy of Information

5.1. Italia Conti will ensure that:

- Published information that includes details about the courses, facilities, progression opportunities, industry links, employability outcomes, and the Student experience is factual;
- Marketing materials and Student-facing communications and documents will not intentionally exaggerate or misrepresent;
- Statements relating to graduate outcomes, employability, industry connections, partnerships, or performance statistics are accurate and current; and
- Information is reviewed regularly to ensure continued accuracy.

5.2. No website content, marketing material, offer communication, course information, Student-facing notice or policy may be approved where it contains wording or creates an impression that may fall within the OfS prohibited behaviours list, including misleading information, omitted fundamental information, unfair limitation of Student rights, unclear complaints or redress routes or overly broad discretion for Italia Conti to change courses, fees, facilities, delivery arrangements or contractual commitments.

5.3. Where information relates to a validating or sub-contractual partnership, or their respective validated or approved courses, Italia Conti must check that published information is accurate, current and consistent with partner-approved information, including responsibilities for admissions, fees, awards, complaints, refunds, course delivery and Student support.

6. Fees and Course-Related Costs

6.1. Italia Conti will provide Students with clear, accessible information involving tuition fees and registration fees. Any other mandatory course-related expenses, additional charges, payment schedules and refund arrangements will be clearly available

before application wherever practicable, and in all cases, before an applicant accepts an offer or enters into a Student contract. Where any fee, cost or charge cannot reasonably be confirmed at the point of application or offer acceptance, Italia Conti will provide the best available estimate.

- 6.2. All stated tuition fees are to be accurate and up-to-date. Any registration fees, deposits, mandatory course-related costs, optional costs, additional charges, payment schedules, or refund arrangements must be clearly and consistently disclosed and must accurately reflect the applicable charges. Where any costs are indicative, estimated, or subject to confirmation, this must be clearly stated together with the basis on which the estimate has been calculated.
- 6.3. No hidden or mandatory charges will be introduced after enrolment unless required by law or exceptional circumstances beyond Italia Conti's control.
- 6.4. Where changes to tuition fees, mandatory course-related costs or other charges become necessary after offer acceptance and before enrolment, they may only be made where the change is objectively justified, approved through delegated governance channels, and communicated clearly and promptly to affected applicants, offer holders or Students. Italia Conti will explain the reason for the change, when it will take effect, who is affected, the financial or practical impact, and any available remedies. Italia Conti will not introduce hidden charges or new mandatory charges after offer acceptance unless this is required by law, an external regulatory requirement, an approval (sub-contractual) partner requirement, or any other exceptional circumstance that could not reasonably have been anticipated or controlled.

7. Fundamental Changes to Courses

- 7.1. Italia Conti recognises that applicants make decisions based on the information provided prior to and at the point of application.
- 7.2. In line with the approved partner university's policy on fundamental changes to programmes prior to the start of the programme, Italia Conti will notify students as soon as possible, indicating all remedies available to them. The approved partner university includes a change to the programme title, programme award or accreditation, cost, location or substantial change in core programme content a fundamental change.¹
- 7.3. Italia Conti will aim to clearly communicate and detail any fundamental changes to courses after offers have been made where they are unavoidable or where course review and updates fall within the application year. This may happen when a fundamental change to the course is made in response to delivery and Student feedback which will change delivery in the following academic year. All affected Students will be informed promptly once changes are confirmed of the nature of the change, why the change is necessary, when the change will take effect, and any remedies available, if applicable. Where a fundamental change, inaccurate information, omitted information or published error may adversely affect applicants or Students, Italia Conti will assess actual or likely detriment, identify appropriate

¹ University of Chichester's Admissions Policy 2025-26, accessed on 28/05/2026 at: [Admissions Policy - 2025-26.docx](#)

mitigation, and communicate available remedies. Remedies may include corrected information, alternative arrangements, support to transfer, deferral, refund or compensation routes, and access to the relevant complaint process. In the first instance, complaints should be sent to the Head of School via Admissions@italiaconti.co.uk.

7.4. Fundamental changes may include, but are not limited to:

- Course content or material components;
- Modules or subjects offered;
- Qualification title, level, awarding body or validating partner;
- Mode of study;
- Teaching location;
- Course duration or structure;
- Material timetable or delivery pattern changes;
- Course fees, mandatory costs or additional charges;
- Accessibility where it may affect the needs of specific Student groups;
- Facilities or access to specialist resources;
- Significant timetable or delivery pattern changes;
- Withdrawal or suspension of a course;
- Course closure;
- Campus closure.

7.5. Communication regarding changes will be made in writing, through email, in a clear, transparent, and accessible format. Confirmation of receipt will be assumed upon delivery.

7.6. Italia Conti will aim to confirm and publish accurate course information for the next recruitment cycle before applications open and, wherever practicable, before offers are made. Course pages and fee information will be reviewed annually, or whenever a change is proposed or approved. Italia Conti will retain evidence of fundamental information changes, approval and communication records.

8. Student Experience

8.1. Italia Conti will ensure that any information relating to accommodation, living costs, transport, commuting, or employment opportunities is realistic and balanced. Italia Conti will not make any misleading or generalised claims regarding:

- Availability or affordability of accommodation;
- Ease or cost of commuting;
- Availability of employment;
- Local cost of living; and
- Employment opportunities or industry outcomes.

8.2. Where estimates or indicative figures are provided, they will be identified as such.

9. Staff Responsibilities

9.1. All staff employed by Italia Conti that are involved in marketing, recruitment, admissions, Student services, and course management are responsible for complying with this policy. Staff must provide accurate, evidence-based information,

and report to the Academic Quality Board ('**AQB**') and/or Senior Leadership Team ('**SLT**') regarding any potentially misleading information and ensure communications with Students remain accurate and transparent.

- 9.2. Website, marketing and Student-facing course information must be approved through the relevant operational and governance route prior to publication. Content relating to course structure, academic delivery, assessment, Student outcomes, programme changes or regulatory academic compliance must be reviewed by academic leadership and escalated to AQB where required. If a matter creates significant compliance, reputational or contractual risk, it should be reported directly to the SLT. If the matter is sufficiently serious or falls within the Board of Directors' ('**Board**') reserved powers, it must also go to the Board.

10. Internal Procedure

- 10.1. Italia Conti maintains an internal procedure to ensure that any information provided by Italia Conti is reviewed, approved, communicated and recorded in a fair, transparent and timely manner. The procedure supports compliance with the CRA 2015, CPR 2008, DMCC Act 2024, OfS condition C5, the CMA guidance, and approved sub-contractual requirements.
- 10.2. The Vice Principal and Principal have overall operational responsibility for ensuring compliance with this procedure. The Heads of School, Head of Marketing, Admissions Coordinator, Head of Quality Assurance, and the SLT are responsible for identifying, escalating and implementing changes with the relevant operational lead.
- 10.3. Approved changes must be recorded and archived for further reference. The identifier or deliverer of the change must notify the Vice Principal of the amendment in writing, who will keep an archived log of changes for 12 months following the graduation date of the enrolment cohort.
- 10.4. Where a proposed change is considered fundamental, affected Students must be informed promptly, in writing, once the change is confirmed. The Principal will communicate with affected Students, clearly evidencing:
- The nature of the change;
 - Why the change is necessary;
 - When the change will take effect;
 - Any available remedies; and
 - How concerns, complaints or requests for further information may be raised.
- 10.5. Any inconsistency between Italia Conti information and partner-approved information must be escalated to AQB for academic matters and SLT or the Board where the inconsistency creates fundamental contractual, regulatory, financial or reputational risk.

11. Monitoring and Reviewing

- 11.1. All published marketing material will be reviewed annually by the Head of Marketing. This includes the marketing copy, archived versions of the webpages, and periodic audits, at least annually and before each recruitment cycle.

- 11.2. Employment opportunities, industry links, and graduate outcomes will be reviewed annually by the Heads of School. Information relating to facilities and the wider Student experience will be reviewed annually by the Chief Operating Officer.
- 11.3. Approval records for course pages and marketing copies will remain with the Vice Principal, who will ensure archived versions of course pages, prospectus pages, fee pages and offer templates are filed annually. Archived materials will be kept for 12 months following the graduation date of the enrolment cohort.
- 11.4. A log of fundamental changes will be kept with the Head of Quality Assurance. A log of changes implemented during contract, affected cohort, a record of Student communications and remedies offered, will be kept with the Vice Principal.
- 11.5. This policy will be reviewed annually and before each recruitment cycle, or earlier where legislative or regulatory changes require.
- 11.6. Further operational guidance, including approval routes, escalation, and governance, is set out in Appendix 1: Information Change Procedure.

APPENDIX 1: Information Change Procedure

1. Purpose

- 1.1. This procedure sets out how Italia Conti manages changes to course information, fees, Student-facing information, marketing materials and related communications where such changes may affect applicants, offer holders, or current Students.
- 1.2. The procedure ensures that:
 - Information remains accurate, current and transparent;
 - Affected Students are informed promptly of fundamental changes;
 - Risks of Student detriment are assessed and mitigated; and
 - Records of decisions and communications are archived for 12 months following the graduation date of the enrolment cohort.

2. Types of Changes

2.1. Non-material Changes

Non-material changes are administrative or clarificatory updates that do not fundamentally affect or influence the Student decision-making or contractual expectations. Examples may include:

- Spelling or formatting corrections;
- Staff title updates;
- Timetable refinements with no substantive impact;
- Clarification wording;
- Broken links or webpage formatting; and
- Non-material policy updates.

Non-material changes are approved internally with the Head of Marketing.

2.2. Fundamental Changes

Fundamental changes are changes that may reasonably influence a Student's decision to apply, accept an offer, or the overall value, accessibility or delivery of a course.

Examples of fundamental changes may include:

- Changes to modules or core curriculum;
- Changes to the delivery method or location of study;
- Changes to tuition fees or mandatory costs;
- Significant timetable changes;
- Changes to sub-contractual academic partnership arrangements;
- Reduction in contact hours; or
- Changes affecting accessibility or support provision.

Fundamental changes must be formally reviewed and approved prior to implementation.

3. Communication Requirements

- 3.1. Where Students are affected, communications must:
 - Be issued promptly after approval;
 - Clearly explain the impact;

- Identify available remedies, where applicable; and
 - Include relevant contact details.
- 3.2. Affected Students will be notified in writing, through email, which will be deemed delivered upon sending, by the Vice Principal or Principal.
- 3.3. This is line with the approved partner university's procedure for fundamental changes.

4. Record Keeping

- 4.1. An archived log of fundamental changes will be kept with the Vice Principal for no more than 12 months following the graduation date of the enrolment cohort. The archive must be accessible, transparent, and must include the date of the change and at what time the affected Students were notified. Receipt of delivery notice will be kept with the archived change.

5. Governance

- 5.1. Oversight of this procedure sits with the Principal, Vice Principal, AQB and SLT. Significant compliance concerns, repeated inaccuracies, or fundamental Student detriment issues must be escalated to the Board where appropriate.

Information Governance Matrix

This matrix is an operational routing tool only and must be read consistently with the Board-approved Accountability Matrix, Terms of Reference and Meetings Manual, Scheme of Delegation and relevant policy approval routes.

Matters involving academic standards, academic quality, Student outcomes, fundamental Student detriment, regulatory compliance, significant contractual risk or reputation risk must be escalated through AQB, SLT or the Board as required by the Accountability Matrix and governance documents.

In the event of a conflict with the Board-approved Accountability Matrix, the Board-approved Accountability Matrix will take priority.

Information Governance Matrix				
Information Type	Content Owner	Reviewer	Approval Required	Update Deadline
Course Pages and Indicative Course Content	Head of School of Acting Head of School of Musical Theatre and Dance Head of Online Learning	Head of Marketing Head of Quality Assurance	Vice Principal	Within 5 working days
Fee and Funding	Admissions Coordinator Head of Development and Engagement	Head of Quality Assurance	Senior Leadership Team	Prior to publication
Prospectus and Other Written Marketing Materials	Head of Marketing	Head of School of Acting Head of School of Musical Theatre and Dance Head of Online Learning	Vice Principal	Annual Review prior to the start of the recruitment process
Open Day Events	Head of School of Acting Head of School of Musical Theatre and Dance	Vice Principal		Prior to Open Days
Admission Materials and Offer Letter	Admissions Coordinator	Head of Quality Assurance	Vice Principal	Prior to recruitment process
Social Media Recruitment Statements	Head of Marketing	Principal		Immediate correction if inaccurate
Student Support Information	Learning Support Tutor and Head of Safeguarding and Wellbeing	Head of Quality Assurance	Principal	Within 5 working days