



GREEN VALLEY ACADEMY

Marketing, Recruitment and Admissions Compliance Policy

Academic Board Approval, 5 October 2026

DOCUMENT CONTROL

Reference	GVA-19
Policy owner	Principal (approvals); Academic Registrar and Admissions Officer (operations); Marketing Officer (content)
Approved by	Academic Board — 5 October 2026
Effective from	6 October 2026
Next review	August 2027, against current CMA and CAP guidance
Applies to	All marketing, recruitment and admissions activity conducted by any member of staff or any third party acting for the Academy
Linked documents	Admissions Policy; Refund and Compensation Policy; Student Contract; Access and Participation Statement; Conflicts of Interest Policy; University of Wolverhampton course specification

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1. PURPOSE

- 1.1** This policy governs the whole of the journey by which Green Valley Academy attracts, informs and admits its students, and its object can be stated in a sentence: every claim the Academy makes shall be true, every applicant shall decide on accurate and complete material information, and every recruitment practice shall be one the Academy would be content to defend before the University of Wolverhampton, the Advertising Standards Authority, the Competition and Markets Authority and a court. The policy consolidates, in a single instrument proportionate to a small institution, the marketing governance, recruitment ethics, third-party controls and admissions-compliance interfaces which larger providers distribute across several documents, and it supersedes the summary the Marketing and Recruitment Compliance Policy in its entirety.

2. PRINCIPLES

- 2.1** Five principles govern every activity within the scope of this policy, and every member of staff engaged in marketing, recruitment or admissions shall be trained in them. First, one source of truth: all published course information derives exclusively from the University of Wolverhampton's approved course specification and the fee schedule approved by the Board of Directors, and no other source — recollection, estimation or aspiration — may be used. Secondly, material information first: the tuition fee and all additional costs, the entry requirements, the awarding university, the location, mode, length and timetable pattern of the course, and any other information a reasonable applicant would need, shall be presented clearly and prominently before application, and shall never be revealed for the first time after acceptance. Thirdly, no misleading claims: every statement about outcomes, facilities, staffing, satisfaction or standing shall be current, evidenced and sourced; superlatives without evidence are prohibited; and the Academy shall never suggest that it awards degrees itself, nor that any unapproved provision is or will be available. Fourthly, fair recruitment: activity aimed at widening participation shall inform and encourage but never pressure; no inducement shall be offered to any applicant for enrolling; and no member of staff shall receive any payment or benefit calculated by reference to individual enrolments. Fifthly, privacy: enquiry and applicant data shall be processed under the IT, Data Protection and Data Security Policy, used only for the purposes stated when it was collected, and never purchased from or sold to any third party.

3. MARKETING AND INFORMATION GOVERNANCE

- 3.1** No item of public-facing material — website page, prospectus, advertisement, social-media content, open-day script, presentation or template communication — shall be published until it has completed the approval workflow at Figure 1: verification of content against the current course specification and approved fee schedule, with the source version recorded; completion of the pre-publication compliance checklist at Appendix A; and approval by the Principal or nominated deputy, recorded in the Marketing Approval Register together with the version, date and approver. Published material shall carry a version identifier; the register shall enable any published claim to be traced to its source and approval; and material may be amended only through the same workflow.

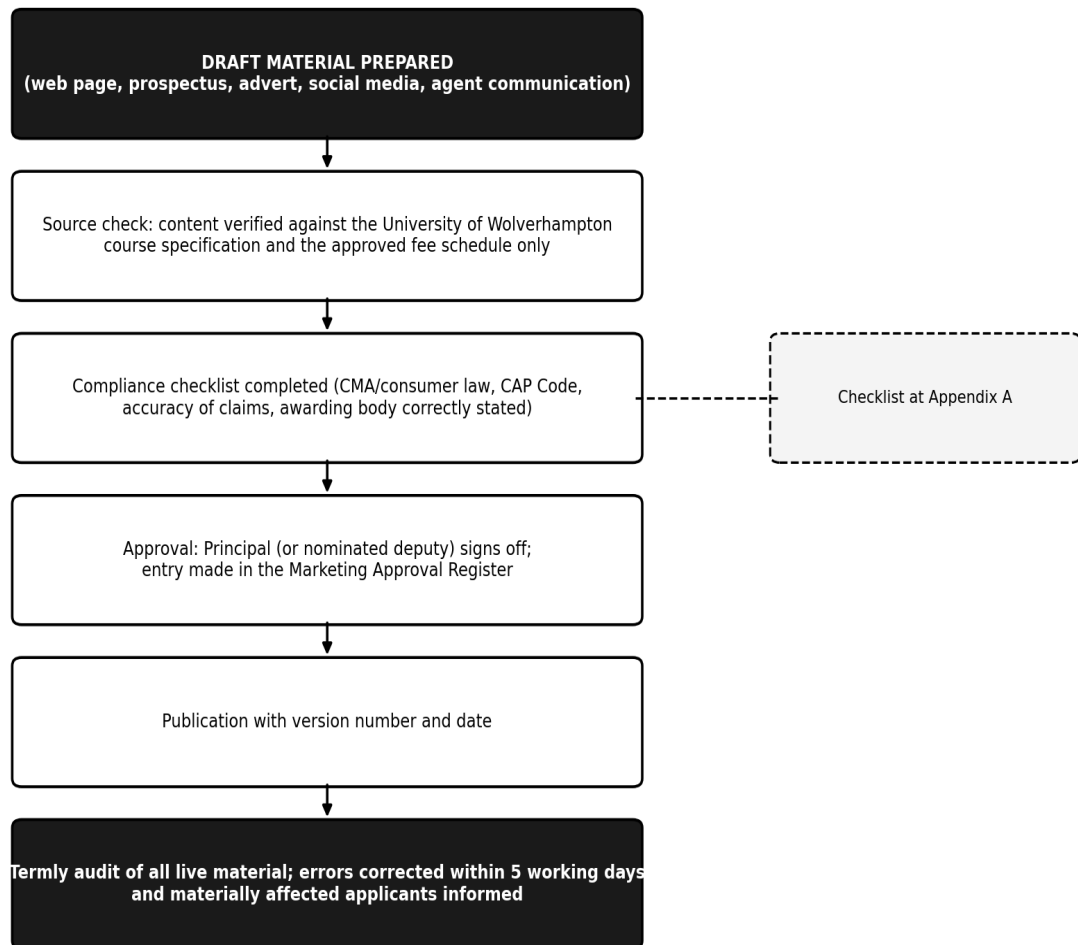


Figure 1: Marketing approval workflow

- 3.2** The accuracy of live material shall be actively maintained, not assumed: every website course page shall be checked against the approved source at least once each term, and additionally whenever the University of Wolverhampton notifies any change; errors shall be corrected within five working days of discovery; and where an error was material and applicants may have relied upon it, those applicants shall be informed individually, offered the correct information, and, where they enrolled in reliance on the error, afforded the remedies in the Refund and Compensation Policy and the Student Contract.

4. RECRUITMENT ETHICS

- 4.1** Recruitment conversations — at open days, in schools and community settings, by telephone and online — shall give honest, balanced and personal advice: staff shall describe the demands of the course as candidly as its attractions, shall answer questions about costs, workload and outcomes truthfully, and where the course is not right for an applicant shall say so and signpost alternatives, the Academy regarding a well-advised non-applicant as a better outcome than a mis-sold enrolment. No member of staff shall guarantee admission, overstate progression or employment prospects, misdescribe the role of the University of Wolverhampton, or disparage any other

provider. Open days and taster events shall present the Academy as it is: real teaching staff, the actual facilities at The Atrium, and the true timetable pattern. Recruitment targets shall be set through the annual planning cycle only after teaching, support and estate capacity have been confirmed, in accordance with the Strategic Plan, so that recruitment pressure can never outrun the Academy's ability to deliver what it promises.

5. AGENTS AND THIRD PARTIES

- 5.1** The Academy may engage approved recruitment agents and other third parties to support recruitment, subject to the Academy's agent-management, due-diligence, monitoring and recruitment-compliance arrangements. Any recruitment agent shall be engaged only after the required due-diligence and approval processes have been completed. These arrangements shall provide, as a minimum, for verification of each agent's identity, registration and reputation; a written contract binding the agent to this policy, to UK consumer law and to the Academy's data protection obligations; the prohibition of sub-agency without express consent; a published register of engaged agents; commission arrangements which can never reach applicants as inducements; monitoring including mystery shopping and annual review; and termination without notice for misrepresentation. Any personal involvement of a member of staff in the referral of applicants, and any interest in a referring business, is a declarable interest under the Conflicts of Interest Policy and the Declaration of Interests Form, and undisclosed involvement shall be treated as gross misconduct.

6. ADMISSIONS COMPLIANCE INTERFACE

- 6.1** Admissions decisions belong exclusively to the framework of the Admissions Policy: published criteria applied exactly, documents verified, decisions recorded and auditable, and suspected fraud investigated and referred. Marketing and recruitment activity shall never promise, imply or foreshadow what admissions cannot properly deliver, and any conflict between recruitment ambition and admissions standards shall be resolved in favour of standards and reported to the Marketing and Admissions Committee. The Committee shall review each term the admissions data bearing on this policy — application and conversion volumes, entry profiles, verification and fraud outcomes, and complaints touching on information accuracy — so that published information, recruitment practice and admissions reality are demonstrably aligned; and the consumer-law documentation of the admissions journey, comprising the offer letter, fee disclosures, cancellation rights and the Student Contract, shall be reviewed annually by the Quality and Compliance Lead against current CMA guidance.

7. GOVERNANCE, MONITORING AND BREACHES

- 7.1** The Marketing and Admissions Committee shall receive each term a compliance report comprising: the approvals made and refused under Section 3; the termly audit results and the errors found and corrected; complaints and enquiries concerning the accuracy of

published information; and any near miss. Breach of this policy — publication without approval, an inaccurate or misleading claim, an inducement, or unethical recruitment conduct — is a conduct matter for the individual concerned and shall additionally be reported to the Academic Board with material. This policy shall be reviewed annually against the current guidance of the Competition and Markets Authority and the Committees of Advertising Practice, and immediately upon any relevant regulatory change.

APPENDIX A — PRE-PUBLICATION COMPLIANCE CHECKLIST

- A.1** The following checks shall be completed and recorded for every item before approval, and the completed checklist retained in the Marketing Approval Register: content verified against the current University of Wolverhampton course specification, with the version and date recorded; fees, additional costs and re-sit fees identical to the approved fee schedule; the awarding university stated correctly and prominently; entry requirements stated exactly as published under the Admissions Policy; every outcome, satisfaction or comparative claim current, sourced and evidenced; no guarantee or implication of admission, employment or earnings; location, mode, length and timetable pattern accurate; images representative of the Academy's real facilities and community; the privacy notice linked wherever data is collected; accessibility checked, including plain English and alternative text for digital media; and the approver, date and version recorded.