



Oakswood College

Empowering Through Education



Procedural Integrity and Fairness

Policy

PROMOTING EXCELLENCE • ENSURING COMPLIANCE
SUPPORTING OUR COMMUNITY



GOVERNANCE



QUALITY



COMPLIANCE



EXCELLENCE

www.oakswoodcollege.co.uk



Oakwood College

Empowering Through Education

(Trading name of Oakwood Group Ltd)

Procedural Integrity and Fairness Policy

Document Control & Version History

Document Title	Procedural Integrity and Fairness Policy
Document Type	Governance Policy
Policy Owner	Chief Executive officer
Accountable Officer	Chief Executive Officer
Approved By	Board of Governors
Approval Date	06 June 2026
Effective From	06 June 2026
Review Cycle	Annual
Next Review Date	06 June 2027
Applies To	Board of Governors, Chief Executive Officer, Senior Leadership Team, Academic Board, all staff involved in decision-making, investigations, complaints, appeals, disciplinary, admissions, student support, and procedural reviews
Version	1.0
Supersedes	New Policy
Related Policies	Admissions Appeals & Complaints Policy; Student Complaints Procedure; Non-Academic Misconduct Procedure; Freedom of Speech Complaints Procedure; Equality, Diversity & Inclusion Policy; Whistleblowing Policy
Document Location	Oakwood College Policy Repository
Regulatory Reference	Office for Students (OfS) Conditions of Registration; OIA Good Practice Framework; Consumer Rights Act 2015; Equality Act 2010; principles of natural justice and procedural fairness

Table of Contents

1. Purpose.....	3
2. Key Principles.....	3
a) Impartiality:	3
b) Transparency:	3
c) Consistency:.....	4
d) Right to Representation:	4
e) Accessibility:	4
f) Accountability:.....	4
g) Timeliness:	4
h) Data Protection:	5
3. External Officers	5
a) Purpose and Value.....	5
b) Circumstances for Engagement.....	5
c) Appointment and Role	5
d) Duties and Boundaries	5
e) Authority and Records	6
f) Monitoring, Quality Assurance and Continuous Improvement.....	6
4. Procedural Safeguards.....	6
a) Delegation	6
b) Conflict of Interest.....	6
c) Support for Students/Staff	7
d) Opportunity to Respond.....	7
e) Written Decisions	7
5. Reviews and Appeals.....	7
a) Clear Pathways	7
b) Independent Review	7
c) Completion of Procedures (students only).....	7
6. Data and Confidentiality.....	7

a) Need-to-Know Management8

b) Record Keeping8

7. Monitoring and Review8

Procedural Integrity and Fairness Policy

1. Purpose

This policy ensures all institutional procedures involving students and staff are conducted with the highest standards of fairness, impartiality, transparency, and integrity. It provides the essential framework underpinning effective, ethical, and trusted decision-making across all formal processes, including disciplinary action, suspensions and exclusions, complaints, appeals, fitness to study, and Safeguarding matters.

2. Key Principles

We are committed to fairness, rigour and integrity in all our procedures, and we achieve this by upholding the following principles:

a) Impartiality:

- Decisions are made free from bias and conflicts of interest.
- Decision-makers must reach decisions without any undue interference or inappropriate influence.
- Where further assurance is required, suitably independent staff or External Officers with appropriate expertise are engaged (see Section 3 of this Policy 'External Officers' for further information).
- No staff member involved in the assessment of an individual student will be involved in procedural decision-making under any student-related policies or processes where this would present a potential or actual conflict of interest, either currently or in the future.

b) Transparency:

- Processes, reasoning, and outcomes are clearly documented and communicated.
- Where information is not available, proportionate, fair and reasonable decisions are made, and the impact of the lack of information is clearly communicated.
- Clear criteria for accepting or declining appeals, complaints or any written representations are set out in the relevant policies.
- Written outcomes and records are shared with students or staff affected within published timescales.
- Oakwood College subscribes to the Office of the Independent Adjudicator's scheme, and issues Completion of Procedures Letters where relevant so that students can access the ombudsman's complaints scheme free of charge.
- Information, data, casework and documentation may be shared where required and/or appropriate with a validating body.

c) Consistency:

- Staff handling or managing any student-related procedures are trained and supported appropriately to ensure the requisite expertise is applied.
- Policy and process are applied evenly and without unfair discrimination.
- Similar cases receive comparable responses, unless specific, recorded factors require otherwise.

d) Right to Representation:

- Individuals may submit written representations, access support, and be accompanied or represented at hearings or meetings as permitted by the specific policy being enacted.
- Reasonable notice will be given of the right to written representations and representation/accompaniment at hearings, along with reasonable timescales for submitting or arranging representations.
- External Officers may be engaged at the discretion of Oakwood College to provide independent advice, support and representation to students in any student-related procedures.

e) Accessibility:

- Reasonable adjustments are made to procedures where required (such as extended deadlines, adjustments to formats of procedural hearings).
- Students will have access to support in understanding and navigating procedures and policies, including from External Officers where appropriate.
- Students can authorise third parties to act on their behalf in procedures where appropriate, subject to any specific requirements set out in applicable policies.

f) Accountability:

- All decisions, actions, and the delegation of authority are clearly recorded and communicated.
- Risk assessments are conducted where appropriate to inform decision-making, and are signed off either by two or more members of staff or the appropriate College governing body.
- Procedural responsibility at each step is clear with the requisite expertise/independence, and rationale for decisions is explained to ensure clarity and understanding.

g) Timeliness:

- Communication and decisions occur within published timeframes.
- Urgent matters are prioritised, regularly reviewed, and acted on promptly.

- Where delays to published timescales occur or are foreseeable, students are communicated with in writing to ensure they are kept updated.

h) Data Protection:

- Information is managed lawfully and confidentially, in accordance with Oakwood College's policies governing data processing and protection, including retention schedules.
- Disclosure is made on a strictly necessary basis and is limited to those with a legitimate need to know, with access and retention managed in accordance with institutional policy and legal requirements.

3. External Officers

i) Purpose and Value

External officers may be appointed by Oakwood College to provide independent oversight, specialised expertise, and an extra safeguard against bias during institutional processes. Their involvement assures all parties of procedural integrity, transparency, and sector best practice.

j) Circumstances for Engagement

External officers may participate as panel chairs or members, reviewers, advisers, or decision-makers in processes such as disciplinary hearings, case conferences, appeals (including reviews and outcomes), and complex or high-stakes cases where independence or impartial expertise is necessary.

k) Appointment and Role

Such officers are selected only when they have relevant qualifications, expertise and clear independence from the case or involved parties. Any potential or actual conflict of interest must be declared and resolved prior to confirmation of appointment. External Officers will be required to sign a confidentiality agreement prior to commencing their role.

l) Duties and Boundaries

The remit of any engaged External Officers — decision-making, advisory, or oversight—is made clear in writing prior to commencement of any role. External Officers adhere to institutional data protection, confidentiality, equality, and safeguarding standards, are briefed on context, and their contributions fully documented. They will be furnished with a copy of relevant institutional Data Protection Policies and any other policies as applicable to their role, ahead of commencing that role.

Where an External Officer is performing a decision-making role (eg in any student-related procedure), this will be made clear to all parties. Any decision made by an External Officer in the

performance of any role or function on behalf of Oakwood College constitutes an institutional decision.

In accordance with the principles of this Policy, once engaged, an External Officer has the delegated authority to act for Oakwood College subject to the specifics set out in the written agreement underpinning their engagement, and they have the freedom to reach decisions without any influence or interference from Oakwood College. Oakwood College understands that any decision reached by an External Officer may result in findings and/or outcomes which could be disappointing for Oakwood College, and External Officers have the assurance that they can perform their role unhindered by any staff, governors or committees of Oakwood College. This is in accordance with the College's principle governing impartiality set out earlier in this Policy.

m) Authority and Records

Participation of an External Officer in any guise does not invalidate any institutional proceedings; the reason for their involvement is minuted and their input is recorded. Where they are acting in a purely advisory capacity and not performing any institutional duties, this will be made clear in writing ahead of the commencement of the advisory role.

Where relevant (e.g. in the event of an External Officer performing a procedural role), Oakwood College will proactively seek feedback from an External Officer for quality assurance, enhancement and monitoring purposes. Such feedback will be taken forward to the Board of Governors, Academic Board and other committees as well as internal teams in Oakwood College, as relevant.

n) Monitoring, Quality Assurance and Continuous Improvement

At the conclusion of proceedings, feedback from External Officers is gathered and considered in policy review and institutional learning.

4. Procedural Safeguards

o) Delegation

When an authorised manager or officer is unavailable, powers may be delegated to senior staff with no conflict of interest, always recorded formally. Where necessary, powers may be delegated to External Officers, with a clear remit set out in the written agreement underpinning their engagement.

p) Conflict of Interest

All involved in investigating, reviewing, or deciding cases must declare any conflicts of interest as soon as these become apparent, and this may result in either internal staff or an External Officer needing to recuse themselves from any proceedings. In such an event, alternative appropriate arrangements will be made. Where this results in a meaningful delay in any proceedings, parties will

be notified as soon as possible of the delay and also kept updated on any developments, including when the matter is resolved.

q) Support for Students/Staff

At every stage, individuals are informed of their rights, available support, timelines, and steps involved. Students may be assigned internal staff to support them in any student-related formal proceedings, or, in cases where the College deems it necessary, an External Officer. Assigned staff contacts are provided during formal institutional processes.

r) Opportunity to Respond

Parties must be given a fair and reasonable opportunity to provide a response, written representation, or further evidence. Further to this, Parties must be given a chance to see allegations and evidence prior to providing any response.

s) Written Decisions

Outcomes and reasoning are formally documented and communicated promptly within the published timescales. Where it is foreseen that these timescales may not be met, relevant parties will be notified promptly, with an indicative timeframe for when they should expect the written outcome.

5. Reviews and Appeals

t) Clear Pathways

Policies that cover formal procedures for both students and staff (eg Student Non-Academic Misconduct Policy and Procedures, Staff Disciplinary Procedures) include defined review and appeal routes with communicated grounds, timelines, and authentication requirements for third-party submissions.

u) Independent Review

At key stages, decisions are reviewed by persons not previously involved in the case. As necessary, this will incur the involvement of External Officers.

v) Completion of Procedures (students only)

On conclusion of the final stage of internal student-related formal processes, students will receive a Completion of Procedures Letter outlining next steps, including how to escalate their case to the Office of the Independent Adjudicator (OIA) in accordance with their statutory rights.

6. Data and Confidentiality

w) Need-to-Know Management

Information is only shared with those directly involved in a process, always in accordance with data protection and safeguarding law. Where an External Officer is engaged, relevant information will be shared with them as is necessary for them to perform the duties for which they have been employed.

x) Record Keeping

Oakwood College ensures that the correct version of any applicable policies is applied. Documentation is accurate, timely, securely stored, and retained per institutional records policy (normally 5–6 years post-closure). All significant decisions, rationale, and disclosures are logged.

7. Monitoring and Review

Approval and ownership of this Policy is held by the Board of Governors. The CEO or their nominee is responsible for primary operation of this Policy and the processes it covers.

Regular quality assurance audits of procedure, outcomes, and the use/effectiveness of External Officers are conducted.

This policy is reviewed every three years, or sooner if required by sector changes, regulatory developments, or outcomes of procedural reviews.