

7. Promotions Policy

PURPOSE:

To set out the Policy of CNELM in regard to Promotions.

SCOPE:

The scope of this policy relates to all staff, students at CNELM and other Stakeholders. Whilst the focus of this Policy relates to public-facing information, this policy also includes promotional activities of staff and students as it relates to CNELM.

STATEMENT:

1. CNELM's remit is to teach educational courses under Licence from NS3UK Ltd.
2. CNELM promotes the courses that it teaches.
3. CNELM aims to be transparent to all Stakeholders in the promotion of its courses and services so that individuals can make an informed choice about studying with CNELM or participating in CNELM's student supervised clinic.
4. Our approach to marketing and promotion of our courses and services aims to be in alignment with the Compliance with Competition and Markets Authority (CMA) requirements.
5. CNELM actively discourages comparative reference to its courses in comparison to other courses accredited by the Nutritional Therapy Education Commission (NTEC) or any other course provider teaching in the nutrition field. CNELM will present information on its public facing website that pertains to CNELM courses. Staff involved in queries from applicants, Open Days and interviews are instructed to speak about CNELM courses and not make comparisons with other providers.
6. In the context of the educational courses, CNELM offers a supervised Student Dietary Educator, Coaching and Nutritional Therapy Teaching Clinic.
7. CNELM may opt to circulate to students, graduates and staff work opportunities and other activities at CNELM or on behalf of a third-party. *
8. CNELM may direct students completing modules to links to an external website or resource. External links are selected and reviewed for relevance at the time they are shared. However, CNELM is not responsible for the content or the maintenance of external websites. Any views expressed may not reflect those of CNELM.

*CNELM occasionally circulates information regarding external events and external job opportunities which we think may be of interest to students, graduates and staff. **Please note that CNELM is not** involved in the organisation or content of such events or job opportunities, unless otherwise stated, and circulates all such information in good faith. As such, students, graduates and staff that participate in an external event or pursue a job opportunity do so as a matter of choice. Students, graduates and staff can alert CNELM should a concern arise following the circulation of opportunities on behalf of a third-party.

EDUCATIONAL COURSES UNDER LICENCE FOR CNELM TO TEACH:

1. BSc Hons Nutritional Science - Validated by Middlesex University phase-out
2. MSc/PG Dip Personalised Nutrition - Validated by Middlesex University
3. CNELM Personalised Nutrition Practice Diploma
4. CNELM Nutrition Coach Diploma phase-out
5. CNELM Health & Diet Coach Diploma from September 2025
6. CNELM Dietary Educator Cert
7. NLP Practitioner Certificate
8. CNELM Bioscience Entry Gateway course
9. Continuing Professional Development

PROMOTIONS STRATEGY: COURSES:

Comply with promotional requirements of external agencies including:

- Middlesex University (MDX)
- Qualifi
- Training Qualifications UK (TQUK)
- Quality Assurance Agency (QAA)
- Office of the Independent Adjudicator (OIA)
- Office for Students (OfS)
- Competition and Markets Authority (CMA)
- Nutritional Therapy Education Commission (NTEC)
- Complementary and Natural Health Care Council (CNHC)
- British Association for Nutrition and Lifestyle Medicine (BANT) See Appendix 1
- Federation of Holistic Therapists (FHT)

- Association of NLP (ANLP)
- Skills for Health
- UK College of Personal Development (UKCPD)
- Royal Society of Medicine (RSM)

Regularly review and update CNELM's published literature for accuracy and transparency including:

- Published Prospectus
- Other published documents
- Information on the CNELM public facing website.

Encourage feedback via the public facing website regarding the information we provide and to use feedback as appropriate to improve clarity and transparency of information.

Utilise well tested and successful promotional strategies including:

- Building Trust
- A professional and effective website
- Provision of a Prospectus
- Reputational Quality and promotion via Word of Mouth
- Working with Marketing Experts
- Regular Social Media Presence via LinkedIn, Instagram, YouTube and Facebook
- Provision of a Public Newsletter
- Educational Events
- Regular Online Open Days
- Professional Response to Enquiries
- Comprehensive Course Interviews and Discussions
- External Validations, Accreditations and Endorsements
- Appearance on Middlesex University website
- Appearance on the BANT website
- Appearance on the NTEC website
- Representation at External Events
- Generating and maintaining professional and collaborative relationships with the nutrition industry

Utilise other strategies as appropriate including:

- Graduate Contact
- Twitter
- Facebook
- Linked-In
- Educational Events
- Instagram
- Podcasts
- YouTube
- Relevant journals

Regularly review and monitor, as appropriate, the most successful promotions strategies.

PROMOTIONS STRATEGY: STUDENTS, GRADUATES & OTHER PROFESSIONALS:

1. CNELM is willing, on request, and subject to time availability to review the work of CNELM graduates and other qualified health professionals with relevant registrations and/or academic credentials that encompasses nutrition. Such reviews that would be considered might include book reviews and journal papers.
2. CNELM does not take responsibility for the publications of third parties wherein CNELM or NS3UK Ltd is mentioned and for which CNELM had no previous knowledge, or did not give express, written consent. **Please note that** CNELM staff and students are not considered third parties due to contractual obligations.
3. CNELM/NS3UK Ltd may pursue legal action against a member of staff, student, client, or graduate who wilfully or inadvertently misrepresented the Centre, or affiliated organisation, or associations that brought the Centre into disrepute. Actions may also be pursued by individuals affected by any misrepresentation and/or organisations, or associations implicated.
4. Where damage to the Centre has not occurred, CNELM would in the first instance communicate with the member of staff, student, client or graduate to resolve the issue amicably. CNELM Business and Education Ethics Committee (BEEC) may be alerted.
5. We request that students following graduation accurately represent their qualifications gained via their studies at CNELM on websites, LinkedIn and other social media platforms. Recommended wording outlined below. The suggested wording is in fairness to all Stakeholders and limits the potential for inadvertent misrepresentation.

Middlesex University in Collaboration with CNELM

MSc or PG Diploma in Personalised Nutrition PN (Classification optional) or BSc (Hons) Nutritional Science NS (Classification optional)

NTEC Accredited Route to Nutritional Therapy Practice

MSc or PG Diploma in Personalised Nutrition (Classification optional) or BSc (Hons) Nutritional Science (Classification optional in combination with the Personalised Nutrition or Nutritional Therapy Practice Diploma)

Endorsed by Qualifi

Personalised Nutrition Practice Diploma (for graduates of the programme that were registered with Qualifi).

Endorsed by Training Qualifications UK

Bioscience Entry Gateway Course

Accredited by the Association of NLP

NLP Practitioner Certificate taught at CNELM and verified by the UK College of Personal Development

Accredited by the Federation of Holistic Therapists

CNELM Dietary Educator Certificate

6. Similarly, students at CNELM that have active social media platforms and/or websites should state the following:

Middlesex University in Collaboration with CNELM

MSc or PGDip in Personalised Nutrition - student

BSc (Hons) Nutritional Science - student

NTEC Accredited Route to Nutritional Therapy Practice

MSc or PG Diploma in Personalised Nutrition in combination with CNELM's Personalised Nutrition Practice Diploma (PNPD) - student

BSc (Hons) Nutritional Science in combination with CNELM's Personalised Nutrition Practice Diploma (PNPD) - student

Students that gain the Dietary Educator Certificate or NLP Practitioner whilst still a student can use the same as for graduates.

Accredited by the Association of NLP

NLP Practitioner Certificate taught at CNELM and verified by the UK College of Personal Development

Accredited by the Federation of Holistic Therapists

CNELM Dietary Educator Certificate

7. CNELM staff that are graduates of any courses taught at CNELM are also expected to represent their qualifications as for point 5 above; and if completing a CNELM course as a staff member to follow guidance in point 6 above.
8. Accurately stating Awards is encouraged and is important to all Stakeholders including the graduate, affiliated organisations, and the public. Awards gained from other Institutions should also be accurately described. **See Appendix 2 Academic Fraud and Misrepresentation.**
9. CNELM staff will not endorse an individual student or graduate. If a member of staff is, for example, asked by an individual for a practitioner referral the following strategy is applied:
- Refer to the BANT website for a list of practitioners.
 - A member of staff, if it is within their knowledge, may state some names of graduates within their locality and suggest they review the practitioner's website.
 - CNELM staff must make it clear to the individual that this is not an endorsement of the practitioner or a referral.
 - CNELM staff may make a referral to another practitioner in the context of their own private clinic. In this instance CNELM does not take responsibility for the transfer of such information. CNELM PAYE and flexible fee staff, unless practising on behalf of CNELM/NS3UK Ltd, should not use their CNELM contact details when making such referrals.
 - CNELM staff must not offer private services of any kind to students or partake in a professional service provided by a student.
 - CNELM staff must not promote any of their private services to students via CNELM platforms.

CNELM staff, students and graduates should seek permission from CNELM to use the CNELM and, by default, the NS3UK Ltd logos. Staff, students and graduates must use the Logos of external bodies associated with CNELM accurately and in context.

Named Contact Person/s responsible for this Policy

Kate Neil Managing Director and Head of Quality Assurance Kate.Neil@cnelm.ac.uk

Dr James Neil Principal and Research Director James.Neil@cnelm.ac.uk

ASSOCIATED POLICY LINKS AND DOCUMENTS:

This policy links to the following key CNELM Policies and documents:

- Admissions & Enrolment Policy
- BSc Hons Nutritional Science (NS)
- Business & Education Ethics Committee (BEEC) Policy
- CNELM Bioscience Entry Courses & Bridging Modules
- CNELM Dietary Educator Course
- CNELM Nutrition Coach Diploma (NCD)
- Communications Policy
- Fitness to Study and Fitness to Practice Policy

- MSc and PG Diploma Personalised Nutrition (PN)
- MDX Regulations
- Payment Charges & Refund Policy
- Confirmation Agreement
- Licence Agreement CNELM/NS3UK Ltd
- MDX Memorandum/s Cooperation
- MDX Partnership Agreement
- Application form
- Prospectus

Appendix 1: BANT PPC Guidelines for Students

All students studying at CNELM must not practice as a nutritional therapist unless they are qualified to do so and have provided CNELM with evidence of their qualifications.

Student members of BANT may only consult with individuals as part of a Nutritional Therapy Consultation under the supervision of a qualified Nutritional Therapist practitioner as an integral part of their training. The Supervisor must be employed by the Training Provider.

CNELM Students must operate within the terms of BANT Student Memberships and follow the BANT Guidelines for Students. The purpose of these guidelines is to protect, first and foremost, the public but also to protect the practitioner, the training provider, qualified practitioners and BANT's professional standards as the gold standard professional association for nutritional therapy.

Exceptions to the above include: Where students have offered advice to the public or nutrition advice to individuals as part of another therapy, for example osteopathy, herbal medicine, personal training, then the PPC recommends that:

Any Nutritional Therapy students falling in this category would need to declare this at interview or to their Course Leader if completing one of the above qualifications whilst a student at CNELM. The student would need to supply, and have signed off by CNELM, a copy of their Insurance which allows them to practice in another field whilst they are training as a Nutritional Therapist.

Any marketing material must be in line with their previous training and current insurance and clearly state the professional body they are a member of.

Any reference to BANT on any marketing material should be with the appropriate designation 'BANT (Stud.)'

It is acceptable for CNELM students that gain interim nutrition awards, including the Dietary Educator Certificate and the Nutrition Coaching Diploma, to use these qualifications whilst a student member of BANT, subject to practising with the scope of practice for these qualifications. Students using interim awards whilst continuing to complete the PNPD must provide CNELM with evidence of membership with the relevant professional associations and insurance to practice.

Please review the Dietary Educator Certificate and the Advanced Health & Diet Coach Diploma course policies and in context of the BANT Guidelines for Students.

It is the responsibility of CNELM as the Training Provider to investigate any reports of inappropriate activity by students.

BANT can only investigate complaints against fully qualified members.

Appendix 2 Academic Fraud and Misrepresentation:

Prevention of Academic Fraud: Higher Education is undermined by academic fraud, i.e., those individuals that claim they have qualifications that they do not or fraudulently alter official documentation to change grades and Award classifications, or use counterfeit documents/certification obtained from other sources and presented as genuine copies of official documents. Such individuals may use such documents to obtain positions of employment, access to courses without genuine entry requirements have been met, and to market themselves to the public online. Such activity undermines the confidence the public can place in the documentation provided and undermines the hard work of students who legitimately gain Awards and Qualifications.

Students, Staff, Graduates and other Stakeholders are actively encouraged to report any concerns related to Academic Fraud whether a student, staff member or graduate. To initiate a concern please email the datamanager@cnelm.ac.uk.

CNELM offers a Verification Service for the following CNELM Awards:

- a) Bioscience Entry Gateway Course
- b) Dietary Educator Certificate
- c) Advanced Health & Diet Coach Diploma (Nutrition Coach Diploma phase-out)
- d) Personalised Nutrition Practice Diploma

e) Return to Practice

Please note that verification is only undertaken with the graduate's permission and only to organisations, institutions and agencies that can demonstrate a legitimate interest in having an award verified. With the permission of the graduate, CNELM will verify awards to prospective employers, registration and professional associations and higher education establishments.

CNELM will also confirm whether a student has completed one of the following programmes at CNELM:

- a) BSc Hons Nutritional Therapy (Awarded by MDX)
- b) BSc Hons Nutritional Science (Awarded by MDX)
- c) Exit Awards from the above programmes (Awarded by MDX)
- d) MSc Personalised Nutrition (Awarded by MDX)
- e) PGDip Personalised Nutrition (Awarded by MDX)
- f) PGCert Personalised Nutrition (previously Awarded by MDX) or received as an Exit Award from the above two programmes
- g) NLP Practitioner Certificate Accredited by ANLP and Certification issued by UKCPD
- h) Dietary Educator Certificate Accredited by the FHT.

Please note that Middlesex University (MDX) or UKCPD can be contacted directly to verify the certificates and where relevant transcripts they have issued.

Similarly, Qualifi can be contacted directly to verify their Endorsement of the PNPd; and Training Qualifications UK for their Endorsement of the Bioscience Entry Gateway. Students must be registered with Qualifi and or Training Qualifications UK in order to receive an Endorsed Certificate.

Please direct queries regarding verification of an Award to contact the Centre Administrator Dave.Lee@cnelm.ac.uk or Head of Quality Assurance Kate.Neil@cnelm.ac.uk at CNELM in the first instance.

CNELM, in the interest of all stakeholders, will actively investigate a potential case of academic fraud including any alerts received from third parties.

As such CNELM will:

1. Randomly verify the qualifications and certificates listed by applicants on their application forms, which will include checking with the stated Awarding institution and checking social media to ensure there is no inconsistency between the application form and what an applicant states online.
2. Randomly check a sample of students and graduates of our programmes each year in relation to publicly available online/social media to identify any potential cases of Academic Fraud.
3. Automatically check the public online/social media activity of any student under investigation for serious or grave academic misconduct.

If a case of Academic Fraud comes to our attention, then it will be investigated as a Serious or Grave allegation of academic misconduct either under our own procedures for CNELM Awards or under the MDX Regulations for MDX Awards whether the case of fraud is identified once enrolled on a degree programme or following graduation from a degree programme. In either instance the **outcomes could be severe or may include:**

1. Suspension from study during investigation
2. Withdrawal from Programme of study
3. Legal action
4. Notification to appropriate authorities that may include Professional and Regulatory Bodies and Law Enforcement
5. Retraction of a qualification

Misrepresentation: Although misrepresentation of facts can apply to fraud for the purposes of this document, it can relate to either deliberate misrepresentation or innocent misrepresentation. CNELM will alert a student, graduate or staff member if a potential case of negligent or innocent misrepresentation is identified by us or presented to us and provide the individual the opportunity to offer an explanation or to verify accuracy, and if relevant, correct any misleading information on their public facing platforms. If a suspected case of deliberate or innocent misrepresentation is in fact fraudulent the processes detailed above would apply. If a student, graduate or staff member failed to amend any information on their public facing platforms amounting to negligent or innocent misrepresentation, then CNELM would investigate further and may lead to severe consequences.