

# **Admissions Policy**

# 1 Scope of the Policy

## 1.1 **Programmes of Study**

This Admissions Policy applies to all programmes of study delivered by the City & Guilds of London Art School, including those programmes which are validated by another institution.

# 1.2 Relationship to the QAA Quality Code for Higher Education

This policy document articulates the framework for the operation of the Art School's admissions processes and requirements, and defines the roles and responsibilities of all who are involved in the admissions process. It draws upon, and is informed by, the Indicators of Sound Practice described in Chapter B2: 'Recruitment, Selection and Admission to Higher Education', of the *Quality Code for Higher Education* and hence ensures compliance with the Expectation enshrined in the Code, that:

"Recruitment, selection, and admission policies and procedures adhere to the principles of fair admission. They are transparent, reliable, valid, inclusive and underpinned by appropriate organisational structures and processes. They support higher education providers in the selection of students who are able to complete their programme."

# 1.3 Relationship to the Competitions and Markets Authority Regulations

This Policy is also informed by the Consumer Protection from Unfair Trading Regulations (2008) and the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations (2013), as far as they apply to the provision of 'educational services'.<sup>1</sup>

# 1.4 Linked Art School terms, policies and guidance

This Policy should be read in conjunction with the following other documents of the Art School:

- The General and Academic Regulations for Students (this Policy is an Appendix thereto);
- The Terms & Conditions;

<sup>1</sup> This Policy particularly draws upon the document: Higher education: consumer law advice for providers, published by the CMA 12 March 2015.

- The Equality & Diversity Statement and Policy;
- Guidance for all staff involved in Admissions: and
- Guidance for applicants to the Art School

## 2 Admissions Policy Statement

The Art School is committed to a fair, transparent and professional admissions process, in order to ensure that the opportunity to benefit from the Fine Art, Craft, and Conservation education we provide is available to the widest possible range of people who have the motivation and ability to undertake our programmes of study. We will operate admissions processes which are:

# 2.1 Individually tailored, but consistent

Because of the creative and practical nature of our programmes, all applicants to Art and Craft programmes are invited to submit a portfolio of work for assessment, which necessitates a highly individualised approach to admissions decisions; however, all the staff involved in Admissions must provide the same *level* and *quality* of information to applicants, regardless of the programme of study they have applied to;

# 2.2 Transparent

We will provide clear, accurate, up-to-date and accessible information about our programmes, including up-to-date programme specifications, entry requirements and profiles, selection criteria, any variations in admissions procedures necessitated by the nature of the programme, timetables for decision-making, etc;

## 2.3 Inclusive

All our admissions processes are included in the scope of our Equality & Diversity Policy, with the aim of enabling the recruitment to our programmes of students from the full range of socio-economic, cultural and educational backgrounds;

## 2.4 Well-managed and accountable

We will ensure that all decisions on institutional admissions strategy are informed by our overall strategic priorities which reflect our core values, and make sure they are clearly understood by all involved in the admissions process;

### 2.5 **Professional**

We will have clear lines of responsibility and accountability for the operation of our processes, and staff will be well-trained and knowledgeable; they will share best practice across the sector and

keep up-to-date with developments in national policy and QAA requirements.

# 3 Roles and responsibilities

## 3.1 Institutional Strategic decisions

Institutional strategic decisions include the overall numbers of students that can be taught at the Art School, the mix of UK/EU and International students, target numbers for individual Departments, the level of student fees (including application, enrolment/registration, and tuition fees), numbers and types of scholarships/bursaries to award year on year. Decisions on these are taken by the Principal in consultation with the Senior Management Team, and are subject to the approval of the Board of Trustees.

## 3.2 Admissions strategy decisions

- 3.2.1 The detailed, course-specific requirements for admissions, including entry and applicant profiles, form part of the Programme Specification for each course, and are the responsibility of the Validating authority. The Academic Board exercises such authority within the Art School.
- 3.2.2 The Art School's student recruitment, marketing, publicity and information strategies are the responsibility of the Senior Management Team exercised through the Marketing & Communications Committee.

## 3.3 Decisions to admit or reject candidates

Decisions on the suitability or otherwise of candidates, and the determination of conditional offers, are made on behalf of the Principal, normally by 2 academic Admissions Tutors, one of which will usually be the Head of Department, by assessing applicants against a published range of selection criteria.

### 3.4 **Operation of the admissions function**

The Art School's admissions processes are the responsibility of the Academic Registrar, who is supported in their day-to-day operation by the Registry & Admissions Team The admissions function includes, but is not limited to, dealing with programme-related admissions queries, processing applications, communication of arrangements for interview and their outcomes, and dealing with any further queries, complaints or appeals that may arise.

## 4 Applicants with disabilities or special needs

# 4.1 **Policy Framework**

The Art School provides a welcoming environment for people with disabilities and specific learning difficulties such as dyslexia. This is underpinned by our *Inclusive Learning Policy*, which aims to support students throughout their association with us.

#### 4.2 **Disclosure**

Applicants are invited and encouraged to disclose any disabilities or special needs at the point of application, so that we can begin to plan any support we may need to give at the earliest opportunity, including during the admissions process itself. Admissions decisions are always made on the basis of the candidate's ability and/or potential to complete the course for which they are being considered.

## 4.3 Reasonable adjustments

Provided that the essential admissions criteria can be met, the Art School will make reasonable adjustments for disabled candidates in accordance with the Equality Act 2010. This may include special arrangements for the interview. The Admissions Officer will provide all applicants who are offered a place at the Art School with details of the support available for students with disabilities or special needs, so that they can make an informed decision as to whether the Art School is able to provide an appropriate environment for their studies.

## 4.4 Accessibility of the Art School's estate

The Art School's premises are currently undergoing a development programme which will result in a considerable improvement to the accessibility of its buildings for people with physical disabilities. However, applicants and potential applicants who have mobility difficulties should arrange to visit the Art School before completing the application process, to ensure that their needs can be met.

# 5 Students who will be under the age of 18 on entry to the Art School

There is no upper or lower age limit for applicants to the Art School, and all applications are considered on their merits. Because those under 18 years are regarded as 'minors' in the eyes of the law, the Art School has an enhanced duty of care towards anyone who is under 18 years of age when they commence their studies; this continues until their 18<sup>th</sup> birthday, even if this is only for the first few weeks of their course. The Art School therefore requires that applicants in this position are provided with a consent form which must be signed by

their parent /guardian before the student can be enrolled. The Admissions Officer will inform the appropriate member(s) of its staff, including the person at the Art School designated to have responsibility for the oversight of child protection issues, whenever an application is received from a potential student 'minor'. Procedures for dealing with the admission of a person under 18 are detailed in the Art School's *Guidance for all Staff involved in Admissions*.

# 6 Consideration of applications from people with an 'unspent' criminal conviction

Applicants with an 'unspent' criminal conviction should declare this on their application form. The Art School will consider such applications, balancing its duty of care to its students and staff with the need to treat all applicants fairly. As far as possible in a small institution, the consideration as to whether such an applicant's admission would pose an unacceptable risk to the School's community will be kept separate from consideration of the applicant's suitability on academic grounds. Procedures for dealing with the admission of people with a criminal conviction are detailed in the Art School's *Guidance for all Staff involved in Admissions*.

# 7 Entrance requirements and entry profiles

# 7.1 **Standard requirements**

The standard entry requirements and profiles for each programme will be published on the Art School's website, in a durable format, and in its publicity literature, and will be reviewed on a regular basis.

### 7.2 Non-standard and non-traditional qualifications

The Art School welcomes applications from students who hold a broad range of qualifications from both the UK and from other countries. We will use independently-published guidelines such as NARIC when considering the equivalence of qualifications.

# 7.3 Accreditation of Prior and /or Experiential Learning (AP(E)L)

We also welcome applications from students who have gained significant knowledge, skills and understanding relevant to our programmes of study through employment, voluntary work, or individual activities and interests. We have developed clear mechanisms for identifying, assessing and formally acknowledging prior learning, both certificated and experiential, and will apply these to ensure that applicants from all educational backgrounds can gain entry to the Art School and benefit from the education we provide. These are

articulated in the Art School's AP(E)L and Credit Transfer Policy and procedure [working title], available via the website at [link].

# 7.4 Entry to a year other than the first year of a programme

Applicants may also be considered for entry to a point in the course later than the start of a programme of study (e.g. entry directly into the second year), provided that the admissions tutors are satisfied that by successfully completing the remaining stages of the programme the applicant will be able to fulfil the learning outcomes and have an equal opportunity of attaining the standard required for the award as the students who have undertaken the entire programme of study. Evidence that this is the case will need to be provided during the application process in the form either of prior academic credit, or, exceptionally, using AP(E)L. The Art School's AP(E)L and Credit Transfer Policy [working title] provides the framework by which such requests are considered.

## 7.5 **English language proficiency**

English is the medium for instruction at the Art School, and it is therefore essential that our students have an acceptable command of the English language. Applicants whose first language is not English will be required to demonstrate proficiency in the language in accordance with the requirements set out for each programme of study.

### 8 The admissions process

### 8.1 **Procedural guidance**

Detailed guidance, including the specific responsibility of the Admissions Tutor, will be available for all staff involved in admissions, including for those who make admissions decisions. The key principles in the process are outlined in the following paragraphs.

## 8.2 Applying to the Art School

All applications are made directly to the Art School. Detailed requirements for inclusion in the application are published on and are available to download from the School's website in respect of each programme of study; any or all of the following may be taken into consideration by the selectors:

- A completed Art School application form;
- A personal statement of at least 300 words;
- A digital mini-portfolio of images of work previously completed;
- A physical portfolio of work;
- At least one letter of reference;
- Applicant CV.

#### 8.3 **Deadlines**

The Art School will agree in respect of each programme of study, appropriate internal timescales for the consideration of applications and for the communication of decisions to applicants; these will be published on the Art School's website.

# 8.4 Incomplete applications

On receipt of the application, the Admissions Officer will ensure it is complete and attempt to follow up any missing elements with the applicant. The Art School reserves the right not to consider incomplete applications.

# 8.5 Initial assessment of qualifications

An initial assessment will be made of the entry qualifications provided by the applicant, in order to assist Admission Tutors in the translation of any non-standard qualifications or to highlight any instances where a formal request to be considered under the AP(E)L or credit transfer provisions is being made or would be appropriate.

- 8.6 Portfolio assessment: applications for Art and Craft programmes
  Although initial scrutiny of all applications for Art and Craft-based
  programmes includes assessment of a digital portfolio, an offer of a
  place at the Art School for these programmes will only be made on the
  basis of an assessment of a second, physical portfolio of work, which
  may then be part of an interview discussion. No applicant to a
  programme which requires the submission of a physical portfolio will be
  offered a place without the portfolio assessment.
- 8.7 Assessment of applications for Conservation programmes
  Applicants for Conservation programmes are not required to submit a portfolio of work; offers will be made on the basis of a traditional 'humanities' interview.

### 8.8 Assessment of International applicants

International students may be interviewed by Skype or other videoconferencing method if they are unable to attend an interview at the Art School.

### 8.9 The selection process

- 8.9.1 Each programme specification will include a list of selection criteria, which will include the potential to benefit from the programme.
- 8.9.2 Consideration of completed applications is a process with up to three stages. In arriving at their decisions, selectors will assess all aspects of an applicant's profile against the selection criteria, as follows:

#### First stage

- Qualifications/previous experience
- Digital portfolio
- Personal statement
- English language proficiency (written) if appropriate
- Reference(s)

At the end of this stage, applicants will either progress to stage 2, or their application will be rejected.

## Second stage

- Physical portfolio assessment
- Personal statement

At the end of this stage, applicants will either be offered a place, or progress to stage 3.

# Third stage

- Interview report
- English language proficiency (verbal) if appropriate

At the end of this stage, applicants will either be offered a place, or their application will be rejected.

### 8.10 **Communication with applicants**

- 8.10.1 During the application process, the Art School will communicate only with the applicant, as required by the Data Protection Act 1988, unless s/he has given specific consent for the School to discuss the application with another person. The Data Protection Act applies equally to the personal details of people who are under 18 years of age as to those who are adults.
- 8.10.2 Applicants will receive notification of the outcome of their application by letter, normally sent as an attachment to an email, within the published timescale for each programme of study. Where for some reason this is not possible, the applicant will be contacted to inform them of the delay and the reason(s) for it.

#### 8.11 *Unsuccessful applicants*

- 8.11.1 No application will be rejected without being reviewed by at least two members of staff.
- 8.11.2 Feedback will be given to any applicant who requests it.
- 8.11.3 Unsuccessful applicants, or those who do not take up their place, may reapply to the Art School in a subsequent year.
- 8.11.4 The Art School reserves the right, if the number of qualified applicants exceeds the number of places available, not to admit

every suitably qualified applicant to a programme of study. In such cases, the School may:

- Offer the opportunity to transfer the application to another programme for the same academic year if the applicant is suitably qualified for it and there are spaces available; OR
- Place the candidate on a waiting list to be offered a place should one become available within the same academic year.

# 9 International applicants and visa requirements

# 9.1 **Obtaining a visa**

The Art School will issue a Confirmation of Acceptance for Studies (CAS) to international applicants who meet the conditions of their offer. It is then up to the international student to make all further arrangements for obtaining the appropriate visa in sufficient time to undertake enrolment and commence study.

9.2 The Art School's obligations under its Tier 4 Sponsor Licence
We are required to view and maintain copies of all international
students' current passports and visas (specifically valid for study at the
Art School), along with original qualification documents, including
certified translations of these if they are not in English. This information
is collected before or at the latest upon enrolment at the Art School,
and an international student cannot be permitted to enrol unless this
documentation is collected and checked.

## 10 **Pre-enrolment period**

### 10.1 Welcoming incoming students

We will offer opportunities to incoming students to get to know the Art School between the time they accept their offer and when they enrol. These may include:

- A welcome letter from the Principal /Head of Department;
- Invitations to degree shows;
- Information about other shows or exhibitions which might be of interest.

## 10.1 Arrangements for enrolment and induction

Enrolment instructions are published with the Art School's term dates. The Art School will ensure that when designing the arrangements for enrolment full consideration is given to any reasonable adjustments necessary to enable disabled students to take a full part in enrolment and induction activities.

#### 10.3 Course handbooks

Course handbooks will be sent in a timely fashion to all applicants who are offered a place at the Art School. They will contain detailed information about the relevant programme, including any additional options available, the timetable, and details of all fees and any additional charges.

## 11 Changes to programmes of study

It is occasionally necessary for the Art School to amend or withdraw a programme or module due to circumstances beyond its control. If such changes are necessary, we will inform applicants who are likely to be affected as soon as possible, and offer alternatives where this is possible.

## 12 The Art School's expectations of applicants

The School considers all applications and makes its admissions decisions on the assumption that all information provided by applicants is complete and accurate. Throughout the application process, the Art School expects applicants to:

- Provide full and accurate information about themselves, both in their original application and in any subsequent responses to requests for information; and to correct any factual errors as soon as they are discovered;
- Inform the Art School of any updates to the application, e.g.
  changes of address or other contact details, in a timely way in order
  to ensure that communications from the Art School reach her/him
  throughout the application process; the School is not responsible for
  correspondence being lost due to the applicant having provided
  incomplete or incorrect contact details;
- Inform the Art School of any changes in their circumstances after an application is submitted;
- Respond to any requests for further information within the timescales stipulated by the Art School, and if this is not possible for a good reason, to inform us in good time so that other arrangements can be agreed.

## 13 Acceptance of offers and the Art School's terms & conditions

13.1 When an applicant accepts an offer, s/he is deemed also to have agreed to abide by the General and Academic Regulations, which are available via the Art School's website.

- 13.2 It is a condition of enrolment that students agree additionally to accept the Art School's Terms and Conditions as laid out on the enrolment form, and which are available via the website.
- 13.3 A registration fee and a deposit towards payment of the tuition fee are payable on acceptance of the offer.

# 13.4 Applicants' right to cancel their acceptance

All applicants who are offered a place are also notified of their right under the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013 to cancel an acceptance /withdraw their application without financial penalty within 14 days of accepting the offer, and are sent a form on which they may do so, although cancellations /withdrawals will also be accepted if notified to the Art School by letter, by email, or over the telephone to a member of staff of the Art School. If a cancellation/withdrawal is made *after* 14 days of the original acceptance the Art School may not refund all monies paid by the applicant; we will make clear in the offer pack and via our website the details of how refunds will be managed and on what timescales they depend.

### 14 Withdrawal, amendment and corrections to offers

# 14.1 Withdrawal or amendment of an offer made in good faith

An offer may be changed or, in exceptional circumstances withdrawn, if additional information comes to light which materially affects the application, which was not available or disclosed by the applicant until after the selection process has been completed.

### 14.2 Correction of communication errors

Where a mistake has been made by Art School staff in the communication of an offer, we reserve the right to correct the error if the offer has not yet been accepted. However, if the conditions of an incorrect offer have already been fulfilled or accepted when the mistake is discovered, the offer will only be withdrawn with the consent of the applicant.

## 15 Fraudulent applications

The Art School has the right to dismiss an application, withdraw an offer or revoke a student's registration if it is discovered that a false statement has been made in the application, significant information omitted, or qualifications falsified in any way including by forgery of certificates. The School will pass information from an application to

such organisations as the Police or the Home Office if legally required to do so.

# 16 Procedure for the investigation of applicant complaints and appeals

- 16.1 The Art School's procedure for the investigation and resolution of complaints and appeals about is detailed in Appendix A to this Policy.
- 16.2 Admissions decisions based on academic judgement may not be challenged unless there is evidence of prejudice or bias against a candidate.
- 16.3 Complaints and appeals about admissions decisions do not fall within the remit of the Office of the Independent Adjudicator for Higher Education (OIA).

# 17 Data protection

By signing an application form, applicants give the School permission to process their personal data, including any 'sensitive' personal data (as defined in the Data Protection Act 1988), for the purposes of managing the School's recruitment, selection and admissions process. In addition, the information will also be used to make statutory returns to such bodies as the Higher Education Statistics Agency (HESA) and may be passed to the Home Office in respect of international student admissions. Data made anonymous will also be used to compile Equality & Diversity statistics for internal reporting and monitoring purposes.

### 18 Admissions Policy Review

This Policy will be formally reviewed by Academic Board every 5 years. In order to incorporate any changes to national and/or institutional requirements in the interim, it will additionally be reviewed annually by the Academic Registrar on behalf of the Academic Board, and any updates reported to Academic Board for formal approval.

### Appendix A:

## Complaints & appeals procedure for applicants to the Art School

#### A1 Introduction

The Art School is committed to providing all applicants with an excellent experience when they apply to us, through high-quality, fair, and transparent admissions procedures. We recognise, however, that there may be occasions when an applicant will feel dissatisfied with the conduct of the process and/or its outcome.

This procedure is designed to ensure that in the event that an issue cannot be resolved informally, all legitimate concerns submitted by applicants are investigated thoroughly and dealt with in a timely fashion and in accordance with our Equality & Diversity Policy.

#### A2 **Definitions**

## A2.1 **Complaints**

A complaint is a specific concern, on one or more of the grounds listed in paragraph A3.5 below, about the way the admissions process was conducted in relation to the complainant's application; it may, but not necessarily, relate to the outcome of the application. If upheld, remedies might include an apology to the applicant, or an undertaking to review an aspect of the procedure.

### A2.2 Appeals

An appeal is a formal request for the review of an admissions decision and/or the outcome of an application on one or more of the grounds listed in paragraph A3.6.1 below. A successful appeal would mean that the application is reconsidered with a view to either changing or upholding the original decision.

### A3 Using this procedure

### A3.1 *Eligibility*

All candidates who apply for a place on a programme of study delivered by the Art School, including programmes validated elsewhere, may use this procedure if they have a legitimate issue relating to the handling of their application by the Art School. This procedure does not apply to applications for Fellows or Residents.

## A3.2 Anonymous complaints and appeals

In order to be considered, a complaint or appeal must be submitted by the affected applicant her/himself. The Art School will not consider or investigate complaints submitted anonymously or by a third party.

# A3.3 Malicious or vexatious complaints and appeals

The Art School will dismiss any complaint or appeal which is found to have been submitted with malicious or vexatious intent.

# A3.4 'No victimisation' statement

The Art School undertakes not to disadvantage an applicant in any way because they have used this Procedure in good faith.

# A3.5 Valid grounds for submitting a complaint

A complaint may relate to any part of the admissions process. The following are possible grounds for a complaint:

- If the complainant believes that the provision of information or the processes identified in the Art School's Admissions Policy have not been adhered to: and /or
- If the complainant believes they have been treated unfairly or disrespectfully in relation to the provisions of the Art School's Equality & Diversity Policy; and /or
- If the complainant believes that one or more of the selectors showed bias or prejudice in exercising their judgement.

# A3.6 Valid grounds for submitting an appeal against an admissions decision

- A3.6.1 Review of the outcome of a selection decision may only be requested in the following circumstances:
  - Where an applicant is able to submit new information which would have been material to the initial decision-making process, e.g. documented medical or other evidence to support a claim for mitigation; and/or
  - Where an applicant can provide evidence that one or more of the selectors showed bias or prejudice in making their decision in a way that makes the decision invalid.
- A3.6.2 Except as provided above, the Art School will not consider appeals based on challenges to the judgement of its selectors in relation to the academic and non-academic selection criteria for the programme.
- A3.6.3The Procedure may not be used simply because a candidate disagrees with the decision made on her/his application.

#### A4 The Procedure

# A4.1 *Informal stage*

It is expected that the Admissions Officer will deal informally with requests from applicants for clarification of communications from the Art School, or the selection arrangements relating to the admissions process. This Procedure will be invoked if an applicant remains dissatisfied with the response they receive to any concerns raised about the process.

# A4.2 Time limits for complaints /appeals

Applicants with valid grounds on which to register a formal complaint or appeal against the selection decision should raise their concerns as soon as possible after the stage in the process which they believe was administered poorly, or, where they relate to the communication of the Art School's decision, within 28 days of receipt by the applicant of that decision. In all cases, the complaint or appeal must be submitted within the current admissions cycle.

## A4.3 How to make a complaint or appeal

A4.3.1 All complaints and appeals should be addressed to the Academic Registrar, City & Guilds of London Art School, 124 Kennington Park Road, London SE11 4DJ, and may be submitted by post, by hand or as an attachment to an email (address: w.schol@cityandguildsartschool.ac.uk

A4.3.2The following information should be provided:

- Applicant name, address and application reference number;
- The programme of study applied for;
- Specific details of the complaint or appeal;
- Any other details the applicant thinks are relevant;
- An indication that this information may be shared with those who will be investigating the complaint or appeal;
- An indication of the desired outcome of the complaint/appeal (without prejudice to the final outcome).

### A4.4 Investigation of complaints and appeals

The investigation of complaints and appeals will be carried out by the Academic Registrar or her/his nominee, involving contact as appropriate with the Head of the relevant Department and/or other members of staff. The Art School undertakes to investigate all complaints and appeals thoroughly and fairly.

## A4.5 **Outcome of the investigation**

A4.5.1 Following careful investigation of the complaint/appeal, the Academic Registrar may determine:

- (a) That the complaint or appeal be upheld, in which case the Art School will take action and/or provide remedy as appropriate:
  - in the case of an upheld appeal this will automatically include re-assessment of the application (although reassessment is not a guarantee that the original decision will be changed);
  - in the case of a upheld complaint against the behaviour of a member of staff during the admissions process the matter may be progressed via the staff disciplinary procedures;
- (b) That the complaint or appeal be not upheld;
- (c) That the complaint or appeal is malicious or vexatious and is therefore dismissed.
- A4.5.2The outcomes will be communicated to the applicant within 20 working days of receipt of the complaint /appeal.
- A4.5.3 Should a reassessment following appeal result in a changed decision to offer a place on a programme on which space is no longer available in the year applied for, the applicant will be offered the first space to become available for that programme, and if none becomes available, the offer will be held over to the following academic year.
- A4.5.4The decisions taken following completion of this process are final and the Art School does not operate any further internal appeal process.

# A5 Processing and storing records of admissions complaints & appeals

#### A5.1 Data Protection

- A5.5.1 Applicants who lodge a complaint and those against whom complaints are made can expect the Art School to deal with the issues confidentially and with due regard for their privacy. The information provided by all parties will be processed and stored in accordance with the Data Protection Act 1998 and will only be disclosed to those members of the Art School who need to see it in order to progress the investigation.
- A5.5.2 If the applicant who has lodged an appeal or complaint subsequently gains admission to the Art School, information relating to the case will not be held on the student's file.
- A5.5.3The personalised record of complaints/appeals, and any supporting papers, will be destroyed one calendar year following resolution of the case.
- A5.5.4 Anonymised data may be used to report statistics and outcomes to Academic Board and/or to the Art School Board of Trustees.