



University of Essex



University of Essex

Title IV Funding Code of Conduct

2026-27

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Title IV Funding Code of Conduct

2026-27

1. Purpose

To ensure administration of Title IV Direct Loans is conducted solely in the interests of students and borrowers and is free from conflicts of interest, improper influence, or financial benefit arising from relationships with lenders, loan servicers, guaranty agencies, or other organisations involved in education lending.

2. Scope

This Code of Conduct applies to:

- Funding Team
- Student Services staff involved in loan administration
- Finance staff involved in Direct Loan processing
- Officers, employees and agents of the University Of Essex.

3. Revenue-Sharing Arrangements

The University of Essex shall not enter into any revenue-sharing arrangement with any lender.

For the purposes of this Code, a revenue-sharing arrangement includes any arrangement under which the University recommends a lender or loan product to students or families and receives a fee, share of revenue, or other financial benefit from the lender in return. This prohibition applies to all Title IV loans and other education loans administered by the University.

4. Gifts

University of Essex employees and agents with Direct Loan responsibilities must not solicit or accept gifts, gratuities, entertainment, hospitality, travel, meals, discounts, or other items of value from:

- Lenders,
- loan servicers,

- guaranty agencies, or
- other organisations doing business in connection with student loans.

Employees and agents of the University of Essex must not accept gifts indirectly through:

- family members;
- relatives;
- partners;
- friends; or
- any other individual where there is reason to believe the gift was provided because of the employee's official position or responsibilities relating to education loans.

Reasonable training materials and informational resources may be accepted where permitted by federal regulations.

5. Conflicts of Interest

Employees and agents of the University of Essex must:

- avoid actual, potential, or perceived conflicts of interest;
- disclose any relationship, financial interest, or arrangement that could influence their judgement or impartiality;
- recuse themselves from decisions where a conflict exists; and
- act solely in the interests of students and borrowers when administering education loan programmes.

6. Consulting and Outside Employment

Employees and agents of the University of Essex may not accept:

- compensation;
- fees;
- retainers;
- stock or equity interests;
- honoraria; or

- any other financial benefit from a lender, loan servicer, or guaranty agency in exchange for consulting services, advisory services, or any contract to provide services relating to education loans.

This prohibition applies regardless of whether the services are performed during working hours or personal time.

7. Borrower Choice

The University will:

- not direct borrowers toward a particular lender, loan product, or borrowing arrangement;
- not assign a lender to a borrower;
- provide objective and unbiased information regarding loan options;
- process loan applications and certifications fairly and promptly; and
- not refuse to certify, nor delay certification of, any loan based on the borrower's selection of a particular eligible lender. The only permissible delays are those attributable to administrative factors beyond the organisation's control, including requests for additional information from applicants or delays in applicants confirming course details.

8. Preferred Lender Arrangements and Inducements

The University shall not request or accept any offer of funds, grants, financial support, staffing assistance, services, or other benefits from a lender in exchange for:

- a specified volume of Title IV loans;
- a preferred lender arrangement;
- a specified volume of private education loans;
- placement on a recommended lender list; or
- any concession or advantage relating to education lending.

The University shall not enter any arrangement that provides a lender with preferential treatment in exchange for financial or non-financial benefits.

9. Advisory Boards

University of Essex Employees and agents serving on an advisory board, commission, committee, or other group established by a lender, loan servicer, or guaranty agency may receive reimbursement only for reasonable expenses incurred in connection with such service.

No individual covered by this Code may receive compensation, consulting fees, honoraria, stock, gifts, or other financial benefits for such service.

10. Annual Training

All University of Essex employees with Direct Loan responsibilities must:

- review the Code annually to ensure continued compliance with applicable US Department of Education requirements.
- complete any required compliance training; and
- acknowledge compliance annually.

This directly reflects the US Department of Education (US DoE) Programme Participation Agreement (PPA) requirement.

11. Publication

This Code of Conduct is:

- published on the University's website;
- available to students, borrowers, and the public upon request; and

12. Violations

Violations of this Code may be reported to appropriate regulatory or oversight bodies where required.

Document Control Panel

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