



Student Protection Plan

2023- 25

Context

The City of London College's strategic planning for 2023 to 2025, aims to define and orchestrate a long-term vision of its higher education provision – a key part of which is the development and implementation of a Student Protection Plan.

The following articulates the College's management & governance processes and the overall approach to the alignment with sector best practice surrounding public interest governance principles. In following this model, the College demonstrates its approach to the accountability, delivery, identification, monitoring and assessment of risk relating to the student protection planning process..

Management and governance processes that underpin the development and implementation of the Student Protection Plan and the mechanism for its approval are central to the mission of the College. This policy plan, written in line with the Office for Students (OfS) guidelines and regulations under the requirements of the Higher Education and Research Act (2017), confirms the College's commitment to ensuring the continuity of studies of students in the event of discontinuation in operations or wider organisational disruptions.

In alignment with the Competitions & Markets Authority (CMA) guidance the College will take all reasonable steps to ensure that study course/programmes are delivered in full and meet the expectations students have when they accept an offer to study with the College. In addition, it will ensure that students who successfully engage with their studies are not prevented from achieving the award studied for because of adverse circumstances, which might include changes to a programme's content, or loss of access to learning resources or campus facilities.

This Student Protection Plan sets out how the College will protect the interest of its students in the event that changes to their programme are unavoidable. It also explains how programmes that no longer run will be taught out, and how students will be supported to complete their programmes in the unlikely event that the College should permanently close. The plan and the contingencies outlined within it are supplementary to students' statutory rights, which remain unaffected; it forms part of the College's *Terms and Conditions*, which can be read on the website.

Due consideration will be given to students with 'protected characteristics' as defined in the *Equality Act (2010)*, and how actions taken by the College to preserve the continuity of learning

opportunities may potentially affect these groups, particularly students presenting with a profound disability or specific learning difficulty.

This plan refers specifically to students' protection as consumers, and does not describe the College's other duties of 'protection from harm', such as those relating to safeguarding, health and safety, protection of personal data or the Prevent duty, which are covered in separate policies, which can be found on the College's website.

1. An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise.

This Student Protection Plan details how the College will, in consultation with its students, treat developing risks to the continuity of learning opportunities or quality of student experience, and seeks to preserve learning opportunities as closely as possible to those agreed at the point of sale in the event of adverse circumstances.

General academic risks are mitigated through procedures for the verification of assessment standards specified by the College's awarding body partner/s and introspective joint quality events (such as the Annual Quality Conference). Broader academic risks are controlled by the Academic Board and its subcommittees. Ongoing evaluation of the College's governance structure will seek to embed within it a tiered risk management framework, facilitating the exposure and control of risks at strategic, programme and activity-levels.

This will enable management of risk at the most appropriate points of mitigation, as well as promoting a holistic approach in the oversight of the range and flexibility of risk mitigation needs.

Under the College's revised governance arrangements, risk management planning will specify the risk appetite and levels of delegated authority for the management of risk, as well as tracking the ownership of individual risk events and assigning responsibility for monitoring and control protocols. Events and circumstances, beyond the College's control, may result in the temporary or permanent withdrawal of continuation of study for students.

These could include:

- Significant human resource changes including the loss of key academic and support staff and the potential inability to recruit staff with the necessary teaching delivery skills.
- Significant physical resource changes including loss of campus and estates facilities to maintain specific and necessary resources to deliver provision
- Inability to operate as intended due to loss or restriction of licenses/registrations/designation and withdrawal of validating agreement(s) by awarding bodies;
- Inability to deliver specific timings of study such as day-time or evening.

The risk of the above categories is deemed to be Low

Industrial action by College staff; this is assessed as beyond the control of the College in circumstances of a national dispute or action and **deemed of moderate risk**

2. The measures that you have put in place to mitigate those risks that you consider to be reasonably likely to crystallise

The College has a Business Continuity Plan and framework in place to assess and mitigate any perceived risks to the continuation of study for our students as outlined below. The plan will be reviewed annually by the Board of Governors and Senior Management Team, taking account of views of student and staff representatives.

The plan is designed to ensure financial stability, effective resource planning and delivery.

3. Significant human resource changes

To mitigate the potential loss of key staff, and the need to ensure the capability of new staff and build high achievement expectations, the College has, as part of its strategic planning, developed a Staff Development Framework, Strategy and Policy.

In addition, the College's 'Externality' Framework and Strategy supports and enhances the further development of staff through the provision and input of external 'critical friends' in the staff development process.

The risk of disruption to normal College teaching and administrative activities due to staffing shortages or absences is considered low since the College will ensure that sufficient, qualified staff are recruited and that staff are able to cover for each other in the event of such shortage or absence.

To mitigate this risk the College will regularly review staff requirements and the recruitment of temporary teaching or administrative staff, as needed.

The risk associated with this scenario is deemed to be Low, due the College's extensive staffing register/network

4. Significant physical resource changes

The provision of 'fit for purpose' estates, premises and resources suitable and appropriate for study at higher level is currently a key feature in the College's business continuity planning.

Should any programmes or modes of study be withdrawn as a result of the loss of physical resources, or withdrawal of collaborative arrangements by awarding body partners, the College will undertake to phase out courses in an open, transparent and timely fashion so that the 'teach out' of students will align with the stated timelines of the academic cycle to minimise the disturbance of the student learning experience.

In the unlikely event of the College premises being unavailable for use, for example due to damage, flooding or other reason, the College will mitigate the impact on students by:

- renting alternative nearby premises as needed;
 - keeping students fully informed of any changed location for classes;
 - ensuring that any repairs to the premises are carried out promptly.
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The risk of occurrence of temporary facilities close (planned or unplanned) is moderate to high as building maintenance issues are fairly commonplace – the College’s planning and contingency procedures ensures the impact remains low

5. Our Commitment to Students, Applicants and Prospective Students

The College will seek to avoid making changes to programmes mid-delivery or close to the start of a programme. However, the College may at times decide that such changes are in the interests of its students or its wider academic community.

There may also be events beyond the College’s control where it must make changes to study programmes to ensure they can be delivered in full.

The College will have in place the necessary contingencies and resources, including financial resources, to ensure the continuity and completion of the study programmes it offers in the event of adverse circumstances beyond its control; where this is not possible the College will consult with affected individuals to achieve the best possible outcome.

Should any disruptions pose a risk to the continuity of its programmes, the College will undertake to:

- contact all students and/or applicants **within two working** days of the time at which the applicable change was decided, or notified to the College - announcements will be made to the student body via their email addresses and notifications posted prominently around campus facilities, on the College’s public website and on our student Virtual Learning Environment;
- immediately arrange for a consultation of affected students, and invite student representatives to relevant decision-making meetings, ensuring the interests of those affected are given due consideration;
- ensure, where required, that recruiters and admissions staff are made aware of any substantial changes to UKBC’s learning opportunities and that all published information and promotional copy are updated in a timely fashion.

Where any substantial changes made to programmes make it unviable for students to continue, the College will consider reasonable requests for refunds and compensation, and will work with affected individuals in assisting them to secure a study placement with another provider, should they require this.

Should any of the provisions within this plan need to be triggered, the College will duly notify all regulatory bodies for higher education in England, the Office for Students (OfS), as well as the relevant awarding bodies. This will ensure these regulatory bodies have oversight of the College’s actions during any continuity period.

The risk associated with this scenario is low. The College has all necessary resources in place to ensure course/programme continuity and effectiveness.

As a result of the College's accreditation arrangements being revoked by its regulator(s), or a partner awarding body withdraws validation agreement(s), we will implement a fair, open & transparent and gradual closure process to minimise disturbance to student studies.

In addition, if programmes and modes of study are withdrawn for reasons beyond the College's control, it will undertake to 'teach out' students under existing timescales and deadlines.

In the event of a 'teach out' process in 2023/24 due to potential loss or changes in collaborative arrangements, students with re- submission requirements will be supported by continued teaching support and financial help (tuition fees paid), demonstrating the College's commitment to ensuring continuity of study and appropriate learning support.

The College has demonstrated its ability for ensuring the provision of quality systems and monitoring to secure partner and regulatory body compliance through successful engagement with awarding body due diligence processes. The implementation of the new Quality Assurance Framework, clearly demonstrates the strength of the College's governance and management of standards and quality to ensure continuity of delivery to students.

The College has demonstrated its ability for the provision of quality systems and monitoring to secure partner and regulatory body compliance. In the unlikely event of the College losing accreditation, other measures that the College can implement to protect the student experience, may include:

- delivering a modified version of the same course;
- offering affected students the chance to move to another course;
- providing assistance to affected students to switch to a different provider holding the relevant accreditation.

The risk of loss of awarding body accreditation **is deemed low** due to effective academic management and quality assurance processes being in place

7. Industrial action by College staff

The College is committed to maintaining effective employee relations and to working with trade union representatives, as applicable, to achieve reasonable solutions for any matters arising.

In the event that local or national industrial action by academic and support staff should occur, the College will ensure that all physical resources will, as far as possible, be made available to students during the period of the action and will take all reasonable steps to ensure that any disruption is minimised and that students are not disadvantaged by the action.

Due the College's inability to exercise full control over this issue the **on-going risk is moderate**.

8. Inability to deliver specific timings of study such as day-time or evening;

Should issues arise related to timings of daytime or evening sessions, due to staff illness/absence, or an IT related malfunction the College will provide alternative modes of study delivered by consultant staff as a short-term interim measure.

The College maintains a comprehensive register/database of professional and academic specialists to be available at short notice to provide cover at a time of need.

In the event of the need to cancel classes due to staff shortages and/or illness, the College will offer repeat sessions at no extra cost to the student.

The College's Board of Governors and Senior Management Team also maintain an ongoing assessment of risk and risk mitigation via their regular meetings and are able to put any additional measures in place, as needed. Communication is maintained with, and input obtained from, students and staff and any other relevant stakeholders as appropriate.

The risk associated with this scenario is low – given the nature of the College's provision, there are few factors which would potentially impede the delivery of provision to certain groups. In addition, the College will undertake comprehensive equality impact assessments of any substantial changes it makes to its learning opportunities

9. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

The College's **Refunds and Compensation Policy** sets out our fees and charges, students' liabilities for course fees, and the College's provisions for refunds of tuition fees, relevant costs or compensation, where necessary, in the event that we are no longer able to preserve continuation of study.

Tuition fees are due annually at the start of a student's course each academic year. Payment of tuition fees is a student's responsibility regardless of how they are funding their fees (e.g. by taking out a student tuition fee loan, self-funding or being sponsored by an employer or other sponsor). The amount of tuition fee liability incurred by a student may change during the academic year. Should a student interrupt or withdraw from the course during the academic year, the tuition fee liability depends on the date of the interruption or withdrawal.

Details about tuition fee payment arrangements and students' tuition fee liability is in the documents 'Your Fees Your Responsibilities: Home (UK) Students' or 'Your Fees Your Responsibilities: Overseas Students' in the Fees and Funding section of the University website.

Refunds will be made to students in relation to tuition fees where they made payments for their tuition fees that exceed their tuition fee liability. It might be due to a student interrupting or withdrawing during the academic year.

Student Refunds and Compensation Policy (1 September 2021 Page 2 3.5). Refunds will also be made to students in relation to tuition fees if an error occurs in the invoicing arrangements and the student is invoiced and pays more than the tuition fee due for their programme of study. A refund will be made based on the difference between the amount paid and the amount due in this event.

The Refunds & Compensation Policy is available on the College website and hard copy may be obtained from the administrator if needed. The policy is revised annually, with student representatives involved in the process of determining any revisions.

The College's financial reserves and strategy, overseen by the Board of Governors, ensure that there are sufficient cash reserves to deliver the financial implications of this policy – **the risk, therefore is deemed to be low**

10. Information about how you will communicate with students about your student protection plan - Student Engagement, Staff & External Participation

The Student Protection Plan will be clearly signposted and accessible to current and prospective students and staff on the College's website and intranet and also available in hard copy from the administrator.

The Plan, along with the Strategic Plan, Strategic Enhancement Plan and the Externality Policy will be reviewed termly (x3) by the Quality Assurance Committee and Academic Board. Students undertaking formal Student Representative roles are present on these committees ensuring that the student voice has a proactive role in development of the plan and any updates to it.

Students and staff will be kept informed about any risks arising by means of face-to-face meetings and also via their email addresses as well as updates on the website and/or the VLE as appropriate.

In addition, students will be consulted and represented in relevant meetings with the College and its awarding bodies and given opportunities to discuss any potential risks or impacts on their study as well as to discuss any actions being taken to mitigate the perceived risks. Staff will also be informed about the Plan as part of their induction and any updates included at staff training events.

The respective Student Engagement Policies outline students' involvement in the quality assurance and enhancement of their educational experience at module, programme and institutional level. The Student Union Committee which meets once per term is the forum for students to engage at College level. Membership of the committee includes the Student Union President and Vice-Presidents and representatives from all courses and campuses.

There is an established student representative system with one elected representative per study group. Student representatives are members of course/programme committees including Academic Board and the Quality Enhancement Committee.

Student feedback confirms the student voice is heard and acted upon. Good levels of support are available for students, many of whom are mature, returning learners providing appropriate human and physical resources to enable students achieve their potential.

A wide range of support mechanisms and resources are available including orientation and academic induction programmes, personal tutors, academic counselling and support, student support services, a learning resource centre, careers advice, a work placement unit, and financial services.

11. Covid 19 Evaluation, Delivery & Planning

The College continues to closely monitor the evolving situation around the viral outbreak of the COVID-19 (Coronavirus) and revises its strategies to respond responsibly to the effect the outbreak will have on our students and operations on campus.

This guidance should be read in conjunction with the College's Health and Safety policy.

All staff and students are advised to follow Public Health and hygiene guidelines, however should any individual start to present symptoms, they should follow the procedures as per HM Guidelines: <https://111.nhs.uk/covid-19>.

Students are especially advised to be cautious if they have themselves recently returned from a high-risk country or have come into contact with someone they know has recently returned from a high-risk country and should not come to the college until they are confident they show no symptoms and/or have been checked by their GP/NHS Officer.

Under the current Government regulations, the College is required to maintain essential study and support facilities for students who cannot access these at home, and it will continue to do so under COVID-secure arrangements; this plan will therefore remain in effect.

The College confirms that, if it is notified of a risk of COVID-19 infection, it will take steps under this Plan to safeguard its academic community and prevent the spread of infection to the general public. This Plan may be amended at short notice in response to an escalation of risk or a specific public health directive coming into force.

Any such changes will be notified to the College's academic community and other stakeholders no later than one working day after they are formally agreed or notified to the College. Under this plan, the College will take a precautionary approach, whereby persons presenting with COVID symptoms (or classic cold and flu symptoms) but without a positive diagnosis will be treated in the same way those who test positive.

The College's Executive Committee will routinely monitor the implementation of this plan as a standing item on its agenda; the Committee will meet on a regular basis and extraordinary meetings may be convened at short notice to address urgent risks.

The College, through its Personal Academic Tutoring and student support structures, will assess and monitor any ongoing support needs that students may face as a consequence the COVID pandemic.

Any changes to the Plan will be made by the Executive Committee, seeking advice and guidance from Public Health authorities and other stakeholders where necessary. Approval of this Plan and changes to it will be upon the College's Board of Governors (as previously confirmed), however, where such changes are required at short notice to comply with public safety directives or protect the safety of individuals, the Chair of the Executive Committee will be empowered to act decisively.

The risk associated with this evolving scenario is, more the most case, out of the College's control, therefore **the overall risk may move between low, moderate and high as the College responds to national guidance**