CITY OF LONDON COLLEGE

A UNIVERSITY SECTOR PREMIER COLLEGE

Student Protection Plan

2025/26

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1. Introduction

This Student Protection Plan sets out how the College will protect the interest of its students in the event that changes to their studies are unavoidable, and has been written in line with the Office for Students (OfS) guidelines and regulations under the requirements of the Higher Education and Research Act (2017), confirming the College's commitment to ensuring the continuity of studies of students in the event of discontinuation in operations or wider organisational disruptions.

The Plan also explains how courses 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.

Strategic Planning

The College's strategic plans aim to define and orchestrate a long-term vision of its undergraduate education provision – a key part of which is the development and implementation of this Student Protection Plan.

The following articulates the College's management and overall approach to the alignment with sector best practice surrounding public interest governance principles and its responsibilities and obligations towards the enrolled student population. 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.

These 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.

The College will seek to avoid making changes to courses mid-delivery or close to commencement of studies, and take all reasonable steps to ensure that courses are delivered in full and meet the expectations of students 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 course content, or loss of access to learning resources or campus facilities.

There are essential contingencies and resources, including financial resources, to ensure the continuity and completion of provision in the event of adverse circumstances beyond its control; where this is not possible the College is committed to a consultation process with affected individuals to achieve the best possible outcome.

3. Should any disruptions pose a risk to the continuity of its courses, the College, in conjunction with its key awarding body partner Plymouth Marjon University 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 the student Virtual Learning Environment (VLE);
- 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 learning opportunities and that all published information and promotional copy are updated in a timely fashion.

Where any substantial changes made 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, notably, the Office for Students (OfS), as well as its current awarding body, Plymouth Marjon University. This will ensure these regulatory bodies have oversight of the College's actions during any continuity period.

Academic Risk

General academic risks are mitigated through procedures for the verification of assessment standards specified by the College's awarding body partner, London Metropolitan University, and introspective joint quality events. Broader academic risks are controlled by the College's Academic Board and its subcommittees, reporting to the Board of Governors and the Executive Management Team.

Ongoing evaluation of the College's governance structure will seek to embed within it a comprehensive risk management framework, facilitating the exposure and control of risks at strategic, programme and activity-levels. This will enable the 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 revised governance arrangements, the College's Risk Management Plan specifies the risk areas 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.

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.

Events and circumstances, beyond our control, might result in a temporary disruption or permanent withdrawal of the planned study programme for students. These include:

- Full closure of the College due to contractual dispute with the validating provider, - the likelihood and saliency of this risk is viewed as low because of the contractual terms and notice required from the University enabling students to complete programmes of a relatively short duration, and reciprocal teach out commitments.
- A strategic decision by the College to close a course on any of its the campuses.
- The removal of the site availability - the impact of this risk would be moderate, but its likelihood and saliency are viewed as low. Any impact will result on a consideration of the range of facilities, and location to support existing student needs and arrangements, and expectations, and commitments to securing equivalence.
- Restrictions on and loss of licence and/or regulatory approval - following any approvals, the likelihood and saliency of the risk is assessed as low in view of the recruitment, delivery standards and quality outputs, and oversight records of both the validating University, and the College which form the basis of the agreed operational framework for the partnership.

- Disruption to planned pathway routes and programmes of study due to staff shortages or student demand - careful planning and flexibility of programme design, combined with monitoring of the College and its regional campuses render this risk low. The development of the teaching teams, and the availability of well qualified staff in London and the regions renders the risk of staff shortages being low.
- Full closure of the College due to commercial and financial failure - although the impact of this risk is high, its likelihood and saliency is assessed as low. The development is supported by a rigorously tested business and finance plan, ensuring a reasonably predicted and planned sustainable College unit.

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

Although none of the identified risks are assessed as likely to crystallise, nonetheless the risk assessment and risk management processes of the College, include the following measures to mitigate any eventuality:

Full closure following a contractual dispute with the validating partner - the relationship and its detailed operation is governed by a detailed Memorandum of Agreement. Oversight of the implementation of the reciprocal obligations and developments fall under the Academic Board and the Governing Boards of both the College and the University. The operation detail and the oversight arrangements enable any issues of uncertainty or concern to be jointly discharged and reported. However, should a closure be predicted then the College will:

- seek an agreement with the University to enable students to complete their intended studies (noting that the programmes of study are of a short duration),
- work with the University to offer affected students the chance to move to another course,
- deliver a modified version of the course,
- provide assistance to affected students to transfer to a different provider who holds the relevant accreditation

Removal of site availability - should this occur. the College will take all reasonable steps to minimise disruption. These could include:

- relocating provision to an alternative location, following the University site approval processes, including student input,
- work with the University in seeking to secure alternative on-campus facilities, permanent or temporary.
- revising timetabling to secure delivery in any available on-campus space.

Loss of Regulatory Approval - should this occur, or licence restrictions be imposed, the College will:

- work with the University and the OfS to seek to allow enrolled students to complete their study programme,
- to offer students who have not yet travelled to the begin studies at the College, to suspend those studies (where possible and appropriate) and provide assistance to affected students to transfer to a different sponsor.

Study disruption - should this occur, the College will work with the University to consider if it is practicable to make changes to the programme delivery rather than advance a full programme closure or programme suspension. Actions might include:

- changes to the programme delivery location or mode of delivery, including the introduction of some blended teaching where necessary,
- changes to the scheduled teaching staff (all staff being approved by the University),
- changes to the module scheduling (where appropriate and permitted),
- offering students the opportunity to transfer to a different course or offer to support them in seeking a transfer to a different provider, including credit-transfer, where possible.

Financial Closure - should this occur, the College will work with the University and the students to ensure that the short duration, programmes of study will be completed within the host Faculty of the University, or support students in seeking transfer and placement with other providers.

3. 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 approach to refunds and compensation follows Plymouth Marjon University's policy which sets out the fees and charges, students 'liabilities for course fees, and the provision for refunds of tuition fees, relevant costs or compensation, in the event that the College is 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.

Refunds

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.

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.

In the event that procedural irregularity on behalf of the College is identified, applicants will have access to the Appeals process and procedure. This is triggered when it can be shown that the College has misinterpreted the original application, any aspect of the supporting evidence has been misinterpreted or not fully considered or financial miscalculations have affected the application outcome. In exceptional circumstances, supporting evidence, not made available at the time of the refund committee meeting, due to the applicant's personal circumstances, may be appealed.

Students have the right to withdraw their acceptance of an offer to study at the College within 14 working days of the start of their programme with any deposits or fees paid automatically refunded. In the event of having to cancel programmes of studies, the College will endeavour to find and offer the opportunity to join another similar programme in the College. If this offer is declined by the student, a full refund is automatically triggered.

Whilst the College reserves the right to change commencement dates of its provision, it will inform students within a reasonable timescale, to minimise the disturbance to the student's personal circumstances.

4. Information about how you will communicate the plan to students

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 form. 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 awarding body 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 College's student support documentation outlines students' involvement in the quality assurance and enhancement of their educational experience at module, course and institutional level. In addition, there is an established student representative system with one elected representative per study group.

Student representatives are members of course committees including the Academic Board, Quality & Standards Committee and the Staff & Students Consultative Committee, where respective minutes confirm 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.

The Student Protection Plan is publicised to current and future students by posting on the College website, clearly signposted and accessible to staff and students. It is also published on the College's VLE for the benefit of current academic and support staff and students with relevant references to be included in student handbooks, College Quality Handbook and the Published Information Policy. The College ensures that all staff are aware of the implications of the plan when engaging with any proposed course modifications.

The plan, along with the Consumer Protection Plan is reviewed annually by the Academic Board with appropriate summary updates to the Executive Management Team and the Board of Governors.

In support of ensuring positive and meaningful student engagement in the oversight of their learning, the College has developed a Student Representative Development programme which is designed to ensure prospective representatives are given adequate training and support to fulfil their role as student representatives, ensuring effective and comprehensive dissemination of institutional information to the student body. Students undertaking formal Student Representative roles are present on College committees ensuring the student voice has a proactive role in development of policy and process.

In the event that the College, as a whole is no longer able to operate, or has decided to cease operating organisational contact will be made to the student body via their College email addresses and updates to the website and VLE with appropriate information.

The End