

DN COLLEGES GROUP

Student Protection Plan for Academic Year 2018-19

DN Colleges Group (North Lindsey College & Doncaster College)

UKPRN: 10004695

The Hub, Chappell Drive, Doncaster, DN1 2RF

1 Introduction

- 1.1 The DN Colleges Group (**'the College'**) is committed to helping to ensure students achieve the best academic outcomes. There may be very rare and exceptional circumstances which mean that unforeseen changes have to be made to modules or programmes (provision for such events is described in the *Higher Education Programme Changes and Closures Policy*).
- 1.2 The College recognises the requirement to ensure full compliance with the Consumer Rights Act 2015 and to observe the Higher Education course changes and closures statement of good practice.
- 1.3 The Higher Education and Research Act 2017 requires all Higher Education providers to agree and publish a Student Protection Plan (SPP) to protect students' interests in the case of material change, e.g. programme changes, suspensions, closures, or institutional closure. The SPP sets out how continuation and quality of the student experience will be ensured for current and prospective students should an identified risk crystallise.
- 1.4 Such events for the College may be triggered by situations such as (not exhaustive):
 - significant material change;
 - a decision taken to close the institution known as the DN Colleges Group
 - a strategic decision by the Corporation Board to close a campus
 - a strategic decision to either close or not run a particular course in a subsequent year
 - withdrawal of designation for student support purposes
 - major changes in year to course content
 - loss of accreditation from regulatory bodies, e.g. Ofsted, PSRB
 - loss of validation through University partners
 - disruption of College business and continuity
 - the unanticipated departure of key members of subject staff
- 1.5 The Student Protection Plan outlines the types of risk which the College has identified with the potential to materialise and explains the actions which might be taken to minimise their impact. The College has a long established reputation for providing higher education opportunities to a wide range of student groups and recognises that the range of risks to continuation of study might differ based on differing student needs, characteristics and circumstances. The SPP has the flexibility to account for and protect the interest of all students; we are committed to our 'Learning Community'

- 1.6 The SPP is associated with the Higher Education Terms and Conditions and Higher Education Programme Changes and Closures Policy, both of which are accessible at www.northlindsey.ac.uk and www.don.ac.uk. It will also be referred to in the 2018-19 Academic Advice and Guidance Handbook at North Lindsey College; the Undergraduate Handbook and Postgraduate Handbook at Doncaster College.
- 1.7 The SPP will be published on the Higher Education Staff electronic noticeboards. The College will ensure that staff demonstrate appropriate consideration of this plan when proposing any programme changes through the relevant approvals processes.
- 1.8 The Higher Education Programme Changes and Closures Policy and SPP have been considered by a group of student representatives.

2 Information and communication of protection measures

- 2.1 The College is committed to communicating any changes to students as early as possible, with clear information and options.
- 2.2 In all cases, the College would seek to ensure that all reasonable steps be taken to minimise disruption to the services which would affect students. The HE Programmes Changes and Closures Policy covers steps such as: offering students an alternative course; delivering a modified version of the same course; or ensuring assistance for those students affected to transfer to another institution.
- 2.3 Students would always be treated as individuals with information, advice and guidance based on each individual's circumstances. The College's Higher Education student population is diverse, drawing from the range of widening participation characteristics including: mature students; those in employment; those with caring responsibilities; from lower socio-economic backgrounds and those with disabilities. Any changes would always ensure that discussion and communication encompasses the specific needs of all students.

3 Significant material changes

The College has a comprehensive risk management system which highlights key academic risks.

3.1 Institutional closure

3.1.1 Where the College has no option, other than to close, it would consider a range of measures to protect the student experience including:

- Where possible, closing in a gradual way allowing current enrolled students to complete their studies
- If the above would not be possible, supporting students to transfer to appropriate programmes at other providers
- (Where appropriate financially) by compensating students who suffer demonstrable, material financial loss suffered as a result of the disruption. This would be highly unlikely
- Merging with another institution to maintain all or part of the current provision.

3.2 Closure of part of a campus

3.2.1 In circumstances where part or all of the campus became unsuitable for student use, the College would consider alternative solutions such as:

- Relocating to a suitable alternative location, including renting spaces within a close proximity and/or installing temporary buildings
- Revising timetabling to allow scheduled teaching to still take place in the College's facilities. This may include student contact sessions extending into longer days or alternative days. The DN Colleges Group has two main campuses and either of these could be utilised for alternative arrangements. Appropriate consultation would normally be conducted with all those affected; appropriate equality impact assessments would also be undertaken
- Delivering programmes using alternative modes such as distance learning or learning blocks. The College would always consider the appropriateness for the students affected.

3.3 Loss or restriction of University validation/awarding body approval

3.3.1 There are formal collaborative agreements with each University partner and centre approvals with the awarding organisations, currently Pearson, CMI, CIPD, City & Guilds and CAPD.

3.3.2. The usual termination period is 12 months. In the unlikely event of termination, the College would:

- Ensure all reasonable steps are taken to minimise the resultant disruption to affected students
- Ensure that, as far as possible, changes are made in a transitional manner.

3.4 Withdrawal of designation

3.4.1. In the event of the withdrawal of statutory student finance for 'Student Support' purposes, the College would take all reasonable steps to minimise the resulting disruption to students by, for example:

- Working with relevant funding bodies to allow enrolled students to complete their year of study
- Where the above is not possible, supporting students to transfer to appropriate programmes at other providers
- Where appropriate, financially compensating students who suffer demonstrable, material financial loss as a result of disruption to their studies
- Working closely with all affected students by providing evidence and references, both orally and in writing, in support of continuation of their studies
- Where appropriate, merging with another institution to maintain all or part of the current provision.

3.5 Suspension of course

3.5.1 The College would always take a suspension or closure decision as a last resort. The [Higher Education Programme Changes and Closures Policy](#) provides further detail. Any material impact would be mitigated by:

- Communication with current students to provide assurance that they would not be adversely affected by the decision and would be able to complete their studies at the College
- Consultation with relevant stakeholders to ensure appropriate equality impact assessments
- Future applicants will be notified in accordance with UCAS deadlines, allowing time for students to source an alternative suitable programme.

3.6 Major changes in year to course content

3.6.1. The College will use all reasonable endeavours to deliver the programme in accordance with the description applied to it in all published material relating to the year of entry. This risk is regarded as highly unlikely to crystallise. However, in the event of major in-year changes to course content the College would ensure that:

- Changes are restricted to the minimum necessary to assure the required quality of experience
- It works with students to ensure all those affected are consulted and communicated with effectively
- Students would be allowed the opportunity to withdraw from the programme
- Students would receive reasonable support to transfer to another programme either within the College, to a partner university or other provider.

4 The implications of the closure of a programme or other significant material change

4.1 Any decision to close a programme or for any other significant material change would always have been preceded by comprehensive assessment of the implications, risks and range of potential actions to mitigate those risks. These would include:

- The impact on students
- The strategic consequences including the impact on other courses, collaborative projects and reputation
- Assessment of the approaches towards ensuring the quality of the student experience and academic standards until the completion of the process
- The most effective approach towards consultation with and communication with students
- Ensuring the progression of students who may need to repeat parts of the programme
- The strategy for on-going delivery and support (including areas such as external examiner arrangements, revalidation requirements, etc.) during the phasing-out period
- The implications regarding professional body registration (where applicable)
- Notification of prospective students (where applicable).

5 Disruption to College business

5.1 Where industrial action might occur, the College would seek to:

- Ensure that normal operations and services are maintained as far as possible
- Take all reasonable steps to fulfil its responsibilities to students in ensuring minimal disruption for students.

6 Loss of key staff

6.1 The College would always maximise the best endeavours to mitigate any impact emerging through the loss of specialist staff. The College would:

- Seek to fill gaps as quickly as possible. This may include moving current members of staff with appropriate skills and experience to cover in the short term or recruiting externally
- Use the strong relationships with University partners to agree short term sharing of specialist staff or to recruit from their post graduate resourcing pool
- Draw upon its permanent fractional post-holders to temporarily increase their hours
- Where the institution cannot avoid closing a programme, the policy as outlined in section 4 would apply.

7 Refund and compensation policy

7.1 The DN Colleges Group *Higher Education Terms and Conditions – Admissions* is available at: www.northlindsey.ac.uk and www.don.ac.uk.

7.2 The policy includes the circumstances in which the College would refund tuition fees and other relevant costs. The College is reviewing the policy to ensure that sufficient contingency is made against potential increases in such payments and how compensation might be provided in the highly unlikely event of not being able to preserve continuation of study. This will be in place by August 2019.

7.3 All of the above would be a remedy of last resort. The College would exhaust all measures to preserve continuation of study should any of the risks identified in the Student Protection Plan materialise.

8 Review of the Student Protection Plan

8.1 The Plan will be reviewed annually to ensure that it remains relevant and effective.

8.2 The College Risk Register includes a Higher Education section which identifies the key risks across the portfolio. The SPP will be reviewed in line with the overarching HE Risk Register.

9 Enquiries and complaints

9.1 Please contact he@northlindsey.ac.uk for any general enquiries relating to this document.

9.2 The *HE Student Complaints Procedure* is accessible for reference in circumstances where this is required.

May 2018

Appendix A: Supporting Information

Provider's name: DN Colleges Group

Provider's UKPRN: 10004695

Legal address: The Hub, Chappell Drive, Doncaster, DN1 2RF

Contact point for enquiries about this student protection plan: Maxina Butler-Holmes
(maxina.butler-holmes@northlindsey.ac.uk, 01724 294 154)

Introduction

- The Student Protection Plan (SPP) has been developed from the existing DN Colleges ('the College') Group Higher Education Programme Changes and Closures Policy.
- The policy was adapted from the previous North Lindsey College Higher Education programme changes and closures policy which was agreed as meeting the Student Protection baseline regulatory requirement by a QAA Quality Review Visit team in 2017.
- The SPP is aligned with the Higher Education Terms and Conditions for Admissions Policy.
- Once approved by the Office for Students, the SPP will be published on the Higher Education pages of the College's websites.

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

The Student Protection Plan forms an important part of a suite of documentation including the Student Contract Terms and Conditions, the Higher Education Terms and Conditions - Admissions policy and the Higher Education Programme Changes and Closures Policy.

A comprehensive College-wide Initial Response and Business Continuity Plan is in place at institutional level which covers major events. The updated plan received Corporation Board approval during 2017-18. The Plan addresses instances where 'a serious emergency or major incident that would cause a significant disruption, serious harm or damage to staff, students or visitor welfare, the college environment or its assets, including its good name or any incident where the cost is likely to seriously impact on the College's financial stability'.

The critical activity analysis part of the above plan, conducted in collaboration with Zurich insurers, identifies key risks which could impact on business continuity. These are rated from insignificant to extreme. [Incident Response and Business Continuity Plan 2017-18]

For Higher Education, there is a separate operational risk register for each University Centre. These are updated and monitored through Senior Leadership Team meetings. From 2018-19, as part of the Group level approaches towards the institutional oversight and management of the significant (2,000+ students) Higher Education portfolio, there will be one Higher Education Risk Register.

Range of risks to the continuation of study

- For the DN Colleges Group, the risk that the **institution as a whole would be unable to operate** is **VERY LOW** and unlikely because our financial performance is very strong. The College has 'Outstanding' financial health rating with a low gearing ratio and planned positive cash flows. The ESFA, as principal regulator, will provide these assurances to the OfS.

The key **overall institutional risks** identified in the critical activity analysis are:

- Failure to retain students due to poor incident management
 - Loss of vocational buildings
 - Disruption to revenue streams
 - Loss of key staff
 - Loss of IT system or cyber-attack.
- [Incident Response and Business Continuity Plan 2017-18]

The main risks identified relating specifically to **Higher Education** include:

- **Approval for validated provision being withdrawn:** this risk is **LOW** as both University Centres within the DN Colleges Group have long-established successful relationships with regional Universities. Each University partner conducts periodic quality reviews. The annual programme monitoring and reporting cycle requires formal accountability across the whole portfolio. The formal Collaborative Agreements are renewed, usually on a three yearly basis
- **Closure of part of a campus or location(s) no longer available:** this risk is currently **LOW** but this is within the positive context of ongoing discussion with local authorities and enterprise partnerships to increase the physical presences within each town, each within close proximity of existing locations. These developments would enhance the student experience. In Doncaster, the strategic closure of the High Melton campus has been completed and there are no further campus closure plans
- **No longer able to offer courses in subject(s):** this risk is **LOW to MODERATE** as existing students would receive a 'teach-out' commitment. This risk is inter-related to the following course closure
- **Course closures over the next 3 years:** this risk is **MODERATE** as demand for some subjects is dependent on trends and may be affected by the loss of key subject specialist staff
- **Loss of key staff in areas of vulnerability e.g. single person dependency/specialists:** this risk is **MODERATE to HIGH** in college-based higher education contexts. The risk is currently greater for those students in Engineering and Construction

- **A change making the mode of study no longer possible** is a **LOW** risk as the College would always seek to fulfil the original commitment to students once enrolled
- **Interruption to IT infrastructure** is **HIGH** as the likelihood of unplanned events and potential threats to cyber security are increasing.

2. The measures put in place to mitigate risks considered to be reasonably likely to crystallise

The College adopts a robust approach towards business security and continuity, with stringent reporting through to the Corporation Board. The Incident Response and Business Continuity Plan has been developed under the advice of insurance specialists. The Plan, originally developed at North Lindsey College, is being reviewed on an ongoing basis to ensure comparability of arrangements at the Doncaster College campus. In critical situations, a Business Continuity Team (BCT) with clearly defined roles and responsibilities would invoke the appropriate actions, including emergency procedures. This is designed to ensure the key risks, if realised, would be managed effectively and flexibly to minimise disruption to daily college functions.

2.1 Risks which could reasonably crystallise for Higher Education students

The College would always take a **suspension or closure** decision as a last resort. Any material impact would be mitigated by:

- Communication with current students to provide assurance that they would not be adversely affected by the decision and would be able to complete their studies at the College
- Consultation with relevant stakeholders to ensure appropriate equality impact assessments
- Future applicants would be notified in accordance with UCAS deadlines, allowing time for students to source an alternative suitable programme

The College would always maximise the best endeavours to mitigate any impact emerging through the **loss of specialist staff**. The College would:

- Seek to fill gaps as quickly as possible. This may include moving current members of staff with appropriate skills and experience to cover in the short term or recruiting externally
- Use the strong relationships with University partners to agree short term sharing of specialist staff or to recruit from their post graduate resourcing pool
- Draw upon its permanent fractional post-holders to temporarily increase their hours
- Where the institution cannot avoid closing a programme, the policy as outlined in section 3 would apply.

The risk of **loss of IT infrastructure** is mitigated through:

- A series of backup and recovery arrangements. JISC conducted an Infrastructure Review for North Lindsey College in August 2017, the report stating: 'The College has an outstanding dual data centre setup which is highly resilient to hardware failure. It is noted that cloud backups and local backups are made.'

"There is a full Disaster Recovery (DR) environment that could be used to recover core information if needed, this represents outstanding sector best practice.... affords the College an excellent level of resilience." [JISC 2017]

The College continues to address this significant risk through the emerging DN Colleges Group Digital Strategy. This working group is led by the Chief Operating Officer.

2.2 Risks unlikely to crystallise

Where the College has no option, other than to **close**, it would consider a range of measures to protect the student experience including:

- Where possible, closing in a gradual way allowing current enrolled students to complete their studies
- If the above would not be possible, supporting students to transfer to appropriate programmes at other providers
- (Where appropriate financially) by compensating students who suffer demonstrable, material financial loss suffered as a result of the disruption. This would be highly unlikely
- Merging with another institution to maintain all or part of the current provision.

In circumstances where part or all of the **campus became unsuitable** for student use, the College would consider alternative solutions such as:

- Relocating to a suitable alternative location, including renting spaces within a close proximity and/or installing temporary buildings
- Revising timetabling to allow scheduled teaching to still take place in the College's facilities. This may include student contact sessions extending into longer days or alternative days. The DN Colleges Group has two main campuses and either of these could be utilised for alternative arrangements. Appropriate consultation would normally be conducted with all those affected; appropriate equality impact assessments would also be undertaken
- Delivering programmes using alternative modes such as distance learning or learning blocks. The College would always consider the appropriateness for the students affected.

In the unlikely event of termination and loss or restriction of **University validation/awarding body approval**:

The usual termination period is 12 months. In the unlikely event of termination, the College would:

- Ensure all reasonable steps are taken to minimise the resultant disruption to affected students
- Ensure that, as far as possible, changes are made in a transitional manner.

In the event of the **withdrawal of statutory student finance for 'Student Support' purposes**, the College would take all reasonable steps to minimise the resulting disruption to students by, for example:

- Working with relevant funding bodies to allow enrolled students to complete their year of study
- Where the above is not possible, supporting students to transfer to appropriate programmes at other providers
- Where appropriate, financially compensating students who suffer demonstrable, material financial loss as a result of disruption to their studies
- Working closely with all affected students by providing evidence and references, both orally and in writing, in support of continuation of their studies.
- Where appropriate, merging with another institution to maintain all or part of the current provision

3. **Information about the policy in place to refund tuition fees and other relevant costs to our students and to provide compensation where necessary in the event that we are no longer able to preserve continuation of study**

The DN Colleges Group Tuition and Examination Fees policy is available at: www.northlindsey.ac.uk and www.don.ac.uk

The policy includes the circumstances in which the College would refund tuition fees and other relevant costs. The College is reviewing the policy to ensure that sufficient contingency is made against potential increases in such payments and how compensation might be provided in the highly unlikely event of not being able to preserve continuation of study.

Refunds for students require the authorisation of the Principal or Director of Finance and would apply where students are in receipt of tuitions fee loan from the Student Loans Company, where students pay their own tuition fees or whose tuition fees are paid by a sponsor.

All of the above would be a **remedy of last resort**. The College would exhaust all measures to preserve continuation of study should any of the risks identified in the Student Protection Plan materialise.

The College would adopt a (senior level) case by case basis approach towards any other form of compensation including: the payment of additional travel costs for students affected by a change in the location of their course; commitments to honour student bursaries and compensation for maintenance costs and lost time where it is not possible to preserve continuation of study. Such decisions would be formally approved through Senior Leadership Team and Group Executive Team meetings.

The College has significant cash reserves which would be sufficient to provide refunds and compensation for those students for whom we have identified an increased risk of non-continuation of study.

Furthermore, the College has Professional Liability insurance cover through Zurich Insurance to cover circumstances where the risk might crystallise and the College would no longer be able to preserve continuation of study. The following extract summarises:

“The insurer will indemnify the insured in respect of all the sums which the insured may become legally liable to pay as damages arising from breach of professional duty by reason of any negligent act, error or omission committed or alleged to have been committed by an employee in providing the Services and for which a claim is first made against the insured and is notified to the insurer during the period of insurance. In addition, the insurer will pay Costs and Expenses.”

We will ensure that this policy explicitly considers the extreme cases of compensation by 01 August 2019.

4. Information about how we will communicate with students about our Student Protection Plan

Students were involved in the development of the Programme Changes and Closures policy during 2016-17, through the Lead Student Representatives, student interns and the Student Experience Group. This was in preparation for the formal Quality Review Visit, conducted by the Quality Assurance Agency for Higher Education, conducted against the baseline regulatory requirement relating to student protection measures.

Student engagement mechanisms are firmly established through membership of programme committee meetings, Higher Education Board of Studies, Higher Education quality committees and on the Corporation Board.

The student protection plan has been discussed amongst a group of students, led by the Student Engagement Officers and student interns. The Quality Assurance Coordinators are conducting a series of meetings with current students. It will be reviewed at each University Centre quality assurance committee annually. The College is committed to communicating any changes to students as early as possible, with clear information and options.

In all cases, the College would seek to ensure that all reasonable steps be taken to minimise disruption to the services which would affect students. The Programmes Changes and Closures policy (www.northlindsey.ac.uk and www.don.ac.uk) covers steps such as: offering students an alternative course; delivering a modified version of the same course; or ensuring assistance for those students affected to transfer to another institution.

Students would always be treated as individuals with information, advice and guidance based on each individual's circumstances. As an established provider operating within a widening participation context with a majority of non-traditional entrants into higher education, the College has a strong culture of inclusivity which ensures accessible and supportive information and advocacy for its Higher Education students.

The SPP is associated with the Student Contract Terms and Conditions, both of which are accessible at www.northlindsey.ac.uk and www.don.ac.uk. It will also be referred to in the 2018-19 Academic Advice and Guidance Handbook at North Lindsey College and the Undergraduate Handbook and Postgraduate Handbook at Doncaster College.

The SPP will be published on the Higher Education Staff electronic noticeboards. The College will ensure that staff demonstrate appropriate consideration of this plan when proposing any programme changes through the relevant approvals processes.

The annual quality assurance enhancement and development sessions for Higher Education staff will include communication and understanding of the Student Protection Plan.

Subject to Approval by the Office for Students