Student Protection Plan

2019 - 2020

Version: 1.1

**Approved by the Board of Governors on XXXXX**

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The Student Protection Plan and the procedures within it are supplementary to students’ statutory rights, which remain unaffected; it forms part of the College’s terms and conditions. The plan has been produced in accordance with the following legislation and regulatory frameworks:

1. ***The Higher Education and Research Act (HERA) 2017***
2. ***The Office for Students Regulatory framework for higher education in England***
3. ***Consumer Protection from Unfair Trading Regulations (2008)***

# St. Patrick’s International College Limited

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The Student Protection Plan explains how St. Patricks International College (“the College”) will take all reasonable steps to ensure that study programmes are delivered in full and meet the expectations students have when they accept an offer to study with the College. Most importantly it will ensure that students who successfully engage with their studies are not prevented from achieving the qualification and the learning gain due to them because of adverse circumstances, which might include changes to a programme’s content, or loss of access to learning resources or campus facilities.

The Plan 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 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; these are covered in separate policies, which can be requested from [info@st-patricks.ac.uk](mailto:info@st-patricks.ac.uk)

* This Plan will be reviewed and updated annually by the College’s Academic Board to ensure it remains current to risks being actively addressed by the College; it should be read with the College’s terms and conditions.

# About St. Patricks International College

The College delivers BTEC Higher National programmes accredited by Pearson. All programmes are delivered full-time from the College’s teaching location in London,. Some programmes also involve work placements with external companies which occur off-campus.

St. Patricks International College is member of the Global University Systems (GUS) network of schools, colleges and universities. GUS will make available resources and contingencies to assist the College in delivering its programmes as specified at the point of sale where any issues affecting programme delivery are encountered.

# The Structure of this Plan

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# The College’s General Principles of Student Protection

1. The College will take all reasonable steps 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 ensure that study programmes can continue to be delivered.
2. Should any provision within this plan need to be triggered, the College will strive to notify all persons affected no later than **5 working days** after a change in circumstances has been decided upon or notified to the College. The College’s website, as well as any information on other public listings affected by the change will be updated within this timeframe.
3. Where appropriate, the College will consult its student representatives in the event that learning opportunities are likely to change to ensure the student voice is present in the decision-making process.
4. In the event of programme closure, The College will take reasonable steps to ensure that existing students may complete their current programme to original timescale.
5. Where changes mean that existing students may not be able to complete their current programme at the College, it will strive to ensure that students may continue their studies for a “continuity period”, as a minimum of **two terms**, while solutions are explored; in such circumstances the College may consider alternative modes of delivery, such as accelerated or online delivery where these are permissible under validation and funding designation arrangements.
6. Should the location of a taught programme change, the College will undertake to keep this as close to the previous location as possible. If the College closes a campus and/or relocates to a new site which is more than 10 miles from the original site, the course will be taught out at a venue local to the original site. Affected students will be informed in good time to allow them to prepare.
7. Should any of the provisions within this plan need to be triggered (with the exception of minor changes to programme content or timetabling), the College will duly notify the regulatory body for higher education in England, the Office for Students (OfS), as well as the programme’s awarding body, Pearson. This will ensure these regulatory bodies have oversight of the College’s actions during any continuity period.
8. The College will be supported in this plan by the its parent company, Global University Systems, which will take all reasonable steps to ensure that the College is adequately resourced during any “continuity period”.

# SECTION A: Risks being actively managed by the College

The following section outlines current known risks to the student experience that the College is actively managing and how it is working to ensure these have a minimal impact the student experience.

## Changes to the College’s management and governance arrangements currently in progress

The College has recently reconfigured its management and governance arrangements to align with planned changes to its academic provision and to support its long-term objectives for future growth.

The management of the College will continue to comply with all requirements and frameworks set out by the regulatory bodies under which it operates; it will preserve, the College’s established governance and committee oversight procedures as specified under the previous management regime, except where enhancement of these processes is agreed.

The College will continue to work closely with representatives from the Department for Education, the Office for Students, and the College’s awarding body (Pearson), as well as the UK Quality Assurance Agency for Higher Education, all of whom will ensure that the College provides a satisfactory service to students.

**The impact of changes to the College’s governance is assessed as being minor and unlikely to have any detrimental effect on the quality of service students receive during this transition period.**

## Planned changes to the College’s provision

**“Teach-out” of School of Technology Programmes (ISE and NETS)**

The College continuously improves, updates and develops its portfolio of academic programmes, and occasionally makes strategic decisions to discontinue recruitment to specific programmes where they are being replaced or substantially changed. From September 2018 the College ceased to recruit new intakes for the following courses, which are now designated for teach-out:

* HND Information Systems Engineering and
* HND Network Engineering and Telecommunication Systems

The College is seeking to replace these with alternative provision, which may include the delivery of its programmes at a new teaching location in Manchester; a full proposal of changes to the College’s provision will be confirmed in due course.

The College will ensure that students currently on affected programmes do not experience any shortcoming in the quality of their programme as a result of there being no further intakes.

The College will continue to work with student representatives from these programmes, as well as the awarding body (Pearson) to preserve the standard of delivery and value of learning opportunities in line with the College’s other provision. The College will further ensure that all existing and new students for the final intakes of these programmes understand the implications of teach-out and the period in which they must complete their studies.

Teach-out will not affect the quality of the experience students on discontinued programmes receive at the College, or the title or nature of the award conferred to successful candidates upon completion of their studies. It will however mean that students will not be able to defer or restart their studies with the College on these programmes at a future date.

**The impact of the teach out of discontinued programmes is considered to be minor to moderate and the College will ensure that all affected students (in particular those joining in summer 2018) are given pre-entry advice and understand the inherent risks of joining a programme for which there will be no further intakes.**

## Replacement of Health and Social Care Programmes with new provision

The QCF accredited *Health and Social Care Management (HSCM)* Programme was replaced with two new RCF accredited qualifications:

*HND Healthcare Practice (England)* and *HND Social and Community Work.*

Due to the College’s background in delivering the HSCM programme, it has the resources and expertise already in place to deliver these courses to a high standard without having to make substantial strategic or resourcing changes. Furthermore it has a strong recruitment strategy for applicants seeking to study health and social care courses, and does not anticipate problems recruiting significant numbers for these courses to commence, despite the short notice period.

The College will however have due regard for the need to closely monitor new programmes over their first year of delivery to ensure they conform to academic standards and ultimately meet students’ expectations.

**The impact of replacing the Health and Social Care Management course is considered to be minimal to both HSCM students on teach out, and those starting on the new programmes.**

## Campus improvement works at the College’s main teaching site

The College’s main teaching location London (Sceptre Court) will undergo internal and external building works to improve space management and the building’s climate control. These activities are necessary for student support and satisfaction purposes and to ensure the temperature of the learning environment is properly managed. These works will include an upgrade of the library, support offices and some student break-out spaces; works will be coordinated to ensure that existing spaces will remain in use until new ones are ready.

The College will actively plan teaching operations around campus works to ensure the impact on students’ learning experience is minimised. Loud or obstructive works will occur mostly outside of main teaching hours and all works will be appropriately screened off. Information about how these improvement works may affect students will be posted on-campus, and timely notifications will be sent to students affected where any changes are made to class timetables because of planned works.

**Pre-planning and advance notification of works mean that their impact on the student experience is expected to be minor.**

# SECTION B: Generic risks applicable to higher education programmes

In the following section, a number of risks and scenarios are identified, along with the measures the College will take in order to protect students’ continuity of study; for each there is an indication of how likely the College considers these to occur and what the impact would be.

## Deferred start or cancellation of a programme

If the College cannot recruit sufficient applicants to ensure the viability of a specific programme of study, it may decide to delay the start of that programme or not to deliver that programme for that specific intake. For example, an unviable cohort size may be determined by the perceived negative impact to the student learning experience where the cohort size is insufficient to undertake interactive teaching or group learning activities.

The College would normally provide at least two weeks’ notice of any such change. Applicants whose programmes are withdrawn will be offered alternative start dates, programmes or modes of delivery, wherever feasible. Where none of these are accepted the student will have full recourse to cancellation and a refund of any fees paid.

**The likelihood of a deferred start or cancellation to a programme is moderate, but the College would ensure the impact is no greater due to the mitigations outlined above.**

## Changes to timetables and scheduling

The College understands that a large portion of its student population have pressing commitments outside of their studies and that changes to published timetables can be very disruptive. The College will strive where possible to avoid making changes to published timetables unless these are absolutely necessary. Where a change to a timetable must be made, this will be done in such a way as to remain as close as possible to the original schedule, or adopt the most convenient alternative. All affected students will be given as much notice as possible. In addition, the College periodically runs catch-up sessions outside of teaching weeks, which a student may attend in place of missed sessions.

Last minute changes owing to faulty classroom equipment or absence of teaching staff will be dealt with by the Administration team, who will make special arrangements; in such circumstances a member of the team will be on hand to advise affected students as they arrive for classes.

**Short-notice timetabling and room changes are fairly routine and the chance of occurrence is high. The Administration team’s contingency processes ensure the impact in most cases will be minor.**

## Changes to programme content and/or structure

The College has an obligation to ensure that the academic content of its programmes is regularly updated and consequently will make minor adjustments that are unlikely to impact negatively on students or changes that are required by necessity. The College’s Teaching and Learning Strategies allow it to make minor adjustments to module content and programmes of study, for example in order to maintain currency or to respond to feedback from students or external examiners, or to align with the changing requirements of the awarding body. Any such adjustments must be approved in accordance with the College’s quality assurance processes and communicated to those affected, with a rationale given for such changes.

Students are notified of programme modifications in good time and before they come into effect. Any changes that might have an adverse effect on students would not be made without formal consultation with affected students and their student representatives.

Occasionally it may be necessary to make major changes to programmes. Normally such changes would not be applied to continuing students and would only take effect for new students. In the unlikely event that the College is required to make major changes to programmes and apply these for continuing students, it would consult formally with all affected students before making a decision. Major changes to a programme must be approved by a panel convened on behalf of the Academic Board and in consultation with the awarding body (Pearson), and in accordance with published procedures for the validation and review of programmes.

**The likelihood of the College making any changes which are detrimental to students or to the qualification awarded is low because all such changes will be impact-assessed by the College’s Academic Board and where appropriate, agreed with students representing those affected.**

## Not being able to fully deliver or certify a programme of study

The College has a good record of successfully teaching out discontinued programmes to the satisfaction of its students and regulators, and works closely with the awarding body (Pearson), which monitors the College’s handling of any programme in teach-out. In order for the College to be in a position where it is unable to fully deliver a programme of study, one or more of the following events must occur:-

1. The partnership with the awarding body (Pearson) is suspended or lost;
2. The College’s programmes are de-designated for student financial support by the Department for Education (DfE);
3. The College receives a negative judgement from the UK Quality Assurance Agency for Higher Education (QAA) after a routine inspection;
4. The College must for any other reason close suddenly and exit the market.

## If the partnership with the awarding body (Pearson) is suspended or lost

The College works closely with Pearson to ensure that academic standards and the student experience meet exacting standards of practice specified by Pearson, and by the UK Quality Assurance Agency for Higher Education. In the event that Pearson has concerns about the quality of service offered by the College sufficient for it to block certification for some or all College programmes, the College will establish an action plan with Pearson and work towards timely resolution. In such circumstances the College will prioritise its actions and resources to assure Pearson that suitable measures have been taken to lift any such blockage in the shortest possible time.

Affected parties will be notified and consulted directly should formal acknowledgement of their achievements be delayed owing to a block on certification. Regular updates will thereafter be provided until the issue is resolved.

In the event that Pearson no longer continues to validate the College’s taught programmes, the College will seek to make arrangements for students to complete their studies at other suitable institutions, or where this is not possible, issue a refund in accordance with its terms and conditions.

**The impact of the loss of awarding body partnership mid-programme is serious, increasing to critical if the certification agreement cannot be recovered.**

**However, the College engages proactively with Pearson’s quality assurance processes and works closely with its allocated Centre Manager to ensure that concerns are raised and addressed thoroughly and in good time. Therefore the likelihood of an issue being allowed to escalate to the point of certification blockage without intervention is considered to be low.**

**The likelihood of further deterioration to a point that the College’s validation agreement with Pearson becomes irretrievably lost is very low.**

## If the College’s programmes are de-designated for student support funding

As a private higher education institution, the College’s taught programmes are designated for student financial support by the Secretary of State for Higher Education. This means that students at St. Patricks International College have access to financial assistance in the form of maintenance and tuition fee loans from the Student Loans Company (SLC). The College understands that for most of its students, this financial assistance is essential for them to participate successfully with their programmes and pay their tuition fees.

The College has successfully renewed its specific course designation with the Department for Education (DfE) for the academic year 2019/20 and students will have access to financial support from the Student Loans Company over this period. Should the College’s designation be withdrawn, suspended or not successfully renewed in AY ‘19/20 and depending on the circumstances of de-designation, the College will appeal the decision or make a new application for designation with a view to the restoration of this for the coming academic year.

Where appropriate the College will also apply for “teach out designation”, allowing eligible existing students to continue to access student tuition and maintenance loans, including those making new loan applications, for the remainder of their studies while on their current programme at the College, which was designated up to that point. The College may also explore alternate programme validation options with other institutions.

In the event of “teach out designation” not being granted, the College will endeavour to transfer existing eligible students, in receipt of or seeking loans, to an approved and designated alternate institution, should they so wish. However, de-designation may also relate to, or lead to, the closure of the College and provisions made in **d.** below should also be noted.

**As the College has satisfied the both OfS and the DfE that its financial sustainability, management and governance arrangements are sufficient to approve designation for AY ‘18/19, and will continue to work closely with both agencies, the risk of the College being de-designated for student support is considered to be low.**

## If the College receives a negative judgement from the UK Quality Assurance Agency for Higher Education (QAA)

The QAA is the independent body entrusted with monitoring and advising on standards and quality in UK higher education. Higher Education institutions, including St. Patrick’s International College, must undergo routine review carried out by the QAA if they seek to access public funding. The scenarios in **a.** and **b.** may be triggered if the College receives, and fails to rectify a negative judgement from the QAA following a routine inspection.

At the present time the College has been confirmed by the QAA as ‘meeting UK standards’ across all areas of provision. Should QAA have any concerns that the College provision does not align with the UK Expectations set out in the *UK Quality Code for Higher Education*, it will issue a set of recommended actions to the College. The College will work with the QAA to ensure all concerns are rectified and that it continues to meet or exceed UK expectations.

**As the College has previously assured the QAA that it meets UK standards, and has diligently upheld or enhanced these standards in the intervening period, it is expected that the risk of receiving a negative judgement in an upcoming review is low.**

More information about the QAA can be found here:

<http://www.qaa.ac.uk//en/home>

The latest QAA reports on the College can be accessed here:

[http://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/provider?UKPRN=10006243#](http://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/provider?UKPRN=10006243)

## If the College closes and exits the market.

As with all providers, an extreme set of events may lead to the prospect of the College being closed or a decision taken by the parent company to exit the market served by St. Patrick’s International College before it can fully conclude the delivery of all its active programmes. This may be triggered, for example, by the College becoming insolvent, falling student demand or any other major event which would render the College’s mission non-viable. In such cases, the following will apply:

Where a decision to close is taken, the College will immediately enter a “continuity period” allowing all existing on-course students to continue with their current programmes for **22 teaching** weeks following communication of the decision to close the College and until the end of the term in which the 22 week period ends. Where necessary, the parent company, Global University Systems, will support the College so that it may continue to operate normally for this continuity period.

During the continuity period, where relevant to the circumstances and in consultation with the awarding body, Global University Systems may seek a buyer for the College. If this is not appropriate, and in any case should a sale not be agreed 2 months before the end of the continuity period, then staff from the College or GUS will work with students to place them with approved providers, effective from the start of the alternate provider’s academic term following the end of the continuity period.

**Whilst the impact of such an event would have a profound effect on students, financial and resourcing support from the parent company ensures that the likelihood of the College closing without fully delivering programmes currently in progress is very low.**

# SECTION C: Refunds and Reimbursement

St. Patrick’s International College strives to process refunds in a manner that is fair, transparent, timely and applied with consistency. The College’s terms and conditions, including those relating to cancellation are clearly explained to prospective students by advisors during pre-application counselling.

Self-funded students wishing to claim a refund will be directed to the online refunds portal here: <http://refunds.st-patricks.ac.uk> and following the on-screen instructions; additional information is posted here regarding an applicant’s eligibility for a refund in addition to practical guidance on completing an application. Where a student’s tuition fees have been sponsored by a third party, it is this party which must initiate the refund claim.

Where a student’s fees have been paid on their behalf by the Student Loans Company (SLC), the College will initiate proceedings to return payments to the SLC in accordance with its service standards.

The College maintains the financial resources to ensure appropriate teach-out, transfer and refund arrangements, as described above. In all cases, refund applicants will have recourse to appeal a refund decision if they can demonstrate procedural or administrative errors where the process leading to the decision has not been carried out correctly.

# SECTION D: Communicating with students about changes to their learning experience

The College will publicise its Student Protection Plan to current and prospective students on its website. Additionally, prospective students will be signposted to it as part of their pre-application consultation. The College will further ensure that staff are aware of the implications of the Student Protection Plan when they propose course changes, through handbooks, procedural documents and staff training.

The College will inform students in writing if there are to be material changes to their programme or to their learning environment **within 2 days of the change being decided upon or notified to the College.**

This written notification would include details of the arrangements for students’ support and protection, which would include teach out arrangements, offering an alternative course with the College or transferring to a different provider without having to start their programme again, and measures to compensate affected students financially.

# Additional Information

This plan is currently under review by the regulatory body for higher education in England; the Office for Students, as well as the College’s accrediting body (Pearson). The Plan will be reviewed and updated annually by the College’s Academic Board. Any changes to it will be ratified by the Board of Governors.

Where students or prospective students are unhappy with the way a change to their study programme has been handled by the College under these procedures, they can use the College’s complaints procedure, which can be found here:

<https://www.st-patricks.ac.uk/current-students>

**Document Information**

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Dissemination: **To be made available on the College’s public website and the OfS website (abbreviated guidance will be provided in student and staff handbooks)**

*\*The document owner is responsible for maintaining and updating the content of this document and ensuring that it reflects current practice at the College.*

**Version History**

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