

## **Greater Brighton Metropolitan College: Higher Education Student Protection Plan (2019-20)**

### **Introduction**

At Greater Brighton Metropolitan College (GBMet), we are committed to the quality of the student experience from application through to the end of their Higher Education (HE) programme, and how this enables their next steps into employment or further study. However, the reality is there are occasionally circumstances in which it is necessary to discontinue courses. This Student Protection Plan (SPP) sets out how we intend to look after the interests of our students should something go wrong which means we're not able to continue to offer our HE Programmes students are enrolled onto.

### **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**

These are examples of the kinds of situations that would result in courses being discontinued:

- The College ceases to operate
- Validation for HE programmes is withdrawn
- The College makes a strategic decision to withdraw certain provision, such as individual courses, whole subject areas, modes of study or delivery of HE at a particular campus
- Low recruiting courses are closed
- The unexpected departure of a member of staff crucial to the delivery of a specific programme

The impact of course closure on individual students would vary depending on a wide range of circumstances, including:

- At what point in the student lifecycle and the academic year their programme is closed
- Whether there is a related programme within the College that the students can be offered as a transfer option
- Where applicable, whether there is a related programme at the validating University
- What relevant programmes are available locally, regionally or nationally
- Personal circumstances which may impact a student's ability to travel to a different locations to continue their studies

The factors that would lead to HE courses being discontinued can be considered in light of their likelihood to happen:

- The risk that the provider is unable to operate is extremely low. In terms of financial performance, the College is assessed for Financial Health by the the Education and Skills Funding Agency (ESFA) as its Regulator, and the current status is 'Satisfactory'. Operationally, the College maintains a business continuity plan to ensure it is able to respond to adverse events or issues.
- GBMet currently has two awarding bodies validating its HE programmes; the University of Brighton is the largest, validating all of our Foundation Degrees and Honour Degrees, with a smaller proportion of Pearson Higher National Certificates and Diplomas (HNCs and HNDs). The University of Brighton has revalidated GBMet through a 5 yearly cycle of Periodic Reviews and Partner College Reviews. The College has Pearson Centre Approval for delivering a wide range of HNC/Ds), and a strong record in annual External Verification. Losing validation is highly unlikely.
- The College regularly reviews its portfolio of HE programmes to ensure alignment with its strategic priorities, educational demand and progression paths for graduates. The likelihood of the College making changes to its HE course offer is reasonably high in the medium to long term, though in the short term the portfolio is stable. No further plans are in place to strategically revise the HE Portfolio for the start of the 2019-20 academic year.

- Where programmes are recruiting in small numbers, this potentially impacts on both the viability of delivering the course and the learning experience of students in small cohorts. It is reasonably likely that the College will make the decision to temporarily close to new applicants any low recruiting courses in the situation where the cohort would be too small to be viable. The cohort size that is deemed viable varies across the college, depending on how a course is taught and resourced.
- Some subject areas are more difficult than others to recruit teaching staff for and some courses rely on the skills of a single member of staff in the teaching. Where a single member of staff is central to the teaching of a difficult to recruit for subject, their unanticipated departure would be highly likely to disrupt the course.

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

In the circumstances of a temporary or permanent course closure because of low recruitment numbers, the course would not be closed to current students, only new applicants. The following principles and practices would be followed:

- The College is committed to teaching out enrolled cohorts for programmes withdrawn in these circumstances or continuing the opportunity to complete study at an alternative location within GBMet.
- The closure decision for the next intake would be reached during the application cycle, usually by May, and certainly before the start of the academic year when the students take up their places
- The College's Admissions team advises applicants in writing that the course is not running and gives them details of how they can substitute the choice through UCAS.
- If there is a suitable alternative course at GBMet, the applicants are given those details
- The Admissions team then facilitates changing interview arrangements and new offers for internal transfers, and the applicants are given names of tutors and admissions staff to contact if they require more support or have questions
- If applicants have accepted offers with the College by the time the course is closed, the Admissions team will contact other providers which offer the same or similar degrees to check the availability of places and refer students to these providers.

Strategic changes to the HE offer would be a planned process, taking into account the length of the admissions cycle. A programme or a mode of study should be withdrawn from marketing and admissions in time to avoid students applying to a discontinued option. The College is committed to teaching out for existing students in these circumstances.

The College works to avoid the risks associated with reliance on a single member of staff to deliver a specialism by developing and utilising the skills of teaching teams. However, if a course is discontinued because of the lack of available specialist teachers, teaching out an enrolled cohort would not be possible. In these circumstances, the College would identify other providers and liaise directly with them to endeavour to secure places for students who wish to transfer. The Admissions team would support the students through the process.

Students on University of Brighton validated programmes which are discontinued may be offered the opportunity to transfer to equivalent courses within the University subject to a mapping exercise of course learning outcomes, content delivered to date and student achievement profile, and appropriate operational considerations at the University in terms of the impact on resources and cohort size.

As a Further Education College, GBMet's approach to protecting the interests of its HE students aligns with those measures that apply to the FE sector. A special administration regime for colleges took effect at the end of 2018. The new college insolvency regime supplements the existing intervention regime run by the ESFA and the FE Commissioner. Once the new arrangements come into force, there will be several lines of control in place:

- Governing bodies, who have a duty to ensure the solvency and viability of colleges
- ESFA, which has financial oversight
- FE commissioner, who intervenes where the college has a notice to improve

- Independent Business Review, a new process for colleges in severe financial distress

Within the college insolvency regime, which is a last resort if the interventions listed above fail, the education administrator appointed by DfE has a duty to minimise the disruption to courses experienced by any students regardless of their funding source.

### **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**

Students' rights to fees refunds are set out in the **Greater Brighton Metropolitan College Tuition Fees Policy**, which is updated annually. The policy for 2019-20 will contain the following commitments:

In the unlikely event that an HE programme is discontinued for a cohort of students who are already enrolled or are part-way through their course, the College seeks to ensure that students are not financially impacted.

- A full fee refund for the current academic year for programmes discontinued by the College, whether student is in receipt of fee loans from the Student Loan Company, is self-funding or whose fees are covered by a sponsor or employer
- The College will commit to pay the difference in fees where the students' needs to transfer to a provider whose fees are higher than those at GBMet, up to the level equivalent to the programme on which the students are registered. These monies will be paid direct to the new provider.
- The College would not seek a repayment of any bursaries that the student has claimed during their time enrolled at GBMet due to a decision by the college to cancel the course.
- The College would honour future bursaries students are entitled to at GBMet only where the student has transferred to a provider where they are not entitled to claim an equivalent bursary. Proof of the non-payment of bursary must be provided by the new provider to support the students claim.
- The College will offer to compensate for additional costs to students, such as travel where the provider transferred to is a further away for students, changes in maintenance expenses or time lost up to a maximum of £250.

The College has assessed the potential impact of having to implement any aspects of its fees and compensation policy and it satisfied that this can be delivered through the use of budget contingency or the use of cash reserves.

### **4. Information about how you will communicate with students about your student protection plan**

The College will publish its Student Protection Plan on the college website to make it accessible to future students, and on the Virtual Learning Environment for current students. It will be displayed in notice boards in spaces HE students use and available in on request from college staff and the Students Union. We will draw attention to it in induction events for new and progressing students.

The College will publish its Student Protection Plan to all staff via the Intranet, and ensure that staff understand its implications by including information about it in induction for new staff delivering HE, covering it in staff Continuous Professional Development (CPD) events and including it as a reference for staff undertaking programme development or de-design.

Should the College need to implement this Student Protection Plan, it is committed to communicating in a timely, transparent and open way with the affected students, who will be offered group and individual support through the process. Furthermore, the College will seek the approval of students already enrolled on a programme for any changes that are planned to the programme or modules if those changes are to be implemented for the existing cohorts.

The College will review and evaluate the Student Protection Plan annually at the end of the academic year. The process will consider any times that the SPP has had to be implemented during the year, and

how well this protected the interests of the students, and whether the elements of the plan are considered reliable and deliverable.

This Student Protection Plan has been developed in consultation with students through a series of Student Union led Focus Groups. Ongoing, the College will request that the Students Union includes review, evaluation and revision of Student Protection Plan in the Job Description of the Lead Student Representative (LSR). The LSRs can undertake this review and evaluation with the participation of the broader student body, and this will be built into the annual process of updating and re-approving the Student Protection Plan. The Students Union is available to offer independent advice to any students affected by the implementation of the Student Protection Plan, and students can complain about the implementation of the Student Protection Plan through the College's Complaints Procedure.