

Provider's name: Newham College of Further Education
Provider's UKPRN: 10004607
Student Protection Plan
Academic Year 2022/2024

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Introduction

1. As a registered provider of higher education, Newham College must publish a Student Protection Plan which describes how continuation and quality of study will be preserved for current and potential students if a risk to their study occurs. This could include the closure of a course, material changes to a course or the closure of study location or the College as a whole.
2. This plan builds on our experience and is intended to assure current and future students that we have appropriate arrangements in place to protect continuation of study. It outlines the types of risks, gives examples of events that might trigger action and explains what we might do to minimise the impact of these events if they happen. Our plan is also designed to take into account the differing needs, characteristics and circumstances of our student community.

Scope of this plan

3. This plan relates to all applicants and students on directly funded HE courses. These courses can be described as meeting the level descriptors of the Framework for Higher Education Qualifications (FHEQ) at level 4 and above. It involves any member of staff involved in offering Information, Advice and Guidance to prospective and current students and therefore includes: administrative (e.g. finance, reception); support (e.g. admissions); academic (e.g. course leaders and lecturers); marketing; and management staff.
4. This plan clarifies what an applicant or student can expect where a material change to their course occurs or were their course to close. It highlights the arrangements for informing and consulting with students so that their rights and the responsibility of the College are clear.
5. There are three parts to this Student Protection Plan:

Section 1 details our assessment of risk to the quality and continuation of courses, the evidence for that assessment and the plans we have in place to ensure we reduce that risk and can provide ongoing support, if required;

Section 2 details information regarding the policy we have in place at the College relating to student financial arrangements in the unlikely event we cannot preserve the quality or continuation a higher education course;

Section 3 details how we will communicate with applicants, current students and staff regarding this plan and how we will revise it periodically to ensure it is up-to-date.

Section 1 - Assessment of Risk and Mitigating Actions

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
1. Financial Stability & Market Exit	As a provider we are unable to operate due to financial instability or we no longer intend to operate as a higher education provider.	Very low	<p>We are a long-standing education provider, with positive regulatory outcomes for the significant majority of our provision and our financial performance measured through a Financial Health Score is now assessed as 'outstanding' by the Education and Skills Funding Agency (ESFA).</p> <p>The governing body has a clear Strategic Plan for the ongoing development of the College, including Higher Education. Moreover, the College's HE provision will be developed in conjunction with the very well-resourced strategic partnerships with London City Institute of Technology ("LCIoT") and Barts Health NHS Trust ("Barts"). This ensures the development of a coherent suite of economically valuable Higher Education courses.</p>	<p>In the very unlikely event that the College had no option other than to close, or chose to close its HE provision, we would undertake this in a managed way, over a sufficient period of time to allow current students to complete their studies.</p> <p>See Section 2 below for full details of teach-out, transfer arrangements and of exit and certification.</p>

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
2. Infrastructure	We decide to close a location, building or campus , or it becomes unavailable, in which a programme is taught and cannot find suitable premises at a nearby location.	Low	<p>Our London estate comprises three primary sites and four satellite centres and is of a suitable size and quality. The viability of these sites has been, and continues to be, systematically reviewed through the annual curriculum planning processes; to date we have not found it necessary to consider the closure of a site. Were this ever to happen it would do so in an orderly and planned fashion and would be subject to a risk assessment. The risk assessment, as with all other aspects of the College's activities, would comprehensively assess students' needs within the parameters of this Student Protection Plan.</p> <p>Moreover, the LCIoT, where much of our intended provision is planned to be located, is funded externally by the DfE and this will provide a state-of-the-art learning facility for HE students. The viability of this campus will also be considered annually within the curriculum planning processes in order to ensure that timely interventions and management actions can be taken to ensure its continued operation.</p> <p>We have considered whether there might be a risk to students' continued study from other forms of interruption - for example, a major incident of terrorism, flood or fire. We are confident that in such an event our students would be protected by our existing Business Continuity Plans (Annex B) which are reviewed annually.</p>	<p>We would never plan to relocate students to a new campus mid-year; where we have plans to re-locate the curriculum, the details of this strategy and the curriculum locations will have a managed communication plan which is timely, open and transparent to both current and prospective students.</p> <p>The student will be put at the heart of any re-location strategy and the communications and our approach will be in line with the Competition and Markets Authority guidance and compliant with consumer protection legislation.</p> <p>The student experience will be enhanced with any potential re-locations. We will take into consideration the needs of all our students, including those with mobility considerations or special educational requirements.</p>

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
3. External events, Validation, Course Regulatory Changes & Unpredictable Disruption	We are no longer able to deliver a qualification due to the termination of validation arrangements with validating partners	Low	The College intends to deliver courses leading to HNC/D qualifications that are awarded by Pearson Education rather than through franchising arrangements where the degree awarding powers are vested in the franchiser. The College already has a very long-standing and positive relationship with Pearson Education.	<p>Where there is a termination of a contract or the withdrawal of approval for specific programmes by an awarding body, the formal agreement provides for the teach-out of existing students. This would result in a cessation to the recruitment of new students rather than impact on existing students. The period of notice for any such termination of a contract or withdrawal of a programme, is long enough to allow any new applicants to be notified in good time to find alternative places.</p> <p>See Section 2 below for full details of teach-out, transfer arrangements and of exit and certification.</p>
	The qualification students obtain is significantly different from that for which they enrolled, for example as a consequence of external regulatory changes	Very low	Courses are subject to an annual review process to ensure they remain contemporary, support the College's strategic objectives and comply with the requirements of the Designated Quality Body, the Quality Assurance Agency. This systematic approach means that courses are approved, or material changes made to existing programmes, in good time to ensure that prospective applicants and existing students are not affected by material change. The College has not planned to deliver any courses that are PSRB approved at this point. However, were we to do so we have extensive experience of working with PSRBs; by working with the processes described in the preceding paragraph we have always met or exceeded expectations.	Our approach to course modification is outlined within the Course Development, Modification and Closure Procedure (CDMCP) and is subject to ratification through the Academic Development and Quality (ADQ) committee. We retain the right to make minor adjustments, subject to the prior written agreement of the awarding body, to courses and modules year on year, as part of quality enhancement and in response to student feedback. These minor amendments in themselves do not warrant the triggering of student protection measures. Were this risk to crystallise and result in material changes to the course students we would also provide information, guidance and support as is described in Section 2 below which describes full details of teach-out, transfer arrangements and of exit and certification.

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
	There is significant and unpredictable disruption to the College's capacity to deliver its courses, e.g. industrial action or global pandemic.	Medium/Low	We believe this risk to be medium in terms of Covid as no organisation can predict the ongoing trajectory of the Global pandemic. However we are confident that we have sufficient risk assessments in place to manage this as an institution. The College operates a Covid risk register which was very effective in managing the transmission of the virus. Public Health Newham confirmed that they saw no evidence of college-based transmission throughout the pandemic. Similarly, in the case of industrial action we believe that the risk is low, we have no record of the College staff undertaking industrial or strike action	<p>Covid – 19</p> <p>Should a national lockdown be necessary in the future, whatever the reason, the College will draw on its experience of operating a 'no-detriment' policy where we are as satisfied as we can be that no student was disadvantaged.</p> <p>We have established frameworks for consultation and negotiation with the recognised trade unions. We remain highly committed to, and we prioritise, maintaining an effective employee relations culture and working with trade union colleagues to achieve reasonable solutions to matters that may arise from time to time. In the unlikely event of industrial or strike action the College will operate a no-detriment policy which would be tailored to the circumstances.</p>
4. Course Discontinuation	We decide to discontinue programmes on timescales that directly affect existing students	Very low	Course closure arrangements guide the processes to ensure that staffing and resources are in place to deliver a high-quality experience for students. As such, we plan any course discontinuations to allow current students to complete their studies through 'teach-out'. This means that current students would not be not adversely affected.	<p>If, very exceptionally, teach out is not possible, we will support individual students in transferring to an alternative provider, utilising student transfer arrangements and facilitating transfer of credit through issue of relevant certification. See Section 2 below for full details of teach-out, transfer arrangements and of exit and certification.</p> <p>We have experience of managing this process successfully where courses have experienced diminishing numbers of students.</p> <p>In handling course closure and potential student transfers, we will be mindful of the needs of students, including those with protected characteristics, and will ensure full consultation and the availability of appropriate</p>

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
				support services, in accordance with the Course Development Modification & Closure Procedure. See Section 2 below for full details of teach-out, transfer arrangements and of exit and certification.
	We stop teaching a discipline, course or delivering a mode of study due to poor enrolment insufficient continuation or completion rates	Low	<p>We have sought to reduce the potential risk of course discontinuation by several actions:</p> <ol style="list-style-type: none"> 1. We carefully develop our curriculum offer in close alignment with our strategic partners within the LCIoT and Barts. Through these relationships we will be developing only those programmes where there is a demonstrable and sustainable need identified for economically valuable courses. For example, Barts has co-invested in, and shares part of, our campus and has predictable patterns of recruitment and can accurately anticipate skills needs. Barts have agreed to provide work placements for all students studying on the College's level 3 Health Sciences T- Level offer and this collaboration will form a natural extension into the development of level 4 and 5 qualifications. 2. All new programmes will be ratified, and monitored, through the ADQ Committee, reporting to the HE Oversight Board, which scrutinises the viability and quality of programmes annually. Through this mechanism the College will be in a position to coherently manage its curriculum offer in an ordered way and any discontinuation of programmes will be 	<p>In the event of course closure the College will, in the first instance, make arrangements to teach out current students. This means that we commit to ensuring the course can be completed by all currently enrolled students, even though the course is being discontinued and we will not recruit any further students to the same course.</p> <p>If, very exceptionally, teach out is not possible, we will support individual students in transferring to an alternative course. Depending on student's individual circumstances and aspirations, this may be at another provider (utilising student transfer arrangements and facilitating transfer of credit through issue of relevant certification).</p> <p>In handling course closure and potential student transfers, we will be mindful of the needs of students, including those with protected characteristics, and will ensure full consultation and the availability of appropriate support services (in accordance with our Course Development, Modification and Closure procedure). See Section 2 below for full details of teach-out, transfer arrangements and of exit and certification.</p>

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			<p>managed within the parameters of the College policy framework.</p> <ol style="list-style-type: none"> <li data-bbox="685 347 1308 639">3. The College has completely refocused its curriculum onto pathways designed to lead to skilled employment; established industry partnerships of Barts and LCIoT will inform the evolution of the HE course offer; and has shifted its leadership and governance focus on data and progress from widening participation to achieving positive outcomes. <li data-bbox="685 647 1308 970">4. As part of our processes relating to the Course Development, Modification and Closure Procedure we annually review the suite of programmes we offer. This ensures that we keep pace with professional, employer and student demand, and we may choose to close a course to future cohorts where demand is low or, periodically, as part of a refresh of our wider portfolio. <li data-bbox="685 978 1308 1230">5. In order to meet the needs of students, some courses may use more than one mode of study. The College has in the past successfully integrated students studying on either full or part-time modes. Such delivery protects the student experience and reduces the likelihood of the College having to suspend programmes. <li data-bbox="685 1238 1308 1375">6. In order to ensure the quality of its HE provision the College has moved from a reliance on the HE audit regime under the previous regulatory framework (HEFCE) to fully accepting its 	

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
			<p>primary responsibility to its students. To this end the College has established effective executive and non-executive scrutiny arrangements, including the creation of an HE Oversight Board, whose members bring directly relevant skills and experience to the role of overseeing the quality and compliance of the College's HE provision and the protection of its HE students.</p> <p>7. All courses conform to the College quality cycle through which commitment to the quality assurance requirements are monitored. This is initially through the quality monitoring processes outlined in the quality cycle. This enables College managers to identify risks and put actions in place to prevent such risks crystallising.</p>	

	Risk Description	Risk Level	Commentary	Mitigation in the event of this risk crystallising
5. Staffing Resources	We are no longer able to deliver significant and material components of our courses due to staffing challenges particularly related to disciplinary specialisms	Low	Whilst the College is planning a number of specialist programmes in line with the requirements of the LCIoT and Barts NHS Trust, the risks of not being able to deliver these are low. The College has well-established procedures in place for the recruitment and replacement of teaching staff, additionally through our annual curriculum planning process we will ensure that we have sufficient full-time permanent academic staff in each of our departments to deliver an appropriate mix of modules and projects. We will draw upon the strengths of our strategic partners within the LCIoT and Barts to ensure that a wide range of relevant skills at L4/5 are available.	<p>While there may be inevitable gaps between academic staff members leaving and being replaced we ensure that vacancies are identified and filled as soon as possible; where it is appropriate, we enable other employed subject experts to cover vacancies or use other experienced members of staff with the appropriate skills and experience to cover teaching sessions.</p> <p>Additionally, we design our programmes to be taught by cross-curricula staff teams; we currently have extensive and highly qualified staffing resources within the College who deliver very high-quality Level 3, Access to Higher Education courses at scale. We will draw on the expertise of these Further Education teams as well as the dedicated HE staff.</p>
6. Recruitment of Specific student types	The provider is no longer able to recruit or teach a particular type of student	Low	The College delivers programmes to a wide variety of students; all our students are classified as 'home' students and we do not hold a Tier 4 Licence. The majority of our students are likely to be drawn from widening participation groups, mature learners, and learners studying full or part-time modes. In all cases, the College is committed to supporting these students and the risk of being unable to recruit or teach a particular type of student is low.	

Section 2 - Fee Refund Policy

6. Notwithstanding the measures taken to maintain 'teach out' provision, if it became completely impossible for the College to continue provision we will make arrangements for affected students to switch to a different provider without having to start their course from the beginning. This will include help to transfer credits where possible and the issuing of a formal transcript. Any entitlement a student may have to a refund of fees will be determined in accordance with Higher Education Refund and Compensation Policy. The College has outstanding financial status as designated by the ESFA, this will enable the College to meet any refunds of compensation necessary for those students who were vulnerable to non-continuation of study.

2.1 Measures to protect students

7. The College has plans to protect students and minimise disruption to their studies should material changes occur to their course or should their course close. These plans may include any one of the following, depending on what is appropriate for the circumstances. We have already outlined a wide range of risks that could occur and if they did materialise could cause disruption to the continuation of students' study. We have explained above some of the actions that we have in place. Further details are below on what the College will do to support students in continuing their studies if these risks do occur, or if in the very unlikely event that we are unable to support students in continuing their studies.

2.1.1 Teach-out

8. The provision of 'teach out' a course for existing students, will always be the preferred option and any deviation from this must be ratified at the ADQ and the College Executive through the HE Steering Board. This means that we will continue to deliver teaching on the current course to its planned completion date, if one of the risks outlined Section 1, subsection 1 – 6 above should occur. We will provide information, advice and guidance to individual students and to groups of students as to the options that they may have; this may include, transfer to another course within the College or externally to another provider. We are aware all students are individuals with individual needs many will have specific needs and/or caring responsibilities. This will ensure that students have enough information to understand how teach-out relates to their own specific circumstances and so make an informed decision.
9. Where it is necessary to make material change to a course, we will consult students on these changes within the scope of the Course Development, Modification and Closure Procedure. This facilitates the orderly and planned changes to courses together with appropriate and timely communication with students. We will communicate with students through student representatives, and individually. We will provide opportunities for individual and group meetings. This will ensure that students have enough information to understand how the changes relate to their own specific circumstances and so make an informed decision.
10. If we need to teach-out a course we will ensure that the quality of the course, the teaching provided, and the student experience are maintained to same level as could be expected if the course were continuing. All quality assurance processes such as annual monitoring of courses will remain in place for any courses in teach-out until all students have completed. This will provide assurance on the maintenance of quality and standards and students can be assured that their course has equal value to any other cohort.

2.1.2 Internal transfer to another course, this means offering students an alternative course, facilities or venue at the College;

11. If students are unable to, or do not wish to continue their current course due to course closure the College will support them to move to a course that is similar to their current course of studies. To help them to make a decision that is right for them, the Course Leader and/or a member of the Student Services team will discuss the options with the student. We will explore and fully understand any specific circumstances learning or support needs that students may have and we will provide information about finances.
12. When discussing the option of internal transfer, the College will explain similarities and differences between the courses on offer and identify courses that provide the nearest match with the original course of study where possible, including learning outcomes, assessments, graduate career prospects.
13. There will be no additional costs to the student regardless of the course to which the student is transferring. This includes any additional equipment or costs that might normally be incurred. Where students decide to transfer to a course internally, the College will make the necessary adjustments to the registration without administration costs and provide the students with an induction into the receiving course.
14. Where a student decides not to transfer to another course at the College then we will support them with information, advice and guidance on transferring to another course at a different provider. Alternatively, students may leave their course early with an exit award where they have gained a sufficient number of credits. The College will also provide guidance on entitlement to refunds and compensation were a course to close during the enrolment period.

2.1.3 External transfer to another provider this means making arrangements for affected students to switch to a different provider without having to start their course from the beginning;

15. In the very unlikely event where the College is unable to continue the delivery of a course or its portfolio of courses the College will support students to move to a course at another provider. To help students make a decision that is right for them, their Course Leader and/or a member of the Student Services team, will discuss the student's options with them.
16. We will explore with the student any specific learning or personal needs such as caring responsibilities. We will compare any other provider that the student may have chosen for an external transfer to set out the differences in academic and student support. This will include matters such as accommodation, learning resources, financial support including scholarship or bursary, wellbeing support, accessibility, career advice, guidance on student complaints. Where students decide to transfer, they will be provided with certification of the learning, the precise nature of which is described in the succeeding section below.

2.1.4 Exit awards and certification

17. The College's academic regulations enable students who transfer externally to have the appropriate exit awards and certification which evidence their academic achievement. If sufficient credit has been earned, then an appropriate exit award will be confirmed by the succeeding Assessment Board. The student will be issued with a Transcript of Results as well as the appropriate exit award, students will not have to either request or pay for this. If students have insufficient credit for an exit award, then they will be sent a Transcript of Results only from the Assessment Board.

2.1.5 Complaints, Refunds and Compensation

18. In all cases students will be referred to the Higher Education Complaints Procedure and, as is outlined within this document (section 6), they will be supported by the College through this process.
19. Full or partial refunds will only be considered in special cases where the College is unable to support students with continuation of studies. Newham College's full Refunds Policy can be found on the HE Page of the College website.

Section 3 - Information about how you will communicate with staff and students about our student protection plan

21. The College is committed to the provision of comprehensive, open and transparent information ensuring accurate, relevant, and current procedures are followed enabling applicants and students to make informed decisions. As such, this Student Protection Plan will be published on the College Website and on the Virtual Learning Environment. We will review this plan at the end of the academic year 2023, our students will be involved in the review through Course Boards and the HE Student Governor.

3.1 Communication with Staff

22. The Student Protection Plan will be shared with all staff through SharePoint and the College Website, these measures are augmented by an annual, mandatory, staff development schedule. Where updates are made, this will be included in the annual staff training on Academic Regulations.
23. The College Academic Regulations and related policies and procedures are approved by our Higher Education Steering Board, and the Higher Education Quality and Standards Team are responsible for any amendments delegated to the College by the awarding body.

3.2 Communication with Students

24. In the event the College needs to take relevant action from this plan, targeted information will be sent to affected students. Full details of communication with students are described in the Student Communication and Publishing Policy. In brief, students and applicants will be informed by the Head of Admissions and/or Director of Higher Education directly by email, telephone or in tutorials of any material changes to their course or module/unit. Notwithstanding those changes that may be externally imposed at short notice by regulators we will seek to give students at least three months' notice where there is a material change to their course. If their offer of study is withdrawn for any reason they will be informed as soon as it is reasonably practicable to do so, and this communication will be formal written communication emailed by the Director of HE or the Head of Admissions at Newham College.
25. Should we need to close a course before students are able to complete it, we will announce this as soon as is feasible and agree a closure date for that course and work through the plans in this document to support students to complete their course. Students will be given a minimum of 2 calendar months' notice of closure unless the reason for closure poses such a risk to staff and students that immediate action is required.
26. The College takes into account student interests in decision making and ensures that decisions are fair, accessible, transparent and explicit. Guidance is published through the Terms and Conditions of enrolment and application document. Adherence to the Competition and Markets Authority guidance on consumer law for UK HE providers (2015) also ensures that the guidance given is accurate, clear, unambiguous and timely.
27. In the annual review of this plan students will be involved through the Course Boards, to ensure participation across the range of courses, the HE Governor, and through specific focus groups.