

Hereford College of Arts
UKPRN: 10003022
Folly Lane, Hereford, HR1 1LT
Version: 20th August 2018

Student Protection Plan (SPP) 2019-20

1. Introduction

- 1.1 Hereford College of Arts (HCA) is committed to helping to ensure students achieve the best academic outcomes from their studies. Events may occasionally occur which mean that changes have to be made to courses or modules that impact on a student's ability to enrol onto or complete a programme of study.
- 1.2 HCA would expect significant changes or closures to programmes to happen only in exceptional circumstances. The Student Protection Plan (SPP) is to protect the student's interests if these circumstances arise and HCA's response to those changes.
- 1.3 This SPP incorporates HCA's Refund and Compensation Plan.
- 1.4 The SPP applies to the following groups:
- a person who has applied to a Higher Education course at HCA who has been offered or has accepted a place on a course which has been closed or suspended.
 - a person who is currently enrolled on a Higher Education course but has not yet completed it.
- 1.5 The SPP may be triggered by the following events:
- a decision to close the College has been taken;
 - a strategic decision by the College to close a course;
 - a decision to suspend a course for one or more academic years;
 - withdrawal of designation for student support purposes;
 - removal of the Tier 4 Sponsor Licence (the Home Office issued licence which allows a provider to teach international students);
 - changes to regulatory framework affecting a specific course;
 - loss of accreditation from regulatory bodies, e.g. Ofsted, OfS;
 - loss of accreditation of validating institution, e.g. University of Wales Trinity Saint David;
 - disruption of College activity (e.g. temporary disruption within term-time not covered by any of the above);
 - major industrial action by College staff or third parties;
 - the unanticipated departure of key members of college staff.

The above list is not exhaustive.

2. Measures to Protect and Inform Students

2.1 The College is committed to communicating any changes to students as early as possible, with clear information and options.

2.2 All reasonable steps will be taken to minimise the resultant disruption to those services and the affected students by, for example:

- offering affected students the chance to transfer to another course;
- delivering a modified version of the same course;
- teaching out the course if it is decided to not enrol new students to the course;
- providing assistance to affected students to switch to a different provider.

2.3 Where a student is required to transfer course, or move to another institution there are likely to be implications for student finance arrangements. The Student Finance Team will contact affected students and provide detailed information, advice and guidance based on their individual circumstances.

3. Risk Grading

HCA risk is assessed using a scoring system of 1 to 5 relating to likelihood and impact. This approach is used to assess all the risks considered within this plan.

Likelihood →/ Impact ↓	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Scores:

Low: 1 to 4

Medium: 5 to 9

High: 10 to 19

Alarm: 20 to 25

4. Significant Material Change

Institutional Closure – risk level: low risk

The College financial health is also monitored by the Education and Skills Agency (ESFA), the College's regulatory body. The College's financial health is currently graded as 'Outstanding' by the ESFA. The College has a very healthy balance sheet and cash reserves. At this point the risk of institutional closure is assessed as low. If the College's financial situation deteriorates the College would work with the FE Commissioner's Office to consider a variety of options for improving the Colleges financial health.

4.1 Institutional closure will be monitored through risk management and managed in accordance with College policies.

4.2 Where the College has no option, other than to close, it may consider measures such as those below to protect student experience:

- where possible, closing in a gradual way, over a period that would allow current enrolled students to complete their studies at the College;
- where the above is not possible, in supporting students to transfer to appropriate programmes at other providers and (where appropriate financially) by compensating students where because of disruption to their studies they suffer demonstrable, material financial loss;
- merging with another institution to maintain all or part of the current provision.

Closure of Part of Campus – risk level: low risk

The likelihood of closure is low, however, the impact on students could be considered significant as students have access to specialist facilities e.g. ceramics workshops. The College would work with other colleges in the area and with the local authority to install temporary accommodation on available sites if that became necessary. The College would work with insurers to put in place replacement accommodation if required. The College has robust finances in order to mitigate many of the issues that arise if a site was closed. Overall risk assessment is low.

4.3 Where part or all of the campus is rendered unusable for activities involving students, the College will typically consider remedies such as:

- relocating provision to an alternative location or a different College site (the College has 2 main sites), this may include hiring spaces for programme delivery (where possible nearby) and/or installing temporary buildings on the College's land (where available);
- revising timetabling to allow all of the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of normal office hours. Where such an approach is taken appropriate consultation will normally be conducted with stakeholders who may be affected and appropriate assessments also undertaken.

Withdrawal of Designation – risk level: risk low

The College has had quality assurance reviews, provider reviews and Teaching Excellence Framework submissions during that period of time and none have raised any significant issues. The College has not had any concerns with the ESFA the College's main regulatory body or with Ofsted. The College is working through the registration process for Office of Students(OfS) and has put in place an action plan to address any areas for improvement identified in the registration self-assessments, which will be implemented as a very high priority. The College assessment on this risk is low.

4.4 In the event of de-designation of its courses for ‘Student Support’ purposes (resulting in the withdrawal of statutory student finance for its courses) the College will take all reasonable steps to minimise the resulting disruption to students by, for example:

- 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.
- working with relevant funding bodies to allow enrolled students to complete their year of study/programme;
- where the above is not possible, supporting students to transfer to appropriate programmes at other providers and, where appropriate, financially compensating students where they suffer demonstrable, material financial loss because of disruption to their studies;
- considering assistance for affected students by providing evidence/letters/statements in support of continuation of their studies;
- merging with another institution to maintain all or part of the current provision.

Suspension of Course- risk level: medium risk

The College has suspended courses where the number of acceptances has been very low and therefore the student experience on that course would have been poor. Mitigating actions would be taken and applicants informed as soon as practical. The College has never suspended a year of a course with enrolled students. Therefore all students on a course have been able to complete their course. The intention of the College would be to teach all courses out even if there was no new intake. The situation would be explained to current course students. The College has assessed this risk as medium.

4.5 In the event of suspension/closure of course where there is a material impact on the students the effect will be mitigated by:

- communication with current students to provide assurance that they will not be adversely affected by the decision, and provide assurance that they are able to complete their studies at HCA;
- where possible, provision will be made to allow for the completion of studies where ‘mitigated circumstances’ have been presented;
- consultation with other stakeholders in addition to students who may be affected;
- future applicants will be notified in accordance with UCAS deadlines, allowing time for students to source an alternative suitable programme (where relevant) at the College or at another Higher Education Provider.

Suspension of Tier 4 Sponsor Licence – risk level: medium risk

The College has a small number of overseas students and as a consequence only a small number of rejected visa applications would take HCA above the 10% threshold, which may trigger a UKVI investigation, especially if there are Tier 4 students who leave before the end of the course. This could involve the temporary suspension of the College’s Tier 4 Sponsor Licence. The College has therefore assessed this as a medium risk.

4.6 In the event of suspension of Tier 4 Sponsor status, the College will take all reasonable steps to minimise the resultant disruption to those services and to affected students by, for example;

- working with UKVI to allow enrolled students to complete their year of study/programme;
- allow students already in receipt of a visa based upon an allocated CAS from the College to enrol and commence their studies;
- offer students who have not commenced their travel to the College the opportunity to postpone their application pending the resolution of the suspension.

Revocation of Tier 4 Sponsor Licence – risk level: medium risk

The College has a small number of overseas students and as a consequence only a small number of rejected visa applications would take HCA above the 10% threshold, which may trigger a UKVI investigation, especially if there are Tier 4 students who leave before the end of the course. This could involve the temporary suspension and subsequent revocation of the College's Tier 4 Sponsor Licence. We endeavour to obtain proof from students who leave before the end of their course that they have left the UK. The College has therefore assessed this as a medium risk.

4.7 The College, in the event of revocation of Tier 4 Sponsor Licence will take all reasonable steps to minimise the resultant disruption to affected students by, for example:

- providing assistance to affected students to switch to an alternative sponsor.

5. Changes to Regulatory Framework Affecting Specific Courses

Loss of accreditation by validating body – risk level: low risk

The College's validating partner is the University of Wales Trinity Saint David(UWTSD).

The College has an established partnership with UWTSD and has no immediate plans to end this partnership. In the event that UWTSD wishes to end the partnership sufficient notice would need to be given. UWTSD is required to work with the College to ensure all students enrolled on current UWTSD validated provision can complete their courses. The College has a good relationship with UWTSD. The College has assessed this risk as low.

5.1 In the event of the College losing accreditation with the UWTSD, the College will consider measures to protect student experience, such as those listed below:

- providing assistance to affected students to transfer to a different provider who holds the relevant accreditation;
- working with another validating body to deliver similar provision.

6. Critical Disruption to College Activity

6.1 Where events result in critical term-time programme disruption such as major fire damage to the estates, the College will normally consider whether it is practicable to make changes to programme delivery, rather than closing or suspending an affected programme.

6.2 Actions to minimise disruption may include:

- temporary short-term suspension of programme delivery (e.g. where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate impact on students);
- changes to the programme delivery location or method;
- changes to the staffing of a programme, for instance through a review of internal staff resources, including recruitment of area specialists, where appropriate;
- offering students the opportunity to transfer to an alternative programme;
- provision of reasonable support to students for accessing a programme run by another provider, including making arrangements for the transfer of credits and information about academic progress;
- relocating provision to an alternative location, this may include hiring spaces for programme delivery (where possible nearby) and/or installing temporary buildings on the College's land (where available);
- revising timetabling to allow all of the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of normal office hours. Where such an approach is taken appropriate consultation will normally be conducted with stakeholders who may be affected and appropriate assessments also undertaken.

Closure of Part of Campus – risk level: low risk

See 4.3 above.

Major Industrial Action – risk level: low risk

College employee relations are good. The College has not experienced any major industrial action for a significant period of time. The College has assessed this risk as low.

6.3 The College is committed to 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.

6.4 Where major industrial action does occur, the College will 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 that any disruption is minimised and students are not, as far as is possible to determine, disadvantaged by the action.

Loss of Key Staff – risk Level: low risk

The College has integrated teams of academic staff, which reduces the risk that the loss of staff members will have a negative impact on the continuation of study for students. The College also has a large number of staff who are employed part-time who can increase the number of days worked in the short term. The risk has therefore been assessed as low.

6.5 Where possible the College will:

- seek to fill gaps as quickly as possible, by moving other current members of staff with appropriate skills and experience, into the vacant post(s) or recruiting externally, to avoid disruption.

7. Refund and Compensation

In the unlikely event that the SPP is triggered and the College cannot teach out the course, the College will make the following minimum commitments for students registered on the course:

- 7.1 The College will ensure that the students on the course will receive the award they are entitled to for the academic level they have reached e.g. a certificate or a diploma.
- 7.2 The College will offer student advice and support to help them decide on the best option for them, including a transfer to another course or to an alternative HE provider.
- 7.3 Offer to pay reasonable costs for students to visit an alternative provider.
- 7.4 Will work with goodwill with students affected to put in place a refund and compensation plan relevant to the circumstances of those students.

Those students who have been offered or accepted a place on a course will be offered guidance on whether to accept a place on a different course at HCA or a place at a different provider.

As there could be many different scenarios that trigger the SPP and the circumstances of all students affected are likely to be different this will affect the refund and compensation options available.

All enrolled students identified as affected will be told what is being put in place and ensuring students are not disadvantaged and the process is fair and proportionate.

The plan will take into consideration:

- Travel costs as a result of relocation of provision;
- Student fee refunds in cases where the SPP is triggered mid-year;
- Bursary entitlement – if a student would have received a bursary at HCA if the course continued, then the College will continue to pay that bursary as long as that student is enrolled on a different course whether at HCA or an alternative provider, assuming no equivalent bursary is available on the new course;
- Compensation for additional tuition and maintenance costs where a student has to transfer courses or provider and as a result the time to complete the course is extended;
- The College will also consider other forms of action beyond refunds and financial compensation.

Relevant guidance published by Competition and Markets Authority (CMA), the Quality Assurance Agency (QAA), the Office for Students (OfS) or the Office for the Independent Adjudicator for Higher Education (OIA) will be taken into account when preparing such plans.

The College has sufficient cash reserves to fund the SPP if it is triggered.

8. Payments

8.1 No payments or refunds will be paid in cash.

9. Communication to Applicants and Students

9.1 This Student Protection Plan will be published on the Colleges website.

9.2 The electronic copy of the Plan will be the current version. Any significant changes to the SPP will be made in consultation with student representatives.

9.3 If the SPP is triggered, the SPP will be shared with those students affected by the event.

10. Feedback and Questions

Any questions relating to the SPP should be addressed to registry@hca.ac.uk in the first instance.

If you wish to make a complaint about your experience under this plan, this can be done using the College Complaints procedure. The link to the policy is below:

<http://www.hca.ac.uk/getmedia/21bb083e-5dcf-4830-b0df-b703e8c2c343/HCA-Student-Complaints-Policy-Procedure-2017.pdf>

