



Carshalton
College

Kingston
College

Merton
College

South Thames
College

South Thames Colleges Group – Student Protection Plan 2020/21

Provider's name: South Thames College Group

Provider's UKPRN: 10003674

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Introduction:

South Thames Colleges' Group comprises of four College centres: Carshalton College, Kingston College, Merton College and South Thames College.

Higher Education courses are currently delivered at three of the four Colleges within the Group - Carshalton, Kingston and South Thames College. There is currently no Higher Education provision at Merton College.

The four Colleges within the Group are all located in South West London with no more than 8.5 miles between any campus and all are served by good transport links including bus and rail with interconnections also available via tram and underground. The colleges serve their local communities South West and Greater London, however all STCG HE offer is available for employers and individual's up to degree level.

The key purpose of the Student Protection Plan is to preserve the continuation and quality of study for the College Group's higher education students whenever a risk to the continuation of that study crystallises.

The Student Protection Plan includes the College Group's assessment of the risks to continuation of study, the likelihood that those risks will crystallise and the potential impact upon students should the risks crystallise. The Plan also sets out the measures in place to mitigate those risks that are reasonably likely to crystallise, and the commitments given to offer advice, refunds, and compensation.

To which students in the College Group is the Student Protection Plan relevant?

The Higher Education courses covered by the plan include Higher National Certificates (HNCs), Higher National Diplomas (HNDs), Foundation Degrees, Honours Degrees, Professional Certificates and Professional Graduate Certificates in Education.

Within the College Group's Higher Education population there are two types of students. This plan affects each of these groups differently and offers the protection of continuity of study in different ways.

- a. ***Directly funded students whose primary registration is with South Thames Colleges Group to which the tuition fee payment is made.*** These students are offered protection

of continuity of study by the entirety of this plan and its full contents are relevant to this group.

- b. ***Students studying at one of the Colleges within the College Group under a franchise arrangement with one of the Group's university partners where the student's primary registration is with the university to which the tuition fee payment is made. These students are offered protection of continuity of study under the terms of the franchising university's Student Protection Plan, which is published on the university's website.*** The College will always work with the partner university to support the commitments of its Student Protection Plan. The broad purpose and content of the South Thames College Group's Student Protection Plan, in terms of risk identification and risk management, is wholly relevant and supportive of the objective of the preservation of the continuity of study in this situation also.

The College Group's approach to risk analysis and management to maintain continuity and quality of higher education study for its students.

The Group operates a formalised approach to risk analysis and management and operates a risk register which formulates exposure to risk by (1) identifying potential risks from internal and external causes (2) calibrating the likelihood/ probability of those risk with (3) the impact upon the College and its stakeholders (including most importantly students) should those risks crystallise. The risk register is regularly reviewed at Group Leadership Team meetings and at Governors' meetings. The Governors' Audit Committee reviews the risk register regularly and receives reports upon its status from the Group Leadership Team. Each of the other Committees within the Governance structure owns a set of critical risks, evaluating the risks and the overall level of assurance that the assessment is correct at the end of each meeting.

This particular risk – "risks to the continuation of study of the College Group's Higher Education students" has been incorporated within this register. The monitoring of these potential situations at a more operational level is a standing item on the agenda of the monthly Higher Education Matrix Leadership Meetings and the termly College Group's Higher Education Board (HEAB).

1. The range and level of risks to the continuation of study at South Thames Colleges Group.

The assessment of risks;

- a) The risk of **small cohort size in terms of both economic/financial sustainability and the quality of learning experience for the student** is evident in a number of individual HE courses and is potentially the largest risk faced by the College and its HE students studying on such courses. While the existence of small cohorts is a fact of the College Group it is also one of the strengths of the College Group as was outlined in our TEF year 3 application and as recognised by the TEF assessors when awarding the successor college (Kingston) Silver at year 2 (June 2017).

- b) The College Group currently operates Higher Education provision across three of the four college sites – Kingston, Carshalton and South Thames College. The Higher Education provision at Kingston College is much the largest and represents 72% in student number terms of the College Group’s total HE population. There is **a risk, which at this stage is moderate, that Higher Education provision is not sustainable in the two smaller colleges, and in particular Carshalton College where some curriculum rationalisation, at other levels (1, 2 and 3), between it and Merton College has taken place.** However, the financial characteristics of the College do **not** make this a higher than **moderate risk** at this stage.
- c) **The risk that the College Group may not be able to offer specialised provision needing high cost and specialist equipment e.g., engineering, art and design, and performing arts is low** as such equipment is used to deliver other courses funded from alternative sources meaning that the cost factor for Higher Education courses is diluted.
- d) **The risk that courses offered in collaboration with university partners (franchised or directly funded) might not be offered due to such agreements being terminated by partners is present for the College Group by definition, as it would be for any institution without its own awarding body powers. This risk is regarded as low** due to the history of long established and successful partnerships which benefit from the robust governance and management arrangements in place to ensure quality. However, **there is the low-risk situation where university partners may terminate a partnership with the College (at course or institutional level) for their own commercial purposes and for no other reasons for example the failing of the College Group, and accordingly entirely beyond its control.** In such a case the College will rely upon the “teach out” clauses in all its university partner academic regulations which would protect continuing students in such a partner generated risk situation and which accordingly means that **the risk of non-continuation in this case is low.**
- e) **For the very small number of international students that might be studying within the College Group there is a moderate risk of loss of Tier 4 Highly Trusted Status (HTS) licence due to the currently very rigorous approach of the UKVI** and specifically due to the very low refusal rate threshold with respect to the issue of Confirmation of Acceptance for Studies (CAS) which is exacerbated by the relatively modest number of applications actually processed. This risk will continue to be managed by close adherence to UKVI regulations, extremely cautious review of any applications and the maintenance of actions in line with UKVI/ College agreed action plans.
- f) There is a very low risk that if the college loses its UKVI licence that this could affect the franchising arrangements with one of the colleges HE awarding bodies. Quality audits review external validation on a yearly basis.

2. The measures that the College Group has put in place to mitigate the risks to the continuation of study which are reasonably likely to crystallise.

The College Group's strategy and processes to avoid the risk of the discontinuity of study and course sustainability.

An essential part of the management of risk in this situation is to anticipate and identify risk in advance to support sustainable and secure decision making with regard to course offerings. The other vital action is to recognise courses of actions where and when risks are arising and plan for mitigating actions where they are more likely to crystallise.

The College Group operates.

- a) A course approval process which includes a thorough review of a new course's potential in both the financial and academic sense – this involves the Assistant Principal for HE working with the Head of School wishing to deliver the programme, a review of the proposal at the termly Higher Education Academic Board (HEAB) and an ultimate sign off of planned delivery by the College Principal.
- b) An annual curriculum planning process which investigates the financial (income and expenditure) proposals for each course, which is supported by the provision of labour market and competitor intelligence and provides an ultimate sign off of approved delivery.
- c) On an ongoing basis, monthly budget reviews will identify where there are potential difficulties of financial sustainability of a course. These will be pursued at School and College level with formal decision making made between the senior managers and Head of Higher Education about future and continuing course offering.
- d) An open and ongoing relationship with its university partners formally at course and college level, and via Academic Annual Partnership Reviews, and Annual Executive Meetings which proactively explore course sustainability and development issues and opportunities. The oversight of these outcomes at course/partnership levels is provided by the Higher Education Academic Board (HEAB) and the monitoring of the quality of that relationship within the College Group's risk register.

As a general further education provider, the College Group does not normally offer HE courses in subjects which are not offered at Level 3 within the College (with a few exceptions such as civil engineering). The strategic imperative is for the College to offer HE programmes from which its current student population at Level 3 and its alumni can progress. We also offer Level 4 directly to our employers and direct entry onto these courses.

The College offers only a small number of BA (Hons) – Level 6 – courses and in the curriculum planning and approval process is particularly cautious about such courses due to;

- a) These courses being three or four yearlong programmes, requiring a larger starting cohort size due to the potential for student drop out over that longer period of study where unexpected personal circumstances are less predictable over such an extended period.
- b) The challenges of student recruitment due to the higher level of competition for such courses from universities and alternative providers.

- c) The need to ensure suitably qualified and experienced teaching staff, particularly at Level 6.
- d) The possible need to withdraw the offer of a small number of such courses due to the heightened competition.

This plan will focus on the measures in place to mitigate the two risks that are higher and are more reasonably identified as moderate in terms of likelihood of crystallisation.

- a) A small number of the subjects offered within the College Group's HE provision are offered at more than one college and in the case of small group size crystallising into a real risk in terms of economic/financial viability or quality of students experience (which is deemed very unlikely) the opportunity to combine cohorts at colleges, which as described above are relatively close together and well served by public transport, could take place with financial compensation paid in terms of additional travel costs.
- b) Some of the subject provision requiring high cost and specialist resources e.g., engineering, art and design, and performing arts are offered at more than one of the Colleges within the Group and therefore transfer/relocation of certain resources could be considered in the very unlikely case of failure of resources and/or the opportunity to transfer students / courses between colleges which could take place with financial compensation paid in terms of additional travel costs.
- c) In the case of the very unlikely crystallisation of risk that courses offered in collaboration with university partners (franchised or directly funded) might not be offered due to such agreements being terminated by partners; The College and partner university would work together within their academic regulations to offer the opportunity of study continuation with the university itself or another of their collaborative partners (supported by the "teach out" clauses and agreements in each university partners academic regulations).

3. Information about the policy in place to refund tuition fees and other relevant costs to students to provide compensation where necessary if STCG is no longer able to preserve continuation of study.

In the case of the crystallisation of the risk, which at this stage is moderate, **that HE provision is not sustainable in the two smaller campuses** we will provide;

- a) Financial compensation for any actual additional travel costs incurred, along with any other reasonable, relevant, and evidenced additional costs will be evaluated for compensation.

In the case of the of the moderate risk of loss of Tier 4 Highly Trusted Status (HTS) which applies to a very small number of international students across the College Group we will;

- a) Work with the UKVI (where the duration of incomplete study is short to mitigate impact) and with all our 7 university partners and our fellow members of Linking London (both

FE and HE providers) to identify alternative suitable locations of study to provide the opportunity for continuation of study.

- b) Financial compensation for any differential in tuition fee payments at an alternative provider will be considered for compensation.
- c) Financial compensation for any actual additional travel costs incurred, along with any other reasonable, relevant, and evidenced additional costs will be evaluated for compensation.

Please refer to the South Thames College Group Refund Policy.

The section above explains that there is no more than a moderate risk of interruption to study in two situations, and in those cases support at an **alternative location of study within the College Group or at an alternative provider can be put in place**. In such a situation the College's refund/compensation policy is outlined below;

- a) Financial compensation for any actual additional travel costs incurred, along with any other reasonable, relevant, and evidenced additional costs will be evaluated for compensation.
- b) In the case of an international student being required to complete their study elsewhere as a result of the loss of the College's Tier 4 HTS financial compensation would also be offered for any differential in tuition fee payments at an alternative provider.

Non continuation of study cases which cannot be resolved to the satisfaction of a reasonable person by the actions of the College Group and which result in the student being unable to complete their planned or similar programme of study, which it is considered to be unlikely during the period of this Student Protection Plan, will be covered by the terms of the College's refund/compensation policy outlined below;

- a) A refund to the student in receipt of a tuition fee loan from the Student Loan Company of an amount proportionate to the value of credits that the student has been unable to achieve as a result of non-continuation (e.g. a student studying a Foundation Degree and who has achieved 120 credits from their first year of study but due to the crystallisation of this risk and the College Group's inability to offer a means of continued study cannot complete their second year, and the outstanding 120 credits, would receive a refund of the fees relating to the first year which represents half of their planned tuition fees and matches the value of credits outstanding and incomplete).
- b) A refund to the student who was self-funding, or of fees paid by a sponsor (e.g. an employer on the student's behalf) of an amount proportionate to the value of credits that the student has been unable to achieve as a result of non-continuation (e.g. a student studying for a Higher National Certificate and who has achieved 30 credits from their one incomplete year of study to date, but due to the crystallisation of this risk, and the College Group's inability to offer a means of continued study cannot complete the remainder of that year, and the outstanding 90 credits, would receive a refund of 75% of the fees for the year which matches the value of credits outstanding and incomplete).
- c) In any of these cases mentioned above any bursary payments awarded but not yet paid would be honoured notwithstanding non-continuance of study (the College's OFFA Access

Agreement 2018/19 only provides for bursary payments in the first year of a student's study).

- d) The College would consider on a case-by-case basis the payment of compensation for reasonable maintenance costs and for lost time taking into account the evidenced personal circumstances of the student and by applying reputable, publicly published average cost and income data.

The College is confident of its ability to deliver the financial compensation mentioned above as the overall value would be modest in relation to the College's overall income from its range of funding sources, and its financial standing as recognised by the ESFA provides confidence in the ability to support unexpected final expenditure of this value.

4. How we will communicate with students about our student protection plan

The provisions of the Student Protection Plan will be communicated to students by;

- The publication of the plan on each of the Colleges' websites (for current and future students).
- The publication of the plan on the College's virtual learning environment – Moodle (for current students).
- The Plan will accompany all course offers (future students).
- The Plan will be provided to students at point of enrolment.
- Students will be directed to the plan via the Undergraduate Guide issued at induction.

Staff at the College will be made aware of the contents of the Student Protection Plan by;

- College Principals and Heads of School will be reminded of its relevance for course planning and monitoring purposes as part of their involvement at the Higher Education Board (HEAB) above and at the annual curriculum planning stage.
- Governors will review any new entries in the risk register at the Governors' Audit Committee.
- We will send our student protection plan to the course leaders of all undergraduate and postgraduate programmes and to all research supervisors.
- We will include our student protection plan in the documentation made available to staff proposing new courses and amendments to courses.

How and when will the College Group review the Student Protection Plan and consult with students on its content?

- Students will be involved in the review of our Student Protection Plan through the Higher Education Student Forum Higher Education Student Forum (HESF), which comprises a student representative of each HE course.

- The annual review of the Student Protection Plan will be considered by the College Group's HESF.
- The Plan when published on Moodle, and elsewhere, for current students will have accompanying explanation and a link to provide the opportunity for feedback on the document.

How will the College Group implement the Student Protection Plan should the risk to continuation of study crystallise?

- The Head of Higher Education will communicate with all the students effected, initially face to face if there are any material changes to the course.
- Advice, guidance, and introductions [to alternative providers] and careers advice will be given to each student effected to support the continuity of study and will be provided by in the first instance by the Head of Higher education.
- This will be summarised in writing, by email and letter, providing full information about any material changes to their course and request feedback and will be followed up with further formal consultation.
- Communication and conversations will be had at teaching group level and with individual students to identify their personal needs.