

## Student protection plan

Provider's name: Havering College of Further and Higher Education

Provider's UKPRN: 10002935

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### Student protection plan for the period [2018-19]

#### **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.**

Havering College of Further and Higher Education (HCFHE) is committed to ensuring students achieve the best academic outcomes from their studies. Events may occasionally occur which may impact on this, however the College will mitigate for this.

#### **Closure of College Campus**

The College plans to close the Quarles campus in the next two years and relocate some of the provision to a new build at the existing Rainham campus. This closure is being managed through the Property Strategy Steering Group. There is a moderate risk that the new build may not be finished on time.

The closure of Quarles and relocation to either existing site may affect students who have caring arrangements as their journeys may be slightly longer. Both campuses are well-served by public transport and have free student parking spaces.

#### **Staff shortages**

There is a moderate risk that we may experience staff shortages in specialised areas which could impact on the delivery of specialised modules.

#### **Merger**

In line with the recent Area-based Reviews, there are plans for the College to merge with an existing college group in London. Risks that we have considered at this very early stage include transfer of our HE provision to another college within the group; duplication of some provision resulting in course closure; transfer of key staff to another college and change of validating partner. However, the College considers the risk to its higher education provision to be minimal as the other colleges have different HE provision that complements our provision.

#### **Industrial Action**

There is a risk of disruption and loss of teaching time through industrial action. This has the potential to affect all students.

#### **Loss of validating partner**

We are currently validated by the Open University Validation Partnership who are growing their numbers of partners and we are not in direct competition with them for delivery. We were successful in our last institutional audit and review and received the maximum five year approval. We therefore consider the risk of the loss of validating partner as minimal.

**Failed re/validation of a programme**

The College has a suite of degree programmes which are validated by the Open University Validation Partnership. Each programme is revalidated every three to five years by the Open University. Although it is unlikely that a programme is not revalidated, it is possible for any validation event to fail and impact on the College delivering this programme.

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

Provisions are in place to relocate all existing provision to the remaining two sites with as little disruption to students as possible. Students will be kept informed at all stages. Financial investment is being made to the remaining two campuses and the risk of their closing is negligible. With the moderate risk of the new-build not being completed on time, the provision will remain at the existing campus for a further academic year. Both campuses are located within the same borough and are very well-served by public transport. Both campuses are accessible and have free student parking spaces.

**Staff Shortages**

In regard to staff shortages in specialised areas, we will seek to fill lecturer gaps as quickly as possible, by moving other current members of staff with appropriate skills and experience into the vacant post(s). This can be identified quickly through our HR department. In the short term, we will continue to use agency staff where appropriate or link with other institutions to address any staff shortages as a result of specialism. If we are unable to provide students with the modules that were agreed, students will be offered alternatives, however if this is unsatisfactory for them, the students will be referred to the College Complaints Procedure and the Refund and Compensation Policy. The College is looking at several succession planning strategies including the upskilling of existing staff both with higher level technical qualifications and management skills, engagement with graduate training programmes and encouraging stronger links with local employers to attract industry experts to facilitate practical learning in specialised subjects, particularly STEAM-related disciplines.

**Industrial action**

Where industrial action does occur, the College will seek to ensure that normal services are maintained as far as possible, and take all reasonable steps to fulfil its responsibilities to students in ensuring that any disruption is minimised and students are not disadvantaged by the action. This may mean workshops being arranged to support students.

**Failed re/validation of a programme**

Re/validations take part each year between January and April. All programmes which are due to be re/validated in a particular year will be advertised with a statement explaining 'subject to re/validation'. In the event that a programme is not re/validated and students have applied for the programme, the College will endeavour to find the student an alternative choice of study either at the College or externally. Students will be referred to the Refund and Compensation Policy as necessary.

### **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**

The College has a Refund and Compensation Policy which is currently awaiting approval by College Corporation. This is expected to be approved by the end of June 2018 and will then be published on the College website.

The College aims to deliver a high quality further and higher education provision, in line with the requirements of learners, employers, awarding bodies and, for HE programmes, the validating partner universities.

This policy applies to all College students, irrespective of the funding arrangements for their further or higher education programme, including:

- students in receipt of a tuition fee loan from the Student Loans Company
- students who pay their own tuition fees
- students whose tuition fees are paid by an employer or another sponsor.

#### **Subject to policy approval:**

Refunds will be made where it is necessary to close a class due to insufficient numbers or where the attendance of learners is made impossible or inappropriate by some action of the College. Should this action prove necessary, the refund will be processed as part of standard procedures, there should be no need to contact the College to request this.

In the event of a course closure, refunds will not be paid to those learners who have:

- voluntarily left the course
- not attended for a period of four weeks prior to closure without previously agreeing a period of planned absence with their course tutor.

For new students, the College will honour requests for a refund made in writing within 14 days of enrolment, where a student or their sponsor changes their mind and they withdraw from their programme of study, with the exclusion of short courses of less than one month.

Fees will not be refunded where course closure is temporary or due to circumstances beyond our control, including but not exclusive to fire, flood or other force majeure, adverse weather conditions, failure of public utilities or transport systems/networks, restrictions imposed by the government, terrorist attack or threat of, epidemic or pandemic disease, temporary staff absences or changes including those due to industrial action. This is the College's current position, however this will be reviewed in February 2019.

For a refund request in response to an issue or problem with a College course, the Complaints and Compliments Policy and Procedures should be followed. Initial contact should be made in writing to the Quality and Compliance team at the Ardleigh Green Campus or email [quality@havering-college.ac.uk](mailto:quality@havering-college.ac.uk). In each case, the student should explain in detail the issue/problem experienced and why they believe that they are entitled to a refund. As stated in the Complaints and Compliments Policy this must be done within 15 days of the issue/problem occurring to enable the College sufficient time to explore options for remedying the issue.

The Complaints and Compliments Policy and Procedures will be followed and if the issue/problem is substantiated the student may receive a refund if this is deemed the appropriate resolution, subject to the authorisation of the Director of Finance and Corporate Affairs (or his nominee). If the claim is not substantiated, the student can appeal, referring back to the Complaints and Compliments policy and procedures.

Financial compensation/refund will not always be the appropriate response to a complaint and it is unlikely that most issues will be resolved in this way. Alternatives to financial compensation might include an apology or goodwill gesture, an offer of alternative learning methods if the course cannot be delivered in the way it was originally intended or repeat delivery of the relevant course element may be offered, where possible.

### **Compensation**

Where it is necessary as a result of action by the College (such as course closure) for students to transfer to an alternative provider or there is a change in the location of the course (which was not notified to the student prior to the commencement of the academic year), the College will consider appropriate compensation for additional travel or other costs directly attributable to the non-preservation of continuation of study.

The College's priority will always be to ensure that students receive the education experience outlined in College course information (whether online or in hard copy format) and their learning agreement. Where, as a result of an investigation through the Complaints and Compliments Policy and Procedures, it is concluded that this has not been the case, appropriate financial or other compensation may be offered.

The College is cognisant of OIA guidance on considering whether it is appropriate to recommend compensation payments to higher education students for distress and inconvenience and the following guidelines will apply in such cases:

<i>Indicative Compensation Bands Distress and Inconvenience Awards for Higher Education Students</i>	
<i>Level of distress and inconvenience</i>	<i>Indicative compensation</i>
<i>Moderate</i>	<i>Up to £300</i>
<i>Substantial</i>	<i>Between £301 and £1,250</i>
<i>Severe</i>	<i>Between £1,251 and £3,000</i>

The above amounts are indicative only and any compensation payments will be determined by the specific circumstances applicable to the student. Guidance follows on levels of distress referred to:

**Moderate:**

- An act or omission of the College which has caused some distress and inconvenience in the short term (e.g. less than six months).
- Moderate delays (i.e. less than six months) or other procedural irregularities on the part of the College where there is evidence to suggest the student suffered material disadvantage.

**Substantial:**

- An act or omission of the College which has caused some distress and inconvenience in the long term (e.g. more than six months).
- Substantial mishandling of the complaint by the College which has resulted in or caused unreasonable or avoidable substantial delay (e.g. over six months) where there is evidence to suggest the student suffered material disadvantage.

**Severe:**

- Cogent and contemporaneous evidence to suggest that as a result of the College's acts or omissions the student has suffered from ill health.
- Major maladministration, procedural flaws, delays or other breaches of natural justice in the College's internal process resulting in material disadvantage to the student.
- Where there has been a clear material disadvantage to a student as a result of the College's acts or omissions, but a practical remedy is inappropriate or impossible.

The College will incorporate provisions within its annual budget for the potential payment of tuition fee and other refunds and compensation payments to students. A combination of cash reserves and (where appropriate) insurance policies will be designated for those students where an increased risk of non-continuation of study has been identified. Arrangements will be developed during 2018 (in consultation with the College's selected merger partner following the conclusion of the strategic options review) and will be in place by August 2019.

Given the extent of national policy and strategic change for both the sector (including qualification review and reform, regulatory change, devolution of adult education budget funding to combined mayoral authorities, College insolvency regime and apprenticeships) and the College (anticipated confirmation of new merger partner in 2018), this policy is subject to a further review in February 2019.

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

We will publicise the Student Protection Plan to current and future students on our website with our other higher education policies and procedures.

We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes by publishing our plan on our staff intranet and summarising this policy in our staff newsletter.

We will inform our students if there are to be material changes to their course by writing to them as soon as we become aware of any changes.

We will hold meetings with affected students and offer them support collectively and individually. We have an independent HE student advisor who can provide support to students.

We will review our Student Protection Plan on an annual basis, in the summer term, in our higher education committee which includes HE students as members.

This Student Protection Plan has been approved by SLT and feedback has been received by Corporation.