

## Annex D: Template for a student protection plan

Provider's name: City College Norwich

Provider's UKPRN:10004772

Legal address: City College Norwich, Ipswich Road, Norwich NR2 2LJ

Contact point for enquiries about this student protection plan: Jerry White, Ed Rose

### **Student protection plan for the period 2019/2020**

#### **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**

For the purposes of the Student Protection Plan, we have categorised medium and significant risks into six main areas, with the potential risks highlighted within these sections being described in more detail within the narrative.

#### Scenarios with Medium / Significant risk, requiring mitigation

Risk 1. - Failure to effectively maintain Estates, Infrastructure, IT and Business continuity.

Risk 2. - Relationship with partners and stakeholders

Risk 3. - Failure to recruit students onto programmes

Risk 4. - Failure to recruit specialist teaching staff

Risk 5. - Potential for loss of the professional recognition required for some courses

Risk 1. - Failure to effectively maintain Estates, Infrastructure, IT and Business continuity.

Around this risk heading we have identified the following potential risk to students: -

- a. The area review into Norfolk and Suffolk FE colleges, published in August 2017, (see <https://www.gov.uk/government/publications/norfolk-and-suffolk-further-education-area-review-report>) recommended that CCN explored with Easton and Otley College the scope for collaboration in several key HE curriculum areas. Following this review, the two institutions have commenced discussions which could result in a decision to co-locate some, or all, of our Higher Education provision. There is a risk to continuity of delivery within the next three years should work to co-locate some or all of our Higher Education provision at a Higher Skills campus come to fruition. This project, which remains at scoping stage, would look to move CCN HE facilities from our Ipswich Road campus and Norfolk House facilities to a shared location with Easton and Otley College outside of the City centre. Specific risks to the provision of facilities (classrooms, IT and buildings) as well as transportation are identified in the planning stage. Risk would be more likely to impact on students with lower incomes and those for whom the additional travel time may represent an additional barrier to participation.

NB For clarity, no decision to move ahead with this project has yet been made, and courses delivered at the International Aviation Academy – Norwich campus, namely the BSc (Honours) Professional Aviation Engineering Practice degree, will not be affected.

Risk 2. - Relationship with partners and stakeholders

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- a. All Foundation and Bachelor degree programmes at City College Norwich are validated through an established partnership with the University of East Anglia (UEA). Although the likelihood of this is low should the UEA decide not to continue this partnership then all validated provision would be at risk.
- b. The BSc(Hons) Professional Aviation Engineering Practice is delivered in partnership with KLM UK Engineering. Should KLM UK Engineering withdraw from this partnership there would be a significant risk which would impact on all students on this programme. There is no local alternative provision and CCN do not hold the required EASA (European Aviation Safety Agency) approval to deliver this element of the programme.

Risk 3. - Failure to recruit students onto programmes

- a. CCN is no longer able to deliver courses to students in one or more subject areas and/or departments due to poor recruitment onto programmes, affecting applicants to these courses.

Risk 4. - Failure to recruit specialist teaching staff

- a. CCN is unable to retain or recruit staff with specialised skills affecting our ability to deliver particular modules within a limited number of technical subjects (HND Mechanical Engineering / HND Electrical Engineering / HND Construction and the Built Environment (Civil Eng.) / HND Construction and the Built Environment). This would affect students on these programmes only.

Risk 5. - Potential to lose professional recognition for some courses.

- a. CCN loses professional recognition (CMI, Early Years Educator Status, etc) for relevant programmes, impacting negatively on students seeking this recognition.

Scenarios identified as Low Risk, which require no further mitigation: -

• **KLM UK Engineering loses Regulatory approval to deliver EASA courses / examinations.**

KLM UK Engineering are routinely audited via the Civil Aviation Authority - UK, on behalf of EASA, and have held approval for a significant period (more than 20 years) so the loss of their approval, following a serious breach of the EASA regulations, is deemed extremely unlikely.

• **CCN loses validation for one or more of its courses.**

Courses are validated (through UEA) for five year periods, and given the good and long-standing contractual partnership between our two institutions loss of validation within the period is deemed extremely unlikely. Revalidations are approved through the UEA via a revalidation process, with input throughout from the validating partner, with an iterative process to achieve approval. UEA academic links are embedded into course committees to provide the necessary oversight and ensure standards are maintained.

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- **CCN are no longer able to recruit international students, through loss of Tier 4 approval, affecting the limited number of international students that study with CCN.**

No International students are currently enrolled. However, there is an expectation that we may have 4 for academic year 2018-19. Currently we have approval to take a maximum of ten Tier 4 students. Therefore, risks and impact are deemed minimal given the number of students involved. Furthermore, CCN has held Tier 4 approval since 8th December 2008, demonstrating confidence by government in our processes to track these students.

- **CCN are no longer able to deliver material components of one or more courses where areas of particular vulnerability exist, such as single person dependencies for teaching.**

Effective staff recruitment is used to limit this impact. As we do not offer extremely niche programmes, the risks of not being able to recruit are relatively low, with existing staff able to cover across modules / courses limiting risk. Partnership working across the New Anglia Colleges Group (including Easton & Otley College, West Suffolk College, College of West Anglia for example) provides scopes to find short-term cover options.

- **CCN are no longer able to deliver one or more modes of study to students, particularly considering withdrawing a mode of study.**

Any risk to modes of study would be captured within risks to the course delivery as a whole, as courses are delivered either solely on a full-time basis / or solely on a part-time basis (e.g. no degree programme is delivered with different modes of study). UEA / CCN Partnership commitments to "teach out" programmes protect existing students in these cases.

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

Risk 1. - Failure to effectively maintain Estates, Infrastructure, IT and Business continuity.

- a. **Potential move of facilities from Main campus / Norfolk House, as part of HSC project, within the next three years, causing disruption to students.**

As described above, this is still in its infancy with no decision to move ahead with the movement of facilities, and no funding in place. However, if it were to proceed we envisage that the facility would open to students for the 2020/21 academic year at the earliest. Plans will be in place to consult with the student body about these changes and inform decisions made regarding the new campus. Any proposed move will be scheduled to minimise disruption to current delivery and students. A full review of the student impact will take place prior to any move, with student involvement.

Risk 2. - Relationship with partners and stakeholders

- a. **CCN lose validation for all its courses, through termination of partnership arrangements with its sole validating partner, UEA.**

At an institutional level, our validating partner (UEA) approves CCN to deliver degree programmes over a five-year term, and monitors this via institutional reviews to ensure that quality of provision is maintained. The UEA

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/ CCN Partnership agreement embeds protection of students by stating that if either party wishes to terminate, unless there is a material breach of contract which cannot be remedied, that they must provide a minimum of 12-months' notice, provided that such notice will take effect only at the end of an academic year.

If, for whatever reason, the decision to end the partnership was taken, CCN would have an appropriate period to either seek other validating partners, or to apply for Degree Awarding powers. In circumstances where UEA had decided to end partnership arrangements we are confident that they would help CCN to find alternative arrangements.

We feel that the positive and long-standing nature of our partnership with UEA mitigates against this risk, with options available to CCN in the worst case of seeking alternative arrangements, meaning that the underlying risks to students in this case are low.

- b. **If KLMUKE were to exit the partnership this would create a significant risk to the delivery of the BSc (Honours) Professional Aviation Engineering Practice degree, affecting all students on this programme of study, given that there is no alternative provision in the local area, and that CCN do not hold the necessary EASA (European Aviation Safety Agency) approval to deliver EASA-regulated content.**

These risks are mitigated via an agreement in place between the partners of the International Aviation Academy Norfolk. This agreement ensures initial continuity of delivery and resources over the duration of the first five years of development with a view to extend as provision expands.

A key feature of this programme of study is that KLM UK Engineering hold an EASA (European Aviation Safety Agency) approval, meaning that students on these courses receive professionally recognised qualifications alongside their degree programme. Were KLM UK Engineering unable to continue to deliver the EASA element of the programme then CCN would make arrangements to ensure continuity for students. Any exit would be managed under an agreement with KLM to maintain delivery until such time as CCN obtained its own EASA Part147 approval. The process for obtaining this approval has already been explored and discussions have been undertaken with FE Colleges where this approval is already in place.

### Risk 3. - Failure to recruit students onto programmes

- a. **Failure to recruit sufficient numbers of students to make programmes viable.**

Given existing contractual commitments (with our validating partner, UEA) to "teach out" any existing courses, this will only impact on prospective applicants, in cases where recruitment is insufficient onto first year programmes to make running individual courses viable.

We will limit this likelihood through effective marketing of courses and using our well-developed school liaison system. This includes relationships with all secondary schools in the region, including those which are part of the wider TEN (Transforming Education in Norfolk) Group

Our Curriculum planning process is thorough and rigorous with robust financial modelling of curriculum income and associated costs, to provide scope for early decisions on whether to run programmes, to allow prospective students to make informed decisions. We will ensure that decisions on whether to run courses are given to prospective students in a timely fashion in line with UCAS schedules and where necessary we will endeavour to help them to find suitable alternative options.

Continued active employer engagement in the development of our HE curriculum will ensure that programmes continue to be relevant to the needs of both employers and students, leading to good employability.

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We are an active member of the Network for East Anglian Collaborative Outreach Project, and our recruitment data points to the success of these programmes in attracting underrepresented groups into HE.

Risk 4. - Failure to recruit specialist teaching staff

**a. Potential Staff/Skills Shortages affecting our ability to deliver particular modules within more technical subjects (HND Mechanical Engineering / HND Electrical Engineering / HND Construction and the Built Environment (Civil Eng.) / HND Construction and the Built Environment). This would affect students on these programmes only**

Certain more specialist modules can be harder to recruit into, due to the more limited number of potential applicants and the potential pay differentials between industry and higher education. As we do not offer extremely niche programmes, the risks of not being able to recruit are relatively low, and staffing contracts limit the scope for staff to leave at short-notice allowing for recruitment, without any impact on students. In cases where despite our best efforts we were still struggling to find replacement staff, we would work with other colleges within the New Anglia Colleges Group for potential short-term cover options (Easton & Otley College, West Suffolk College, College of West Anglia for example), during recruitment.

If we did find that salary differentials were the significant factor limiting our ability to recruit in more specialist areas, we would look to offer additional incentives in these subjects / skills compared to other course programmes.

Risk 5. - Potential to lose professional recognition for some courses.

**a. A small number of our programmes of study are approved by professional bodies such as the Chartered Management Institute or carry with them professional status (such as Early Years Educator Status)**

Professional-recognition in the case of our courses is typically a mapping exercise of our course to a professional standard (e.g. CMI), so in these cases loss of professional recognition is unlikely. If, for example, CMI were no longer operating, we would look to map our courses to alternative professional bodies, such as the Institute of Leadership and Management.

Courses which carry with them professional status, such as Early Years Educator Status, on the BA (Honours) Childhood Studies, have been mapped and approved by the Government against the Early Years Educator criteria. If we were to revalidate programmes that carried similar status, following changes to the programme specification, a further application would be required to maintain the professional status attached to the course.

### **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**

Please see below link to City College Norwich's refund policy which demonstrates how we ensure: -

- refunds for students in receipt of tuitions fee loan from the Student Loans Company.
- refunds for students who pay their own tuition fees.
- refunds for students whose tuition fees are paid by a sponsor.
- the payment of additional travel costs for students affected by a change in the location of their course.
- compensation for maintenance costs and lost time where it is not possible to preserve continuation of study.
- compensation for tuition and maintenance costs where students have to transfer courses or provider.

(We attach a draft version of our Rules and Regulations 2018/19, as part of our submission, with the Refund and Compensation section (red text) having been approved by Academic Management Board Chair's action, with the rest of the document subject to corporation approval before publication)

Our most recent published accounts (2016/17 Financial year) show cash reserves of £7.11m which would be sufficient to provide refunds and compensation for those students for whom we have identified an increased risk of non-continuation of study.

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

We will publicise our student protection plan and our Refund and Compensation Policy to current and future students through student handbooks, the College website and via Blackboard, our virtual learning environment (VLE).

We will ensure that staff are aware of the implications of our student protection plan when they propose course changes through the structure of the proposal documentation.

We will review our student protection plan through regular HE Student Forums (which take place termly) and School of HE Management meetings, which feed into Corporation meetings.

Our students will be involved in our review through HE Student Forum representatives and through wider consultation via surveys and the HE newsletter.

We will inform our students if there are to be material changes to their course through Course Team meetings, the VLE, emails, letter and via their Student Representatives.

We will give students a minimum of 14 days' notice when we need to make material changes to their courses

If we need to implement the measures in our student protection plan we will carry out consultation in through the HE Student Forum, post information on the VLE and inform students through lines of communication such as emails and letters to support students collectively and individually.

We will put in place an action plan incorporating student access to individual advice and guidance to ensure that our students have access to independent advice if we need to implement the measures in our student protection plan, both collectively and individually.