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Student protection plan for 2024/25

The Office for Students requires all registered providers of higher education to publish and follow a student protection plan in order to inform students of any risks that may affect the continuation of their studies. This plan is intended to provide assurance to both our current HE students and prospective HE students, that Gloucestershire College has put in place arrangements to protect the continuation of their studies. Our Higher Education Student Protection Policy outlines the principles and priorities that the College will follow when supporting and protecting student interests in the case of material changes or course closure.

1. ***The following is a summary of our current assessment of the range and level of risks to the continuation of study for our HE students.***

    The risk assessment scale used below is as follows:

Highly unlikely	= < 10% chance of occurring in a 3 year period
Unlikely	= 10%, <50% chance of occurring in a 3 year period
Likely	= 50%, <80% chance of occurring in a 3 year period
Highly likely	= >80% chance of occurring in a 3 year period.

    1.1 Risk: the College as a whole is no longer able to operate or has decided to cease operating. The risk of financial failure resulting in the College as whole being unable to operate is considered to be 'highly unlikely' for the following reasons:

    a. The College had reserves of £45m in 2022/23
    b. The College generated a positive operating profit (EBITDA) in 2022/23
    c. The College was assessed by the ESFA to be in 'Good' financial health in 2022/23
    d. The College's latest 3-year financial forecast, indicates the College will maintain its 'Good' financial health grade through to 2025/26
    e. The College has a Reserves Policy to hold sufficient funds to ensure that main operations can continue for at least 2 months

    1.2 Risk: loss of validation for one or more of its courses
    The risk of loss of validation for the College's HND/HNC course is 'highly unlikely'
    The risk of loss of validation for the College's other HE course is considered 'unlikely'

The College operates a comprehensive and embedded academic governance framework that ensures that the appropriate checks, controls and systems are in place to prevent circumstances or deficiencies that would lead to any such occurrence. This includes a Board of Governors, a Curriculum and Quality Committee of the Board of Governors, College Executive Meetings, HE Strategy Group and HE Practitioners' Group. In additional the College's agreements with partnership universities, ensures robust annual monitoring and the early identification of any issues or concerns.

Validating/ Awarding Body	Courses	Risk Assessment	
Pearson	All HNC/HND courses	Highly unlikely	Pearson is a national awarding body for our Higher National Certificates and Diplomas. There is no on-going risk of removal of validations. Changes to qualifications are always arranged to include 'teaching out' current cohorts of students. Quality standards are monitored through Annual Programme Monitoring Reports. Any partnerships with organisations delivering HNs on our behalf are subject to thorough QA processes and we have contingency plans in place to teach out.
University of Gloucestershire	Therapeutic Counselling (Levels 4 and 5)	Unlikely	UoG stated priority focus to facilitate teaching out in the event of a failure of academic partnership. Termination of the Partnership Agreement must comply with terms to ensure that any remaining students are able to complete their studies. Quality monitoring takes place at two Exam Boards each year which mitigate any potential problems.
University of West of England	Degree in Electronic and Computer Engineering /Degree Apprenticeship Product design	Unlikely	Partner Module Reports available to External Examiner, which informs Programme Report. University Link Tutor input to UWE Programme Leader and Partnership Board. Partnership Lead Report also considered by Partnership Board. Exam Boards are held at least twice a year to monitor quality and mitigate any potential issues. These meetings also incorporate collaborative partnership meetings.
	Degree in Product Design/Degree Apprenticeship	Unlikely	
	Cyber degree apprenticeship	Unlikely	

1.3 Risk: one or both of the campuses at which we deliver HE courses to students is no longer available.

The risk that either Gloucester campus or Cheltenham campus is no longer available is assessed as 'highly unlikely'.

The College delivers HE courses from its Gloucester and Cheltenham campuses. The campuses offer a range of courses including further education full time, part time courses for 16-18 year olds and adults, as well as apprenticeship courses and Higher Education programmes.   Both campuses continue to be vibrant and sustainable, based on a local model of delivery.   The College's estate strategy focuses on the continuation of both campuses which are well-placed, modern and efficient buildings. There are no plans the foreseeable future to change this focus. Transport links between the campuses are very good.   HE courses have been positioned at either campus on the basis of providing specialist equipment and accommodation, and curriculum based 'centres'.

Provision of HE courses over the 2 campuses continues to meet student needs in terms of the range of curriculum.   There may be occasions when there is a need to re-locate a course from one campus to another.   The risk that this might happen for one or more courses, is assessed as likely over the next 3 year period.   This is partly due to the variable nature of student demand, but also the unpredictable political and financial environment in which the College operates. The College seeks to provide curriculum plans which meet the needs of a wide range of students both FE and HE.

1.4 Risk: the College is no longer able to deliver courses to our students in one or more subject areas and/or departments
The risk that the College is no longer able to deliver courses to our students in one or more subject areas is assessed as 'unlikely'.

Our HE offer has developed over time and meets the needs of our progressing level 3 further education learners, and the needs of adults moving into the development of higher level skills as part of personal and professional development.   Our Higher National courses offer progression and transition to work or further HE study.   Our HE curriculum offer as a whole is reviewed annually and courses may be changed within a timescale to ensure teaching out.   The College's plans are based on a local delivery model – over 90% of HE students live within 30 miles of the place where the curriculum is delivered. The subject areas of study remain viable. Any quality issues are addressed via our embedded academic governance framework and will feed into this annual review process.

1.5 Risk: loss of key staff which results in the College no longer being able to deliver one or more courses or material components of one or more courses to our students.

The risk that the loss of key staff results in the College no longer being able to deliver one or more Higher National courses or material components of one or more Higher National courses is assessed as highly unlikely. The College is a large general further education college. Our Higher National qualifications are delivered by academic teams of staff. For all the relevant areas of delivery, the College has sufficient staff to cover staff absence, or unexpected loss, whilst maintaining the quality and standard of academic delivery.

Assessment of the College's other HE programmes indicates that the risk that loss of key staff results in the College not being able to deliver one or more courses or material components of one or more courses to our students is unlikely. The College

has however taken mitigating action to reduce this risk further, as detailed in section 2 below.

1.6 Risk: the College is no longer able to deliver courses which meet the diverse needs of students

The risk that the College is no longer able to deliver courses which meet the needs of students in the local community, in employment, from low income backgrounds, of wide range of ages and with a wide range of additional support needs, is <u>unlikely</u>.

The College offers HE courses in engineering, construction, early years, business, counselling and teacher training according to timetabled sessions and delivery methods which meet the needs of students who combine study, working and professional lives. Courses are designed with part time options including evening, weekend or specific one-day a week sessions. Delivery methods also utilise e-learning to improve access.   The substantial number of employer sponsored students in engineering and construction means that the College plans year-on-year to provide certainty with regard to college sessions and will always consult with regular sponsors before introducing changes.

The College has substantial experience in supporting learners with high needs through FE provision. The College is committed to increasing the overall rates of progression from our level 3 learners to HE study, and will, in particular continue to support students with additional needs to enable a successful transition.

College analysis identifies that over 45% of our HE students come from low participation neighbourhoods (as defined by POLAR4 quintiles 1 &2). The College has detailed data analysis available, and will have regard for the profile of enrolments on each programme to ensure that consideration is given to any decisions which might impact the continuation of study for students. The College will also look to support the strategic aims of the sector to increase the access, attainment and progression rates for HE students.

1.7 Risk: the College is temporarily unable to deliver one or more courses or material components of one or more courses.

The risk that the College is temporarily unable to deliver one or more courses is assessed as <u>likely</u>.   The temporary inability to deliver could be the result of unexpected conditions or unforeseen circumstances which could include staff sickness, a failure of IT systems or equipment, industrial action or disruption which prevents access to College buildings for students or staff. The College has identified mitigating actions to reduce the risks of disruption to students. These include the development of 'on-line' resources at course level which will ensure continued learning in the event of a temporary absence of face-to-face planned teaching. Other mitigations are covered in section 2 below.

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

The College assesses that overall, the risk of non-completion of teaching delivery of an HE programme is highly unlikely. As part of this assessment the College has put in place a HE Student Protection Policy, which will be regularly reviewed by the Curriculum & Quality Committee of the Governing Body. This policy identifies the principles that will be applied to protect student and applicant interests.

As part of the College's curriculum review process, there may be occasions when a course is re-located from one campus to another. In the event that the College decides to relocate a course, it will follow the HE Student Protection Policy, which states that this will be organised to have minimal impact on students and will usually only be considered as a possibility at the beginning of an academic year. The College will use best endeavours to give 6 months' notice of any such change. The College will always consult with students with regard to their individual circumstances, backgrounds and needs. This will inform any such decision. The College's Tuition Fee Policy which includes details on refunds and compensation will apply. The College benefits from campuses at Gloucester and Cheltenham which are only 8 miles apart, with very strong transport links.

Assessment of the College's HE programmes indicated that it is unlikely that the risk of the loss of key staff will result in the College no longer being able to deliver one or more courses, or material components of one or more courses, to our students. However in order to further reduce that risk, the College has appointed a number of graduate trainees in specialist areas to provide cover and ensure a future supply of skills and expertise to ensure that the risk does not materialise.

The College recognises an increasing risk to the College's IT infrastructure and systems from cyber related threats. As part of the College's Data Protection and IT Security Policy, a number of technical and organisational measures have been identified to reduce the risk of non-availability of service, or data breach which could impact the student experience. These include but are not limited to:

i. Network security and vulnerability assessments; including appropriate firewall and network segregation.
ii. Secure configuration of college systems using secure industry standard operating systems for network configuration, user access and directory permissions.
iii. Automatic virus and malware protection
iv. Management of user privileges and access controls
v. Incident Management – including a Business Recovery Plan and a specific Cyber Incident Response Plan
vi. Internal monitoring and reporting of activity and threats.

The protection of the College's IT system is also monitored by the College's Audit Committee with the support of external assessment to identify any emerging vulnerabilities and act accordingly. In the event of IT infrastructure failure, there are procedures in place to assess the nature and likely impact of any such failure, before action is taken to restore access or functionality to students and staff, as soon as possible.

It is recognised that industrial action can be disruptive to academic delivery. The College assesses that this risk to our students is unlikely to materialise. The College has experienced two separate one day events of industrial action over the last 7 academic years (Nov 2015 and Feb 2016). The number of staff involved represented approximately 3% and 4% respectively of college staff by headcount.

In the event of a major incident, the College has Business Recovery Plan in place which is tested and audited by the College's Audit Committee. This includes clear roles and

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responsibilities for key staff who focus on protecting people from harm and protecting critical infrastructure.   In these circumstances the College will assess and enable the resumption of teaching accordingly, in order to minimise any disruption to students.

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's Tuition Fee Policy includes a full section on HE refunds and compensation.   It makes reference to the guidance issued by the Office of the Independent Adjudicator (OIA) and the need to consider individual circumstances, within the framework of the policy.

The College assesses that its level of reserves is more than sufficient to support any potential compensation awards which are made in line with the Tuition Fee Policy.

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

The Student Protection Plan will be published through the College's student intranet which is accessible by all current students.

It will also be published on the College's website as part of a suite of governance policies, to ensure that it is accessible to prospective students and any member of the public who wish to support them.

The Student Protection Plan will be reviewed annually by the HE Strategy Group as part of the College's HE curriculum review cycle. At this time risks will be reviewed and any new emerging risks will be assessed. Where risks are assessed as likely or highly likely, mitigating actions will be identified, approved as necessary and outlined in a revised Student Protect Plan. The College's Risk Policy will apply.

The Student Protection Plan will be accessible to all staff via the College's O365 SharePoint site. It will also be formally distributed through the HE Practitioners' Group. Student Support Services will be updated and trained in the content of the Plan and the associated HE Student Protection Policy.