

RTC Education Ltd
t/a Regent College Higher Education (UKPRN 10008455)

Office for Students Registration Submission

Student Protection Plan



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

Please provide an evidenced statement of your assessment of the range and level of risks to the continuation of study for your students.

Introduction

1. Regent College Higher Education (the College) recognises that students investing significant time and money in their higher education are entitled to be confident that their provider will treat them fairly, deliver the course chosen and have adequate contingency arrangements in place if that ceases to be possible.
2. The College's assessment of risk to the continuation of study for students takes into account that its HND programmes are two years in duration. Students starting these programmes in September 2019 will be expected to graduate at the end of 2021. Only students who have interrupted their studies or who need to resubmit elements of their assignment work might sit outside that time frame.
3. It should be noted that students enrolled on the Buckinghamshire New University (BNU) BA (Hons) Top-up, which the College delivers under a franchise agreement, will be covered by the BNU Student Protection Plan. However, any potential issues that might come up in relation to campus closure or external disruption, would most likely be dealt with by the College in the first instance, in consultation with BNU.

College closure

4. The risk that the College as a whole is unable to operate is assessed as **extremely low**. This is because its financial performance is monitored and audited internally and the College has had to provide audited, annual financial performance figures and forecasts to HEFCE as part of its Financial Sustainability Management and Governance submission to renew its Course Designation since 2014. This process of internal and external audit of financial performance confirm the College as a going concern. The College has cash reserves of £3.67m and has business continuity plans in place to deal with any potential financial issues and ensure that in the unlikely event of a decision being taken to close the College, this would be phased in order to enable teach out of all existing HND programmes. In its ten year history, RTC Education has had no bank overdrafts or bank loans.
5. There is a **medium risk** associated with the directorship of the organisation as both directors are family members and therefore any event or accident that poses a risk to life or severe injury may affect both parties simultaneously. To mitigate this risk the directors have prepared a will including a business continuation plan with permitted bank signatory details and devised a business contingency plan in the event that the CEO and MD are incapacitated or pass away.

Campus Closure

6. The risk of the College having to close part or all of any of its campuses has been assessed as **low** because it undertakes regular safety audits, planned maintenance and regular testing of alarm systems to ensure that the fabric of buildings is fit for purpose. The leases are also long.

7. The lease on the Madison House Campus, where the HND is delivered, is not due for renewal until 2024 so there is no imminent risk attached to any renewal process and is covered by the Landlord & Tenant Act and thus the College has the ability to renew without landlord objection. Additionally, a factor that strongly mitigates against this risk is that Regent Group owns or leases 4 other educational buildings and other property in the North West London area. This would ensure that in the unlikely event of the College having to move HND provision away from its Madison House Campus, any disruption to students and additional travel costs would be minimised. The lease for Masons House, which is approved by Pearson for HND delivery and SLC funding, runs until 2027.

Course Closure

8. The College has procedures in place in the event of it deciding to close a course. At present there are no plans to close its HND course for either strategic or recruitment reasons. Current recruitment targets are consistently met, therefore the risk of this occurring has been assessed as **low**. In the event that the College decides to close its HND course it would do so in a phased manner to ensure all students could be taught out.

Course Variation

9. The College consistently aims to deliver programmes in accordance with the descriptions in its published prospectus. The most likely reason for the College having to make changes to courses 'in-year' would be the unexpected loss of a number of staff. The risk of the College having to make changes to a student's programme of study because it is no longer able to deliver material components is **low**. This is because all modules are taught by integrated teams of academic staff and the College is not reliant on single highly specialist members of staff to deliver any one part of the programmes.

Course Designation

10. The risk of the College losing its Course Designation for student support purposes has been assessed as **very low** as it has a consistent track record of achieving all quality measures required by QAA and was awarded an assessment of commendable progress in its most recent QAA Annual Review (Dec 2017). The College also has an established track record of successfully achieving all Financial Sustainability, Management and Governance criteria in its annual renewal of Course Designation with HEFCE.

Course Validation

11. The assessed risk of the College losing its validation with Pearson for its HND programme is **low**. The College has an excellent track record of successfully meeting all Pearson quality requirements through the Annual Monitoring Review process and at External Examiner visits with No Action Required. In addition, the College has been able to respond successfully to any Pearson unannounced, thematic spot-checks on matters such as attendance and registration. The Bucks New is a new franchise agreement and progressing well.

Tier 4 Sponsorship Status

12. Whilst the College has a Tier 4 sponsorship licence, at the time of this submission to the OfS, it has no overseas students studying on its programmes

External Disruption

13. Although the likelihood of disruption to College activity brought on by external factors occurring is slight, the fact that its campus is in a major capital city where external or internal events could result in term-time programme disruption is a possibility. Such events could include:
- Industrial action
 - External environmental incidents
 - Large scale public health incidents
 - Terrorism incidents – lower risk outside central London
- The College would consider whether it is practicable to make changes to programme delivery, rather than closing or suspending an affected programme.
14. Whilst it is highly unlikely that the College itself would be affected by internal industrial action, it is possible that the College and its students may be unduly affected by industrial action by a third party, for instance during a prolonged Tube strike. Similarly, ongoing public monitoring of environmental and public health issues usually ensure that significant disruption to students completing their programmes is highly unlikely.
15. The College is familiar with the guidance issued by the Metropolitan Police regarding potential terrorist incidents in London and has assessed the potential risk of short-term disruption to institutional activity from such an incident as moderate, due to the College's proximity to Wembley Stadium. The College also recognises that such an incident may have disproportionate effects on individual students and staff.

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

Please provide an evidenced statement of the measures you have put in place to preserve continuation of study for your students in those areas where you consider the risk to be increased.

Introduction

16. The College recognises the importance of mitigating identified risks and of reassuring its stakeholders that contingency measures are in place.

College Closure

17. If the College finds itself in a position where it has no option other than to close, it would consider measures such as those below to protect the position of its students:

- where possible, the primary objective would be closing in a phased manner, over a period of time that would allow current enrolled students to complete their studies at the College;
- in a situation where this is not possible, the College would support students to transfer to appropriate/equivalent programmes provided by other providers. The College is in the process of arranging memorandums of understanding with a number of Colleges that deliver the same Pearson HND in Business, which commit each institution to take some or all of the others HND students in the event of that institution closing or being unable to complete the students programme of study.
- the College (where appropriate financially) would look to compensate students if, because of the change to the location of their studies, they suffer demonstrable material financial loss, for example through additional travel costs;
- alternatively, it may explore the possibility of merging with another provider in order to maintain all or part of the current provision.

Campus Closure

18. In the event that part or all of a campus is rendered unusable for activities involving students, the College would usually consider remedies such as:

- relocating provision to an alternative location; this may include utilising other property used by Regent Group or hiring spaces for programme delivery (where possible nearby, but definitely in North West London); we have good relations with local FE colleges so could identify classroom space; we also have links with the local council;
- rescheduling the timetabled hours to allow all of the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of usual planned hours. Where such an approach is taken, appropriate consultation would be conducted with students and stakeholders who may be affected;
- delivering part or all of programmes through alternative means, such as distance learning. Where such an approach is taken, the College would consider whether this is appropriate for students affected; the College also has access to an interactive platform, Zoom, over which lessons can be delivered.

- In the event that any student may not be able to move their studies to an alternative location, or engage with alternative modes of study for credible and demonstrable reasons, the College would consider where appropriate possible refunds if a student had to change providers or compensating a student if, because of disruption to their studies, he/she suffers demonstrable, financial loss.
19. In the event of the College having to close significant parts of a campus it would adopt a strategy of employing a combination of the methods outlined above.

Course Closure

20. In the event of the College deciding to close the HND programme, the effects would be mitigated by:
- closing the course over a phased period to enable students to be taught out;
 - timely communication with all current students affected by this decision, and assurance that they will be able to complete their studies at the College;
 - additionally, where possible, provision will be made to allow for students to complete their studies where 'mitigating circumstances' have been presented or an interruption of studies has been requested;
 - possible future applicants will be notified, allowing time for them to apply for an alternative programme of study;
 - in the event of individual students not wanting to complete their programme of study at the College during any teach out period, or the College having to close the programme before teach out was complete, it would employ measures outlined above to facilitate student transfer to other providers to complete their studies.

Course Variation

21. The College would mitigate the risk of having to make changes to student programmes due to the loss of key staff and minimise disruption by:
- filling any gaps in staffing as quickly as possible;
 - deploying other current members of staff with appropriate skills and experience into any vacant post(s) or recruiting externally as quickly as possible.
22. However, in the event of the College having to make major in-year changes to course content it will ensure that:
- any changes are restricted to the minimum necessary to achieve the required quality of student experience;
 - affected students are notified and consulted in a timely and appropriate manner;
 - it works with students to ensure that any revised offer is still acceptable;
 - where necessary, students are given the opportunity to withdraw from the programme;
 - if required, students will be offered every reasonable support to transfer to another programme, or provider;
 - in the event that any student finds the revised offer unacceptable or is not able to move their studies to an alternative location, or engage with alternative modes of study for credible and demonstrable reasons, the College would consider, where appropriate, possible refunds if students had to change providers or compensating students if, because of disruption to their studies, they suffer demonstrable, material financial loss.

Course Designation

23. In the unlikely event of the de-designation of its courses for 'Student Support' purposes (resulting in the withdrawal of statutory student finance) the College would take reasonable steps to minimise the resulting disruption to students by, for example:

- working with relevant regulatory bodies to allow enrolled students to complete their programme;
- where the above is not possible, supporting students to transfer to appropriate programmes at other providers and, if appropriate, refunding and/or compensating students where they suffer demonstrable, material financial loss because of disruption to their studies;
- supporting students by providing any evidence required to facilitate the continuation of their studies with another provider;
- in the event that some students are not able to move their studies to another provider, or suffers demonstrable, financial loss from doing so for credible reasons, the College would consider, where appropriate, possible refunds or compensation to students if, because of disruption to their studies, they suffer demonstrable, financial loss;
- explore the possibility of merging with another provider to maintain all or part of the current provision.

Course Validation

24. In the event of the College losing validation through Pearson, the College will consider measures to protect student experience, such as those listed below:

- working with the awarding body/validating partner to ensure students could complete their programmes prior to the validation/approval being withdrawn;
- providing assistance to any affected students to switch to a different provider who holds the relevant accreditation, as outlined above;
- exploring the possibility of finding a new franchising partner or alternate programmes

Tier 4 Sponsorship Status

25. In the event of suspension of the College's Tier 4 Sponsor status, it 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 any enrolled students to complete their year of study/programme;
- allowing any students already in receipt of a VISA based upon an allocated CAS from the College to enrol and commence their studies;
- offering any students who have not commenced their travel to the College, the opportunity to postpone their application pending the resolution of the suspension.

26. In the event of a revocation of its Tier 4 Sponsor status, the College would provide all reasonable assistance to any affected students to switch to an alternative sponsor.

External Disruption

27. In the unlikely event of disruption of institutional activity through external factors the College will usually seek to:

- ensure that normal operations and services are maintained as far as possible. This may also include taking actions outlined in relation to partial campus closure above;
- 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;
- in the event that the external event may be traumatic for students, to offer one to one support internally or referral externally for any students who may be disproportionately affected by any such event.

28. In the event of a significant terrorist event in London which impacted upon the College, it would:

- ensure that normal operations and services are maintained as far as possible. This may also include taking actions outlined in the section addressing closure or partial closure of the campus, above;
- offer one to one support internally or referred externally for any students who may be disproportionately affected by any such event;
- in the event that a student or students are not able to return to the College after a terrorist event, it would consider implementing measures outlined under the closure of the campus.

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 link to or provide a copy of your refund and compensation policy and ensure that it makes provision for:

- *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.*
- *commitments to honour student bursaries.*
- *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.*

Refund and Compensation Policy

29. The College Tuition Fee Refund and Compensation Policy has been designed to address each of the scenarios above and can be accessed here: <http://www.regentcollegelondon.com/our-college/policies>

Cash Reserves

30. The College has cash reserves of £3.67m 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. The College is also conscious about its fixed and variable cost of running its operation and an appropriate balance is maintained to deal with such situations. The financial discipline of Regent Group is to maintain profitability in the region of 15%-16% to enable the College to utilise the retained revenue reserves for any such purposes.

Insurance arrangements

31. The College will put in place insurance/factoring arrangements for an appropriate amount to provide refunds and compensation for those students for whom we have identified an increased risk of non-continuation of study. We will ensure that this is in place by 1 August 2019.

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

Please provide a statement about how you will communicate the provisions in your student protection plan to current and future students.'

Please provide a statement about how you will work with your current students in the development of your student protection plan.

Please provide a statement about the arrangements you will put in place to communicate with affected students should your student protection plan need to be implemented.

Introduction

32. The College recognises that a key determinant of the effectiveness of its Student Protection Plan will be how its content is relayed to those whose interests it is designed to safeguard.

Publication

33. The College will publicise its Student Protection Plan to current and future students by:

- publishing it on the College's website;
- including it in Student handbooks;
- re-publishing the Student Protection Plan via the Virtual Learning Environment (VLE) in the event that one or more of the possible risks materialises.

Staff Awareness

34. The College will ensure that staff are aware of the implications of its Student Protection Plan when they propose course changes by:

- addressing student protection through training and development activities;
- including the Student Protection Plan as part of the Quality Handbook, circulated to all staff via the VLE.

Review

35. The College will review its Student Protection Plan by:

- ensuring student representatives are consulted in the process of developing the initial Student Protection Plan;
- gathering and responding to feedback on the effectiveness of any actions put in place as part of the measures outlined in the Student Protection Plan;
- monitoring any complaints that may arise in relation to student protection issues.

36. The College will inform students if there are to be any material changes to their course by:

- notifying them by e-mail via the VLE;
- arranging meetings with affected groups or individuals;
- notifying students who have not yet commenced their studies of any changes by e-mail and/or phone.

37. The College will always try to ensure that material changes to programmes do not affect current students. In the event that a material change must be made part way through an academic year, the College will consult with those affected and provide them with as much notice as possible. Any

student who does not wish to accept the material change will be permitted to withdraw from their programme. The College will assist the student to transfer to another provider and refund the tuition fees paid for the years of study that could not be completed at the College.

38. If the College needs to implement the measures in its Student Protection Plan it will do the following to support students collectively and individually:
- ensure information is timely and reaches all affected students;
 - ensure sufficient staffing resource is available to discuss any proposed changes and their implications with students;
 - offer dedicated one to one support for students who may be more at risk of being affected by any changes.
39. Regent College encourages all its students to join the National Union of Students. In the event of any major disruption to the delivery of the HND programme, the College would refer students to the NUS for independent advice. The College would also endeavour to use its links with other HE providers through the Independent Higher Education Student Support Network to enable student support advisors from other providers to offer impartial advice to students. Finally, the College would direct affected students to sources of independent advice such as Citizens Advice Bureau.

'Our solicitors, VWV LLP, have advised the College on the sufficiency of this document.'