

STUDENT PROTECTION PLAN 2020/21

Provider Name: The WKCIC Group

Provider's URN: 10007455

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Introduction

The WKCIC Group is a large Further Education provider, but with a small proportion of Office for Students (OfS) Higher Education activity. Trading as Capital City College Group (CCCG) it is an independent Corporation with exempt charity status formed under the Further and Higher Education Act 1992. The Group was formed on 1st August 2016 through the merger of Westminster Kingsway (WKC) and City and Islington Colleges (CIC). A training arm, Capital City College Training (CCCT), was launched on 23rd February 2017 to lead on Apprenticeship delivery. With effect from 1st November 2017, the College of Haringey, Enfield and North East London (CoNEL) joined the Group. The CCCG Board is our governing body. Although one corporation, the colleges have retained their brands, specialisms and community focus.

Higher Education (HE) is currently delivered across 8 sites at all three colleges. Student numbers are modest and the provision is a mixture of one and two-year programmes validated by Pearson Edexcel or by a partner university. At present we do not deliver any provision overseas.

The Group believes that the risks of institutional financial failure is low; the Education and Skills Funding Agency (ESFA) has rated our financial health as 'Requires Improvement'. As one of the largest Further Education institutions in the UK, the Group has the financial resilience to be able to continue to offer courses to students.

This Student Protection Plan sets out the measures that the WKCIC Group has in place to protect the continuation and quality of study for all our HE students should risk to such continuation crystallise. The plan is supported by the following Group documents:

- Group and College Business Continuity Plans
- HE Closure, Suspension or Changing HE Provision Policy
- HE Admissions Policy
- HE Contract
- Fees Policy (Annex A - Refunds and Compensation)
- HE Student Transfer Policy

The type of event or change that might cause a risk, together with an explanation of the steps the Group would take to protect students' continuation of study are set out below.

These measures are in addition to the protections that students have under consumer protection law and do not affect students' consumer rights.

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Risk Assessment

The Group's Business risks (financial, operational, reputational and circumstantial/environmental) are evaluated for materiality and probability and assigned an owner whose responsibility it is to ensure that the agreed mitigation is put in place.

The Group, and each of the colleges within the Group, maintain a Risk Register, reviewing the potential major factors that could affect the Group's or colleges' operations. This is reviewed by each college's Senior Management Team and by the Advisory Board within each college on a bi-monthly basis. These feed into the Group's Risk Register that is reviewed by the Group Leadership Team and the Corporation. This is a RAG rated document and is able to provide a framework about how the Group will test, review, adjust and update performance and risks.

The Group, and each college within the Group, have business continuity plans in place. There is a **Business Continuity Plan** that the Estates Director has for the Group which details the business of the Group, identifying the assets (including people) and processes that are critical to delivering our business. Detailed responses include the initial response to an incident and the longer-term implementation of measures for a return to business as usual. It also considers continuity preparations and how to make the organisation more resilient to risk.

The Group's management of circumstantial or environmental risks such as disease, fire, floods and or Force Majeure are the same as for any major FE college. The Group's Disaster Recovery Plan ensures ongoing risk assessments, regular safety inspections and the maintenance of appropriate insurance and cash reserves to support business continuity in the event of such unforeseen circumstances.

Risks that may trigger the Student Protection Plan (SPP)

Closure of sites

The Group has no plans to close any of its sites where HE is delivered. If any changes were to be made to close any site or to re-locate the delivery of any course to a different site within the Group's existing or newly-acquired centres, the impact on students would be minimal as all centres are located close to well-connected transport routes in London. The Group has 12 sites in North and Central London in relatively close proximity, allowing decant in emergency situations, minimising disruption to learners. No particular groups of students would be more affected by any changes; each site offers a full range of support for all students.

Closure and suspension of programmes

The Group may wish to close and remove a programme of study from its portfolio. This may be as a result of low recruitment numbers that could negatively affect student experience or following a curriculum review to enhance the student offer. Closure of a programme means that it will no longer be open for future student registration. Suspension of a programme is defined by a fixed timeframe in which the programme will not be delivered and is normally reserved for new programmes of study that have yet to register students.

The risk of a course or programme cancellation is **moderate**. In the event of insufficient student recruitment of viable student numbers, the students will be kept informed of the situation and the Group will ensure that there is a minimal impact on students. In situations where a decision is made to discontinue a course or programme, the Group is committed to teaching out those courses or programmes and offers to new entrants

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will cease to be made. Programmes of study cannot be closed without fulfilling the course closure approval procedure outlined in the **HE Closure, Suspension or Changing HE Provision Policy** in order that contractual matters between current and prospective students and the Group can be fully considered.

There is a risk that some learners on courses with internal progression routes may choose not to continue to study at one of the colleges within the Group. This could result in very few learners remaining on the course, leading to a different experience for the students. In these circumstances, each course would be looked at to see if there were opportunities to bring, for example, HNC and HND students together, covering topics or units where the content can reasonably be linked across teaching years.

Closure of subject areas

The risk of not being able to deliver whole courses or programmes due to staffing or resource issues is **low**. Each curriculum area has staff with a range of skills, experience and expertise that ensures students receive a positive experience. Each curriculum area has contingency plans in place to mitigate the impact of any loss of specific skill sets that are dependent on only one member of staff. Each area is also well resourced with specialist equipment and investment in these areas is on-going, with opportunities to bid to upgrade these available each year through the Group's budget planning process.

Loss of specialist staff

The risk that the Group is no longer able to deliver components of courses is **moderate**. A small number of courses have units or modules that rely on the specific skill set of one member of staff. The curriculum team have relationships with local employers who are willing to deliver specific aspects of a unit where the high level skills are covered by one specialist teacher; and other members of staff are able to support delivery by industry contacts. The Group's appraisal process is used to ensure existing staff members are accessing courses and events that minimise the impact to students in any changes in staffing. Budgets for staff development have been maintained during recent reductions in funding so that staff have up-to-date and wide-ranging technical and vocationally relevant skills. Existing staff work alongside these specialists so that they are familiar with the module descriptors and course content. Recruitment of new staff is focused on hiring people who have a wide range of relevant skills. The Group has an arrangement with a recruitment agency to source appropriate teaching staff should a need arise.

Updating programme content, regulations and policies

The Group is committed to ongoing enhancement of programmes and student experience and as a result may wish to make changes to programme content, regulations or policies. Where material changes (such as a number of changes to the structure or content of the programme) are made the Group will draw these changes to the attention of students and prospective students as soon as possible. The processes are outlined in the **HE Closure, Suspension or Changing HE Provision Policy**. Changes to policies and regulations that affect students will normally come into effect at the start of an academic year and following the conclusion of approval processes.

Where material changes are made to programmes of study prior to enrolment, the Group will contact prospective students to provide information and guidance to help them to take an informed decision on their course of action. This will include their right to seek entry to another programme within the Group for which they may be qualified or to withdraw their application and seek entry to another institution.

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In normal circumstances, material changes will not be made to a programme after enrolment, but if this is necessary students will be informed at the earliest opportunity of the changes and wherever possible their views will be taken into account.

Each constituent college of the Group will inform every registered student of any editorial, minor or major changes or variations no later than six weeks of the term preceding the term in which the change or variation shall take place. In the case of changes due to circumstances beyond the College's control (e.g. illness, sudden departure or death of a key staff), registered students will be informed as soon as practically possible.

If a student reasonably believes that a material change to their programme of study adversely affects them, they may cancel their contract with the Group as outlined in the terms and conditions. In such circumstances the Group will offer advice and information to a student to aid transfer to another institution that offers a suitable alternative programme of study as outlined in the **HE Student Transfer Policy**.

The Group will continue to make changes to programmes during the course of a student's studies in order to improve the quality, enhance the content, and meet the latest requirements of an accrediting body or awarding organisation or in response to student feedback. The Group will consult with and/or inform students of these changes as appropriate.

Where continuation of study is not negatively impacted upon, it is unlikely that the updating of programme content, regulations and policies will result in the triggering of the Student Protection Plan.

Partnership Provision

The risk of our partner Higher Education Institutions (HEIs) losing their Degree Awarding Powers (DAPs) is **low**. The Group shall also continue to undertake thorough due diligence checks prior to going into a collaborative partnership; the outcomes of the initial due diligence are also monitored annually to assess further risks associated with education delivery. Through its academic partnership agreements, the Group ensures that there is a contingency plan for each collaborative partner which considers how best to allow students to continue their studies in the event of the collapse of a collaboration agreement. A 'teaching-out' arrangement is the preferred option as it ensures continuation of study. Transfers and in the worst case scenario - sudden closure- may also be considered. Students will be fully supported in finding arrangements for alternative provision.

Refund (and Compensation) Arrangements

The Group's Fees Policy sets out the provision for refund of fees (and compensation) in the event of the Student Protection Plan being triggered – the relevant section is included at Annex A.

The Group's financial strategy is to ensure that there are sufficient day cash reserves of a minimum of 25 days (ESFA minimum requirement) and working capital at any one time to meet its obligations as they fall due and to be able to provide refunds and compensation should the need arise.

The refund policy is applied in a fair and proportionate way ensuring students are not disadvantaged. The Group complies with OIA and CMA guidance on this matter.

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Communicating with Students

The Group publishes the Student Protection Plan on its website within its Governance tab under the Reports and Compliance Statements section.

In addition, the constituent colleges will publish links to the SPP on their websites within their dedicated Higher Education pages and the VLE.

HE Course handbooks contain information on the Student Protection Plan and where to access it. These are updated annually and provided to students for each year of their course and explained during induction.

The Group will continue to ensure that all academic and support staff involved in HE provision are aware of the implications of the consumer protection compliance in general and also the Student Protection Plan (SPP) in particular through the deliberative committee structure (Board of Governors, the Group HE Strategy Board, the Group HE Curriculum & Quality Group and the college-based HE Committees), staff training events and the Group 's curriculum planning, course modification and closure of programmes and courses processes.

The Group's Student Protection Plan (SPP) will be reviewed on an annual basis in consultation with relevant student representative meetings and through the HE deliberative committee structure that has student representatives as members. Final approval of the SSP will be by the Group's Board of Governors that also has student representatives as members.

The Group will keep HE students informed through the College and Group digital channels, by formal letters and where possible, through face-to-face meetings designed to assist affected students with understanding the nature and implications of such events and the Group's responses in regard to the Student Protection Plan. The Group and Colleges will ensure that affected students are either provided with, or signposted to, independent advice as appropriate to the given situation.

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ANNEX A

College Refund Policy [Extract from CCCG FEES POLICY [Section 8]

CCCG has a 'no refunds' policy; however, refunds may be considered if any of the following circumstances exist:

- The college terminates a course which has already started
- The college is not able to provide an advertised course
- The college changes the time or location of a course from that advertised
- The college cancels an examination
- The college recommends a student transfers to a course with a lower fee
- The college has overcharged a student or assessed their fees incorrectly
- Medical conditions, certified by appropriate medical professionals, resulting in the student having to leave the college completely
- You notify the College, in writing, you are withdrawing at least 7 days before the course starts

If after enrolment you decide to withdraw from your course for any other reason you will not get a refund. If we have agreed for you to pay in instalments, then you must pay all unpaid instalments immediately.

Refund applications will only be considered if received on a correctly completed form, available from all college centres on request. Where refunds are declined the college may issue a credit note or voucher for another college course, as an alternative.

Where the college terminates a course which has already started, you will receive a full refund of all amounts paid.

All other refunds will be subject to deductions for classes already attended, the examination fee where the college has already registered your entry, unpaid student membership fees, unpaid fees in respect of other programmes of study and an administration fee of £30.

Refunds will be made to the person or organisation who has made the payment to the College, be this the individual learner, a sponsor or the Student Loans Company.

For Higher Education courses only:

- The College will make payment to learners to cover any additional travel costs incurred by them if they are affected by a change in the delivery location of their course, or will make funding available to offset these additional costs.
- If it is not possible for the College to continue to deliver a course, the College will make a payment to cover any additional maintenance costs and/or lost time incurred by a learner. The College will also make a payment to cover any tuition and/or maintenance costs incurred by a learner where these are of a greater value than they would have incurred had the College continued to deliver a course for which they were enrolled.

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