



MORLEY COLLEGE LONDON

Higher Education Student Protection Plan

OWNER:

Chair of the HE Sub-Committee

FINAL APPROVAL BY:

Office for Students

Policy Category:

Student

Approved by Office for Students:

March 2023

Review Date by the Policy Committee:

March 2027

1. Introduction

- 1.1. Morley College London is registered with the Office for Students and is required to publish an approved Student Protection Plan (SPP).
- 1.2. The purpose of a SPP is to assure current and future students that Morley College London has appropriate arrangements in place to ensure continuation and quality of study for Higher Education (HE) programmes. It sets out how the College will react if particular events threaten the ability to deliver an academic programme. The SPP outlines the types of risks that might arise, gives examples of the sort of events that might trigger action and explains how the College would respond to minimise the impact of these events on students, their studies and the wider student experience.
- 1.3. A detailed risk assessment setting out this information is included in the annex to the SPP and all this material is approved annually by the College's Academic Board and updated regularly by the HE Sub-Committee. The purpose of the plan is to ensure that, in the event of a major problem, all students can continue or complete their studies, or, if this is not the case, that there is adequate compensation in place.
- 1.4. The plan is further supported by the following college documents which form an integral part of our approach to student protection and are referred to within this plan:
 - Business Continuity Plan
 - Fees and Refunds Policy
 - HE Admissions Policy.

2. Equality and Diversity Analysis Screening

- 2.1. In accordance with the College's Equality and Diversity Policy, the development of this policy complies with the Equality Act 2010 in ensuring due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations (see section 4 of the Equality and Diversity Policy).
- 2.2. An equality analysis will be completed if there is a risk the policy may affect different groups protected from discrimination. If an equality analysis is required, the Chair of the College's Equality, Diversity & Inclusion Steering Group will advise on completion, and the equality analysis included as an appendix to the policy.

3. Applicability:

- 3.1. This SPP applies to all students registered at Morley College London on programmes leading to an HE award, including those where the qualification is awarded by one of our partner Awarding Institutions, such as Ravensbourne University London and Kingston University London.

4. Definitions:

- 4.1. Programme Suspension: this means that admissions to a programme will be suspended for a minimum of one academic year and suspension reviewed during the annual curriculum planning process
- 4.2. Programme Closure: this means that a programme will be withdrawn and closed indefinitely to applications or enrolments.

5. Statutory and regulatory requirements:

- 5.1. The Student Protection Plan is a requirement of the College's Office for Students registration.

6. Approach to Risk Assessment

- 6.1. Morley College London is proactive in risk management, identifying, analysing and responding to risk factors associated with the development of new and existing HE provision, and more broadly in delivering educational provision through validation (new programmes) and the risk assessment outlined in Annex A for existing provision.
- 6.2. The College aims to ensure the on-going sustainability of HE provision through a systematic and evidenced-based approach that is led by student demand and which is rigorous in ensuring a well maintained, high-quality student experience that represents excellent value for money.
- 6.3. The SPP's Detailed Risk Assessment Schedule [Annex 1] explores the different risks listed below, suggests the likelihood of these occurring and identifies mitigating actions in relation to:
 - Financial Instability of Morley College London
 - Loss or suspension of OfS registration
 - Risk to continued validation arrangements
 - Loss of equipment or facilities (including building and IT infrastructure)
 - Loss of key members of staff
 - Impact of a Public Health Crisis

7. Programme Suspension and Closure Policy

- 7.1. Programmes may be suspended or closed for educational, practical or business reasons, e.g. where student numbers are expected to be so low that the student experience will be harmed; where the College is unable to resource a programme; or where a programme will not be economically viable.
- 7.2. Where the College decides to suspend or close a programme, implications of the suspension or closure will have been carefully considered from a number of perspectives. Factors considered include:
 - 7.2.1. The strategic consequences of any suspension or closure, including

potential or actual impact on other programmes

- 7.2.2. The impact of any suspension or closure on students and staff
- 7.2.3. How the quality of the student experience will be maintained until the completion of the suspension or closure, including a strategy for ongoing delivery and support for students during the phasing-out period
- 7.2.4. The process of consultation with students where the delivery of the course will materially change, close or be closed
- 7.2.5. Progression of students who may need to repeat units

8. Decisions Before Programmes Commence Delivery

- 8.1. In addition to the regular meetings of the college-wide 'Curriculum Control Group' the College holds a HE programme viability meeting in mid-August to determine whether there is sufficient recruitment for a programme to run successfully. Annex 2 outlines the arrangements for the HE Programme Viability Decision Group.
- 8.2. Where it is clear, that despite the best efforts of the College, it is unlikely to recruit critical numbers to a programme cohort, all students enrolled or yet to enrol on the programme will be notified of suspension or closure not less than four weeks before scheduled commencement (subject to circumstances beyond the College's control).
- 8.3. Where a programme has started and the viability is in doubt, the College will ordinarily consult with students before a decision is taken to suspend or close.
- 8.4. The College will provide help and advice to those enrolled on the suspended or closed programme(s) to enable them to find an alternative programme within the College, whether they are newly enrolled or existing students. If a programme is suspended, the College will advise students on its timeline for reviewing the suspension.
- 8.5. If the College decides that a programme is closed, students will be supported to find an alternative within the College if possible. Should an alternative programme not be available in the College, help and advice will be provided to find an alternative with another London institution.

9. Decisions for Programmes Where Delivery is Underway

- 9.1. The College will always endeavour to 'teach out' its HE programmes wherever possible once teaching has commenced. This is a commitment to complete the full academic year of the programme underway.
- 9.2. Where possible, the College will work to deliver the qualification should this span a number of years (HND – 2 years; full BA – 3 years).
- 9.3. If this is not possible, the College will help students join other programmes in similar institutions and provide support in the transferring of HE credits to the new institution.

10. Refunds and Compensation

10.1. The College's **Fees and Refunds Policy** explains the conditions under which the College will refund student fees and charges that have been paid.

10.2. In relation to HE programmes, the policy states:

- *In the event that the College fails to deliver the agreed provision, or where there is evidence that the College has not followed an Awarding Organisation's policies and procedures, including appropriate registration, any self-funded fees will be repaid and student loans will not be activated.*
- *Other compensatory remedies may be considered on a case-by-case basis such as payment of additional travel costs (for students affected by a change in location), commitments regarding bursaries, compensation for maintenance costs and lost time where continuation of study is not possible, or students must transfer. Claims for such compensation will be dealt with through the College's Student Complaints Procedure.*
- *Cancelled session: If a session cannot go ahead then the College will make up the lost session over the course of the year; no refund or partial refund will therefore be payable.*
- *If a loan-funded student withdraws from the course either before the start of the course or during the course, the College's attendance records will ensure that loan funding ceases - the College will notify the Student Loan Company of a Change of Circumstance and the student's loan balance would be adjusted accordingly. The College will not actively seek to recover the remaining course fees from the student.*
- *For all courses lasting a year or more, if a self-funded student who is paying their fees in staged payments withdraws from the course, the student will be liable for the accrued fee at the point of withdrawal. The College will not actively seek to recover the remaining course fees from the student.*
- *If a self-funded student requests a refund before the start of the course, a written notice of withdrawal must be received at least 10 working days before the start of the course. The Student will receive a refund of fees paid, less a cancellation fee (£50 for fees in excess of £500).*
- *Compensation will be provided on a case-by-case basis for students who need to transfer to an alternative provider and, where necessary, the College will consider awarding compensation for students who need to transfer to an institution where fees are higher.*

11. Communication Plan

11.1. To ensure the SPP is effectively shared with students, Morley College London will:

11.1.1. Publish the SPP on its website within the HE policy section at <https://www.morleycollege.ac.uk/policies>

11.1.2. Ensure that any changes to the Plan are notified to students following the same systems used to inform students of other policy or procedural changes

11.1.3. Inform prospective students about the Plan during the application process and their induction period at the start of their programme

11.2. To ensure the SPP is effectively communicated to staff, Morley College London will:

11.2.1. Circulate the SPP to all key managers by email and keep a copy available on a shared access folder

11.2.2. Share and review through the committee structure on an annual basis

11.2.3. Include as part of the induction and onboarding process for any staff involved in the college's higher education provision.

11.2.4. Include the SPP within the HE Student Handbook

12. Complaints

12.1. Students may make a complaint about the College's application of the SPP through the **complaints and appeals process**. This has been designed to align with the Office of the Independent Adjudicator for HE's Good Practice Framework. Guidance on making a complaint is available on the 'About' section of the college website.

12.2. www.morleycollege.ac.uk/about/our-policies/

13. Review and Revision

13.1. The SPP will be formally reviewed on an annual basis at the first meeting of the HE Sub-Committee (HESC) to ensure that the risk assessment remains current, and the mitigating measures remain practicable, relevant and effective. It will then be formally approved by the College's Academic Board.

13.2. The HESC meets four times a year and any urgent revisions will be considered at the next meeting of the Sub Committee

13.3. Future revisions will be carried out in consultation with the student council to ensure that students' views, interests and needs are taken into account. Any changes will be formally approved by the HE Sub-Committee.

13.4. Each version of the SPP will be numbered and a record of revisions will be maintained in annex two of this document.

Annex One: Detailed Risk Assessment Schedule

The Risk Assessment Schedule categorises risk by identifying each risk, exploring the likelihood of it happening and then assessing the impact on students and the college.

The likelihood of risk is assessed on the following scale:

- Low – less than 10% probability of occurring
- Medium – greater than 10% but less than 50% of occurring
- High – greater than 51% of occurring

The impact on students is reviewed on the following basis:

- Low – resolution at programme level
- Medium – resolution at college level through HE Sub-Committee reporting to the Academic Board
- High – resolution at college level by Senior Leadership informed by specialist advice as necessary with the governing body informed, as appropriate.

Risk	Financial Instability of Morley College London
Likelihood:	Low
Impact	High
Rationale for assessment	<p>As an Institute of Adult Learning within the FE Sector in London, the College is majority-funded by the Education and Skills Funding Agency and the Greater London Authority.</p> <p>The College has robust systems and controls in place to monitor financial sustainability, such as its risk register, rigorous monthly financial monitoring, effective financial forecasting, strong financial controls, internal audit scrutiny and well-developed risk management processes.</p> <p>The College additionally monitors factors influencing finances through the following Key Performance Indicators:</p> <ul style="list-style-type: none"> - KPR01 Student Recruitment - KPR08 Contribution - KPR09 Estate Utilisation - KPR10 Staff Utilisation
Mitigation	The College's financial strategy is to ensure at least 45 cash days are maintained (equivalent to at least £2.4M) cash reserves at any one time. The College's financial

	resources are more than sufficient to refund and compensate students, even in the very unlikely scenario of the closure of Morley's portfolio of HE programmes. In addition, the College has robust insurance arrangements in place that include protection for loss of income. This is fully sufficient to provide additional compensation for students at risk of non-continuation of study due to programme suspension and closure.
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Risk	Loss or suspension of OfS registration
Likelihood:	Low
Impact	High
Rationale for assessment	The likelihood of this is low. Morley has successfully worked with regulatory authorities for many years.
Mitigation	Morley is committed to meeting the conditions of OfS registration and to the successful delivery of HE programmes and continues to enhance its internal structure to ensure the successful delivery of a coordinated portfolio of programmes. This includes ongoing formal monitoring and evaluation of delivery through the sub-committee structure that operates, with the active participation of students.

Risk	Risk to continued validation arrangements
Likelihood:	Low
Impact	Medium
Rationale for assessment	Morley has identified key partners which share the ethos of the College and is working closely with them to ensure the successful development and delivery of programmes. We are in regular conversation with our validation partners and are working towards enhancing these relationships to ensure there is appropriate alignment between the different institutions. The quality and value of these working relationships is considered to be high.
Mitigation	In the unlikely event that a relationship with an awarding institution were to cease, different students would be affected in different ways, though in every case we would ensure work to ensure the successful teaching out of any and all programmes affected. The College would also

	work to secure a validating relationship with a different institution.
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Risk	Loss of equipment or facilities (including Building and IT infrastructure)
Likelihood:	Medium
Impact	Medium
Rationale for assessment	<p>If HE provision is at risk through closure of one of the College's centres, the risk to students would be mitigated through the potential for the affected provision to be moved to an alternative centre. Within the College's Business Continuity Plan a number of supporting sites and venues have also been identified as potential additional locations for teaching space and office space.</p> <p>Many programmes utilise specialist equipment and the loss of this might lead to a short term disruption to the student experience, including the temporary suspension of teaching, while alternative arrangements are put in place.</p>
Mitigation	<p>Each of the College's three centres has a dedicated facilities team focused on the maintenance of the estate and business continuity. Senior leadership of the College's estates, facilities and IT services is provided by the Chief Finance Officer who also has responsibility for the College's risk management. Business continuity mitigations are in place in the event of disruption to enable the smoothest possible return to normal. These mitigations cover all activities of the College.</p> <p>Morley has adequate insurance in place for business interruption.</p>

Risk	Loss of key members of staff
Likelihood:	Medium
Impact	Low
Rationale for assessment	Much of the College's HE provision requires highly specialised, technical expertise, however the risk that the College is no longer able to deliver individual modules within HE programmes due to staff unavailability is low

	because Morley has has a large cohort of sessional lecturers in each curriculum area who are able to provide cover for all our subjects. In addition, modules are designed to be taught by integrated teams of academic staff, overseen by Subject Leaders/Programme Leaders each of whom are also subject specialists. Previous changes of staff personnel have been managed successfully.
Mitigation	Our existing staff teams consist of academics, teachers and professionals whose combined expertise is sufficient to cover either the departure or absence of team members. Moreover, in the event of a particular skills gap occurring, Morley is able to either draw on staff within the wider team or recruit suitable expertise through professional networks.

Risk	Impact of Public Health Crisis
Likelihood:	Low
Impact	High
Rationale for assessment	<p>Under the Covid-19 pandemic the College was proactive in communicating with its students through email and a dedicated web page on the College's website. Programmes went online for the initial lockdown in 2020-21 and moved to a hybrid of online and in-centre learning when the restrictions were lifted. Assessments and programme delivery were adapted – fully supported by the awarding bodies – where necessary. Adaptations included: front-loading practical access at the start of the academic year in case of further lockdowns over winter; providing resources for students to continue practical work at home; recording tutorials in a 'bank' of resources; greater access to tutors via online support at the start of the pandemic to ensure students were supported; and continuing virtual support and hybrid learning for students with Covid-19 or in care roles who were unable to attend. During the Covid-19 pandemic HE student satisfaction remained above the NSS national benchmark.</p> <p>Morley College London is confident it can respond positively and with agility as necessary in the event of any future public health crisis.</p>

Mitigation	In relation to Covid-19, the College was able to put in place a series of practical arrangements to ensure continuity of study in accordance with guidelines. The College would be able to draw on this experience in the event of any future public health crisis. Moreover, the College now have considerable experience in the successful delivery of online provision of HE programmes, with the capacity to switch to online delivery if required.
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Risk	Campus Closure
Likelihood:	Low
Impact	High
Rationale for assessment	The College Business Continuity Plan describes the manner in which the College will respond to disasters affecting our premises and therefore our ability to deliver our programmes. The Plan provides a framework for taking the College through the process of establishing temporary arrangements to ensure that 'business as usual' activities are resumed as soon as possible, minimising the inconvenience and disruption to students and staff.
Mitigation	Plans are in place to ensure that delivery can take place in alternative settings and, where necessary, teaching could be delivered either entirely or partially online.

Annex Two: HE Programme Viability Group

The College holds a HE programme viability meeting in mid-August in review viability in the context of section 7 of the SPP. The Group can be convened in-year if required.

The panel will usually include:

- The Chair of the HE Sub-Committee (meeting Chair)
- The Head of Quality Enhancement (HE)
- Heads of Curriculum with HE provision

The panel will consider:

- The ongoing viability of each HE programme
- Any reasons for suspension or closure of an HE programme, including any internal or external factors
- The potential impact(s) on new and continuing students and how the impacts would be mitigated.

The Chair of the HE Programme Viability Group will formulate measures to manage the closure or suspension of the affected programme or programmes in accordance with section 8 of the SPP.

The Head of Quality Enhancement (HE) will co-ordinate the implementation of measures, working with college managers, ensuring clear and timely communication with students, notification to the validating body, and liaison with relevant stakeholders including External Examiners.

The Head of Quality Enhancement (HE) will notify internal professional service stakeholders through the College Operations Group.

Annex Three: Student Protection Policy Review

Version Number	Date	Revision Description	Editor	Status
1.0	March 2023	Version One	Head of Quality Enhancement (HE)	Subject to OfS review