



Student Protection Plan



Core Documentation Cover Page					
Student Protection Plan					
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Equality Impact					
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)					
Neutral equality impact (i.e. no significant effect)					X
Negative equality impact (i.e. increasing inequalities)					
<p align="center">If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk</p>					

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1. Introduction

As a registered provider of higher education, the University College of Osteopathy is required to publish a Student Protection Plan (SPP) which sets out how continuation and quality of study will be preserved for current and potential students if a risk to their continued study crystallises.

With over 100 years of delivering higher education courses the UCO has a long established and respected history of providing Higher Education. We have a wealth of experience in preserving continuation and quality of study for any affected students on those rare occasions when we have either ceased to offer a particular area of curriculum or made other substantial changes to our qualifications. This SPP builds on our experience and is intended to assure current and future students that we have appropriate arrangements in place to protect continuation of study. It outlines the types of risks, gives examples of events that might trigger action and explains what we might do to minimise the impact of these events if they happen.

This SPP forms an important part of Student Contract Terms and Conditions.

The University College of Osteopathy (UCO) is committed to helping to ensure students achieve the best academic outcomes from their studies. Events may occasionally occur which mean that unforeseen changes have to be made to units or courses.

This SPP is in two parts:

Part One details in general terms the UCO's policy on Student Protection, it gives an indication of issues that might go wrong and how the UCO will try to resolve them, it is reviewed annually.

Part Two details the Specific Risks that the UCO faces regarding Student Protection and is reviewed quarterly in line with the UCO's Risk Policy.

PART ONE – Issues & Resolutions

2. Measures to Inform and Protect Students

The UCO is committed to communicating any changes to students as early as possible, with clear information and options. All reasonable steps will be taken to minimise the resultant disruption to those services and to affected students by, for example:

- Delivering a modified version of the same course;
- Providing assistance to affected students to switch to an alternative course
- Providing assistance to affected students to switch to a different provider.

In certain circumstances, the UCO may make a strategic decision to close a course, in this case the UCO will endeavour to 'Teach-out' those affected students, allowing them to complete their studies before the closure occurs. The priority would be to ensure as many of our students as possible completed their course of study in the original timescale.

Although the circumstances giving rise to the need to 'teach-out' are rare, when they do occur, 'teach-out' will usually be realistic and achievable. An example of exceptional circumstances where we might not be able to 'teach-out' would be if issues relating to standards or the quality of the academic experience arose. In such a case we would seek to protect continuation of study by offering a transfer on to a similar or replacement course or by giving support to transfer to an alternative supplier (for

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example, providing certification of credit or a record of academic achievement). The UCO have an agreement with other Osteopathic Education Institutions should such an issue present itself.

Where a student is required to transfer course or move to another institution there are likely to be implications for student finance arrangements. The UCO's Student Services team will be notified of students affected in the event of any the above steps being taken. Student Services will contact affected students and provide detailed information, advice and guidance based on their individual circumstances.

3. Institutional Closure

Institutional failure will be monitored through risk management in accordance with the Office for Students (OfS) and other regulatory bodies and any instance of this will be managed in accordance with UCO policies.

Where the UCO has no option, other than to close, it may consider measures such as those below to protect student experience:

- Where possible, closing in a gradual way, over a period that would allow current enrolled students to complete their studies at the Institution;
- Where the above is not possible, in supporting students to transfer to appropriate courses at other providers and (where appropriate financially) by compensating students where because of disruption to their studies they suffer demonstrable, material financial loss;
- Merging with another institution to maintain all or part of the current provision.

4. Institutional Closure of Part of UCO

Where part or all of the UCO teaching building or clinic is rendered unusable, the UCO will typically consider remedies such as:

- Relocating provision to an alternative location, this may include hiring spaces for course delivery (where possible nearby) and/or installing temporary buildings on the UCO's land (where available);
- Revising timetabling to allow all of the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of normal office hours. Where such an approach is taken, appropriate consultation will normally be conducted with stakeholders who may be affected; appropriate equality impact assessments will also be undertaken;
- Delivering courses via alternative means, such as Distance Learning. Where such an approach is taken, the UCO will consider whether this it is appropriate for enrolled students who would be affected.
- ensuring students are reminded of the relevant procedures relating to mitigating circumstances, such as special circumstances procedure and academic appeals policy, where there is a risk of impact on subsequent academic performance.

5. Loss or Restriction Degree Awarding Powers

In the event of loss or restriction of degree awarding powers, UCO will work with the Office for Students to:

- Ensure all reasonable steps are taken to minimise the resultant disruption to affected students;
- Ensure that, as far as possible, changes are made in a transitional manner.

6. Withdrawal of Designation

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

- Working with the OfS to allow enrolled students to complete their year of study/course;
- Where the above is not possible, supporting students to transfer to appropriate courses at other providers and, where appropriate, financially compensating students where they suffer demonstrable, material financial loss because of disruption to their studies;
- Considering assistance for affected students by providing evidence/letters/statements in support of continuation of their studies;
- Merging with another institution to maintain all or part of the current provision.

7. Closure/Suspension of Course

UCO has established procedures in place of the event of closure/suspension of course. Where there is a material impact on the students, the effect will be mitigated by:

- Communication with current students to provide assurance that they will not be adversely affected by the decision, and provide assurance that they are able to complete their studies at the Institution;
- Where possible, provision will be made to allow for the completion of studies where 'mitigated circumstances' have been presented;
- Consultation with stakeholders who may be affected to ensure appropriate equality impact assessments will also be undertaken;
- future applicants will be notified of the risk of closure/suspension as early as possible and in accordance with UCAS deadlines where appropriate, allowing time to source an alternative suitable course.

8. Major Changes in Year to Course Content

UCO will use all reasonable endeavours to deliver the course in accordance with the description applied to it in the UCO's prospectus for the academic year in which a student began their course. However, in the event of major in-year changes to course content the UCO will ensure that:

- Changes are restricted to the minimum necessary to achieve the required quality of experience, and affected students are notified and consulted with as appropriate;
- It works with students to ensure the offer is still acceptable;
- Where necessary it allows students the opportunity to withdraw from the course;
- Where required students will be offered reasonable support to transfer to another course at the University College, or to another provider.

9. Suspension/Revocation of Tier 4 Sponsor Licence

In the event of suspension/revocation of Tier 4 Sponsor status, the UCO 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 enrolled students to complete their year of study/course;

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- Allow students already in receipt of a VISA based upon an allocated CAS from the UCO to enrol and commence their studies;
- Offer students who have not commenced their travel to the UCO, the opportunity to postpone their application pending the resolution of the suspension.
- Providing assistance to affected students to switch to an alternative sponsor.

10. Loss of Professional Statutory Recognised Body Accreditation

In the event of the UCO losing PSRB accreditation, the UCO will consider measures to protect student experience, such as those listed below:

- Offering affected students the chance to move to another course;
- Delivering a modified version of the same course;
- Providing assistance to affected students to switch to a different provider who holds the relevant accreditation.

11. Disruption to UCO Activity

Where events result in term-time course disruption, UCO will normally consider whether it is practicable to make changes to course delivery, rather than closing or suspending an affected course.

Actions to minimise disruption may include:

- Temporary short-term suspension of course delivery (e.g. where there is a change in the course delivery location or staffing, with appropriate actions to mitigate impact on students);
- Changes to the course delivery location or method, which may include distance learning;
- Changes to the staffing of a course, for instance through a review of internal staff resources, including recruitment of area specialists, where appropriate;
- Offering students the opportunity to transfer to an alternative course;
- Provision of reasonable support to students for accessing a course run by another provider, including making arrangements for the transfer of credits and information about academic progress.

12. Loss of Key Staff

Where possible the UCO will seek to fill gaps as quickly as possible, by moving other current members of staff with appropriate skills and experience, into the vacant post(s) or recruiting externally, to avoid disruption.

The UCO's Disaster Plan covers other actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment.

Part Two – University College of Osteopathy Risk Assessment

The risks identified here are not exhaustive and there are other risks which may disrupt our activity. They are reviewed on a quarterly basis and the most update risks can be found on the UCO Intranet.

Risks may operate in isolation or concurrently. Our mitigating actions may therefore apply to more than one risk.

13. UCO Categorisation of Risk

Criteria for Likelihood

LIKELIHOOD	Description	Chance	
	Event is expected in most circumstances	>90%	Almost Certain
	Event will probably occur in most circumstances	50-90%	Likely
	Event should occur at some time	30-50%	Possible
	Event could occur at some time	10-30%	Unlikely
	Event may occur only in exceptional circumstances	<10%	Rare

Criteria for Impact

Descriptor	Impact
Insignificant	No impact on service No impact on reputation No complaint likely No impact financially Litigation risk remote
Minor	Slight impact on service Slight impact on reputation Complaint possible Slight impact financially Litigation risk possible
Moderate	Some impact on service Some impact on reputation Complaint probable Some impact financially Litigation risk probable
Major	Service disrupted Adverse publicity (local) Complaint probable Impact financially Litigation risk probable
Extreme/catastrophic	Major impact on service for some time National impact on reputation Complaint probable and investigation by externals Damaging impact financially Litigation risk probable

14. Schedule 1 - Risks Classified as "Rare", "Unlikely" or "Possible"

Risk	Likelihood	Impact	Reason
UCO degree awarding powers or university status are lost, varied or suspended	Unlikely	Extreme	UCO have recently undergone a full QAA review for taught degree awarding powers and have in place a robust governance structure. It has a series of control measures that prevent or positively react to an event which would lead to loss, variation or suspension of degree awarding powers or university status from occurring
That the UCO as a whole is unable to operate	Unlikely	Extreme	The UCO is an established institution of over 100 years and has been responsible for the education of approximately 50% of Osteopaths in the UK with a very strong financial performance as demonstrated by our most recent Annual Report and Financial Statement (2016/7). This showed a surplus of £538k in 2017 compared to £377k in 2016, total net assets of £10.466m with cash and bank balances held on short term deposit amounting to £2.511m.
UCO Tier 4 sponsor licence is lost or suspended	Unlikely	Moderate	UCO have very few Students with Tier 4 Visas. A UKVI audit in 20?? reviewed compliance with our Tier 4 Sponsor Licence duties.
Loss of our recognised qualification (RQ) status from the General Osteopathic Council (GOsC)	Unlikely	Major	The last RQ review in 2016 led to no conditions being placed on the UCOs RQ's courses (M.Ost and MSc in Osteopathy (Pre-registration)). The UCO gets positive feedback on its annual reports to the GOsC.
We become unable to charge higher amount fees damaging our financial stability	Unlikely	Extreme	The UCO are aware of and up to date with the requirements needed in order to charge 'higher amount' fees. A Student Access and Participation Plan has been developed for 2019/20 and an Access Agreement agreed and in place for 2018/19. Positive feedback was received for the 2016/17 OFFA monitoring.

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Borough High Street of Southwark Bridge Road Clinic are permanently closed	Unlikely	Extreme	UCO have a maintenance schedule and insurance and are developing a Business Continuity Plan.
UCO lose key equipment or facilities (e.g. technique rooms or clinic rooms)	Rare	Moderate	The equipment and facilities which UCO provide are not specialist and alternatives could be found in the local area
UCO experiences issues with partner organisations (for example, validation)	Unlikely	Moderate	In the development of new partnerships, the UCO carry out full due diligence on potential partners and include protective provisions in contracts (for example, requirements to give early notice of issues affecting ability to deliver or to commit to 'teach-out') as a matter of course
UCO are no longer able to deliver our undergraduate M.Ost courses in the next three years	Unlikely	Extreme	As this is our core business and is considered unlikely due to the UCO being in a robust financial position. Although our delivery model does change over time, these improvements are consulted upon and gradual and usually occur over a long cycle and so have little to no impact on the students concerned.

15. Schedule 2 - Risks Classified as "Likely" or "Almost Certain"

1. Permanent or temporary loss of key staff
2. No longer delivering courses at the BHS or Southwark Bridge Road.
3. Interruption to IT infrastructure
4. Cancellation of postgraduate courses

Risk and Reason	Likelihood	Impact	Actions
1. Permanent or temporary loss of key staff. As a small and specialist mono-technic loss of key staff can be a particular risk to the ongoing business of the UCO.	Likely	Moderate	<p>A staff member leaving the UCO can be difficult to replace due to the specialist subject matter they are required to deliver. This may impact upon the delivery of the courses.</p> <p>UCO consider staffing as a priority due to the high number of part time staff on fractional contracts and the specialised nature of the staff required. The UCO have a strategy in place to look to recruit fewer staff and to increase the time commitment of staff in post.</p> <ol style="list-style-type: none"> 1. Cover being provided by other tutors as required. 2. Roles advertised quickly 3. Use of recruitment Consultants 4. Courses adjusted
2. We will no longer deliver courses at our Borough High Street teaching facility and or Southwark Bridge Road Clinic in order to facilitate the integration of our teaching and clinical facilities. The UCO are currently developing an Estates Strategy to address this which may result in a refurbishment or relocation. This may affect student's joining the	Likely	Moderate	<ol style="list-style-type: none"> 1. Seeking temporary or alternative premises 2. Delivery of some aspects of the course by alternative means eg distance learning, VLE 3. Revising the timetable to limit the exposure to any refurbishment works 4. Transfer or seek support from other osteopathic providers who have the appropriate space and equipment. 5. The Estates Strategy will consider the impact on students. 6. Where students incur additional costs in relation to inconvenience or change in location, the Refunds and Compensation Policy will apply.

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<p>UCO in 2019 and also some of the student currently enrolled on UCO courses.</p>			
<p>3. Interruption to IT infrastructure – the UCO have recently undertaken an ICT infrastructure audit with JISC. This has identified several areas in which the UCO can enhance its provision. This 'upgrading' may result in unplanned events and IT downtime. Also, the UCO are aware of the possibility of a malicious attack by a third party.</p>	<p>Likely</p>	<p>Depends on the nature of the event. Could cover any impacts from Insignificant to extreme.</p>	<p>Works undertaken to minimise the disruption to students and staff Consider alternative means of delivery where the VLE is unavailable.</p>
<p>4. UCO no longer able to deliver our specialist Postgraduate Certificate programmes because of the risk of recruiting insufficient student numbers to support a meaningful student learning experience and to justify the cost of delivering the teaching.</p>	<p>Likely</p>	<p>Moderate</p>	<p>Clear notifications on website for applicants stating minimum numbers of students required to run the course. Early contact with applicants issuing a full explanation of the circumstances and help and advice in finding an appropriate alternative course of study. Any tuition fees paid will be refunded in full if not transferred to another course.</p>

16. Refund and Compensation Policy

The UCO have a Refund and Compensation Policy which can be found on our website. It outlines the circumstances in which we will refund tuition fees and other relevant costs to students and to provide compensation where necessary if we are no longer able to preserve continuation of study. The Policy may be implemented as a result of any of the risks in this Plan occurring.

The UCO have always had sufficient finance to refund/compensate students when appropriate. However in the new UK HE financial environment and the fact the UCO have many ambitious plans which could involve a full refurbishment or possible relocation we are conscious that there could be an increase in such payments so we are now actively investigating whether insurance against relevant costs could be procured. If not, we will target growth in our retained earnings/cash reserves to be able to fund any estimated cost increases.

17. General Communication of the SPP in the UCO

The SPP can be found on the UCO's website and will be included in applicant's information packs on initial enrolment and each year subsequently. The risks will be a rolling agenda for the Staff Student Liaison Committee on an annual basis.

For staff, this Plan is also available on the UCO intranet. Annually refreshed plans and any changes which have become necessary following a mid-cycle risk assessment will be drawn to the attention of all staff via the Vice Chancellors briefings. We will ensure that staff are aware of the implications of the Plan when they are engaging in relevant activities (such as proposing changes to a course) by delivering training at Staff Conference and providing signposts in the Academic Quality Handbook.

18. Review of the SPP

Part One of the SPP will be reviewed annually and Part Two reviewed quarterly in line with the UCO's Risk Policy. The quarterly risk assessments will be carried out by a sub-group of the Senior Management Team comprising representation from the M.Ost course and relevant service areas, this will be shared with the Students at the termly Staff and Student Liaison Committee. The risk assessments will inform the annual review of the Plan.

19. Feedback and Complaints

Students wishing to provide feedback regarding the UCO's management of the process of change should follow the UCO's complaints procedure. Details regarding our Complaints Process can be found on the UCO website. This process may be used, for example, if you have a complaint about the way in which we are implementing or not implementing this Plan or the way in which you have been dealt with or affected by an event.