

London South East Colleges Student Protection Plan 2023/24

Provider's name:

Bromley College of Further and Higher Education

Provider's UKPRN: 10000948

Legal address:

Bromley College of Further and Higher Education trading as London South East Colleges, Rookery Lane, Bromley, BR2 8HE

Contact point for enquiries about this student protection plan: Executive Principal and Chief Learning Officer, HE@lse.ac.uk Student Protection Plan for the period 2023/24.

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

The College recognises the considerable financial and time investment made by students studying on higher education programmes and therefore the need for formalised transactions that are in the collective student interest. This includes a range of student-centred policies, procedure and practices to ensure that student interest is a focus at all times. Our policies ensure prospective, current and past students including those studying in full or part-time modes are at the heart of the system. Prioritising and protecting their interests fall within the following categories:

- A set of enablers that ensure the student voice is heard and respected
- Enhancement of the interests of students in the quality procedures underpinning their higher education experience especially where changes are made to their programmes.

There is an internal process in place for ensuring all procedures and policies are signed off and approved by the College Executive Group and where relevant, the Corporation. The College has assessed the following as potential risks to student's continuation of studies and are kept updated as per the risk register and reported to the corporation.

Closure of the College (very low risk)

The risk that the College as a whole becomes unable to operate is considered to be very low, because the institution has historically run its accounts at a surplus and has significant reserves to draw on if required. The College's financial management information and financial forecasts are regularly reviewed by the Education and Skills Funding Agency to enable any corrective action to be initiated immediately, in the event of a deterioration in the College's financial position.

The College maintains a risk register, approved by senior committees and regularly reviewed by senior management. This risk management framework ensures that risks to the institution's sustainability are identified and appropriate risk controls and mitigations put in place. The Risk Management Policy and the Institutional Risk Register are regularly reviewed by the Audit Committee.

QAA Monitoring Review Visit of the College's Higher Education provision in March 2017 concluded that: "There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable. There can be confidence that the quality of the student academic experience meets baseline regulatory requirements." There were no specified improvements required from this review.

Loss of validating arrangements and collaborative partnership (low risk)

The College has strategic alliance with both its validating and awarding bodies, Canterbury Christ Church University (CCCU) and University of Greenwich (UoG). The College works closely with Pearson (the third awarding body for HE) and has regular engagement throughout the year.

Although, this is a low risk, the College ensures regular engagement at all levels with existing partners and works closely with senior management from both institutions to set key objectives in the College's HE Strategy Review and the HE Strategic Plan.

The college has a Financial Memorandum and a Memorandum of Agreement with all the validating partners that outlines which courses will be offered under QA/Franchised arrangements and also details termination procedures should the awarding body wish to cease offering a course. Regular monitoring meetings, application reporting and communication takes place between the Partnerships Manager and the Partner Colleges. Support in terms of Away Days and Strategic Planning Meetings also occur on an annual basis.

Loss of PSRB accreditation for a programme (low risk)

Some of our programmes of study are accredited by a Professional, Statutory and Regulatory Body (PSRB) and successful completion of some of these programmes will lead to chartered status with the relevant PSRB. It is possible that a PSRB may withdraw its accreditation for one or more of our programmes of study, meaning that students completing the programme would no longer be awarded chartered status. All these arrangements are set with the validating University partners.

However, the risk of the University losing accreditation for one of these programmes is considered to be low as Universities engage closely with all PSRBs and regularly assess our compliance with requirements for teaching and assessment standards and other key practices. This relationship is continually monitored at Programme Review Meetings.

Loss of Key Staff (moderate risk)

The College considers loss of key staff as moderate risk. As it diversifies into new business and curriculum areas, it ensures that it has access to the management capacity and staff expertise in the areas where it is difficult to recruit to specialist curriculum areas in higher education.

The College has made a long-term commitment to supporting the staff in gaining further qualifications. There is a partnership agreement between the College and university which is part of our wider HE academic framework. The College has supported staff in undertaking advanced subject level training at Masters and Doctorate level. There is also a wider academic development framework for teaching and learning where all modules are located within the PGCert (HE), the Diploma in Education (HE) and the Masters in Education (HE).

Relocation of a programme (moderate risk)

The College operates four main campuses in the South East London (Bromley, Orpington, Bexley and Greenwich) and keeps the configuration of its estate under regular review, as part of its academic and financial planning. In some cases, this may mean that a programme is transferred from one campus to another in the interests of efficiency and sustainability, or to provide improved facilities for students. However, the College ensures no such decisions are made in year and students are well-informed of any changes prior to the commencement of their programme.

The College made the decision to move Higher Education University Centre based at the Bromley Campus into the Ozone building on the Orpington Campus for the 2022/23 student intake. This was a positive move for the Higher Education experience and was co-ordinated carefully to ensure that all continuing students needs were understood and met. Due diligence was completed with both university partners.

The risk to students' continuity of study is considered to be moderate, as all the campuses are in relatively close proximity and the College has a Business Continuity Plan to ensure minimum impact in events such as acts of terrorism, damage to buildings or equipment.

Closure of a programme (moderate risk)

The College keeps its portfolio of programmes under regular review and may occasionally discontinue a programme for reasons of academic or financial sustainability or as part of ensuring the currency of our offering. The closure of all programmes is subject to approval by the HE Academic Planning and Student Experience Committee chaired by the Principalship and must include consideration of how the interests of current and prospective students are protected.

The risk to students' continuity of study is considered to be moderate, as the College has arrangements with all its validating partners and awarding bodies where practice is to 'teach out' programmes which are closing to ensure that students receive the degree that they registered for. In some cases, provision is made to transfer students to the University where students have few modules or credits to re-sit and the programme has already been taught out at the College.

Changes to a programme (moderate risk)

The College keeps its programmes under regular review. Changes to programmes e.g. to their structure or content, to ensure the currency of our offering and that programmes are academically and financially sustainable, made by the awarding body and validating partners, the College ensures that these changes have a minimum impact on the continuity of the programme.

The risk to students' continuity of studies is considered to be moderate. The College works with the awarding bodies and take all reasonable steps to minimise the impact of any material changes to programmes on

students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis) and will consult with students about any material changes to programmes which might affect them. Many changes are intended to be beneficial to students and to improve student outcomes.

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

This section covers the measures that we have put in place to mitigate the risks which we have identified as 'moderate' in section 1, on the basis that these are risks with a higher likelihood of being crystallised.

Loss of Key Staff (moderate risk)

The College considers loss of key staff as moderate risk. As it diversifies into new business and curriculum areas, it must ensure it has access to the management capacity and staff expertise.

Academic expertise is managed closely for each programme. Where a member of staff leaves, appropriate arrangements to replace relevant expertise are put in place through Faculty management structures. Loss of staff may impact upon our delivery, our response will depend on the nature of the problem and whether it is a planned or unplanned event. Planned losses include redundancies, strikes or restructuring. Unplanned losses include for example an unexpected death or a specialist lecturer leaving to take up another post in a different institution. In each case, an impact assessment and an appropriate action plan would be drawn up.

The staffing capacity/expertise are discussed and reviewed by the Principalship and senior management at regular basis. This risk is assessed on a monthly basis by the Principalship with a focus on staff development and sharing of expertise to give focus to projects and milestones such as talent development plan implemented and Working Practices Meetings to monitor pressures on workloads and specialisms. It 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.

In the meanwhile, we will seek temporary or permanent replacements internally or externally noting that temporary cover may be needed whilst permanent appointments are made as these take time, providing cover from existing staffing, adjustment of delivery or content (for example enhanced Blackboard/VLE content). Discussion with university partner staff who may be available from their staffing team to teach on the programme.

To further support academic staff to develop their professional practice and offer students a rigorous and challenging learning experience, the College has a dedicated HE CPD, Research and Scholarship Policy which is monitored by College's Research and Scholarship Committee. The policy focuses on College based higher education scholarship and is mapped to the Quality Code Expectation and UKPSF. Academic staff are required to engage with the Advance HE and work towards Fellowship. The policy contains definitions and examples of scholarship and provides a checklist for staff to develop their scholarship in the College. The aim of the policy is to enhance the quality of learning, teaching and academic support and develop areas of specialism.

Relocation of a programme (moderate risk)

The College operates four main campuses in the South East London (Bromley, Orpington, Bexley (Erith and Holy Hill) and Greenwich) and keeps the configuration of its estate under regular review, as part of its academic and financial planning. In some cases, this may mean that a programme is transferred from one campus to another in the interests of efficiency and sustainability, or to provide improved facilities for students. However, the College ensures no such decisions are made in-year and students are well-informed of any changes prior to the commencement of their programme.

The risk to students' continuity of study is considered to be moderate, as all the campuses are in relatively close proximity and the College has a Business Continuity Plan to ensure minimum impact in events such as acts of terrorism, damage to buildings or equipment.

The mitigation where students are unable to travel to the nearest campus, will include seeking temporary or permanent alternative premises (whether on-campus or off-campus, hiring spaces, installing temporary structures etc on a like-for-like basis where necessary); delivery by alternative means or methods (for example, virtually through Blackboard Collaborate, Teams or Zoom); revising the timetable to avoid or limit exposure to estates works and scheduling estates work to minimise impact on teaching, students and study; transfer to or seek temporary support from university partners who have the relevant space and equipment. We already have a Business Continuity Plan which caters for planned works. It includes an assessment of impact on students. Certain losses may be covered by insurance which would underpin our ability to respond and recover quickly. Where students incur additional costs in relation to a change in location, the Higher Education Refunds and Compensation Policy would apply.

Closure of a programme (moderate risk)

The College keeps its portfolio of programmes under regular review and may occasionally discontinue a programme for reasons of academic or financial sustainability or as part of ensuring the currency of our offering. The closure of all programmes is subject to approval by the HE Academic Planning and Student Experience Committee chaired by the Senior Management and must include consideration of how the interests of current and prospective students are protected.

The risk to students' continuity of study is considered to be moderate, as the College has arrangements with all its validating partners and awarding bodies where practice is to 'teach out' programmes which are closing to ensure that students receive the degree that they registered for. In some cases, provision is made to transfer students to the University where students have few modules or credits to re-sit.

The College recognises the requirement for good practice in communicating with students about course closures when they occur. The College ensures that such communications are transparent, fair and are supported by accessible policies, procedures and practices. The importance of doing so is important in both the short and long term, for students now and in the future, and for the Colleges reputation.

Measures are taken to ensure that the communication of and adherence to the University policies are comprehensible to partner College students and ensure that they offer students a precise and unambiguous guide to any course closures. When putting them into place, we consult with our team of serving student representatives and student cohorts to test their acceptability or if there are any issues arising. It is also to

verify that the communication around them has been effective and if we have been successful in minimising the impact on students affected by any closures.

Communication of any nature is made through the College website, in the HE and programme handbooks and via student reps and, in the event of a course, communication will be reinforced by letters, emails and personal telephone conversations as appropriate and relevant to the nature of the change. Students receive direct communication from the Programme Leaders and any student absent will receive written notification as outlined above.

The College will work with the partner university in the event of a programme closure to offer alternative arrangements for existing students, however, teaching-out is usually the agreed option. Should teaching-out not be an option, the partner university has, in the past, made special provision to transfer students with outstanding credits.

For students making a new application the same process will take place should the advertised programme not run, and the College will also examine its own provision for options to offer the student. For a recent closure, students were content to take up places on an alternative programme which offered equivalent vocational qualifications.

Changes to a programme (moderate risk)

The College will take all reasonable steps to minimise the impact of any material changes to programmes on students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis) and will consult with students about any material changes to programmes which might affect them. Operational changes to a continuing course will often be instigated from student feedback. In which case the tutor will then inform the programme leader who will then check the feasibility of the change with the partner university before returning to the student cohort to consult with them on the plan of action/progress on the change request. If the change is instigated by either the College or the partner university, students will be consulted initially (the university link tutor will usually be present). They will also be offered the opportunity to discuss the proposed change as a group.

Where the academic changes are instigated by our awarding bodies and communicated to the College via Academic Link Tutors, Programme Directors or at Review meetings. While major changes programmes are rare, they form part of the contract with the student to ensure that they understand their rights and responsibilities. Our awarding bodies generate and validate a set of policies and procedures covering both their franchised and validated programmes, by which the partner College must abide. The CMA and our partner universities, awarding bodies ensure fairness of policies and practices for course changes. For Pearson programmes, HE Academic Planning and Student Experience Committee receives the suggested changes, action plan of communication and signs it off for implementation. The College recognises the requirement for good practice in communicating with students about course changes when they occur. The College ensures that such communications are transparent, fair and are supported by accessible policies, procedures and practices. The importance of doing so is important in both the short and long term, for students now and in the future, and for the College's reputation.

Measures are taken to ensure that the communication of and adherence to the policies are comprehensible to students and ensure that they offer students a precise and unambiguous guide to any course changes. When putting them into place, we consult with our team of HE Student Council and student representatives and student cohorts to test their acceptability or if there are any issues arising. It is also to verify that the communication around them has been effective and if we have been successful in minimising the impact on students affected by changes.

Communication of any nature is made through the programme handbooks and via student representatives and communication will be reinforced by letters, emails, texts and personal telephone conversations as appropriate and relevant to the nature of the change. Students receive direct communication from the Programme Leaders and any student absent will receive written notification. Course information on website is updated accordingly.

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

[Our Higher Education – Terms and Conditions 2023/24-](#)

https://www.lsec.ac.uk/images/governors/New_Docs_1218/LSEC-HE-TermsConditions23_24.pdf

Appendix 2 [Higher Education Tuition Fees Policy for 2023/24](#) is provided with this Student Protection

Plan and will be available:

https://www.lsec.ac.uk/images/policies/Tuition_Fee_Payments_and_Other_Charges_Policy_23-24.pdf

[Higher Education Refunds and Compensation Policy](#)

https://www.lsec.ac.uk/images/policies/Highereducationprocedures/LSEC_HE_Refunds_and_Compensation_Policy_and_Procedure_2023_24.pdf

Higher Education [Student Transfer Policy](#) -

https://www.lsec.ac.uk/images/policies/LSEC_Student_Transfer_Policy_2023_24.pdf

We believe that our reserves would be sufficient to provide refunds and compensation for the students for whom we have identified an increased risk of non-continuation of study.

3. Information about how you will communicate with students about your student protection plan We will communicate our Student Protection Plan to current and future students by publishing it on our website, by signposting the Student Protection Plan when offering applicants a place on our courses, and by linking to the plan in our students' programme handbooks.

We will communicate the Student Protection Plan to staff by all-staff emails and the staff e-newsletter. We will ensure that staff are aware of the implications of our Student Protection Plan when they propose programme or course changes by linking to the plan from our Quality Handbook and programme(s) and course change guidance.

Our Student Protection Plan has been developed by a Senior Management Working Group that includes representation from the Higher Education Student Council (HESC). The student protection plan will be reviewed annually and representation from HESC will be a part of this review.

The Student Protection Plan covers a range of potential risks to students' continuity of study and what the College will do in the event that a risk crystallises. How we will communicate and consult with students will depend on the nature of the situation in which the Student Protection Plan has to be implemented, so it is not possible to be specific in advance. The overarching principle of our communication is that, wherever possible, we will consult with students at the earliest opportunity to ensure that students are fully informed and can provide their views. We will normally do so through existing mechanisms that we use to involve students in their teaching and learning, such as student representatives on programme committees.

In all cases students will be referred to information for students published on the College website but, in addition, the College 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, for example by:

- 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

Where a student is required to transfer course or move to another institution there are likely to be implications for student finance arrangements. Student Services will contact affected students and provide detailed information, advice and guidance based on their individual circumstances. This process will be managed in accordance with HE regulatory bodies' requirements and in line with relevant College policies as well as the Student Transfer policy. Where the College has no option, other than to close HE programmes, it will consider measures to protect student experience: where possible, closing in a gradual way, over a period that would allow current enrolled students to be 'taught out' and thus complete their studies at the College; where the above is not possible, in supporting students to transfer to appropriate programmes at other providers and (where appropriate financially) by compensating students because of disruption to their studies.