

CECOS Student protection plan

Provider's name: CECOS College London

Provider's UKPRN: 10037364

Legal address: Edmonton Campus,
St. Georges Chambers,
23 South Mall,
Edmonton Green, N9 0TS, UK

Contact point for enquiries about this student protection plan: Professor Mark Mabey (mark@cecos.ac.uk) and Mrs Mandy Hobart (mandyhobart@cecos.ac.uk, tel: 07946 870071)

Student protection plan for the period [2022-2023]

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 Student Protection Plan (the Plan) sets out what measures the College has in place to protect its students, in the event that a risk to the continuation of studies arises. This plan is reviewed annually by the Academic Board and is an integral part of wider risk management strategy of CECOS College. This plan will be implemented with other parts of the risk assessment and management strategy.

CECOS College London has extensive experience in protecting the quality of study for its students. This Student Protection Plan builds on the College's experience and is intended to assure present and potential learners that we have appropriate measures in place to guard continuance of their studies with us.

In order to help further minimise any risks to students, CECOS College London has a Further Education arm to its business which can provide financial support to the Higher Education business element, the streams of revenue include:

- Apprenticeships
- Adult Education Budget
- ESF Programmes

In preparing the Student Protection Plan for 2022/2023, CECOS undertook a risk assessment. This formed part of our ongoing risk management process. The reason was to identify risks likely to crystallise.

We have covered the following types of events in the Student Protection Plan which has involved the College in taking into consideration a wider range of risks as shown in the list below:

1. Discontinuity of Course
2. Closure of Campus/change of Location
3. Company ceases to operate/financial risk
4. Withdrawal of partnerships and/or approval by awarding bodies
5. Risks of an Academic nature
6. Risks arising from compromised reputation
7. IT Failure

Our plan sets out the nature of risks, along with examples of events that may pose a potential risk and explains what actions the College may take in order to minimise the impact of these events.

The CECOS College London student protection plan sets out what students can expect to happen should a course, campus, or institution close. The purpose of a plan is to ensure that students can continue and complete their studies, or can be compensated if this is not possible. Our Student Protection Plan is easily available to current and prospective students and seeks to address specific risks to the continuation of study in a proportionate way.

We have divided the risk into the following three categories;

1. Low: an event may occur only in exceptional circumstances (possibility at less than 10%)
2. Medium: an event may occur (possibility between 30-50%)
3. High: an event is expected (possibility at more than 90%)

We have also classified impacts as:

- a. Minor: would be resolved through day-to-day activity
- b. Moderate: would be resolved through a dedicated and designated team
- c. Extreme: would be resolved through input from Senior Management or an external/third party.

The measures that we have put in place to mitigate the identified risks are those that we consider to be reasonably likely to protect the student interest.

1. Discontinuity of Course

We consider the risk of our students being unable to complete their courses to be low. The risk we will be unable to offer courses attracting sufficient numbers of students to make them viable is also low, with demand always exceeding available places.

The performance of all our course teams is monitored through a monthly performance review process against an agreed set of key performance indicators. This covers education and financial performance measures. Additional support is put in place for those students for which a specific support need is identified.

The risk to an individual module not running is low for a compulsory module and medium for an option module. If we are unable to run a module due to the viability of student numbers or availability of staff, we make a decision at the earliest possible opportunity. We would let the students affected know in advance of the decision and offer a suitable alternative module. Any changes would follow the College's Change Policy. The risks to students being unable to complete their studies because of a module not running are low.

The most likely cause of discontinuation is through a course closure. This is likely to occur when a course reaches the end of its marketability due to a trend of falling recruitment or changes within the field of study. We believe this unlikely as our curriculum plan covers areas of high demand – Education, Business and Health & Social Care. If this were to happen, there would be ample opportunity to give applicants and students notice of the change. This would coincide with a replacement by a new course within the same subject area as the closed course. We have a commitment to the teach-out of the curriculum to the students registered on the closed course.

Our plan for dealing with the closure of a course includes arrangements for communicating with applicants who accepted a place. Applicants who accepted a place on a course which is then closed, but have not commenced study, will be offered advice and support. This is to help them decide whether to transfer to a different course with us or to seek a suitable alternative at another provider. Where they choose another provider, we will work with that student to broker the transfer.

We would also work closely with students who are on a course closed to new applicants. This is to ensure they are supported in their studies so they can complete their qualification. In some cases, this support might include a transfer to another course. The risks to students being unable to complete their studies on courses closed to new applicants are low.

The risks we are no longer able to deliver material components of our courses is low. We have protections in place for the students affected. The College makes any material change in accordance with the College's Change Policy. A key requirement of the Change Policy is a requirement to consult the students affected by the change.

We regularly review our academic provision through our Annual Course Monitoring process. This is to maintain academic standards and to ensure our courses keep up-to-date, and meet awarding body and validating partner requirements. These reviews may result in changes to course provision. We have Course Modification procedures and agreed timescales to inform students of such changes.

The risk we decide to discontinue a course before students have completed is very low as we would plan such a change to allow current students to complete their studies. We would also take steps to minimise the impact on their studies and fully consult with the Student Council.

The risk we do not have the staff to teach your course is low. We successfully recruit qualified staff to teach on our courses. We provide programmes to support and develop our staff. We work to ensure our teaching staff have, or study for, teaching qualifications. The College also has a bank of skilled and well qualified sessional teachers to provide a further layer of cover if needed. Additionally, we have a number of employers who are happy to provide expert input to sessions.

Considering staffing requirements forms part of our processes for approving new courses and modules. There is an annual planning process where we consider teaching requirements based on courses to be offered and numbers of students planned. This means we are able to identify and take action relating to staffing in advance of the new academic year, and each new cohort intake.

2. Closure of Campus/change of Location

It is our assessment that the risk we are unable to operate at our Edmonton and Birmingham Campuses is low. CECOS has in place a legally binding lease for the premises that it holds for providing education. This Edmonton lease is of 15 years duration and Birmingham has ?? both landlords have confirmed this can be extend as needed. CECOS has invested heavily to ensure the Campuses are able to support the delivery of high-quality learning and teaching to all of our students. There is already over capacity withing the current accommodation and an option to extend our accommodation in the buildings if required. We currently have no plans to leave our current sites. However, in the future, if this were to change then, special consideration would be given to the individual needs of our students.

In case of temporary disruption to learning caused by a short-term issue with the building, we have an option to rent out external rooms at a nearby both buildings. Both leases require the landlord to give 6 months notice on the lease, so in the unlikely event that we are required to move, there is ample time to find alternative premises, which are readily available in our area.

In the event that a safety or security incident occurs, the College's Emergency Planning and Business Continuity Framework is brought into effect. In addition, we have contingency plans in place relating to Covid-19. In the event of emergencies that impact students, communications would be managed through business continuity plans to provide information on the available access to our facilities, including a transfer to online delivery as needed.

We have comprehensive insurance cover in respect of all risks, including property and business continuity, to ensure it has sufficient resources to sustain the provision of education in the event of a serious incident at any of its campuses.

3. Company ceases to operate/financial risk

It is our assessment that our current financial position means the risk we will become unable to operate is low. Over the last thirteen years of trading, we have demonstrated year-on-year growth, our current business plan projections indicate this growth is set to continue. This is also documented as part of the

commentary submitted by our accountants. The College keeps sufficient funds in reserve and has sufficient bank overdraft facilities to protect us in the event of a financial crisis.

We rate the medium- and long-term financial strength of the College as good. This judgment is based on:

- Positive balance sheets
- Strong ESFA financial health rating
- Our self-assessment judges us as good across all areas of provision
- Strong and growing partnerships with a number of HE and FE providers
- Direct access to funding via the Register of Apprenticeship Training Providers (RoATP) - Main Provider
- Additional partnership funding for Adult Education Budget and ESFA funding agencies regionally
- A growing portfolio of full-cost programmes

We identified no risks likely to crystallise that would mean we were no longer financially sustainable.

We have business continuity plans in place to deal with challenges relating to recruitment. These include strategies for extending the recruitment cycle into Clearing.

4. Withdrawal of partnerships and/or accreditation by awarding bodies

This risk that an awarding body may withdraw their accreditation or validation is judged to be low. This is because the College is fully aware of and up to date with the requirements needed in order to be accredited by such bodies. We have processes in place to regularly review and renew such accreditation. We will work with our awarding organisations in order to mitigate against and reduce any risk of a particular course withdrawal. Our staff are highly experienced in the management of awarding body and University partnerships.

If in the very unlikely event that an awarding body or University partner withdraws its accreditation, the College would provide an option to 'Teach Out' to its current students and would work out the details with the partner/awarding body. Any prospective closure, in case of withdrawal, would be done systematically and through a phased process so that all affected students can complete their studies.

5. Risks of an Academic nature

Risks of an academic nature are judged to be low. This is because of the tight internal controls on student performance and a hierarchy of quality challenge and support through the organisation. Self-assessment and quality improvement planning are embedded and working well across the College and data is readily accessible, timely, accurate and used well by all staff. Regular updates on student performance are provided to the Senior Leadership Team.

6. Risks arising from compromised reputation

Risks of compromised reputation are judged to be low. CECOS knows that managing reputational risk begins with recognising that reputation is a matter of perception. Our overall reputation is a function of our reputation among our various stakeholders - students, employees, employers, regulators, partners, and the communities in which we operate. Our strong positive reputation among our various stakeholders results in a strong positive reputation for the company overall, which is tightly managed.

7. IT Failure

The risk students will be unable to complete their course because of a failure of IT infrastructure is low. We have operational, tested and robust IT business continuity arrangements in place including contracts with external professionals. We run IT crisis simulation exercises once a year to ensure we can address risks to the continuity of our systems.

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

1. Discontinuity of Course

Risk: Low as alternative courses may be identified and introduced to meet student needs. The risk that College may not be able to deliver a full programme due to lack of staff is covered by a pool of associate lecturers. Staff turnover or non-availability of other resources is planned for.

Likelihood: As notice periods require awarding bodies and organisations to inform providers/partners of any anticipated course closure and to ensure teach out arrangements are in place. This means the risk level is LOW.

Impact: Minor to moderate as alternative programmes would be identified for new intakes and teach out would be provided.

Rationale: The College may make a strategic decision to close a programme because of any or all of the following factors:

- i. insufficient enrolments which render the course non-viable from an academic, student experience or resourcing perspective;
- ii. the course has been superseded in the College portfolio by another programme;
- iii. the course no longer aligns with the College's mission. In such cases and where possible, the College will offer existing students a choice of two options:
 - a. To continue with their programme which will be 'taught out' to allow students to complete;
 - b. To facilitate students in taking forward credit to other programmes at the same level, or to finding an alternative provider who will support students to complete their studies.

Once a programme is established and the College has developed an understanding of the demand for places, business decisions linked to the delivery of these programmes each year reflect on historical patterns of recruitment. Should a decision be taken to cease to offer an established programme it will be based on the pattern of recruitment and will be made in good time to ensure that current students have the opportunity to complete their programmes and prospective students receive clear communication regarding the College's decision to close the programme, in line with our student protection plan.

We have a continuous staff development programme to ensure that we grow expertise in potential shortage areas. We operate a progression planning system to ensure that trained staff are available throughout the taught and management sectors of the College. In the event of staff shortages, we would look to recruit temporary staff if we were not able to cover this for our pool of associate lecturers. Temporary staff would be extensively supported by our outstanding practitioners to ensure consistent quality of delivery.

2. Closure of Campus/change of Location

Risk: All or part of our Campus is closed or not fit for study for a shorter or longer period of time.

Likelihood: very unlikely and the risk level is LOW

Impact: Moderate as legal leases in place.

Rationale: The College has signed a proper and professional/legally binding leases for the premises that it uses for providing education. Therefore, it is highly unlikely that the College is asked to change its premises or discontinue its operations. The premises are well maintained, and its risk assessments are fully completed and regularly monitored. Appropriate health and safety measures and appropriate policies are in place to ensure that it is highly unlikely to face a risk of closure or discontinuity.

In case of temporary disruption due to a sudden damage to the premises, the College has an option to rent external rooms at a nearby College as well as suitable accommodation in the nearby business park. In unusual circumstances of losing the lease, the College will use the time before the premises are handed back to find other appropriate premises for the delivery of programmes.

CECOS College London has no plans in future to close down its current site. The response to any associated problem would depend on the nature of the event. In all cases special consideration would be given to the individual needs of the students.

3. Company ceases to operate/financial risk

Risk: The College is no longer able to operate due to poor financial performance or lack of financial viability.

Likelihood: very unlikely and the risk level is LOW

Impact: Extreme

Rationale: CECOS College London has a good prospects and its expected financial performance is reflected in the projections, business plan and commentary submitted by our accountants. The shareholders are committed to raising and providing funds in case of any such financial crises. The College will also keep an adequate financial reserve and has sufficient bank overdraft facilities to protect against short to medium term financial performance shortfalls. As mentioned in the introduction in order to help further minimise any risks to students, CECOS College has a Further Education arm to its business which can provide financial support to the Higher Education business element when needed.

We have business continuity plans in place coupled with the support from our shareholders and Directors. Such inside support would continue to allow students to either complete their studies or to be transferred at an appropriate point to another provider. Our balance sheet and reserves provide a stable base for the College and we plan to generate positive net cash flow from operations in both further and higher education provision for the foreseeable future.

4. Withdrawal of partnerships and/or accreditation by awarding bodies

Risk: Awarding bodies may withdraw their accreditation from the College or any partners withdraw their validation.

Likelihood: very unlikely and the risk level is LOW

Impact: Moderate

Rationale: The College is fully aware of and up-to-date with the requirements of its awarding bodies and institution and has processes in place to regularly review and update its systems and to provide data to meet approval and partnership requirements. The College has an appropriate and current Quality Assurance policy, processes and diagram, along with a designated lead for the quality assurance process. A Quality Management Group also monitors and advises on partnership and awarding body requirements and monitors the outcomes of centre visits and inspections by external bodies including Ofsted, Pearson, City and Guilds, partner colleges and partner university link tutor visits. Feedback from external examiners and external quality assurance visits is also monitored by Programme Managers, Academic Board and the Quality Management Group and actions for enhancement included in programme and whole College action plans.

The College will seek to work with a range of awarding organisations and partnerships in order to mitigate against and reduce any risk of a particular course withdrawal. The Principal and senior management team are experienced at managing partnerships with awarding bodies and Universities alike.

Our stakeholders also carry out their due diligence checks linked to the College's compliance and standards regularly including undertaking audits that ensure our processes and procedures are robust and meet awarding body and organisation requirements. In the unlikely event that an awarding body or partner withdraws its accreditation, the College would take forward a 'Teach Out' option for its current students. Any prospective course closure, in case of withdrawal would be done systematically and through a phased method so that all affected students can complete their studies. We understand that the circumstances leading to the need to teach-out are exceptional, and would be managed and delivered in a way to ensure student learning is not adversely affected. The College has undergone

awarding body annual monitoring visits and an Ofsted inspection with favourable outcomes in all cases which attest to the effective College practices.

5. Risks of an Academic nature

Risk: Change of course, amendment, suspension or updates

Likelihood: periods of notification are required to protect current students and the risk level is LOW

Impact: Minor

Rationale: An ongoing commitment to quality assurance and enhancement at CECOS and oversight its validating partners and/or awarding bodies means that, as required, programme content, regulations and policies are updated. Communications with awarding bodies and partner organisations ensure that statutory requirements and timelines for changes and updates are met. Oversight of compliance with standards is maintained through the operational committee structure of the Quality Management Group and the Academic Board and the Programme Management Committee. Programme managers are key points of contact in ensuring all teaching and support staff are aware of impending changes and implementation dates.

Where updates or suggestions for amendments to content are made, for example substitution of modules, changes to module contents or assessment activities, these will be discussed by Academic Board which includes student representation, before being passed to the validating partner or awarding body. Meetings are also held with relevant student cohorts to gather their feedback. CECOS undertakes not to make any changes to programme content within 3 months of the start of the first academic year affected.

Changes to regulations and policies may be prompted by the validating partners and/or awarding bodies and organisations and will be considered by the Quality Management Group and Academic Board. Revised regulations shall only apply to students enrolling after implementation of agreed revisions unless changes are not deemed significant. As a result, different regulations may apply to different cohorts on a programme and will be documented in the Programme Handbook for each individual cohort.

New or revised policies shall apply to all students from the start of the academic term following approval by the College's Academic Board, with a proviso that for the remainder of the current academic year, no student may be treated disadvantageously in comparison with the previous policy.

The recruitment strategy accounts for all planned events (redundancies, restructuring, end of contracts) and unplanned events (unexpected death, illness etc). In either case, an impact assessment would be carried out immediately and gap filled with the help of multiple methods as explained above.

The College keeps all key teaching and learning resources on its Moodle VLE in the form of course outlines, lesson plans, lecture notes and presentation slides, articles and case studies etc. Such resources are safely kept online with only authorised access to staff and students, wherever applicable. The website and Moodle have a regular back up through the College server. In the case of needing to change IT supplier, the management of the College would manage the structure and timing of such change in order to ensure minimum or no disruption to studies. Management would also consider alternate means of delivery during the implementation by making best use of alternate or unaffected systems. In the case of third-party involvement, management would work to minimise or manage disaster recovery systems jointly.

6. Risks arising from compromised reputation

Risk: Negative Publicity, incident at the College / Accusation on Staff member

Likelihood: The College has clear a complaints policy procedure and grievance policy for dealing with complaints and seeks to address issues in a timely way and the level of risk is Low.

Impact: Minor the College works to ensure all materials are clear, current and accessible, and that staff and students are valued.

Rationale: The College is keen to ensure that students are provided with a good quality learning experience. Regular student surveys are completed and student have access to a clear complaints procedure to allow the College to address concerns in a timely matter. Any threats to the College's reputation will be addressed as a matter of priority, and as appropriate, legal advice will be sought to address any inaccurate or threat to reputation information.

Negative Publicity.

The College understands the sensitivity of negative publicity and has put in place staff responsible for ensuring that marketing and business development activities are closely monitored and that website documentation is accurate. All published information about CECOS provision is reviewed by Academic Board and authorised by the Principal and/or the Chief Executive Officer.

7. IT Failure

Risk: Backup systems are in place along with internal and external IT expertise so the level of risk is seen as Low.

Likelihood: Very unlikely for any length of time, so the level of risk is low.

Impact: Low due to backups and professional support.

We have a fault-tolerant, cloud-based, IT Infrastructure. Contracts are in place to assure the continuity of our IT services, with robust IT business continuity arrangements. In addition, all students and staff will receive text messages informing them about any problems with or interruption to the IT system through a group messaging facility.

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

CECOS College London has a comprehensive policy for refunds and compensation which is reviewed annually and is available to student through website links to student information:

[https://cecos.ac.uk/Student information/policies](https://cecos.ac.uk/Student%20information/policies)

The refund policy applies to all students who either pay their own fees or have their fees paid by an employer or a sponsor, and student will be entitled to a full refund of fees. Where students have their fees paid through access to loans provided through the Student Loans Company, refunds are covered by the policies of the partner institution with whom the individual student is registered, namely, the policies of ¹Staffordshire University, ²North Hertfordshire College and ³Swindon College. In all cases the College will seek to ensure that students are treated fairly.

Students who have to incur additional travel costs will also receive compensation from the College to cover costs as appropriate. In most cases other local providers are available to offer students the opportunity to continue with their studies.

¹ Staffordshire University Fees Refund & Compensation Policy: www.staffs.ac.uk/students/course-administration/academic-policies-and-regulations/refund-and-compensation-policy

² North Hertfordshire College Refund Policy: www.nhc.ac.uk/wp-content/uploads/2020/09/NHC-HE-Student-Compensation-and-Refund-Policy-1920-R.pdf

³ Swindon College Refund Policy: www.newcollege.ac.uk/adults/terms-fees-and-conditions#:~:text=Cancellations%20and%20refunds&tex

The College does not operate any student bursaries at the present time, and no bursaries are currently offered by the partner colleges or university.

The College has sufficient financial reserves which will allow for compensation to be paid to the very small number of students who do not receive student loans.

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

The Student Protection Plan (SPP) will be available to students on the College's website and through the VLE. A full consultation with Student Council representatives from each cohort has informed the development of the SPP. A draft of the SPP has been made available for students to comment upon via the VLE. Feedback obtained has been used to ensure that the SPP is clear and relevant to student needs.

If any changes are made to the Student Protection Plan as a result of ongoing feedback or the need to meet sector requirements, these changes will be fully debated by the Student Council prior to changes being finalised. The updated plan will also be reviewed by the Quality Management Group, the Senior Leadership Team and the Academic Board.

In the event that key aspects or content of the SPP require action or revision, the Principal will notify stakeholders in writing ten working days prior to any action being taken or revisions to the plan made. Once they have been notified, stakeholders will receive information on who they can contact. Where student provision is to be changed or discontinued, discussions would take place with the Student Council led by the Principal, and comprehensive student consultation will also be undertaken and led by the Principal.

The Plan will also be available on the VLE in the downloads section. Any extensions or changes required, will be communicated to the staff and students via email and the VLE. Updated versions will be placed on the College website.

The SPP will be reviewed annually to ensure it remains relevant, effective and up-to-date. The annual review team will include all members of the Students Council. The finalised updated plan will be ratified by Academic Board. The students will have access to external and independent advice should they so wish, and the Student Council will be consulted on all decisions made in relation to the Student Protection Plan.

Students will be able to gain additional advice and guidance from services at our partner colleges and at our partner university as appropriate, including in relation to any risks to the continuation of their programme of study. In terms of complaints, the College's Student Complaints Policy also includes guidance on access to the Office of the Independent Adjudicator.