



David Game College

31 Jewry Street, London EC3N 2ET

Student Protection Plan for the academic year 2019/2020

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1. Introduction and Guiding Principles

David Game College is committed to delivering high quality education, in a safe and inclusive environment and ensuring that all of its students achieve the best academic outcomes.

The College's guiding principles in the development of this plan are to:

- make every effort to ensure that the programmes offered to students are delivered as described;
- accept that it may be necessary to make changes to its provision to maintain currency and validity;
- always seek to minimise disruption to students and give special consideration to its widening participation population and those with protected characteristics;
- endeavour at all times to keep students appropriately informed with regard to changes that may be necessary and will bring these to their attention as soon as possible;

Student Protection Plans (SPPs) are intended to provide assurance to current and future students that higher education providers have in place appropriate arrangements to protect the quality and continuation of study for their students. The production and publication of a SPP is a requirement of registration with the Office for Students (OfS)

This Student Protection Plan looks at the strategies in place to mitigate the risks to students following higher education courses at the David Game College Higher Education Centre (DGHE). It also considers the wider context of institutional change/closure for the College as a whole. The plan lays out measures the College will take in order to protect the students' interests and ensure their continuity of study. Note: These are in addition to statutory rights, which remain unaffected.

This Student Protection Plan has been informed by the David Game College Institutional Risk Register and Business Continuity Plan which were developed under guidance provided by an external management consultancy. The coverage of those documents is institution-wide (i.e. concerning all provision at David Game College).

The risks identified which impact specifically on David Game Higher Education students (at RQF/FHEQ Levels 4 to Level 6) are listed below in Section 2. An assessment of these risks has been made and a risk factor applied depending on the likelihood of an event taking place. Depending on the risk level, mitigation strategies have then been outlined in order to demonstrate how continuation of study will be ensured (note: student protection exists for students in the other departments of the College as detailed in the Business Continuity Plan).

Section 3 details policy with regards to refunds and compensation in the event that the College is unable to preserve continuation of study and Section 4 considers communications, student engagement and student support.

This Plan is owned by the Board of Directors (the College's governing body) and managed by the College Leadership Group (CLG).

2. Risk Assessment - Potential Risk Events and Mitigation Strategies

This section looks at the measures in place to:

1. **Mitigate risks from occurring in the first place;**
2. **Identify and manage risks should they occur.**

2.1 Risk prevention/minimisation through good governance

Good governance is the key to mitigating risk generally. The College has:

An effective Corporate Governance Framework that ensures regulatory compliance

A policy driven committee structure ensuring good Academic Governance

Strategy that enables competitiveness through the application of key performance measures

Risk management processes including: Risk register; Business continuity plan and Risk committee

Financial planning and forecasting with institutional growth across both FE and HE which spreads risk of under-performance in one particular department

Effective management at Programme level with Policy and Procedures to ensure programmes are delivered as described.

2.2 Risk management (assessment and mitigation)

2.21 Introduction

DGHE is committed to helping its students achieve the best academic outcomes from their studies. However, events may occur, which mean that unforeseen changes have to be made to modules or programmes. Provision for such minor events is detailed in the College's Terms and Conditions of Enrolment.

The College will always communicate any changes to students as early as possible, with clear information and options. In cases where there is an event that results in a material change, e.g. programme changes, suspensions, closures or institutional closure, the College will make every effort to minimise disruption by offering effected students, for example, the chance to transfer on to another course or switch to a different provider. These events may be triggered by situations such as (but not limited to):

- significant material changes;
- inability to operate as intended;
- loss or restriction of licenses;
- revocation of OfS registration;
- restriction or withdrawal of franchising/validating agreement(s) by awarding bodies;
- closure or relocation of one or more campuses;
- a decision not to continue running an existing course;
- major changes in the contents of a course;
- temporary disruption(s) of any kind due to uncontrollable events;
- inability to deliver specific timings of study such as day-time or evening;

- the unanticipated departure of key members of College staff;
- inability to recruit staff with the necessary skills to deliver a course.

Where students are required to change course or provider, there may be implications for their student finance arrangements (e.g. SLC loans). In such cases the College's Student Services team will provide the necessary information, advice and guidance to allow an effective transition.

2.22 Significant material changes

The following 'risk events' are considered under this SPP with details provided on the measures we will take in specific situations:

College closure

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>A decision to close the institution has been taken for strategic reasons.</p> <p>We are unable or no longer intend to operate due to financial performance.</p>	Low	<p>College strategy is to grow portfolio provision in both FE and HE and spread sector risk.</p> <p>The risk of being unable to operate due to financial instability or unsustainability is low because our balance sheet and cash reserves are relatively healthy.</p> <p>Student numbers are growing. The College has long term property lease arrangements.</p>
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
<p>Good governance and regulatory compliance Maintenance of Risk Register and Business Continuity Plan Quality provision Course development Effective marketing and recruitment campaigns Financial planning and forecasting</p> <p>In the unlikely event the College had to close we would make immediate announcements and convene consultation meetings with students. The College would first always seek to 'teach-out' programmes but failing this would ensure the continuation of studies for all students through transfers to alternate providers. In respect of this, the College has signed a Memorandum of Understanding with a provider of HND and Top-up Degrees in order to facilitate such transfers. If possible and/or where appropriate financial arrangements would be made according to the College's Refunds & Compensation Policy.</p>		

Loss of student loan facility

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
De-designation of entire provision or specific courses for student support	Low	Currently DGHE is sub-contracting student loans from New College Swindon for its HND provision and operates under a franchise agreement with Bucks New University for its Top-up Degree

<p>purposes (i.e. students no longer able to access SLC loans).</p> <p>Could occur if removed from OfS register or other major issue.</p>		<p>courses. Therefore its partner institutions draw down the SLC loan monies. The risk of them losing designation is very low according to their own SPPs.</p> <p>Under the OfS, DGHE courses will become eligible for loans directly but the loss risk is still considered low.</p>
<p>Mitigation Strategies (measures put in place to mitigate impact of risk events)</p>		
<p>Good governance and regulatory compliance.</p> <p>In the unlikely event DGHE students were no longer able to access student loans we would liaise closely with the Student Loans Company and OfS to allow enrolled students to complete their course/year. Failing this we would support students to transfer to alternative programmes or alternate higher education providers (including our current collaborative partners). In respect of this, the College has signed a Memorandum of Understanding with a provider of HND and Top-up Degrees in order to facilitate such transfers. Where appropriate, financial arrangements would be made according to the College's Refunds & Compensation Policy.</p>		

Withdrawal or non-renewal of franchise/validation agreement

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Loss or non-renewal of validation/franchise agreement (collaborative provision)	Low	DGHE admin and academic teams are fully trained in the regulation requirements of collaborative partners and therefore meet with expectations. Student numbers are good and programmes financially viable. Partners have long term strategy and positive attitude toward developing partnerships. Risk level is therefore considered low.
<p>Mitigation Strategies (measures put in place to mitigate impact of risk events)</p>		
<p>Good governance and regulatory compliance Quality provision and the maintenance of academic standards Collaborative partnership agreements that allow for 'teach-out'</p> <p>In the unlikely event the College were to lose a collaborative partner we would make immediate announcements and convene consultation meetings with students. The College would first always seek to 'teach-out' programmes but failing this would ensure the continuation of studies for all students through transfers to the collaborative partner institution or other alternate providers. In respect of this, the College has signed a Memorandum of Understanding with a provider of HND and Top-up Degrees in order to facilitate such transfers. If possible and/or where appropriate financial arrangements would be made according to the College's Refunds & Compensation Policy.</p>		

Suspension/closure of a course

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
A decision has been taken not to run a	Low-Medium	DGHE operates a Course Development and Approval Policy that ensures that any newly

<p>course for the subsequent year.</p> <p>A course fails to recruit suitable numbers.</p>		<p>proposed programmes are thoroughly researched to confirm market demand, financial viability, resource requirements, etc. That said, competition in the market could have adverse effects. The risk of later failure and withdrawal is therefore considered low to medium.</p>
<p>Mitigation Strategies (measures put in place to mitigate impact of risk events)</p>		
<p>Comprehensive market research Application of detailed Policy and Procedure documents Monitoring of recruitment activity Annual review of courses Measuring student satisfaction and achievement rates</p> <p>In the unlikely event the College had to close or suspend a course we would make immediate announcements to current students and cease any future recruitment. We would consider a number of mitigation options, depending on the circumstances and student needs. These would include:</p> <ul style="list-style-type: none"> Teach-out arrangements (guaranteed under College T&C's and collaborative agreements) Course Transfer arrangements (where suitable alternatives exist) College Transfer arrangements <p>These could include:</p> <p>Offering HND completion at sub-contracting partner premises (New College Swindon) or at other more suitable location (this will be covered under the NCS SPP)</p> <p>If HND directly funded (i.e. when DGHE under OfS registration) students would be offered transfer options to a number of other private colleges, with a similar range of courses and still within the Greater London catchment area.</p> <p>For the BA (Hons) Business and BA (Hons) Healthcare programmes, delivered under franchise with Bucks New University students would be offered protection under the University's SPP.</p> <p>Prospective students are informed at the time of application that courses are run subject to demand. Should an intake for a course need to be cancelled students are given reasonable notice. Students who have been accepted are offered an alternative start date and/or advice and guidance on alternative providers able to meet their needs sooner.</p>		

In-year major course content changes

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>Module closure or other changes to programme content due to regulatory framework changes.</p>	<p>Low-Medium</p>	<p>Current programme provision consists of Pearson BTEC HNDs and franchised Top-up degrees from Bucks New University. Both awarding bodies have published periodic review dates and/or curriculum changes are announced well in advance. The College is therefore well placed to avoid any in-year changes. The risk level is therefore considered to be low to medium.</p> <p>Where programmes have 'pathways options' there can be a risk that due to the lack of demand not all modules are offered. DGHE avoids these situations by only offering fixed option pathways.</p>
<p>Mitigation Strategies (measures put in place to mitigate impact of risk events)</p>		
<p>Annual monitoring of programmes Module evaluations</p>		

Monitoring of qualification framework changes
CMA compliance

In the event of major in-year content changes the College would first consult with student representatives. Where changes could not be agreed students would be given the opportunity to transfer to other programmes / modules where possible or required. Refunds and financial compensation would be considered as appropriate.

Suspension or revocation of Tier 4 sponsor licence

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Removal or suspension of the Tier 4 Sponsor Licence (the Home Office issued licence which allows a provider to recruit international students).	Zero-Low	No impact since no Tier 4 recruitment planned onto higher education courses for 2019/2020. In a College-wide context, where recruitment of international students does take place, risk management and mitigation is covered under the institutional Business Continuity Plan. College-wide the risk rating is also considered to be very low as the College has held a licence for many years and annually maintains good compliance metrics.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Compliance team applying strict policy ensuring compliance to UKVI regulations Strict attendance policy and monitoring Robust admissions processes In the unlikely event of a licence suspension the College would look to work closely with the UKVI to allow enrolled students to complete their year of study / programme. Where students are yet to start their course, they are given the opportunity to postpone their application pending the resolution of the suspension. In the case of a revocation, the College would take all reasonable steps to minimise the disruption, for example, by assisting affected students to switch to an alternative provider. In respect of this, the College has signed a Memorandum of Understanding with a provider of HND and Top-up Degrees in order to facilitate such transfers.		

Drop in country-specific student demand

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Reduction in enrolments from a specific country or region. In the current climate the main concern here is considered to be the countries from the European Union (i.e.	Medium/High	The College currently enjoys a strong representation from EU nationals who fund their studies through SLC loans. After the UK's exit from the EU, the existing funding arrangements for such students may no longer be available. However, we already know that the government has committed to funding EU students beginning courses in the academic year 2020/2021 (and we are optimistic that solutions will be found beyond

the impact of Brexit).		that). Any negative changes due to Brexit could therefore not manifest until the intake in September 2021 (i.e. beyond the scope of this plan). DGHE may then experience some drop in demand but does not anticipate this to be sudden since many EU nationals will gain 'settled status' and therefore qualify for loans as 'Home' students. We have ranked this risk as medium/high but have robust mitigation strategies in place.
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Mitigation Strategies (measures put in place to mitigate impact of risk events)

Diversification of marketing and recruitment channels
Introducing more FHEQ Level 6 course provision

DGHE is mitigating any risk of a fall in demand by building a strategy to target UK and international students. Central to this strategy is the introduction (February 2019) of top-up degrees which hold more appeal to the UK and overseas market than 2 year HNDs. Looking further ahead to the medium term, DGHE plans to replace the 2+1 structure with full 3 year degrees franchised/validated by a UK university. Initial discussions with potential partners are already at an advanced stage in this regard. In addition DGHE has just joined UCAS in order to raise the profile of the provision to UK students who are more likely to apply via that channel. With regards to developing international recruitment, David Game College already holds a Tier 4 licence (for GCSE and A level provision) and has a well-established network of agents that could also be exploited by the HE department. Compliance systems and policies are fully embedded and would be shared by HE should an application to the UKVI for a Tier 4 licence be successful after securing OfS registration. It is felt that these actions would diversify the student body and mitigate the risk associated with relying on the current demographic.

Loss of 'Confidence' from the QAA

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The College fails to meet the educational oversight expectations of the Quality Assurance Agency (QAA)	Low	<p>DGHE was subject to an Annual Monitoring visit in November 2018 with the final report, published in January 2019 confirming that the College was making acceptable progress. Another review by the QAA is not required if the College is registered under OfS before November 2019.</p> <p>DGHE takes its regulatory obligations very seriously. QAA reviews have consistently cited the College for its adherence to quality standards for the past 5 years.</p>
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Good academic governance.		

Loss of accreditation from an awarding body (Pearson Centre/Course approval)

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Loss of accreditation from an awarding body Changes to regulatory framework affecting a specific course	Low	Our HND courses are accredited by Pearson and regularly monitored and reviewed in order to meet the changing demands of employers and students. DHGE is subject to an annual Academic Management Review which is a rigorous assessment of the centre's processes and standards. Having administered Pearson qualifications since 2013, DGHE staff are very familiar with the requirements of centre accreditation and we do not consider that losing accreditation would be at all likely.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Good academic governance In the event that a new regulation or loss of centre approval makes a course impossible to deliver, the College will teach out the enrolled students and review the viability for delivery in the next year. If required we would enter into discussions with Pearson to find a suitable resolution.		

Loss of OfS registration

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The OfS does not approve the College's admission to the Register or removes it (giving rise to students being unable to access student loans)	Low	This is considered a low risk as the College has the governance framework and operational committee structure to ensure regulatory compliance.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
College strategy Good governance and regulatory compliance Financial sustainability Effective policies and procedures Annual monitoring and review In the unlikely event the College is not approved for registration or after approval, was removed, we would work with the OfS to minimise the resultant disruption to affected students and applicants and comply with their requirements.		

Loss of key staff or industrial action

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>The unanticipated departure of key members of institution staff.</p> <p>Industrial action by institution staff or third parties.</p> <p>Changes in the immigration rules affecting employment rights of EU nationals may affect DGHE staff.</p>	Low	<p>DGHE maintains a core of full-time administrative and academic staff and a significant pool of part-time and freelance lecturers for delivery purposes. Its central London location means that its faculty base is well resourced with multiple options for re-staffing when staff are lost. The provision of a good working environment, competitive salaries and ongoing CPD opportunities has resulted in a largely stable and long-standing team with little disruption to student/course continuity.</p> <p>All DGHE staff vulnerable to changes in their employment rights have been advised to apply for settled status.</p>
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
<p>HR strategy</p> <p>Contracts of employment, notice periods and CPD opportunities</p> <p>Remedies for staff losses is also addressed in the College's Business Continuity Plan (BCP).</p>		

Disruption to college activity

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>Disruption to activity (short or long term) could occur through a number of events including: fire, theft, terrorism, etc.</p>	Low	<p>The College operates secure premises, guarded and patrolled by a small team of security staff. CCTV is in operation in all areas. A Lockdown policy is in place and can be implemented in cases of suspected terrorist activity. Health & Safety and Fire Safety are taken very seriously with regular checks and drills taking place. AP testing is conducted annually.</p>
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
<p>Regular application of security, fire safety and H&S protocols</p> <p>Business interruption insurance cover</p> <p>The impact and remedy of significant physical events such as terrorism, damage to the building and/or equipment (e.g. by flooding, fire, etc) are covered more fully in the College's Business Continuity Plan (BCP).</p>		

3. Refunds and Compensation

The DGHE *Refund and Compensation Policy* can be accessed here: [<https://www.dghe.ac.uk/college/policies>]. Policy terms were determined by senior management and developed and scripted through consultation with a firm of solicitors with particular experience and expertise in the education sector.

Wherever possible the College will always seek to preserve continuation of study for those affected by any of the scenarios identified in Section 2. This will include continued access to other support services such as learning resources and student welfare.

The College will normally seek to 'teach out' academic programmes providing students with the opportunity to complete their course of studies. Where this is not possible alternative arrangements would be made.

In the rare event that it is not possible to arrange alternative provision, the College commits to refund fees and compensate other costs incurred by students, according to the conditions detailed in its *Refund and Compensation Policy*.

The College is a long standing and experienced provider of education and training and as such maintains sufficient cash reserves to ensure business continuity in the case of exceptional events and to cover the costs of refunds and compensation as described above. However, the College recognises the benefit of seeking ways to strengthen this position so will be investigating opportunities to protect refund and compensation costs through an insurance policy.

Students enrolled on a programme of study at DGHE which is under a sub-contracting and/or franchise agreement with a collaborative partner will fall under the protection of the partner's SPP.

4. Communications and Student Participation

4.1 Communicating the plan and engaging students

We will publicise our Student Protection Plan (SPP) to current and future students (and all related stakeholders) by posting it on the College website and internal VLE. We will draw attention to it in the student newsletter which is sent to existing students, new applicants and referral agencies. The College's Offer Letter sent to all new applicants will include a link to the SPP and is also referenced within the College's Terms & Conditions of Enrolment.

We will ensure that staff are aware of the implications of our student protection plan when they propose course changes, by highlighting the SPP at the Quality and Standards Committee, Programme Management Committee and Higher Education Administration Team meetings and ensuring any revisions are communicated to all relevant staff via the VLE.

We will review our student protection plan, on an annual basis, with class representatives at the Student Staff Liaison Committee meetings. All students will have the opportunity to be involved in the review by being asked by class representatives for their feedback.

4.2 Communicating material changes and supporting students

In the unlikely event that continuation of study is compromised or material changes to a course of study are necessary/unavoidable, we will inform students of any material changes to their course by email and where possible in face to face meetings. Notifications will also be posted on the College website and VLE.

For minor changes, we will notify students via our student portal and via email of any amendments by providing as much notice as is in our view appropriate in the circumstances. Where possible, we will look to provide this notice in advance, but this may not always be possible.

For major changes, we will notify students via our student portal and via email as soon as possible, and in any event, generally no later than 1 month before we are due to make the relevant change. Typically, we would aim to give a full term's notice. If students do not agree with a major change we make to the course, they will be entitled to terminate the course in accordance with section 25 of the *Terms and Conditions of Enrolment*, and may be entitled to an appropriate refund of the fees paid to us plus compensation.

If we need to implement the measures in our student protection plan we will offer advice, guidance and support to students via the College's Student Welfare Office on an individual basis, and collectively by convening an emergency meeting of the *Student/Staff Liaison Committee*.

DGHE will ensure that affected students are also either provided with, or signposted to, independent advice as appropriate to the given situation. Such advice could be from a collaborative partner institution, a Students Union, the Pearson awarding body or a legal representative.

Complaints about the implementation of any of the changes through this plan should be made via the College's *Student Complaints Procedure*.