

Student Protection Plan

Provider's name: NCG

Provider's UKPRN: 10004599

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Student protection plan for the period 2024-25

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 Higher Education and Research Act 2017 requires universities and colleges to maintain a Student Protection Plan to protect students' interests in the case of material change, e.g. programme changes, suspensions, closures, or institutional closure.

This student protection plan is to clarify what an applicant or student can expect if unanticipated problems occur. We have identified two categories of risk: the first set are those risks we think are "very unlikely" or "unlikely" to happen. The second set are risks we think are "reasonably likely" to happen. We set out details of the mitigation measures that might be applied.

Risks categorised as "**very unlikely**" or "**unlikely**". These events may be triggered by situations such as (but not limited to):

- A decision to close the college/organisation has been taken.
- Loss or restriction of taught degree awarding powers status.
- Withdrawal of designation for student support purposes.
- Major changes in year to course content.
- Changes to regulatory framework affecting a specific course.
- Loss of accreditation from regulatory bodies, e.g. Ofsted, PSRB, etc.

The way in which NCG is governed and operates means that appropriate control systems and checks are in place to prevent or positively react to an event which would lead to the above risks coming to pass. Effective and rigorous internal and external audits are in place. We have risk and assurance teams that have oversight of regulatory compliance. The level of risk that might result from unplanned changes is low because viability and sustainability are planned in advance.

The risk of being unable to operate due to financial instability is low because NCG's balance sheet and cash reserves are healthy compared to FE sector averages. NCG's disaster planning covers other actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment. Given the mitigation outlined above we believe that the risk of not being able to provide course continuity is low.

Risks categorised as "**reasonably likely**". These events may be triggered by situations such as (but not limited to):

- Failure to recruit and retain specialist teaching staff.
- Failure to recruit sufficient students.
- Disruption of college activity (e.g. temporary disruption within term-time).
- Industrial action by college staff or third parties.

- Removal of the tier 4 sponsor licence (the home office issued licence which allows a provider to teach international students).
- Revocation of Student Sponsor Licence.
- A strategic decision by the college to close a course or campus.
- Termination or Failure of a sub contractual partnership.

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

Failure to recruit and retain specialist teaching staff

To mitigate this risk, the following general measures have been taken:

- Structure of the curriculum where appropriate to share common modules, for example in our foundation degrees generic modules make up one third of the curriculum.
- Staff with specialist knowledge in research methods provide institution-wide masterclasses that are available to all students.
- As a National College Group there is support from other colleges within the organisation.
- We have a team of academic support specialists to provide 1-1 support for individuals, drop-ins and group workshops for a variety of academic support needs (i.e., referencing, presentations skills, SPSS, assignment structure, dissertations).
- In the skill-shortage subject areas market rate supplement packages are in place to successfully attract and retain suitably qualified and experienced staff.
- We have a robust staff approval system that is overseen by the Assistant Director of HE Quality and Standards. Any staffing changes within programmes must be reported to HE Registry and the C.V.'s of replacement staff are considered at a staff approval meeting. If the staff member is inexperienced then appropriate mentoring/training will be put into place.
- As part of business continuity planning there has been substantial investment in developing our teaching staff. A commitment to three dedicated professional development days in the academic year exploring; effective learning, teaching and assessment; undergraduates as active agents in their learning and collaborators in their learning experience.
- We have well-developed connections with regional practitioners who are experienced teachers who can deliver HE on fractional contracts. In all areas there are experienced HE staff who are now in management positions. In cases of staff absence they are able to provide cover to protect the student experience. There are schemes of work, module guides, and resources which mean that managers are able to provide continuity of the student learning experience.
- Teaching materials are available on the virtual learning environment to aid continuity of delivery, and enabled pivots in learning should they be required.
- We also have links with agencies where we can bring in teaching staff at short notice although this would be a last resort.
- Teaching staff are on two months period of notice which gives us time to contingency plan and recruit a replacement.
- NCG retain staff through opportunities of personal and professional development: Encouragement and support of colleagues to engage in personal development e.g. further and higher study either financially or with allocation of time; maintenance of staff currency with their technical or vocational sector e.g. payment of licence to practice; industrial updating release; collaborative community for colleagues engaged in research to support, share and explore their work and that of their peers.

Failure to recruit sufficient students

To mitigate this risk, the following general measures have been taken:

- All of our programmes are endorsed by regional employers to ensure that our curriculum is vocationally sound and likely to provide good outcomes for learners.
- We have built good relationships with local schools.
- NCG Colleges work with regional authorities to raise participation rates through aspirational activities, working with both local schools, industry, and with specialist providers.
- Activities to raise the aspirations of level three education and training students better prepares and enables students to access, progress and succeed in higher education.
- There are regular reviews of the curriculum portfolio to ensure that it remains attractive to students.

Disruption of college activity (e.g. temporary disruption within term-time)

Where events result in term-time programme disruption, NCG will consider whether it is practicable to make changes to programme delivery, rather than closing or suspending an affected programme, for example, by providing on-line learning materials. NCG will ensure that provisions are put in place so that they are able to meet the intended learning outcomes of their programme. NCG has effective Estates teams who are well experienced at minimising disruption due to problems with buildings.

Actions to minimise disruption may include:

- Temporary short-term suspension of programme delivery (e.g. where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate impact on students).
- Changes to the programme delivery location or method, which may include distance learning.
- Changes to the staffing of a programme, 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 programme.
- Provision of reasonable support to students for accessing a programme run by another provider, including making arrangements for the transfer of credits and information about academic progress.

Industrial action by college staff or third parties

NCG has established frameworks for consultation and negotiation with the recognised trade unions. It is highly committed to maintaining an effective employee relations culture and working with trade union colleagues to achieve reasonable solutions to matters that may arise from time to time. NCG has recently brokered clear partnership agreements with its recognised Trade Unions. This is in addition to the existing routine and regular communication with the Trade Unions at both operational and senior level.

Where industrial action does occur, NCG will seek to:

- Ensure that normal operations and services are maintained as far as possible.
- Take all reasonable steps to fulfil its responsibilities to students in ensuring that any disruption is minimised and students are not, as far as is possible to determine, disadvantaged by the action.

Removal of the tier 4 sponsor licence (the home office issued licence which allows a provider to teach international students).

In the event of suspension of Student Sponsor status, NCG will take all reasonable steps to minimise the resultant disruption to those services and to affected students by, for example:

- Working to meet the requirements of any compliance action and/or action plan implemented by UKVI.
- Working with UKVI to allow enrolled students to complete their current study/programme.
- Allow students already in receipt of a visa based upon an allocated CAS from the College to enrol and commence their studies.
- Offer students who have not commenced their travel to the College, the opportunity to postpone their application pending the resolution of the suspension.

Revocation of student sponsor licence

The College, in the event of revocation of Student Sponsor Licence will take all reasonable steps to minimise the resultant disruption to affected students by, for example:

- Continuing to provide teaching to students who are in country and enrolled onto an NCG award should the licence conditions permit for the length of time permitted; usually 6 months or to the end of the current academic year.
- Providing assistance to affected students to switch to an alternative Student sponsor, where permitted.

A strategic decision by the college to close a course or campus

Where NCG has no option, other than to close a campus or a course, 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 campus (teach-out).
- Supporting students to transfer to appropriate programmes, which may be 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.
- Making reasonable adjustments to programme delivery to minimise impact on the student experience.

Where part or all of the campus is rendered unusable for activities involving students, for example a temporary closure, NCG will typically consider remedies such as:

- Relocating provision to an alternative location, this may include hiring spaces for programme delivery (where possible nearby) and/or installing temporary buildings on the land owned by NCG (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 programmes via alternative means, such as distance learning. Where such an approach is taken, NCG will consider whether this it is appropriate for enrolled students who would be affected.

Termination or failure of a sub contractual HE partnership

NCG has a discrete HE partnership team which employs staff with responsibility for the management of partnership arrangements and assessment of the student experience. This team's activity cycle enables effective management of NCG partnership arrangements to ensure regulatory expectations are met and students receive a high quality experience and are given opportunities to achieve excellent outcomes.

NCG has contractual clauses to initiate and manage partner exit should there be reason to do so. NCG's legal agreements set out details of the requirements for partners to ensure student protection plan compliance.

In the event of a failed NCG partnership, or where NCG initiates a closure, students can typically expect to be able to complete their studies as part of a teach out arrangement. Where a teach out opportunity at the campus of study is not possible, NCG has a process for managing partner exit and will look to enable continued further study by methods such as:

- Enabling distance learning for students.
- Transferring students to another partner whereby NCG has an active contractual agreement in place.
- Teaching out at a campus of NCG.
- Be provided with support to transfer to another HEI subject to an admissions decision by the HEI (this is not an exhaustive list).

Students will also have the chance to end their studies and receive credit for their academic attainment to date.

In the event of partnership closure, NCG will contact students to provide information, advice and guidance on their options for continuing study. NCG recognises a loss of partnership may include a break in learning for these students until the student protection plan has been enacted. Students can expect to not be penalised by any loss of teaching during this period, reasonable adjustments will be made to the academic calendar to ensure students are not disadvantaged as a result of the partnership closure.

Partnership closure is an item on NCG corporation risk register.

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 Refund and Compensation Policy (available at <https://www.ncgrp.co.uk/>) 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 provide continuation of study. We consider refunds and compensation to be remedies of last resort and we are committed to doing all we can so that refunds and compensation aren't necessary. The Policy may be implemented as a result of any of the risks in this plan occurring.

Our refund and compensation policy contains information on the following circumstances:

- Refunds for students in receipt of tuition fee loan from the Student Loans Company.
- Refunds for students who pay their own tuition fees.
- Refunds for students whose tuition fees are paid by a sponsor.
- The payment of additional travel costs for students affected by a change in the location of their course.
- Commitments to honour student bursaries.

- Compensation for maintenance costs and lost time where it is not possible to preserve continuation of study.
- In some circumstances offer compensation for tuition and maintenance costs where students have to transfer courses or provider.

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

We will publicise our student protection plan to current and future students by including it on our website (<https://www.ncgrp.co.uk/>). Students are directed to our website as part of our Student Agreement which I sent during the course offer making process. NCG is committed to communicating any changes to students as early as possible, with clear information and all options outlined to prospective and current students.

We will ensure that staff are aware of the implications of our student protection plan when they propose course changes by providing guidance and training. The information will also be made available to staff new to teaching HE as part of their induction process.

Our students have been involved in discussions about the development of the student protection plan at HE Academic Board and the HE Governance Committee.

The student protection plan will be reviewed annually.

Our students will be involved in our review through focus groups, discussions at HE Academic Board, HE Governance Committee and in HE student forums.

We will inform our students if there are to be material changes to their course through the VLE, emails, letter and student representatives.

If we need to implement the measures in our Student Protection Plan we will provide information, advice and guidance on the range of options that are available to them to support students collectively and individually.

We will put in place an action plan incorporating student access to independent advice and guidance to ensure that our students can make the right decisions for themselves should we need to implement the measures in our student protection plan.