

# 1.0 Governance and Strategy

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## 1.14. Student Protection Plan

Version Number

Reviewed by Head of HE

Version Control Statement

Version	Date	Changes	Reason	Author	Next review
1	23/05/2018		New Policy	Academic Manager	May 2019
2	23/01/2019	Changes to titles and committees in line with the new Governance structure.	Annual Review. Will need a period review for the next Academic Year.	Director of Studies	August 2019
3	10/07/2019	Alignment to the risk register and full annual review incorporating references to other policies affected and external reference points	Full review	Director of Studies	July 2020
4	July 2020	Inclusion of university partner. Grammar and spelling checks and refinements	Annual Review	Head of HE	July/Aug 2021
5	July 2021	Change of address, Review of risk areas in accordance with the current risk register	Annual Review	Head of HE	July/Aug 2022
6	July 2022	General review in Line with the Risk register	Annual Review	Vice Principal HE	July 2023
7	Sept 2024	General review in Line with the Risk register and wider sector	Annual Review	Head of HE	Aug 2025

**External Reference Points**

- Higher Education and Research Act 2017
- OFS registration Conditions

**Related Policies and Documents**

Affects all other policy documents. This document should however be read together with the following documents:

- Risk Management Policy
- Contingency and Business Continuity Plan
- Refund and Compensation Policy

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# Student Protection Plan

Provider's name: Waltham International College Ltd

Provider's UKPRN: 10029843

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## Student protection plan for the period 2024/2025

### Introduction:

At Waltham International College (WIC) we hold students central to our organisation as such this plan will set out the measures WIC will take to protect student and prospective student interests and ensure the continuation of studies.

The measures contained in this plan are in addition to your statutory rights, which remain unaffected. All students studying under the Leeds Trinity University partnership will be protected under The Leeds Trinity University Student Protection Plan (<https://www.leadstrinity.ac.uk/media/site-assets/documents/key-documents/pdfs/student-protection-plan.pdf>). All students studying towards other higher education awards and in receipt of student tuition fee loans will be protected under this WIC Student Protection Plan.

To support and ensure ongoing transparency in this process we will continue to include student consultation and representation in our decision-making.

The Student Contract details the relationship between you and the awarding organisation, and also with WIC, and explains WIC's responsibilities and how programme changes beyond WIC's control are managed.

We are committed to communicating any changes to you as early as possible, setting out clear information and options. We will take all reasonable steps to minimise disruption and enable you to complete your studies as intended. However, where this is ultimately not possible you may, for example:

- be offered the opportunity to move to another programme.
- be offered a modified version of the same programme.
- be provided with assistance to switch to a different provider.
- be offered a financial refund and/or compensation (for cases where it is not possible to preserve the continuation of study or where the study is disrupted and there is demonstrable, material financial loss as a result of the transfer to or change of programme) by our Refund and Compensation Policy. For students studying under the Leeds Trinity partnership, the students can also seek recourse from the Leeds Trinity Refund and Compensation Policy. <https://www.leadstrinity.ac.uk/medi/site-assets/documents/key-documents/pdfs/student-refund-and-compensation-policy.pdf>

Where you are required to transfer the programme or move to another provider, there may be implications for your student finance arrangements. If you are affected, the Head of HE will contact you and provide detailed information, advice and guidance based on this Plan, the Student Contract and the Refund and Compensation Policy taking into account your circumstances.

Where decisions are required on individual or collective circumstances, brought about by certain events outlined in this Student Protection Plan, the Governing Body will convene the Student Contingency Panel, consisting of senior staff, members of the Board of Governors and Student Representatives, to assess the circumstances and recommend action to be taken. You will be informed of the timing of this Panel meeting and any decisions taken within 24 hours of the completion of the Panel's assessment.

This Student Protection Plan has been developed in line with guidance from the Office for Students and the Higher Education and Research Act 2017 to protect students' interests and detail the steps we would take where significant material changes had to take place affecting the quality and/or continuation of your study, such as (but not limited to):

- disruption of programme delivery.
- the unanticipated departure of the key members of staff.
- the cessation of programme delivery, likely cessation, or change of delivery mode.
- major changes in the year to programme content.
- changes to regulatory framework affecting a specific programme and loss of accreditation from regulatory bodies.
- a decision to close WIC or part of WIC had been taken.
- loss of access to student loan facilities.

This Plan applies to Higher Education students studying at Waltham International College.

WIC will review this Plan at least annually, in consultation with Student Representatives, and update and amend it as required. We also reserve the right to amend this Plan from time to time based on legal or regulatory changes affecting you or us or best practices in the higher education sector.

## Risk Levels

WIC's Risk and Compliance Panel makes assessment to decide how likely significant material changes, that may impact the continuation of the business and/or the academic delivery of a programme, are to occur. From this, a Risk Register is created, which is maintained and updated by the Panel. This informs the Business Continuity, Student Protection and Emergency Plans.

Under each heading, we have indicated how likely the event is to occur by assigning it a Risk Level. Risk Levels can be **High** (likely to occur during the academic year), **Medium** (unlikely to occur during the academic year) or **Low** (very unlikely to occur during the academic year).

It is important to note that whilst WIC will plan for a wide range of scenarios many of these are very unlikely to happen. WIC undertakes risk assessments in each department and regularly reviews them. There are processes to escalate risks through WIC's governance structures to ensure that interventions to mitigate them take place. WIC assesses the risk of the occurrence of the material changes listed above regarding its financial stability and business planning.

The following section details the likely steps that would be taken in the unlikely event that any of these significant material changes occur.

## Risk of Significant Material Change:

The inclusion of a specific risk does not in itself indicate a likelihood of it occurring but ensures that we have a contingency plan in place to ensure the continuation of studies in all events we can reasonably foresee.

### Disruption to studies

Disruption of studies due to no-notice disruptions of business is a normal risk in business and includes occurrences such as the loss of premises (through the fire, flood etc.); loss of utilities (electricity, gas, water, fuel); failure of IT and telephone services; failure of supply; staff shortage; issues such as pandemics or industrial action.

Depending on the extent of disruption WIC have a formulated contingency plan in place which include alternative premises, online (distance) learning and comprehensive backup systems. All of these are designed to minimise the impact on the student and ensure the continuation of studies. The Business Continuity plan contains full details.

*Likelihood of occurrence:* Low to Medium

*Contingency:* Where there is a disruption to programme delivery, we will normally consider whether it is practicable to make changes to delivery, rather than closing or suspending the affected programme.

The actions we will take to minimise disruption may include (in increasing levels of disruption):

- changes to the delivery location or method e.g. temporary on-line teaching, or utilisation of local temporary classrooms;
- changes to the staffing of a programme, including the recruitment of alternative, relevantly qualified staff, where appropriate;
- offering you the opportunity to transfer to an alternative programme;
- temporary short-term suspension of programme delivery (e.g., where there is a significant change in the programme delivery location or staffing, with appropriate actions to mitigate the impact on you);
- if the disruption will be long-term, provide reasonable support to you to access a programme run by another provider, including making arrangements for the transfer of your credits and information about your academic progress.

Where we have to close part or all of the campus (or other study location), or if it becomes unusable for student activity, we will typically consider remedies such as:

- relocating provision to an alternative suitable location. This may include hiring spaces for programme delivery (where possible) and/or obtaining additional suitable spaces at partner organisations where possible within 1 mile from the current campus;
- revising the timetable to allow all of the scheduled teaching to take part in the available

facilities. This may include student contact sessions delivered outside of normal college hours. Where we take this approach, we will consult with you and undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances.

- delivering programmes or parts of programmes via different delivery modes, such as online study. Where such an approach is taken, we will consider carefully whether this is appropriate for the enrolled students who would be affected.

The full detailed contingency plan for all reasonable no-notice disruptions is available from the College on request. Business Continuity Plan also covers other mitigating actions affecting business continuity, such as acts of terrorism, and damage to buildings or equipment.

### **Permanent or temporary loss of key staff**

Unplanned loss of staff is largely out of our control and is a realistic possibility at any given time. WIC recognises that loss of staff may impact upon delivery as result all modules will be taught in Module teams to ensure that there is at least one more suitable lecturer available to cover classes if a staff loss occurs. Academic contracts are established to provide for employee/employer commitment to the end of the academic year to enable full completion of academic functions.

Planned losses include redundancies, strikes or restructuring and will have alternative staffing arrangements as part of the process to ensure that impact is minimal. Unplanned losses include for example an unexpected death, a change of circumstances or a specialist lecturer leaving to take up another post in a different institution. In each case, WIC will rely on the Module teams in the first instance while we seek temporary or permanent replacements internally or externally noting that temporary cover may be needed whilst permanent appointments are made as these take time. Alternative programme arrangements, which may include VLE support, could also be arranged to minimise the impact of loss in extreme cases programme changes may be necessary.

Depending on the scale and nature of the event, we may consult with the affected students in formulating our response and will always try to minimise the impact on our students for example, by carefully timing the event and giving notice where this is possible.

*Likelihood of Occurrence:* Medium

*Contingency:* Where possible we will:

- Providing cover from existing staffing in the first instance,
- adjustment of delivery or content (for example enhanced VLE content)
- replace staff with minimal disruption to your studies by assigning responsibility to other current members of staff with appropriate skills and experience or recruiting externally, to avoid disruption;
- where WIC cannot avoid closing a programme, the policy outlined above will apply.

## Changes in Curriculum

Changes in the core curriculum and programme content will normally be initiated by our awarding bodies to ensure content is in line with subject benchmarks and industry development and this will be communicated to the students and prospective students as soon as WIC becomes aware of any changes.

Where material changes (such as several changes to the structure of the programme, or the removal or addition of several modules) occur these will be escalated directly to the Academic Board. Should a change in optional modules, assessment methods or policies be required this will be proposed through the Programme Boards and approved by the Academic Board both of these boards have student representation.

In event of any substantial change, WIC undertakes to hold a student consultation to ensure the student's voice is considered during the decision-making process. WIC also will when practically possible finalise all changes, as far in advance as possible. All changes will take effect in the trimester after it was approved by the Academic Board at the earliest. Where possible, existing students registered on programmes will not be impacted by such curriculum changes unless it is to their material benefit, e.g. provides improved real-world career opportunities or demonstrable skills.

It is unlikely that unpredicted, major changes (such as but not limited to, a change of course title, change of award outcome or change of the awarding body) will be required on a programme, due to the nature of the Collaborative Agreements with our awarding bodies.

*Likelihood of occurrence:* Low

*Contingency:* We will use all reasonable endeavours to deliver your programme by its description in our prospectus and on our website for the academic year in which you began your programme. However, in the event of major in-year changes to programme content, we will ensure that:

- we consult with students throughout the decision-making process
- we restrict changes to the minimum necessary to achieve the required quality of experience, and you are notified and consulted with as appropriate.
- we work with you to ensure the academic offer is still acceptable.
- where necessary, you could withdraw from the programme with a relevant exit award.
- where required, you are offered reasonable support to transfer to another programme at WIC, LTU or another provider.

As such if a student reasonably believes that the curriculum changes constitute a material change to their programme which adversely affects them, they may cancel their contract with the College. In such circumstances the College will offer suitable information, advice and guidance to a student and, where possible, facilitate their transfer to another institution which offers an appropriate programme for which they are qualified.

Where changes are made between the application and enrolment, WIC will draw these changes to the attention of applicants as soon as possible and advise them of their right to seek entry to another



College programme for which they may be qualified or to withdraw their application and seek entry to another institution.

## Discontinuation of Individual Programmes, modules or pathways

As with all academic matters, the Academic Board has overall responsibility and operational control in this process. A decision to discontinue will not be made lightly and at all times the best interest of the students will be kept in mind.

The cessation process is added to the programme review process, as it specifically addresses the removal of a programme from the college portfolio at times that may fall outside of the formal review cycle.

The Head of HE will in the first instance notify the Operations Management Committee and the Academic Board that a request to discontinue a programme/module has been made. This request would normally initiate from the Programme/Year Leader or Programme Board.

The Operations Management Committee (OMC) will evaluate the financial, reputational and infrastructural impact that the discontinuation will have on the college.

The Academic Board will consider the proposal to discontinue and will invite representations from the Academic Development Lead, programme/year leader(s) or their nominee to the case for discontinuing. The Academic Board will undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances.

There should be a clear statement of the reason(s) why the request has come about and an evaluation of the failures (if any) that have contributed to the request about the following points:

- Academic Integrity of the Programme
- Student feedback and contributions from student representatives
- Staff feedback and contributions
- The views of external agencies (where appropriate), employers and other stakeholders
- Strategic fit and planning for both short- and long-term
- Current infrastructure and the possible release of facilities, resources etc.
- Market demand, rationale and forecast for the changes that discontinuing the programme will have on the present offer
- Attendance, retention and achievement on the programme to be discontinued
- Mode of delivery
- Alternatives and possibilities after the programme have closed

These will be considered by the Academic Board and a recommendation of approval to discontinue will be either supported or rejected.

The outcome of the review will be reported to the Board of Governors where the final decision will be made.

*Likelihood of Occurrence:* Low

**Contingency:** All programmes are reviewed annually and should a programme be nominated for discontinuation due to operational or strategic considerations the college will offer existing students the following options

- Teaching out currently enrolled students were practically viable (Current students should normally be allowed to complete the programme of study for which they are registered unless each gives their explicit written consent to the contrary. Such consent must not be sought until a closure or suspension recommendation has been agreed.)
- To offer students access to a similar programme of study within WIC with the transfer of credits where possible (Current students should be informed of their options. The College will provide all necessary information, advice, guidance and support to facilitate students in deciding which option to follow)
- Transfer to the same programme with an approved alternative provider. (All prospective students will be informed as soon as possible in the event of a programme closure, suspension or material changes to programme content, all communications with applicants must be undertaken via Admissions)

Should any of the programmes fall under partnership/subcontractor agreements the student will be provided for in line with the university partner student protection procedure.

## **Withdrawal of Partnership or Awarding body agreements**

In the unlikely event that the relationship between WIC and Awarding bodies or partnerships breaks down for any reason, WIC will normally be permitted to complete the teaching and assessment activity for currently enrolled cohorts. Should this not be an option the college undertakes to offer an appropriate alternative as set out under contingency. In each case, WIC will work with the awarding body/ partner institution to agree on a close-out plan that will be in the best interest of the students on the programme.

It is recognised that the English HE sector is experiencing significant external stresses on financial liquidity that has potential impact for the sustainability for ongoing franchise collaboration. WIC is sufficiently financially liquid to accommodate economic stresses within the short term. However, the college does recognise the [OfS insight brief](#) (May 2024) relating to current financial challenges within the sector and the potential for financial collapse from established traditional HE institutions.

*Likelihood of Occurrence:* Low to Medium

**Contingency:** 2 alternative options to ensure the continuation of studies

- To offer students access to a similar programme of study within WIC with the transfer of credits where possible (Current students should be informed of their options. The College will provide all necessary information, advice, guidance and support to facilitate students in deciding which option to follow)

- Transfer to the same programme with an approved alternative provider. (All prospective students will be informed as soon as possible in the event of a programme closure, suspension or material changes to programme content, all communications with applicants must be undertaken via Admissions)

Should any of the programmes fall under partnership/subcontractor agreements the student will be provided for in line with the university partner student protection procedure.

In the event of non-renewal or withdrawal of the Leeds Trinity University approval for degree programmes, in line with the franchise agreement, the College will work with the University to ensure the minimum impact on the students affected and to plan for a smooth transition of students. A detailed plan for the closure of the partnership will ensure that students' rights are protected, and any material impact is mitigated by communication with current students to assure that they will not be adversely affected by the decision. The University will take all reasonable steps to minimise the resultant disruption to those services and affected students by, for example;

- working with the WIC to allow enrolled students to complete their study/programme;
- offering affected students, the chance to continue their study with a different partner or directly with the University;
- assisting to affected students to switch to a different provider

## Loss of access to Funding (OfS Register)

If WIC is removed from the register, this will remove your eligibility for student funding, we will take all reasonable steps to minimise disruption to you. However, WIC has sufficient short-term liquidity to support existing students through to at least the end of their academic year.

The college management and board of governors recognise and welcome the increased scrutiny by OfS into franchise provision since 2022 including the [Insight Brief](#) (Sept 2024) discussing sub-contractual arrangements. WIC has historically provided for and supported students from diverse widening participation backgrounds to access and benefit from achieving credible and relevant HE learning experiences, resulting in transformative career and life opportunities. Meanwhile, WIC continues to work with sector partners in assuring reliable routes into and through HE by all prospective students as supported by the terms of its Access and Participation Plan.

*Likelihood of Occurrence:* Low

*Contingency:* Where possible we will:

- work with the OfS to allow you to complete your year of study/programme.
- where the above is not possible, help you to transfer to an appropriate programme at another provider in line with the procedure detailed above
- where appropriate, providing you with financial compensation if you can demonstrate to us that you have suffered financial losses due to the disruption to your studies.
- Assisting you through evidence/letters/statements in support of your continuation of studies.
- Work to secure a collaborative arrangement with another institution to maintain all or part of WIC's current provision or offer a transfer to our university partner where available.

## Closure of the College

Institutional failure would be monitored by all higher education regulatory body requirements and any likelihood of this would be identified and carefully managed through WIC's risk management procedures.

Although extremely unlikely, a combination of catastrophic events outside the control of the college can lead to college closure. Where the decision is taken to close the college is made, this will result into entering a close-out period where partnership/collaboration agreements in place with other surrounding/local colleges will be triggered or the direct teaching by University faculty. Such arrangements are considered within the legal collaboration contracts with the awarding university partner. These agreements ensure that all our students are transferred to other appropriate/suitable courses with other local colleges or university partners, on time, so our students are not left stranded and can still complete their studies with the least possible disruption.

WIC undertakes, under these agreements to directly manage and deliver the remainder of the agreed provision already being delivered as far as practically possible. Any course provision planned but not yet started will be cancelled, the project closed and prospective students notified accordingly.

*Likelihood of occurrence:* Very Low

*Contingency:* Where we have no option other than to cease operating, we would consider measures to protect your student experience, such as the following:

- where possible, closing gradually, over a period that would allow you to complete your studies at the College;
- where the above is not possible, helping you to transfer to an appropriate programme at another provider and,
- where appropriate, providing you with financial compensation if you can demonstrate to us that you have suffered financial losses due to the disruption to your studies;
- Trigger close-out contracts/agreements.

## Reimbursement

If any of the above scenarios occur, or if you are a student studying directly at WIC and, for any other reason not outlined in the Plan which has been caused by our omission or fault, you are unable to reasonably continue your studies, then our Compensation and Refund Policy will apply.

Should the College fail to preserve the continuation of studies as it relates to the above or fail to deliver the contingency as set out above it will undertake to offer reasonable reimbursement to affected students. Reimbursement will be made within twenty working days when the College cancels courses, subject to receipt of all relevant requests of you for material evidence relating to your financial loss.

## **Student Protection Plan Activation**

Should this Student Protection Plan be activated WIC will:

- Contact all students affected within 2 working days of the decision or event that will affect the continuation of their studies. (Student contact will include emails, text messages and notifications on the VLE and WIC's website);
- In case of location change we undertake to keep alternative premises in the Greater London and Birmingham Metropolitan areas for respective campus cohorts;
- Activate contingency plans as set out in this document.