



HARROW INDEPENDENT COLLEGE
School of Mathematics, Science & Economics

Student Protection Plan of Harrow Independent College (HIC)

Students should read this document and understand policies and procedures for

- 1. Closure, Suspension and Changes to Further Education Courses and Higher Education Programmes; and*
- 2. Complete closure of the college.*

These processes articulate HIC's procedures for applicants and students.

Scope and identification of Risks

1. Introduction

In 2017 the Higher Education and Research Act placed a requirement on institutions to inform students of what they can expect should a course, campus or institution close. This Student Protection Plan aims to demonstrate that Harrow Independent College (HIC) has considered how students can continue or complete their studies or be compensated if this is not possible.

This policy sets out HIC's procedures for closing, suspending or changing any programme or course of study. This policy outlines the procedures for closing, suspending or changing any course of study at the college designed for students at GCSE level, Sixth Form and Higher Education. It is also planned to reflect the Higher education programme changes and closures: statement of good practice 2015.

The college recognises that in the event of a significant course or campus closure it will be expected to work closely with the Office for Students and its own student body to ensure that students' interests are protected through any such change. Every course will have a Development & Approval Group with a student representative who will be liaising very closely with the senior leadership team (SLT) in the following areas:

- Raising their voices on their issues arising from various matters with the delivery of the course;
- Participating in the annual review of the plan to make amendments, insertions and omissions of any processes which may have detrimental effects on the students and their welfare;

c) The student representatives must hold meetings or sessions with all other students to collect feedback about the course which includes the quality of teaching and learning and closure of any cohorts and courses. An overall conclusion should be made by the student representative and given to SLT during the consultation process.

Examples of risks to which this Plan would apply:

- a) Decision to close the college;
- b) No longer being able to deliver a course to students in one or more subject areas and/or departments for the subsequent year;
- c) No longer being able to deliver material components of one or more courses particularly where there are areas of vulnerability such as single person dependencies for teaching; and
- d) Changes to regulatory and Professional Body requirements or loss of accreditation;
- e) Disruptions to access to learning resources.

2. Range of Risks to the continuation of study at HIC

A. Institutional Failure: Closure would likely be phased to protect successive cohorts where possible. Senior Leadership Team (SLT) will immediately initiate the talk with nearby colleges and universities to facilitate transfer of students concerning continuation of studies due to the college closure. Students would be transferred to other colleges in nearby locations with same or similar courses who have agreed to provide support to each others' students where necessary and feasible.

B. Academic Quality administration: External assessment of the rigour of HIC's approach to quality management is evidenced by positive outcomes in:

- a) The Ofsted inspection report for 2018 which is published on our website in which the college is rated GOOD in meeting all independent school standards - <https://www.harrowindependentcollege.com/ofsted-report-2/>

Although the report is only meant for students between 14 to 19 years of age, the college feels that same level of quality will be maintained for higher education students. The college aims to achieve OUTSTANDING level within next two years.

- b) The Accreditation Service for International Schools, Colleges & Universities (ASIC) certification in March 2017 in which the college is awarded commendable grades in management and staff resources, learning and teaching, premises & health and safety, student welfare and marketing & recruitment.

These reports have determined that confidence can be placed in HIC's approach to the management of risks to the continuation of study for our students.

In addition, the Higher Education at HIC was reviewed to examine HIC's processes and governance that ensure (a) courses are only approved after rigorous business evaluation of the potential risks to quality and the student experience; (b) courses are reviewed periodically (frequency and nature determined by level of perceived risk); and (c) effective mechanisms are in place to ensure the mitigation of risk, when an event arises which presents a risk to student continuation of study. So far no major courses have ceased to exist in the past two years.

C. Staff: For a minority of courses at HIC the module choice is dependent on the availability of member of the course team with specific expertise. This is minimised at course approval and the Senior Tutor maintains active oversight of the staffing complement. The college maintains a flexible pool of adjunct and sessional staff to ensure continuity of supply of both general and specialist teaching.

D. Real Estate: The college owns the freehold of 50% of its campus in Harrow. It is therefore in control of the deployment of its built estate and not subject to landlord intervention which could impact students.

E. Information Systems: The college data and IT Infrastructure is backed up regularly on cloud under college IT provision to mitigate the risk of IT disruption.

F. Closure and Suspension of courses: The imperative to maintain a current, up to date portfolio which delivers employability outcomes for students means that courses are frequently scrutinised and continually improved. The following mitigation steps are in place:

a) All proposals for new courses and changes to existing courses are assessed for their market, financial or consumer rights impact under the appropriate Business Evaluation process within the College.

b) A Development & Approval Group may be used where proposed changes to an existing course impacts on other modules or aspects of the course which themselves require adjustment (for example, changes to assessment weightings or changes to the delivery pattern). This avoids an accumulation of minor changes becoming in effect a major change which has not been scrutinised by students and staff. Particular thought is given to the timescale for enacting changes and any effect on current cohorts of students. Those affected are provided with details and an opportunity to comment on changes before they are implemented. This feedback may modify any proposed changes. The external examiner will be asked to comment on major modifications.

c) Where events materialise which present a potential risk of course closure, HIC has a demonstrably effective policy to ensure the continuation of study for students enrolled and wherever possible for those applicants who have accepted an offer. This includes the preparation of contingency plans which are developed to address the range of potential outcomes. If a course does close, HIC's policy for the management of closures and suspensions determines that: students are clearly informed and that a plan is put in place to ensure that students are enabled to pursue a course of study aligned to that which is being withdrawn.

d) Similarly, teach out of courses follows a well-established set of procedures. In summary the requirement is that the learning experience of students on courses in teach-out will be maintained. When a course ceases to recruit students, the college will ensure that adequate standards are maintained for any remaining students or those students are enabled to transfer to a suitable alternative course elsewhere.

e) HIC may wish to close and remove a programme or course of study from its portfolio. Closure of a programme, whether at sixth form or undergraduate level, means that the college will cease to recognise the programme as one for which a student may be registered.

f) Suspension of a programme or course of study is defined by a fixed timeframe in which the programme or course will not be delivered.

g) HIC may not close or suspend a programme or course without an approval of an accreditation body and/or funding agency because of the implications for the contractual relationship between current and prospective students and the college.

h) A request to close or suspend a programme or course must be made by the Senior Tutor in which that programme or course is positioned. HIC will only consider about approving the proposal in line with their strategic plans. The Senior Tutor is required to make an impact case to the SLT at the college who will make the final decision. The request shall be accompanied by the following information;

- Impact on current and prospective students
- Impact on existing or proposed programmes or courses
- The expected impact on staff and resources
- Overall impact on the college

The format shall also confirm that consultation will take place with academic staff and students affected by the request.

i) Where there are any expected changes to staff/staffing structure consultation with HR must be sought.

j) On receipt of a request to close or suspend a programme or course at the college, SLT may agree one of the following:

- Decline the request
- Approve the request without condition(s)
- Approve the request with condition(s)
- Referred for further consultation with SLT (with clear deadline or timeframe)

k) Contingency planning and teach out arrangements - Where events materialise which present a potential risk of course closure, HIC will follow its policy to ensure the continuation of study for students enrolled and wherever possible for those applicants who have accepted an offer. This includes the preparation of contingency plans which are developed to address the range of potential outcomes. These contingency plans will be approved at an institutional level. If a course does close, HIC's policy for the management of closures and suspensions determines that: students are clearly informed and that a plan is put in place to ensure that students are enabled to pursue a course of study aligned to that which is being withdrawn with another institution or college with similar capabilities. Nearest institution which offers same or similar courses will be identified and students will be informed to contact them after the SLT at HIC have spoken to their admissions team.

G. Programme or Course Changes Prior to Registration

HIC may be required to make changes to programmes at the following times:

1. between publication of the prospectus/programme or course information AND registration
2. after registration
 - a) Where material changes (such as a number of changes to the structure of the programme or course, or the removal or addition of a number of modules) are made between the publication of the prospectus/programme or course information and registration, the college will draw these changes to the attention of applicants as soon as possible and advise them of their right to seek entry to another appropriate programme or course for which they may be qualified or to withdraw their application and seek entry to another institution.
 - b) Where the applicant has already accepted an offer, they shall be furnished with all necessary information, advice and guidance by the college to help them make an informed decision on their future course of action.
 - c) In normal circumstances, material changes to programmes or courses should not be made after registration, but where this is unavoidable, students and their parents and/or their representatives shall be consulted at the earliest opportunity on the changes and, where practicable, their views shall be taken into account.
 - d) If a student reasonably believes that a material change to their programme or course adversely affects them, they may cancel their application 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 or course for which they are qualified.
 - e) Further to commencement of the programme or course and during the term of a student's studies, the college may make minor amendments to programmes or courses in order to improve the quality; to meet the latest requirements of an accrediting body; or in response to student feedback. Where such minor amendments to the delivery of a programme or course are

necessary, the college will consult with or inform students and their representatives of these changes, as appropriate, and in line with the quality assurance processes.

Communication and Timings

Students must read this plan which is also published on our website. The plan will be published in the student handbook which will be given to the students at the time of enrolment. Further, the plan will be explained briefly during the student induction at the start of each term.

Any decisions made by the SLT to terminate any courses or to bring changes in specific courses will be communicated with concerned students within 5 working days from the day such decisions (determination) are made. However, please note the students and their representatives would involve in the consultation process as prescribed under section F of this document. At this stage it would be clear to the students to make their decisions and a signed copy of this agreement will be kept by both parties.

a) Current students

Current students should normally be allowed to complete the programme or course 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.

Where a programme or course is being closed to new entrants only, HIC's proposed arrangements for students currently registered on the programme or course (including those whose registration is suspended but have not yet completed the programme or course) must comply with the following:

- Current students should be informed of their option. The college will provide all necessary information, advice, guidance and support to facilitate students in deciding which option to follow.
- The standard of academic provision and the student experience must, as far as is reasonably practicable, be maintained throughout their period of registration. In particular, the conditions must be maintained to enable the stated learning outcomes in the relevant Programme or Course Specification to be achievable by students who are being 'taught out'.
- To ensure the student experience and to support the students, the Senior Tutor for Academic Transitions, together with the SLT will monitor their experience.

b) Applicants

In the event of a programme or course closure, suspension or material changes to programme or course content, all communications with applicants must be undertaken via Admissions.

- Applicants who have accepted offers should not be contacted until the closure or suspension process has been fully completed.

- Applicants thus affected should then be informed of their options to transfer their applications to another programme or course within the college or to another institution.
- Applicants who have been made offers, but have not yet accepted them, may however be advised that a closure or suspension request has been made. Such applicants should be advised that the offer of a place is suspended until a final decision has been made and will be withdrawn if the request is accepted. They should also be advised that they may choose another programme or course available with another institution.
- UCAS should be notified when the closure or suspension request has been finalised by SLT.

Timing

- Wherever possible, requests to delete, suspend or make material changes to the content of programmes or courses should be made in a timely manner.
- Since preparation for the production of the printed prospectus/programme or course information takes place sometime ahead of publication, the process of strategic planning should identify those programmes which are likely to be closed prior to the commencement of the prospectus/programme or course information production process.
- As a result of unforeseen and unforeseeable circumstances (e.g. loss of specialist staff) it may be necessary to close or suspend a programme or course within a foreshortened timescale. In such circumstances, the student interest is paramount and full consultation should be undertaken with all affected students, their parents and their nominated representatives.
- In order to ensure full compliance with the Consumer Rights Act 2015 and related regulations, students should be given the fullest information, advice and guidance to enable them to make well-informed decisions in the event of a programme or course closure or suspension.
- This Plan has been created and reviewed by the SLT of the college. The college has full membership of the Governing Body and Academic Board at which this Plan will be considered on an annual basis. Staff guidance on the Plan will be regularly updated and will be included in staff induction and staff development programmes.
- If there is to be a change to the material information related to a course this will be communicated to affected students via a notification to the staff/student course committee, held virtually if necessary. Students will be communicated individually thereafter via their email. Additional routes such as social media, phone calls and face-to-face meetings will be used as needed.

H) Refund and Compensation Policy

We have a Refund and Compensation Policy as set out in our Terms and Conditions for students and parents which can be found on our website. It 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 preserve continuation of study. We consider refunds and compensation to be a remedy 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. Students must read and understand the following points along with the terms and conditions published on our website:

a) Refund or waiver: Save where there is a legal liability including liability under a court order or under the provisions of this agreement to make a refund or reduction the Fees will not be refunded reduced or waived if:

- the Student is absent through illness; or
- a Term is shortened or a vacation extended; or
- the Student is released home before or after public examinations or otherwise before the normal end of a Term; or
- the College is temporarily closed due to adverse weather conditions; or
- for any reason other than exceptionally and at the sole discretion of the Principal in a case of genuine hardship.

b) Cancelling a place offered in the Term before Entry: If the offer of a place is made in the Term immediately prior to the Term of Entry the Parents may cancel their acceptance in writing at any time up to a 14-day period from the date of the application form.

Any Deposit made will be refunded if the cancellation happens within 14 days but during this 14 day period, there should not be the day – 1st of September. (A deposit, normally the first payment of the academic year as shown on the fees list for the relevant year will be payable when the Student accept the offer of a place or when stated in the offer letter for a conditional place.)

c) Fees in lieu of Notice will apply on withdrawal of a place after the term has started: Withdrawal means the withdrawal of the Student from the College by the Parents or the Student with or without Notice required under these terms and conditions at any time after the Student has entered the College. In circumstances where the Student and Parents have not given a Term's Written Notice, Fees in lieu of Notice means Fees in full at the rate applicable for the next Term following Withdrawal and not limited to the parental contribution in the case of a scholarship, exhibition, bursary or other award or concession. One Term's Fees in lieu of Notice represents a genuine pre-estimate of the College's loss in these circumstances, and sometimes the actual loss to the College will be much greater. This rule is necessary to promote stability and the College's ability to plan its staffing and other resources.

d) Discontinuing extra tuition: A Term's Written Notice is required to discontinue extra tuition or a Term's Fees for the extra tuition will be immediately payable in lieu as a debt.

e) Termination by the College: The College may terminate this agreement on one Term's notice in writing sent by ordinary post or by email. The College will not terminate this agreement without good cause and full consultation with the Parents and also the Student (if of sufficient maturity and understanding). The Deposit will be refunded without interest less any outstanding balance of Fees. The College may terminate this agreement immediately where the Student does not have the appropriate immigration permission to live in the United Kingdom and to study at the College.

f) Fees following Expulsion: If the Student is expelled, there will be no refund of the Deposit or of Fees for the current or past Terms. There will be no charge to Fees in lieu of Notice but, save for any contrary provisions in any other agreement made between the Parents and the College, all arrears of Fees and any other sums due to the College will be payable.

g) Fee Increases: Fees are reviewed annually and are subject to increase from time to time. If the Parents receive less than a Term's notice of a Fees increase they may give to the College written Notice of Withdrawal of the student within 21 days and will not be liable to pay Fees in lieu of Notice and the Deposit, if paid, will be refunded without interest less any sums owing to the College.

We have always had sufficient finances to refund/compensate students when appropriate and we factor this into our annual budgets on the basis of previous experiences. We are investing in various initiatives that will assist student support and retention and target a decrease in student non-continuation rates thereby reducing the level of refund/compensation payments.

Modified on 01st November 2018