

Student Protection Plan

This approved SPP is published on the College website and aims to provide assurance to current and future students, and to the Office for Students (OfS), that Plymouth College of Art has in place appropriate arrangements to protect the quality and continuation of study for students in higher education.

1 Introduction

The Higher Education and Research Act 2017 (HERA) requires Higher Education (HE) providers to maintain a Student Protection Plan (SPP) to protect higher education students' interests in the case of material change. These events may be triggered by situations such as (but not limited to):

- a decision to close the College;
- a strategic decision by the College to close/discontinue or suspend a programme;
- loss or restriction of degree awarding status;
- major changes in year to programme content;
- removal of the Tier 4 Sponsor Licence (the Home Office issued licence which allows a provider to teach international students);
- disruption of College activity (e.g. temporary disruption within term-time not covered by any of the above);
- industrial action by College staff or third parties;
- the unanticipated departure of key members of College staff

2 Assessment of range of risks to continuation of study for higher education students

The College risks are assessed as follows:

- the risk of the College no longer being able to operate, or deciding to cease operating is assessed as **Low**
- the risk of one or more of the locations at which we deliver courses to students being no longer available, particularly if we are considering closure or significant change to a location, is assessed as **Low**
- the risk of no longer being able to deliver courses to our students in one or more subject areas and/or departments is assessed as **Low**
- the risk of being no longer able to deliver material components of one or more courses, particularly if there are areas of particular vulnerability such as single person dependencies for teaching is assessed as **Low**
- The risk of no longer being able to recruit or teach a particular type of student, such as international students is **Low**.

3 Measures to mitigate risks of continuation of study for higher education students

Over the past 5 years the HE sector has been experiencing a period of significant change, during which the College has been successful in growing its national profile and enhancing its reputation. The College achieved transfer from Further Education College to Higher Education Institute (HEI) in 2014, performed strongly in the formal, routine review of its Higher Education provision by the Quality Assurance Agency for Higher Education (QAA) in 2015 and was awarded Taught Degree Awarding Powers (TDAP) by Privy Council in March 2019 following detailed scrutiny by the QAA through academic year 2017-18. The College is now operating independently with TDAP.

Our financial position demonstrates continued solvency and strength in cash balances, with the majority of our income based on publicly funded teaching. We are managing the short term decline in student numbers, which has arisen across the sector from the demographic fall in the student applicant population. Our resilience in the increasingly competitive environment of student recruitment is helped by the strength of our attractiveness to UK students on both a regional and national basis, as well as modest numbers from Europe and internationally. To maintain cost-effectiveness and value for money in terms of delivering the highest quality student experience, the College exercises strict budgetary control and maintains close scrutiny of all operational activities. This is supported by proven risk management procedures and accompanying close oversight by the Board of Governors.

This risk of the College no longer being able to operate, or deciding to cease operating, is therefore assessed as **Low**. In extreme circumstances that could lead the College to consider closure, measures such as those below may be considered in order to protect the student experience:

- closing in a gradual way over a period that would allow current enrolled students to complete their studies at PCA;
- supporting students to transfer to appropriate programmes at other providers and (where appropriate) compensating students for adverse financial impact of such disruption to their studies;
- merging with another institution to maintain all or part of the current provision

Risk of losing the availability of one or more of the locations at which we deliver courses is considered **Low**. The College has in recent years invested heavily in the estate and the condition of the building stock is good to very good, with a fully costed buildings maintenance plan included in ongoing plans. All buildings operated by the College lie relatively close to the main campus within the city of Plymouth. Comprehensive arrangements and procedures relating to site security and safety are monitored and regularly reviewed by the College. The College owns all buildings on the main HE campus and otherwise rents three relatively small buildings off campus utilised in HE delivery, with the lease arrangements considered to offer flexibility for changing College requirements and forward planning. The lease on one of these smaller buildings that is used to provide additional space for student projects is kept under ongoing review, with potential for the lease to expire or the College to withdraw from the lease at or after the end of academic year 19/20. Whilst alternative additional space would be sought, loss of this resource is not significant in terms of delivery of courses to students.

The risk of no longer being able to deliver courses to our students in one or more subject areas and/or departments is assessed as **Low**, as is the risk of being no longer able to deliver material components of one or more courses, particularly if there are areas of particular vulnerability such as single person dependencies for teaching.

With its own degree awarding powers the College will continue to validate new programmes and revalidate ongoing programmes, continuing our strong record of delivering high quality programmes of study. In the event of consideration regarding programme closure or major change to a programme or programmes, this will continue to be planned carefully and in consultation with students to ensure minimum disruption and the maintenance of a high quality student experience whilst 'teaching out' the programme. In the past, major changes to programmes including, for example, those that have involved changes in programme names, have been managed effectively and in consultation with students. Additional to these individual changes that may arise, the College has embarked on a major review of its entire HE curriculum that will involve significant change to programme structures, and student consultation is firmly included in this process. Teaching out of programmes ensures students are able to complete the programme of study on which they embarked, and where it is possible to do so the option to transfer to a new programme may be offered.

The College has a very small number of programmes that may be considered 'niche', dependent on specific staff members and where student numbers are relatively low. Should a key member of staff decide to give notice to leave the College and an appropriate replacement could not be found, or should student numbers fall to levels below which the student experience would be compromised, a decision to close the programme or to suspend recruitment to the affected programme may be made. This would always be accompanied by the decision to 'teach out' the remaining years for current students, unless there are a set of extreme circumstances that mean this is not viable.

In normal course, there is complete confidence in the ability to replace staff in 'niche' subjects such that 'teaching out' existing students always remains viable. Some re-organisation may be necessary to provide the most appropriate combination of staff skills and experience. 'Niche' experience is often provided through part time staff who are also pursuing accompanying careers relevant to their specialism but for whom a part time teaching role is both an attractive and fulfilling experience. This helps to ensure a breadth and depth to the pool of potential candidates for new posts or for replacement staff as and when opportunities arise. Full time staff invariably offer a broader range of both industry and academic skills and experience that can support different skills sets from different part time staff. It is highly likely therefore that 'teaching out' any programme of study is always a viable option.

Despite viable staffing, it could be that very low student numbers compromise the quality of student experience such that programme closure is the only option. If such extreme circumstances arise where a programme would have to close, the College would support students in seeking to transfer to an alternative programme either internally, or to a different provider, utilising links with other similar institutions in the UK as appropriate. Refunds and compensation would be offered in accordance with the [Tuition Fee Refund and Compensation Policy](#) as appropriate.

With regards to no longer being able to recruit or teach a particular type of student it is pertinent to note that the College has always successfully met all requirements to continue to make offers to candidates with Tier 4 student visas, and to operate with international students. To date, we have attracted small numbers of international students but are targeting modest increases in international students going forward. To date, we have also continued to attract more significant numbers of students from non-UK European backgrounds/residence and aim to continue to do so, subject to any challenges arising relating to considerations associated with Brexit. Whilst part time student numbers are also relatively low, currently all programmes offer a part time pathway and the College is successful in attracting mature students across both full and part time study. The College is very proud of its record on equality and widening participation, with relatively high numbers of students from backgrounds that are generally under-represented in the higher education sector.

4 Refund and Compensation Policy

The College has a [Tuition Fee Refund and Compensation Policy](#). This details the refund of tuition fees where appropriate and whether paid by or on behalf of a student. The policy also covers circumstances when it is not possible to continue to study for one or more students.

The refund and compensation policy makes provision for:

- refunds for students in receipt of tuition fee loans from Student Loans Company
- refunds for students who pay their own tuition fees
- refunds for students whose tuition fees are paid by a sponsor
- payment of compensation to students to cover living/study costs that have been incurred or committed but are no longer necessary because the College has been unable to preserve continuation of study
- payment of travel costs for students affected by a change in the location of their course or funding to offset additional costs incurred by relocation,
- commitments to honour student bursaries.

The College recognises the financial implications of the Tuition Fee Refund and Compensation Policy and has adequate cash reserves in place to cover the risk of such eventualities.

5 Communication with higher education students and staff

We commit to publishing our Student Protection Plan (SPP) to current and future students by making it available on the College website and student portal, also linked through the Student Handbook. At the time of its introduction as part of initial registration with the Office for Students, existing students were advised of its introduction through email and briefing at Student Voice meetings, and new students since are advised through information provided prior to enrolment. College Terms and Conditions for students make reference to the SPP and these are routinely made available to prospective students through the website and with offers, and to new students in advance of enrolment. Key terms and conditions are highlighted during face-to-face registration for new students, and the SPP is included in these initial briefings.

PCA ensures that staff are aware of the implications of the SPP if they are considering proposals for

programme changes by making the Plan available on the staff portal, through consultation of the plan at meetings discussing programme change, and by making reference to the SPP in the College procedures that provide guidance to staff on making proposals regarding programme changes including withdrawal/suspension. As necessary and appropriate, the SPP will also feature in staff learning and teaching workshops and/or staff briefings.

As stated above, the arrangements put in place will be linked to the Terms and Conditions provided to students during the recruitment cycle and in advance of enrolment. [Procedure for Withdrawing or Suspending a HE Programme](#) and the [Tuition Fee Refund and Compensation Policy](#) are located on the Student Portal and signposted in the HE Student Handbook.

We will continue to review our SPP on an annual basis through consideration and re-approval at Senior Leadership Team meetings and/or meetings of Academic Board, with oversight by the Board of Governors. Like all documentation, the potential requirement for review in-year is always a consideration arising from experience, changing sector guidance or requirements; if the need arises for any changes in-year, approval would be sought through these channels, noting that student consultation is a fundamental part of that process.

Should any changes indicate any reduction in commitment to students by the College, unless full consultation is conducted with all students, these would be introduced only for new students joining in the academic year after the year in which enrolments will result from the current recruitment cycle. Full consultation with all students will include communication with students who have either deferred their entry to the next academic year, or have interrupted their studies with the intention of returning the next academic year. Additionally, and as part of the annual ongoing review, the SPP will be considered at Equality and Diversity Committee meetings with particular emphasis on how students with specific needs may be affected; students are represented in these meetings. In addition, opinions on legibility and whether it is clearly written with students in mind will be sought from the Students Union (President and Executive Officers).

The Students Union was consulted in developing the first SPP for the College. On an ongoing basis, there will be close liaison with the President and Executive Officers of the Student Union regarding the SPP.

Should the SPP ever need to be implemented, arrangements would be made to communicate effectively with students affected with the Vice Principal and/or Registrar leading the provision of necessary information in person.

We will inform our students if there are to be material changes to their programme by meeting with them and initially advising them of potential changes under consideration and ensuring full consultation in the development of firm proposals.

In normal course, we will give students a minimum of 90 days' notice when we need to make material changes to their programme.

We will ensure that our students have access to independent advice if we need to implement the

measures in our student protection plan through arrangements for access to business support areas such as Student Support services and the Registry for professional advice. In addition, the Students Union will be available to provide independent advice.

We will make clear to students the opportunity for them to use the [Complaints Procedures](#) should they wish to complain about how the SPP is implemented.

| Document version control | |
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| Policy title: | Student Protection Plan |
| Effective Date: | December 2019 |
| Approving body: | SLT |
| Version: | 2 |
| Supersedes: | Initial Plan - September 2018 |
| Previous review dates: | N/A |
| Next review date: | August 2020 |
| Related Statutes, Ordinances, & General Regulations | OfS Registration |
| Related policies: | Tuition Fee Refund and Compensation Policy |
| Related procedures | Procedure for Withdrawing or Suspending HE Programmes Validation Procedures Student Transfer Guidelines Student Complaint Procedures |
| Related information: | https://www.officeforstudents.org.uk/ |
| Policy owner and Lead contact: | Registrar Email: strotter@pca.ac.uk Deputy Registrar (Quality Systems & Performance) Email: jwright@pca.ac.uk |