

David Game College

31 Jewry Street, London EC3N 2ET

STUDENT PROTECTION PLAN

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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.

Note: when this plan was previously updated in March 2022 it also addressed the continuity issues and impact on the quality of student experience due to the covid-pandemic. During this review it was considered appropriate to retain this section in order to accommodate any future similar event.

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.

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 Higher Education Management Team (HEMT), which in turn also reports to 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 Rating	Risk Assessment
(Likelihood of risk event	(Assessment and evidence for this risk rating)
taking place and impact)	
	College strategy is to grow portfolio provision in
Low	both FE and HE and spread sector risk.
	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.
	Student numbers are growing. The College has
	long term property lease arrangements.
	(Likelihood of risk event taking place and impact)

Mitigation Strategies (measures put in place to mitigate impact of risk events)

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

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.

If possible and/or where appropriate financial arrangements would be made according to the College's Refunds & Compensation Policy.

Note: If there was a significant risk of the College exiting the English Higher Education market, we would work with the OfS to develop, and if necessary, implement a 'market exit' plan in order to protect the interests of our students.

Loss of student loan facility

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
De-designation of		DGHE operates under franchise agreements with
entire HE provision or	Low	Bucks New University and the University of

specific courses for student support purposes (i.e. students no longer able to access SLC loans).	Gloucestershire for its Degree courses (i.e. subcontracting). Therefore its partner institutions draw down the SLC loan monies. The risk of them losing designation is very low according to their own SPPs.
Could occur if removed from OfS register or other major issue.	Under the OfS, DGHE Pearson BTEC HND courses are eligible for loans directly through the SLC, but the loss risk is still considered low due to good governance and the application of robust policies and procedures.

Good governance and regulatory compliance.

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). Where appropriate, financial arrangements would be made according to the College's Refunds & Compensation Policy.

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	Formal partnership agreements are in place that clearly define each parties' responsibilities and expectations. DGHE professional services 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 a long term strategy and positive attitude toward developing partnerships. Risk level is therefore considered low.

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Good governance and regulatory compliance

Quality provision and the maintenance of academic standards Collaborative partnership agreements that allow for 'teach-out'

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. If possible and/or where appropriate financial arrangements would be made according to the College's Refunds & Compensation Policy.

Suspension/closure of a course

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
A decision has been		DGHE operates a Course Development and
taken not to run a	Low-Medium	Approval Policy that ensures that any newly
course for the		proposed programmes are thoroughly
subsequent year.		researched to confirm market demand, financial
		viability, resource requirements, etc. That said,
A course fails to recruit		competition in the market and/or other
suitable numbers.		exceptional circumstances, could have adverse
		effects. The risk of later failure and withdrawal is
		therefore considered low to medium.

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Comprehensive market research

Application of detailed Policy and Procedure documents

Monitoring of recruitment activity

Annual review of courses

Measuring student satisfaction and achievement rates

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:

Teach-out arrangements (guaranteed under College T&C's and collaborative agreements)
Course Transfer arrangements (where suitable alternatives exist)

College Transfer arrangements

These could include:

For our BTEC HND provision, students would be offered transfer options to other institutions, with a similar range of courses and still within the Greater London catchment area.

For degree courses, delivered under franchise with Bucks New University and University of Gloucestershire students would be offered protection under the University's SPP.

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.

In-year major course content changes

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
Module closure or		Current programme provision consists of Pearson
other changes to	Low	BTEC HNDs and franchised University degrees.
programme content		These awarding bodies have published periodic
due to regulatory		review dates and curriculum changes are
framework changes.		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.

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.

Annual monitoring of programmes

Module evaluations

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.

<u>Suspension or revocation of Student Visa sponsor licence</u>

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 College's Student Sponsor Licence (the Home Office issued licence which allows a provider to recruit international students).	Zero-Low	Currently no impact since no international student recruitment planned onto higher education courses until 2024. In a College-wide context, where recruitment (into further education courses) 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 (FE) 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.

Drop in country-specific student demand

Risk Rating	Risk Assessment
(Likelihood of risk event	(Assessment and evidence for this risk rating)
taking place and impact)	
	The College's HE courses currently enjoy a strong
Medium	representation from EU nationals with 'settled
	status' who fund their studies through SLC loans.
	Since the UK's exit from the EU, the demand
	from EU students has reduced so the college has
	implemented new marketing strategies in order
	to develop alternative recruitment channels. It is
	however, recognised that during this shift and
	transition there is likely to be a temporary fall in
	student numbers. We have therefore ranked this
	risk as medium but have robust mitigation
	strategies in place.
	(Likelihood of risk event taking place and impact)

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Diversification of marketing and recruitment channels

Introducing additional full degree courses (not just Top-up degrees)

Development of postgraduate degrees under university partner validation.

DGHE is mitigating any risk of a fall in demand by building a strategy to target UK (Home) students and in the longer term, international students. Central to this strategy was the launch (February 2019) of franchised top-up degrees and more recently (September 2021) the introduction of full undergraduate 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 more full 3 year degrees under franchise and/or validation. Discussions with potential partners are ongoing in this regard. DGHE is also a member of UCAS which raises 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 Student Sponsor licence and has a well-established network of agents that could also be used by the HE department. Compliance systems and policies are fully embedded and would be shared by DGHE. This however, is a longer term objective (2024) and does not currently feature in recruitment planning. 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 Designated Quality Body

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
The College fails to		DGHE was subject to a QAA Annual Monitoring
meet the educational	Low	visit in November 2018 with the final report,
oversight		published in January 2019 confirming that the
expectations of the		College was making acceptable progress.
Designated Quality		Subsequent to this another review by the QAA
Body (DQB).		was not required as the College was registered
		under the OfS in August 2020. However, due to
		its application to change its registration from
		'Approved' to 'Approved Fee Cap' in August
		2022, DGHE underwent a quality and standards
		review (QSR) by the QAA in October 2022. The

subsequent report submitted to the OfS resulted in the college being registered in the Approved (Fee Cap) category.

The college continues to operate under a robust academic governance structure with a comprehensive committee structure ensuring effective implementation of policy and procedure. In addition, particular attention is paid to the OfS Regulatory Framework Condition B3: Numerical Thresholds & Indicators.

The College has a number of mechanisms to monitor student outcomes and these are aligned with the OfS B3 regulations. We use a comprehensive student records management system which supports staff in tracking these metrics. Continuation and completion rates are analysed by course and by cohort and these are discussed by managers at appropriate panels and committees. Tracking Progression rates presents challenges with regards to data collection. We use data on progression from HND to Top-up degrees to inform management on our success in this area and as a new provider (in our own right) we will use the "Graduate Outcomes" data when it becomes available to us.

We therefore consider this as a low risk event.

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Good academic governance and regulatory compliance Quality provision and the maintenance of academic standards Utilisation of comprehensive student records management system Metrics monitoring and tracking and hence data informed decision making.

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

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
Loss of accreditation		Our HND courses are accredited by Pearson and
from an awarding	Low	regularly monitored and reviewed in order to
body		meet the changing demands of employers and
		students.
Changes to regulatory		
framework affecting a		DGHE is subject to an annual Academic
specific course		Management Review which is a rigorous
		assessment of the centre's processes and
		standards. In addition, Pearson External
		Examiner reviews have consistently provided

	positive feedback. Having administered BTEC
	qualifications since 2013, DGHE staff are very
	familiar with the requirements of centre
	accreditation and we therefore consider losing
	accreditation to be highly unlikely.
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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	(Assessment and evidence for this risk rating)
	taking place and impact)	
The OfS suspends or		This is considered a low risk as the College has
revokes	Low	the governance framework and operational
(deregistration) the		committee structure to ensure regulatory
College's Registration		compliance. In addition, a significant part of
(giving rise to students		the DGHE student body is subcontracted so
being unable to access		loan access would not be affected for these
student loans)		learners. We therefore consider both the
		likelihood and impact to be low.

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 loses its OfS registered status, we would work with the OfS to minimise the resultant disruption to affected students and applicants and comply with their requirements. If necessary, additional sub-contracting arrangements could be put in place.

Loss of key staff or industrial action

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event	(Assessment and evidence for this risk rating)
	taking place and impact)	
The unanticipated		DGHE has a growing core of full-time
departure of key	Low	administrative and academic staff and hence a
members of		reducing reliance on its part-time and freelance
institution staff.		lecturers (used for delivery purposes). Its central
		London location means that its faculty base is
Industrial action by		well resourced with multiple options for re-
institution staff or		staffing when staff are lost. The provision of a
third parties.		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.

HR strategy

Contracts of employment, notice periods and CPD opportunities

Remedies for staff losses is also addressed in the College's Business Continuity Plan.

Disruption to college activity

Risk Rating	Risk Assessment
(Likelihood of risk event	(Assessment and evidence for this risk rating)
taking place and impact)	
	The College operates secure premises, guarded
Low	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.
	(Likelihood of risk event taking place and impact)

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Regular application of security, fire safety and H&S protocols Business interruption insurance cover

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.

Disruption to college activity due to a health-pandemic (or similar)

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Inability to deliver		The College provides comprehensive and clear
programme of study	Low-Medium	information to prospective and current students
and/or services (partially or in full) as originally described and contracted (short or long term).		through its website, VLE, social media platforms, newsletters, prospectus, promotional materials, events, etc., in order to ensure full CMA compliance. Content and accuracy audits are conducted on a regular basis and when changes and/or updates are required these are communicated through the appropriate channels.
		The College has an extensive range of proprietary course specific online study materials, easily accessible to learners 24/7 via its VLE. In addition, the College subscribes to a number of online

database/library resources for student/staff access to e-books and journals.

Although the risk of interruption to service levels is considered medium to high (which in the case of the health-pandemic a shut-down of physical delivery would be forced via a public health enforcement), the College is well placed to respond to such events (by moving courses online) due to its effective management of communications, robust IT infrastructure, well trained staff and comprehensive library of online resources. Therefore the non-continuation of studies is considered to be low.

Mitigation Strategies (measures put in place to mitigate impact of risk events)

Maintaining robust IT infrastructure.

Staff training and CPD in effective online pedagogy.

Student and staff training in the use of online learning platforms and software.

Ongoing programme of online content development.

Well trained and accessible student wellbeing support staff.

Regular and detailed communications with all stakeholders.

Processes to identify 'at risk' students disadvantaged by the situation.

Implementation of 'reasonable' adjustments to academic assessment plans and decision making. Ongoing review of terms and conditions to ensure they continue to be fair and transparent given the changing circumstances.

Implementation of procedures to ensure ongoing CMA compliance.

Consistent application of complaints processes including access to OIA.

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.

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 Academic Board, 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 Advice and Well-being Service (AWS) 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*.

END.