

## David Game College

31 Jewry Street, London EC3N 2ET

*\*Brand transition note (2026/27): David Game Higher Education is transitioning to the UCDG trading brand. References to DGHE and UCDG relate to the same higher education provider.*

### STUDENT PROTECTION PLAN

|                                                                 |                                                                                                                               |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Provider's name:                                                | DAVID GAME COLLEGE                                                                                                            |
| Provider's UKPRN:                                               | 10015688                                                                                                                      |
| Campus address:                                                 | 31 Jewry Street, London EC3N 2ET                                                                                              |
| Registered legal address:                                       | David Game College Ltd., 843 Finchley Road, London N11 8NA                                                                    |
| Version control:                                                | Ownership: DGC Board of Directors<br>Previous review: December 2024<br>Reviewed: July 2026 (v5)<br>Next review: December 2027 |
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# 1. Introduction and Guiding Principles

## Our commitment to students

David Game College is committed to providing high-quality higher education in a safe, supportive and inclusive learning environment. Our aim is to help every student achieve the best possible academic outcomes and successfully complete their studies.

## Our guiding principles

In developing this Student Protection Plan, the College is committed to:

- delivering our courses and services as described wherever reasonably possible;
- making changes only where they are necessary to maintain the quality, relevance or academic standards of our provision;
- minimising disruption to students and giving particular consideration to students from widening participation backgrounds and those with protected characteristics under the Equality Act 2010;
- keeping students informed about significant changes as early as reasonably possible and explaining how those changes may affect their studies; and
- providing appropriate advice, guidance and support whenever this Student Protection Plan is implemented.

## Purpose of this Student Protection Plan

This Student Protection Plan (SPP) explains how the College will protect your studies if events occur that could significantly affect your ability to complete your course.

All higher education providers registered with the Office for Students (OfS) are required to publish a Student Protection Plan. The purpose of the Plan is to give current and prospective students confidence that appropriate arrangements are in place to help them continue and complete their studies if significant risks arise.

This Plan identifies the main risks that could affect students studying higher education programmes at David Game Higher Education (DGHE). It explains the measures the College has in place to reduce those risks and the actions we will take to protect students and support the continuation of their studies if a significant event occurs.

The protections described in this Plan are in addition to your statutory and contractual rights, which remain unaffected.

## How this Plan has been developed

This Student Protection Plan has been informed by the College's Institutional Risk Register and Business Continuity Plan. These documents help the College identify, assess and manage risks that could affect its operations and the student experience.

**Section 2** of this Plan identifies the specific risks that could affect higher education students. Each risk has been assessed according to its likelihood and potential impact, together with the measures the College has in place to reduce the risk and protect students' continuation of study.

**Section 3** explains the College's approach to refunds and compensation where continuation of study cannot reasonably be preserved.

**Section 4** explains how we will communicate with students, consult with them where appropriate, and provide support if this Student Protection Plan is implemented. Wherever possible, the College will seek to preserve students' continuation of study before considering refunds or compensation.

### **Governance and partnership arrangements**

Overall responsibility for this Student Protection Plan rests with the College's Governing Body (the Board of Directors). Day-to-day responsibility for maintaining, reviewing and implementing the Plan sits with the Higher Education Management Team (HEMT), which reports to the College Leadership Group (CLG).

If you are studying on a programme delivered through a franchise or validation partnership, this Student Protection Plan should be read alongside the Student Protection Plan of the relevant awarding body or partner university. Where responsibilities are shared, the College and its partner institution will work together to provide coordinated support and, wherever reasonably practicable, ensure that you are able to continue and complete your studies.

## **2. Risk Assessment - Potential Risk Events and Mitigation Strategies**

### **Our approach to managing risk**

This section explains how the College works to:

- reduce the likelihood of risks affecting students;
- identify and respond to risks if they do occur; and
- protect students' ability to continue and complete their studies with as little disruption as reasonably possible.

The College regularly reviews potential risks that could affect students and puts measures in place to reduce their impact wherever possible.

### **Preventing and reducing risk**

Strong governance and effective planning help the College minimise the likelihood of significant disruption to students.

To support this, the College has:

- a robust corporate and academic governance framework that helps ensure compliance with regulatory requirements;
- clear policies, procedures and committee structures that oversee the quality and delivery of our higher education provision;
- strategic planning and performance monitoring to support the long-term sustainability of the College;
- formal risk management processes, including an Institutional Risk Register, Business Continuity Plan and oversight through appropriate governance committees;
- financial planning and forecasting that supports the long-term resilience of both further and higher education provision;
- programme management arrangements that help ensure courses are delivered as described; and
- annual reviews of this Student Protection Plan as part of the College's wider risk management and business continuity arrangements.

## Responding to significant risks

The College is committed to helping students achieve the best possible outcomes from their studies. However, despite careful planning, there may be occasions when unexpected events require changes to a module, course or the way it is delivered.

Minor changes are managed in accordance with the College's Terms and Conditions of Enrolment and will be communicated to students as early as reasonably possible.

If a significant event occurs that could materially affect students' continuation of study, the College will take all reasonable steps to minimise disruption and protect students' interests. Depending on the circumstances, this may include:

- transferring students to an alternative course;
- making changes to the mode, location or timing of study where appropriate;
- arranging alternative teaching or assessment;
- working with an awarding body or partner institution to preserve continuation of study; or
- supporting students to transfer to another provider if continuation at the College is no longer reasonably practicable.

Examples of events that could require the implementation of this Student Protection Plan include, but are not limited to:

- significant changes to a course or programme;
- suspension or closure of a course;
- closure or relocation of a campus;
- the loss, restriction or withdrawal of licences, approvals or regulatory registration;
- the withdrawal or termination of franchise or validation arrangements;
- temporary disruption caused by events beyond the College's reasonable control;
- changes that affect the planned mode or timing of study (for example, daytime or evening delivery);
- the unexpected loss of key members of staff; or
- difficulties recruiting suitably qualified staff to deliver a programme.

Where changes affect a student's entitlement to Student Finance (including Student Loans Company funding), the College's Student Services team will provide advice and guidance to help students understand their options and support them through any necessary transition.

Where the implementation of mitigation measures requires the involvement of an awarding body, regulator or another external organisation, the College will work closely with those organisations to ensure students receive timely information, appropriate support and consistent advice.

## Significant risk events

The following sections identify the significant risks that could affect students, assess the likelihood and potential impact of each risk, and describe the measures the College has in place to reduce those risks and protect students' continuation of study.

### College closure

| Risk Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Risk Rating                                        | Risk Assessment                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                   |
| A decision to close the institution has been taken for strategic reasons.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Low                                                | College strategy is to grow portfolio provision in both FE and HE and spread sector risk.                                                                                                                                                                                                        |
| We are unable or no longer intend to operate due to financial performance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Low                                                | <p>The risk of being unable to operate due to financial instability is considered low because proactive steps would be taken to ensure sustainability. E.g. merger, collaborative partnership.</p> <p>HE student numbers are growing. The College has long term property lease arrangements.</p> |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    |                                                                                                                                                                                                                                                                                                  |
| <p>Good governance and regulatory compliance<br/> Maintenance of Risk Register and Business Continuity Plan<br/> Quality provision<br/> Course development<br/> Effective marketing and recruitment campaigns<br/> Financial planning and forecasting</p> <p>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.</p> <p>If possible and/or where appropriate financial arrangements would be made according to the College's Refunds &amp; Compensation Policy.</p> <p>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.</p> |                                                    |                                                                                                                                                                                                                                                                                                  |

### Loss of student loan facility

| Risk Event                                                                                                                                 | Risk Rating                                        | Risk Assessment                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                     | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                          |
| De-designation of entire HE provision or specific courses for student support purposes (i.e. students no longer able to access SLC loans). | Low                                                | DGHE operates under franchise agreements with Bucks New University and the University of Gloucestershire for its Degree courses (i.e. sub-contracting). 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.                                                                             | Low                                                | 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.                                                                                   |

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

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. The College will work closely with its awarding partners, the Student Loans Company and the Office for Students to minimise disruption.

**Withdrawal or non-renewal of franchise/validation agreement**

| <b>Risk Event</b>                                                               | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (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                                                | <p>Formal partnership agreements are in place that clearly define each parties' responsibilities and expectations.</p> <p>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.</p> |

**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. Where the effected provision leads to a specific University Partner's award, the College will implement the relevant provisions of that University's Student Protection Plan alongside this Plan where appropriate.

### Suspension/closure of a course

| <b>Risk Event</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                                                                                                               |
| <p>A decision has been taken not to run a course for the subsequent year.</p> <p>A course fails to recruit suitable numbers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Low-Medium                                         | <p>DGHE operates a Course Development and Approval Policy that ensures that any newly proposed programmes are thoroughly researched to confirm market demand, financial viability, resource requirements, etc. That said, competition in the market and/or other exceptional circumstances, could have adverse effects. The risk of later failure and withdrawal is therefore, considered low to medium.</p> |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>Comprehensive market research<br/>           Application of detailed Policy and Procedure documents<br/>           Monitoring of recruitment activity<br/>           Annual review of courses<br/>           Measuring student satisfaction and achievement rates</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Teach-out arrangements (guaranteed under College T&amp;C's and collaborative agreements)</li> <li>• Course Transfer arrangements (where suitable alternatives exist)</li> <li>• College Transfer arrangements</li> </ul> <p>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.<br/>           For degree courses, delivered under franchise with Bucks New University and University of Gloucestershire students would be offered protection under the University's SPP.</p> <p>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.</p> |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                              |

### In-year major course content changes

| <b>Risk Event</b>                                                                         | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                    | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                  |
| Module closure or other changes to programme content due to regulatory framework changes. | Low                                                | <p>Current programme provision consists of Pearson BTEC HNDs and franchised/validated University degrees.</p> <p>These awarding bodies have published periodic review dates and curriculum changes are announced well in advance. The College is therefore well placed to avoid any in-year</p> |

|  |  |                                                            |
|--|--|------------------------------------------------------------|
|  |  | 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. |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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

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.

Decisions to suspend or close programmes will normally follow consultation with effected students and consideration of Equality Impact Assessments. Students will receive clear written information regarding available options and associated timescales.

**Suspension or revocation of Student Visa sponsor licence**

| <b>Risk Event</b>                                                                                                                                          | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (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). | Low                                                | DGHE conducts international recruitment within a robust compliance framework with regular reviews and on-going monitoring. Its risk management and mitigation is also covered under the institutional Business Continuity Plan.<br><br>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 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 effected students to switch to an alternative provider.

International students will receive immigration advice and guidance where changes may affect their visa status.

## Digital disruption

| Risk Event                                                                             | Risk Rating                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Risk Assessment                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                 | (Likelihood of risk event taking place and impact)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | (Assessment and evidence for this risk rating)                                                                                                                                                                                      |
| Major cyber attack                                                                     | Medium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A cyber incident could temporarily prevent access to core systems including the VLE, student records, email, and assessment platforms. This may interrupt teaching, learning and assessment if systems cannot be restored promptly. |
| Virtual Learning Environment (VLE) outage                                              | Medium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Loss of access to the VLE may prevent students from accessing learning materials, recorded lectures, assessment submissions and course communications                                                                               |
| Failure of online teaching platforms (e.g. Microsoft Teams, Zoom)                      | Low                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Students may temporarily be unable to participate in online classes, tutorials or meetings, particularly where blended delivery is used                                                                                             |
| Internet connectivity failure at campus                                                | Low                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Loss of internet connectivity may temporarily affect access to online resources during on-campus teaching but would normally be short term.                                                                                         |
| Failure of student information systems                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Temporary inability to access attendance, timetabling, student records or assessment information may affect administration but is unlikely to prevent teaching continuing.                                                          |
| Loss or corruption of assessment data                                                  | Low                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | A system failure affecting submitted assessments or marks could delay marking, progression or awards if not recoverable                                                                                                             |
| Loss of institutional email service                                                    | Low                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Communication with students may be disrupted, affecting the timely provision of important academic information.                                                                                                                     |
| Third-party cloud service disruption                                                   | Low                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Dependence on external software providers may result in temporary loss of access to specialist systems outside the provider's control.                                                                                              |
| Extended digital disruption affecting teaching for several days                        | Medium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Prolonged loss of multiple digital services could affect teaching delivery, assessment deadlines and access to learning resources, particularly for students studying remotely.                                                     |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                     |
| Major cyber attack                                                                     | <ul style="list-style-type: none"> <li>• Multi-factor authentication across core systems.</li> <li>• Regular security patching and vulnerability monitoring.</li> <li>• Staff cybersecurity awareness training and simulated phishing exercises.</li> <li>• Daily encrypted backups stored separately from production systems.</li> <li>• Incident Response and Disaster Recovery Plans with defined recovery time objectives.</li> <li>• Temporary use of alternative communication platforms and assessment arrangements where required.</li> <li>• Regular communication with students throughout any disruption.</li> </ul> |                                                                                                                                                                                                                                     |

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| Virtual Learning Environment (VLE) outage                         | <ul style="list-style-type: none"> <li>• Cloud-hosted VLE with service level agreements.</li> <li>• Local copies of essential teaching materials retained by academic staff.</li> <li>• Alternative distribution of teaching materials through institutional email or secure cloud storage.</li> <li>• Flexible assessment deadlines where disruption affects submissions.</li> <li>• Academic staff prepared to deliver teaching through alternative platforms if required.</li> </ul>                                  |
| Failure of online teaching platforms (e.g. Microsoft Teams, Zoom) | <ul style="list-style-type: none"> <li>• Multiple approved online platforms available.</li> <li>• Face-to-face teaching used where appropriate.</li> <li>• Sessions recorded where possible.</li> <li>• Teaching rescheduled promptly if disruption cannot be resolved.</li> <li>• Students informed immediately of alternative joining arrangements.</li> </ul>                                                                                                                                                         |
| Internet connectivity failure at campus                           | <ul style="list-style-type: none"> <li>• Business-grade internet connections with monitored service agreements.</li> <li>• Backup connectivity where available.</li> <li>• Ability to continue teaching offline using downloaded resources.</li> <li>• Alternative teaching rooms or rescheduling where necessary.</li> <li>• Students kept informed through SMS or email if significant disruption occurs.</li> </ul>                                                                                                   |
| Failure of student information systems                            | <ul style="list-style-type: none"> <li>• Secure cloud-based systems with regular backups.</li> <li>• Restricted administrative access and audit controls.</li> <li>• Manual contingency processes for attendance and student records.</li> <li>• Restoration procedures regularly tested.</li> <li>• Priority given to restoring systems supporting student progression and assessment.</li> </ul>                                                                                                                       |
| Loss or corruption of assessment data                             | <ul style="list-style-type: none"> <li>• Secure assessment platforms with automatic backups.</li> <li>• Version control and audit logs.</li> <li>• Moderation records retained separately.</li> <li>• Regular exports of assessment data.</li> <li>• Contingency assessment arrangements if recovery is not possible.</li> </ul>                                                                                                                                                                                         |
| Loss of institutional email service                               | <ul style="list-style-type: none"> <li>• Alternative communication methods including SMS, VLE announcements (where available), website notices and social media.</li> <li>• Emergency communication procedures maintained.</li> <li>• Contact details regularly reviewed to ensure accuracy.</li> </ul>                                                                                                                                                                                                                  |
| Third-party cloud service disruption                              | <ul style="list-style-type: none"> <li>• Due diligence undertaken when selecting suppliers.</li> <li>• Service level agreements monitored.</li> <li>• Alternative manual or local processes identified for critical functions.</li> <li>• Regular review of supplier resilience.</li> <li>• Communication plans to minimise disruption to students</li> </ul>                                                                                                                                                            |
| Extended digital disruption affecting teaching for several days   | <ul style="list-style-type: none"> <li>• Business Continuity and Academic Continuity Plans.</li> <li>• Ability to revert to face-to-face delivery where feasible.</li> <li>• Alternative assessment arrangements approved through academic governance.</li> <li>• Extensions or revised submission dates where appropriate.</li> <li>• Enhanced academic and wellbeing support during disruption.</li> <li>• Clear communication with students regarding revised arrangements and expected restoration times.</li> </ul> |

### Loss of 'Confidence' from the Designated Quality Body

| <b>Risk Event</b><br>(Scenario explanation)                                                            | <b>Risk Rating</b><br>(Likelihood of risk event taking place and impact) | <b>Risk Assessment</b><br>(Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The College fails to meet the educational oversight expectations of the Designated Quality Body (DQB). | Low                                                                      | DGHE was subject to a QAA Annual Monitoring visit in November 2018 with the final report, published in January 2019 confirming that the College was making acceptable progress. Subsequent to this another review by the QAA 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 |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                              |  | <p>subsequent report submitted to the OfS resulted in the college being registered in the Approved (Fee Cap) category.</p> <p>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 &amp; Indicators.</p> <p>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.</p> <p>We therefore consider this as a low-risk event.</p> |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                                                                       |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Good academic governance and regulatory compliance</p> <p>Quality provision and the maintenance of academic standards</p> <p>Utilisation of comprehensive student records management system</p> <p>Metrics monitoring and tracking and hence data informed decision making.</p> <p>The risk of regulatory intervention that affects the College's ability to deliver higher education</p> |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

provision is assessed as low, reflecting the College's established academic governance arrangements, quality assurance processes and ongoing monitoring of regulatory compliance. Should regulatory intervention occur, the College will work proactively with the Office for Students, its awarding partners and any relevant regulatory bodies to minimise disruption to students.

Where necessary, the College will implement appropriate mitigation measures, including enhanced academic oversight, teach-out arrangements, transfer opportunities to alternative providers or programmes where reasonably practicable, and clear, timely communication with all effected students. The College will prioritise the continuation of study and maintain academic standards throughout any period of regulatory intervention.

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

| <b>Risk Event</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                                                                          |
| <p>Loss of accreditation from an awarding body</p> <p>Changes to regulatory framework affecting a specific course</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Low                                                | <p>Our HND courses are accredited by Pearson and regularly monitored and reviewed in order to meet the changing demands of employers and students.</p> <p>DGHE is subject to an annual Academic Management Review which is a rigorous assessment of the centre's processes and standards. In addition, Pearson External Examiner reviews have consistently provided</p> |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                    | <p>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.</p>                                                                                                                                          |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                    |                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Good academic governance.</p> <p>The College will work with the awarding organisation and partner university to protect students' ability to complete an accredited award wherever reasonably practicable.</p> <p>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.</p> <p>Where teach-out is not reasonably practicable, transfers will be subject to the availability of suitable places, admissions requirements and agreement between receiving providers. The College will establish a dedicated student support team to coordinate communications, transfers and individual advice.</p> |                                                    |                                                                                                                                                                                                                                                                                                                                                                         |

### Loss of OfS registration

| <b>Risk Event</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                 |
| The OfS suspends or revokes (deregistration) the College's Registration (giving rise to students being unable to access student loans)                                                                                                                                                                                                                                                                                                                                                                               | Low                                                | This is considered a low risk as the College has the governance framework and operational committee structure to ensure regulatory compliance. |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                    |                                                                                                                                                |
| <p>College strategy<br/>           Good governance and regulatory compliance<br/>           Financial sustainability<br/>           Effective policies and procedures<br/>           Annual monitoring and review</p> <p>In the unlikely event the College loses its OfS registered status, we would work with the OfS to minimise the resultant disruption to effected students and applicants and comply with their requirements. If necessary, additional sub-contracting arrangements could be put in place.</p> |                                                    |                                                                                                                                                |

### Loss of key staff or industrial action

| <b>Risk Event</b>                                                                                                                                                                                     | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                   |
| The unanticipated departure of key members of institution staff.                                                                                                                                      | Low                                                | DGHE has a growing core of full-time administrative and academic staff and hence a reducing reliance on its part-time and freelance lecturers (used for delivery purposes). Its central London location means that its faculty base is well resourced with multiple options for re-staffing when staff are lost. |
| Industrial action by institution staff or third parties.                                                                                                                                              | Low                                                | The provision of a 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.                                                                                                     |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                |                                                    |                                                                                                                                                                                                                                                                                                                  |
| <p>HR strategy<br/>           Contracts of employment, notice periods and CPD opportunities<br/>           Remedies for staff losses is also addressed in the College's Business Continuity Plan.</p> |                                                    |                                                                                                                                                                                                                                                                                                                  |

### Disruption to college activity

| <b>Risk Event</b>                                                                                                                                                                                                                                                                                                                             | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                                                                                                                                                                                                                        | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                                                                            |
| Disruption to activity (short or long term) could occur through a number of events including: fire, theft, terrorism, etc.                                                                                                                                                                                                                    | Low                                                | The College operates secure premises, guarded 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. PAT testing is conducted annually. |
| <b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)                                                                                                                                                                                                                                                        |                                                    |                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Regular application of security, fire safety and H&amp;S protocols</p> <p>Business interruption insurance cover</p> <p>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.</p> |                                                    |                                                                                                                                                                                                                                                                                                                                                                           |

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

| <b>Risk Event</b>                                                                                                                           | <b>Risk Rating</b>                                 | <b>Risk Assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (Scenario explanation)                                                                                                                      | (Likelihood of risk event taking place and impact) | (Assessment and evidence for this risk rating)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Inability to deliver programme of study and/or services (partially or in full) as originally described and contracted (short or long term). | Low-Medium                                         | <p>The College provides comprehensive and clear information to prospective and current students 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.</p> <p>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.</p> <p>The risk of interruption to service levels is considered low. The College is well placed to respond should events be cause to move its courses online. This is 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 also considered to be low.</p> |

#### 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 effected 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*.

#### Principles

The College will take all reasonable steps to preserve students' continuation of study before considering refunds or compensation. Where a risk identified in this Student Protection Plan crystallises, the College will normally seek to:

- continue delivery of the programme wherever reasonably practicable;
- implement teach-out arrangements where appropriate;
- offer suitable alternative programmes or facilitate transfer to another provider where continuation of study cannot be maintained;
- provide timely information, advice and support to enable students to make informed decisions.

Refunds and compensation will only be considered where the College is unable to preserve continuation of study through these measures. Any refund or compensation will be assessed on a case-by-case basis in accordance with the College's published Refund and Compensation Policy,

taking account of the individual circumstances of effected students. Nothing in this Student Protection Plan creates an automatic entitlement to financial compensation.

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.

Where appropriate, the College may consider reimbursement of reasonable additional costs incurred by students as a direct result of implementing this Student Protection Plan, such as additional travel or relocation costs arising from a required change in location of study. Any such payments will be considered on a case-by-case basis, supported by appropriate evidence, and in accordance with the College's *Refund and Compensation Policy*.

## 4. Communications and Student Participation

### Communicating the plan and engaging students

We want all students to understand how this Student Protection Plan works and what support is available if a significant change affects their studies.

We will communicate important information through the most appropriate channels, including:

- your College email account;
- the Student Portal;
- the Virtual Learning Environment (VLE);
- the College website; and
- where appropriate, face-to-face or online meetings.

To ensure you receive important updates, you are responsible for keeping your contact details up to date and checking your College email and other College communications regularly.

If a risk or disruption occurs, we will provide updates as soon as reasonably possible. In some situations, we may not be able to provide immediate or frequent updates while information is still being confirmed. We will always aim to keep students informed as clearly and promptly as we can.

We will also make students aware of this Student Protection Plan by:

- including information and a link to the Plan in the student newsletter sent to current students, applicants and education agents;
- including a link to the Plan in the College Offer Letter issued to new applicants and referencing it in the College's Terms and Conditions of Enrolment;
- ensuring College staff understand their responsibilities under the Plan by discussing it at relevant College committees and meetings, including the Academic Board, Programme Management Committee and Higher Education Administration Team, and communicating any updates to staff through the VLE; and
- reviewing the Plan each year with student representatives through the Student Staff Liaison Committee (SSLC). All students will have the opportunity to provide feedback through their class representatives so that their views can help inform future updates to the Plan.

## Communicating material changes and supporting students

If the College needs to make a significant change that could affect your studies, we will keep you informed and provide support throughout the process.

Wherever reasonably possible, we will consult with students who may be affected before making a significant change. We may do this through meetings, surveys, or discussions with student representatives at the Student Staff Liaison Committee (SSLC). We will carefully consider the views of students before making decisions. However, in some circumstances we may need to act quickly without full consultation, for example where immediate action is required to protect students, meet legal or regulatory requirements, or maintain academic standards.

### How we will communicate changes

#### Minor changes

If we make a minor change that is unlikely to have a significant impact on your studies, we will normally notify you by email and through the Student Portal. We will provide as much notice as reasonably possible, although the amount of notice will depend on the circumstances.

#### Major changes

If we need to make a major change that could have a significant impact on your course or studies, we will notify affected students by email and through the Student Portal as soon as possible. Where reasonably practicable, we will normally give at least one month's notice before the change takes effect and, wherever possible, aim to provide a full academic term's notice.

If you believe a major change has had a significant negative impact on your studies, you may have the right to withdraw from your course in accordance with the College's Terms and Conditions of Enrolment. Depending on the circumstances, you may also be entitled to an appropriate refund of tuition fees already paid and, where applicable, compensation in line with the College's policies and contractual obligations.

### Support available

If the College needs to activate the measures set out in this Student Protection Plan, we will provide appropriate advice, guidance and support to affected students.

Support may include:

- individual advice from the College's Advice and Well-being Service (AWS);
- group briefings or information sessions for affected students;
- meetings with student representatives through the Student Staff Liaison Committee (SSLC), where appropriate; and
- referrals or signposting to independent sources of advice where this would better support your needs.

Depending on the circumstances, independent advice may be available from a partner university, a students' union, Pearson (where applicable), or other appropriate organisations.

## Raising concerns or making a complaint

If you are unhappy with how the College has implemented this Student Protection Plan or any changes made under it, you can raise your concerns through the **College's Student Complaints Procedure. Information** about the procedure, including how to submit a complaint and the timescales involved, is available on the College website and Student Portal.

## 5. Implementation of this Student Protection Plan

If an event occurs that could significantly affect your ability to continue your studies, the College will take all reasonable steps to put this Student Protection Plan into action. Any action we take will depend on the nature of the issue, how many students are affected, and the impact on their studies. Our priority will always be to protect students' interests, minimise disruption and help students complete their studies wherever possible.

The decision to activate this Plan will normally be made by the Principal, or a nominated deputy, in consultation with the Higher Education Management Team (HEMT). The College's Board of Directors will be informed where appropriate and will oversee the College's response through its governance arrangements.

Where your course is delivered in partnership with another institution or awarding body, we will work closely with that organisation to:

- ensure responsibilities are clearly coordinated;
- maintain academic standards and the quality of your qualification;
- provide consistent and accurate information; and
- make sure you receive appropriate advice and support throughout the process.

Where required, we will notify the Office for Students (OfS) of any event that requires this Student Protection Plan to be implemented and will comply with all relevant regulatory requirements.

Throughout the implementation of this Plan, we will keep clear records of:

- the decisions we make;
- the information and updates we provide to students;
- the support and protection measures we put in place; and
- the outcomes for affected students.

Once the situation has been resolved, we will review how effectively this Student Protection Plan worked. We will use what we have learned to improve our procedures and strengthen our arrangements for protecting students in the future.

## 6. Reviewing of Student Protection Plan

We review this Student Protection Plan at least once every year to ensure that it remains effective, up to date and continues to protect students if significant risks arise.

The Plan may also be reviewed sooner if:

- it has been activated following a significant event;
- there are important changes to the College, its courses or partnership arrangements;
- there are changes to the Office for Students (OfS) regulatory requirements; or
- new or emerging risks are identified that could affect students' continuation of study.

Students play an important role in helping us improve this Plan. We will seek feedback through the Student Staff Liaison Committee (SSLC) and other appropriate student engagement activities. We will use this feedback, together with lessons learned from any implementation of the Plan, to identify improvements and ensure that the support and protection offered to students remains effective.

The annual review will be carried out by the Higher Education Management Team (HEMT) and any revised version of the Student Protection Plan will be approved by the Governing Body before it is published.

END.

