

Annex D: Student Protection Plan

Providers Name: British College of Osteopathic Medicine

Providers UKPRN: 10000911

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Student protection plan for the period 2018-19 (to be reviewed annually)

BCOM recognises that students invest significant amounts of financial resources, time and commitment to their studies and in return expect to receive value for money. BCOM is fully committed to supporting students in their studies to achieve the best possible outcomes in terms of training, for a future career as an osteopath and in their academic studies.

In accordance with the new regulatory framework governing all HE providers, all institutions are required to maintain and publish a student protection plan to identify potential risks to the provision. This protection plan sets out BCOM's responsibilities to its students in the event of a risk to their continuation of study.

This plan will be submitted to the Office for Students (OfS) and will be available to all existing and potential students and forms an important part of the terms and conditions of their study

1. An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise

The plan identifies the following range of risks and their impact to the continuation of study for BCOM students that may arise and assesses the level, the likelihood and impact should any of these arise:

1. Institutional Closure: BCOM is no longer able to operate or has decided to cease trading
2. Programme Closure or change in delivery: BCOM is no longer able to deliver material components of one or more of its provision
3. Programme or Module amendment
4. BCOM is no longer able to deliver its programmes either on a permanent or temporary basis due to the revoking of its Tier4 Licence
5. The closure of buildings
6. BCOM is no longer able to offer its provision due to the validating and/or accrediting professional bodies withdrawing validation

Explanation: Risk is what might happen, likelihood is the chances of it happening and impact means the scale of the effect - if it does happen. BCOM has assessed

the above risks to continuation of study and classified the likelihood of them happening using this sliding scale.

- Very unlikely: an event may occur only in exceptional circumstances (chance less than 10%);
- Unlikely: an event could occur at some time (chance between 10-30%);
- Possible: an event should occur at some time (chance between 30-50%);
- Likely: an event will probably occur (chance between 50-90%);
- Very Likely: an event is expected (chance more than 90%).

BCOM has also classified impact on a sliding scale.

- Insignificant: resolution would be achieved during normal day to day activity;
- Minor: resolution would require coordinated input from faculties and service areas;
- Moderate: resolution would require input from a dedicated project team;
- Major: resolution would require input from the validating body, the University of Plymouth
- Extreme: resolution would require input from the University of Plymouth and the Board of Governors

1. Institutional Closure

BCOM is a specialist Independent Higher Education (HE) College which offers University level courses for aspiring osteopaths. It was founded 80 years ago and moved to its current location in Hampstead in 1953 when Frazer House became the permanent home. Lief House was added in 1996 and the two sites were linked to form a dedicated centre for naturopathic and osteopathic teaching, research and clinical provision. The freehold titles of both buildings are owned by the College Company.

The risk of BCOM as a whole being able to operate is low. Plymouth University has ultimate responsibility for the academic provision of BCOM and there is in place an 'Agreement of Academic Co-operation' which covers the 'teach out' of existing students until their graduation, in the unlikely event of the college closing. BCOM also has a business continuity plan in respect of a major disaster. In addition to this there is also a signed Memorandum of Understanding with the University College of Osteopathy and the College of Osteopaths to ensure the continuation of studies for osteopathic students should the College for whatever reasons be unable to deliver its validated provision.

2. Programme Closure

BCOM believes that the risk of closure for our well established programmes in Osteopathy is low. Programmes are reviewed regularly to ensure that they stay up to date with the needs of the profession and there is demand for the programme from applicants together with a strong core team of staff to deliver and expand the programmes in line with student needs. The current programme was recently validated (2016) and in 2017 and 2018 the College successfully underwent both

QAA and General Osteopathic Council (GoSC) recognised qualification status and Programme Review at the University of Plymouth. Prior to a formal decision being taken there would be extensive discussions between senior management and the validation body (Plymouth) and an agreement in principle required before discussions with relevant parties would be initiated. A programme closure strategy would then be developed with an indicative timetable being drawn up.

Following the college making the strategic decision to close a programme due to insufficient enrolments which make it non-viable from an academic, student experience or resourcing perspective it will endeavour to offer existing students a choice to be 'taught out' or to move to another appropriate institution to continue their studies, should the option to continue at BCOM not be viable. Plymouth University has ultimate responsibility for the academic provision of BCOM and there is in place an 'Agreement of Academic Co-operation' which covers the 'teach out' of existing students until their graduation, in the unlikely event of the Programme closing. In these cases we will work with our validating partner (the University of Plymouth) and students affected, to develop the most effective solution. Normally this will include an option to relocate study to the University of Plymouth to complete their studies. Where this is the only or preferred solution the College would honour the student fee and would apply the principles in the Refund and Compensation Policy on a case by case basis.

In addition to this there is also a signed Memorandum of Understanding with the University College of Osteopathy and the College of Osteopaths to ensure the continuation of studies for osteopathic students should the College for whatever reasons be unable to deliver its validated provision.

3. Programme or module amendment

Programmes and their associated modules are reviewed regularly as part of the Annual Monitoring process and at least every 5 years under period review (revalidation). Through these processes, both minor and major amendments could be made which are intended to enhance the student experience. All amendments will be considered by the relevant committees and the student body will be involved in the decision making. It is a possibility that a major amendment could be made to the programme during revalidation but the College and the University Plymouth have in place mechanisms to protect the student interest in this event.

4. Loss of Tier 4 Licence

BCOM recently underwent a successful inspection of our recording and monitoring processes by UKVI (2018). It is very mindful of the responsibilities that are involved and has rigorous processes in place to support students applying and monitoring of attendance once they are enrolled to ensure that we continue to comply with the requirements of our sponsorship licence. BCOM has an excellent track record with UKVI and the Head of Admissions works closely with our external legal representative to ensure that they keep abreast of any regulatory changes. Given our established track record, including successful outcomes from the QAA and Home Office reviews, as well as our comprehensive procedures for attendance and progress monitoring, it is unlikely that the UKVI would find it necessary to suspend or revoke our licence. As a result of this we assess the risk of losing our licence as low.

5. The closure of buildings

On health and safety, academic, student or resource grounds it may be necessary to close a building. Such sudden closure or loss of access to College buildings might have risk and impact consequences. Most costs due to permanent loss of equipment and facilities would be covered by insurance but there might be very serious short- or medium-term impacts. BCOM complies with all relevant health and safety legislation thus minimising the risk of such an occurrence, however it recognises that factors may arise which are beyond our control due to a major incident which could result in temporary closure. Clinic rooms and classrooms are available at both sites, although a reduced service would be offered. The Clinic patient management system is available at both sites and is 'backed up' each evening as part of the IT Policy. Space may be rented on a short term basis in the local area if required. The College has in place a comprehensive Business Continuity Plan.

The risk that buildings may close due reorganisation of the teaching/administrative facilities in line with the strategic plan to improve the teaching and learning experience is possible as parts of building(s) may be unavailable or closed during the implementation of the improvements.

6. BCOM is no longer able to offer its provision due to the validating body withdrawing validation

BCOM has excellent academic standards and well established quality assurance processes as demonstrated in our recent QAA and Programme Reviews. There is provision within the Academic Co-operation Agreement for a notice period to allow for a new validating body to be sought should this be arise. However, BCOM recognises that a major theoretical risk comes from the sudden loss of accreditation by GOsC or the University of Plymouth, regulators or validation by a university. Sudden suspension or withdrawal of accreditation or validation could have massive repercussions on the professional status and business and institutional viability of the College in the medium term, however, BCOM is a fiscally and procedurally transparent institution with good governance and high performance at external review, so the associated risk is low.

2. The measures that you have put in place to mitigate those risks that you consider to be reasonably likely to crystallise

Note: The College's Business Continuity Plan covers mitigating actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment.

Risk 1 Institutional Closure: BCOM is no longer able to operate or has decided to cease trading

Likelihood: very unlikely

Impact: Extreme

The risk of being able to operate due to financial instability is low due to our assets and cash reserves. A Business Continuity Plan is in place. In the event of a major

disaster which means that BCOM is no longer able to operate, working in close liaison with the accrediting and validating bodies (University of Plymouth and GOsC), it will take all reasonable steps to maintain continuity of study through a structured 'teach out' process in accordance with the agreed Academic Co-operation Agreement. All programmes will be closed to new entrants and all applicants will be contacted, and marketing and recruitment would be discontinued.

In the short term (< 2 months), emergency accommodation could be arranged on or off site; any longer would require a more permanent solution. This would have significant short-term impacts on most staff and students.

Risk 2: Programme Closure or changes in delivery

Likelihood: Unlikely

Impact: Severe

If BCOM is unable to offer material components of one or more programmes then it will make any amendments in accordance with the agreed quality procedures for major modifications. Prior to any decision there will be local discussions between the Principal and the Heads of Department and with the HEI, the University of Plymouth. Students will be consulted regarding any proposed changes including the exploration of suitable alternatives.

In the short term should the programme be affected due to estate issues (< 2 months), emergency accommodation could be arranged on or off site; any longer would require a more permanent solution. This would have significant short-term impacts on most staff and students.

BCOM has established procedures in place in the event of the suspension / closure or change of delivery mode of a programme of study. Where there is a material impact on students, we will mitigate the effect by communicating with them at the earliest possible moment to provide assurance that they will not be adversely affected by the decision and that they will be able to complete their studies.

Wherever possible BCOM will enable students to complete their programme of study ('teach out'). In doing so the college in partnership with The University of Plymouth will carefully manage its approach to staffing and other resources to ensure students' studies are affected as little as possible.

Where it is not possible to teach out then BCOM will consider whether there are options for students to change programmes at the College or to transfer to complete their programme at another institution.

BCOM will undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances.

If students have applied for a BCOM programme, but have not yet enrolled, they will be notified (in accordance with UCAS deadlines where appropriate) in time for them to source an alternative suitable programme, where relevant,

Where there is disruption to programme delivery, we will normally consider whether it is practicable to make changes to delivery, rather than closing or suspending the affected programme. The actions we will take to minimise disruption may include:

- temporary short-term suspension of programme delivery (e.g. where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate the impact on students);
- changes to the delivery location or method, which may include distance learning;
- changes to the staffing of a programme, including the recruitment of alternative staff, where appropriate (see 2 below);
- offering students the opportunity to transfer to an alternative programme;
- providing reasonable support to students to access a programme run by another provider, including making arrangements for the transfer of their credits and information about their academic progress.

If key academic staff involved in delivering a programme are unavailable, for example as a result of long term sickness, retirement, death or leaving the College, where possible BCOM will seek to fill gaps as quickly as possible, by assigning responsibility to other current members of staff with appropriate skills and experience or recruiting externally, to avoid disruption

Risk 3: Programme or Module Amendment

Likelihood: Unlikely

Impact: Major

Programmes and their associated modules are reviewed regularly as part of the Annual Monitoring process and at least every 5 years under period review (revalidation). Through these processes, both minor and major amendments could be made which are intended to enhance the student experience. All amendments will be considered by the relevant committees and the student body will be involved in the decision making. It is a possibility that a major amendment could be made to the programme during revalidation but the College and the University Plymouth have in place mechanisms to protect the student interest in this event.

If major in-year changes are needed to the content of a programme, BCOM will use all reasonable endeavours to deliver our programme in accordance with the description in our prospectus for the academic year in which students began studying. However, in the event of major in-year changes to programme content BCOM will ensure that:

- we restrict changes to the minimum necessary to achieve the required quality of experience, and students are notified and consulted with as appropriate;
- we work with students to ensure the offer is still acceptable;
- where necessary, students will have the opportunity to withdraw from the programme;
- where required, students are offered reasonable support to transfer to another programme, or to another provider. Where appropriate, we would

consider financially compensating students when they might suffer demonstrable, material financial loss because of disruption to their studies, under our Compensation and Refund Policy.

Risk 4: Loss of Tier 4 Licence

Likelihood: Unlikely

Impact: Major

Given our established track record, including successful outcomes from the QAA and Home Office reviews, as well as our comprehensive procedures for attendance and progress monitoring, it is unlikely that the UKVI would find it necessary to suspend or revoke our licence. As a result of this we assess the risk of losing our licence as low

However, should our Tier 4 Sponsor status is suspended, we will take all reasonable steps to minimise disruption to students by, for example:

- working with UKVI to allow students to complete their year of study or programme;
- allowing students to enrol and commence their studies, if they are already in receipt of a visa based upon an allocated CAS from the College;
- offering students the opportunity to postpone their application pending the resolution of the suspension (if they have not already commenced their travel to the College)
- where the above is not possible, we would support students to transfer to an appropriate programme at another provider and, where appropriate, financially compensating them where they suffer demonstrable, material financial loss because of disruption to their studies, under our Compensation and Refund Policy.

Risk 5: The closure of buildings

Likelihood: Likely

Impact: Moderate

The risk that buildings may close due reorganisation of the teaching/administrative facilities in line with the strategic plan to improve the teaching and learning experience is possible as parts of building(s) may be unavailable or closed during the implementation of the improvements. Clinic rooms and classrooms are available at both sites, although a reduced service would be offered. The Clinic patient management system is available at both sites and is 'backed up' each evening as part of the IT Policy. Space may be rented on a short term basis in the local area if required. The College has in place a comprehensive Business Continuity Plan.

Should BCOM have to close part or all of the campus or if it becomes unusable for student activity, the College will typically consider remedies such as:

- relocating provision to an alternative suitable location. This may include hiring spaces for programme delivery (where possible) and/or installing temporary buildings on the campus or other locations;
- revising the timetable to allow all of the scheduled teaching to take part in the available facilities. This may include student contact sessions delivered outside of normal office hours. Where we take this approach, we will consult with students and undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances;
- delivering parts of programmes via different delivery modes, such as Distance Learning. Where such an approach is taken, we will consider carefully whether this it is appropriate for the enrolled students who would be affected

Risk 6: BCOM is no longer able to offer its provision due to the validating body or Regulatory Body (GoSC) withdrawing accreditation

Likelihood: Unlikely

Impact: Major

BCOM are aware of, and up to date with, the requirements needed to be accredited. The College successfully underwent GOsC/QAA review in 2017, this was the third consecutive review to receive RQ approval with 'no conditions'. BCOM also successfully underwent a 5 year Periodic Review by the University of Plymouth, with no conditions and only minor recommendations in 2018, and have processes in place to review and renew as necessary.

If the programme loses its accreditation from the professional, statutory or regulatory body, BCOM will consider measures to protect the student experience, such as:

- offering students the chance to move to another programme;
- delivering a modified version of the same programme;
- providing assistance to students to switch to a different provider who has the relevant accreditation;
- where the above is not possible, we would support students to transfer to an appropriate programme (possibly at another provider) and, where appropriate, financially compensate them where they suffer demonstrable, material financial loss because of disruption to their studies, under our Compensation and Refund Policy.

3. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

BCOM's approach to compensation and refunds where provision ceases to run, or where provision cannot be delivered as per the advertised information, can be found in the Refund and Compensation Policy on our website, <https://www.bcom.ac.uk/admissions-courses/funding-fees/> The policy clearly outlines

the circumstances in which BCOM will refund tuition fees and other relevant costs to students and to provide compensation where appropriate.

BCOM has sufficient finances to refund/compensate students where appropriate and this is factored into our annual budgets. BCOM is aware that in the changing UK HE financial environment there could be an increase in such claims and subsequent payments and we are now investigating the possibility of whether insurance against such costs can be procured. Parallel to this we will be investing in initiatives that will assist student support and thus increase retention and progression and lessen the likelihood of such claims and payments.

4 Advice, Support and Communication in the event of implementation

Should any of the risks identified in this plan happen and their impact on students is judged to be more than insignificant then BCOM will act swiftly to offer student suitable advice and support. The nature of the advice and support will vary from risk to risk and depend upon the impact, and will normally be determined in consultation with our accreditation partner, The University of Plymouth, in accordance with our Agreement of Academic Co-operation.

BCOM is committed to communicating any changes to students as early as possible, setting out clear information and options. Working with the student representatives and student union to discuss the changes and providing advice and guidance on the proposed changes and the options that students will have. We will take all reasonable steps to minimise disruption and to enable them to complete their studies as intended. However, where this is ultimately not possible they may, for example as outlined above in section 2:

- be offered a modified version of the same programme;
- be offered the opportunity to move to another programme;
- be provided with assistance to switch to a different provider;
- be offered a financial refund and/or compensation (for cases where it is not possible to preserve the continuation of study or where study is disrupted) in accordance with our Refund and Compensation Policy which can be found at <https://www.bcom.ac.uk/admissions-courses/funding-fees/>

The College's Business Continuity Plan covers other mitigating actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment.

In the event of any conflict between this Plan and our Refund and Compensation Policy then this Plan will apply. Where a student is required to transfer programme, or move to another institution, we recognise that there may be implications for their student finance arrangements. Those affected will be contacted by the BCOM Registrar via email, followed by a face to face meeting and provided with detailed information, advice and guidance based on this Plan and the Refund and Compensation Policy taking account of their individual circumstances.

Promotion of the Plan:

This Student Protection Plan will be considered annually by the Academic Board and Board of Governors (which includes student representation via the Student Union

and the Student Year Programme Representatives) and is available to all stakeholders and prospective students via the College website <http://bcom.ac.uk>. Additionally it is also available for staff and current students to view on our intranet, Osteonet and referenced in all our offers communications and in the Student Handbook.

The College Registry is responsible for ensuring staff are aware of and implement the Student Protection Plan. In particular:

- Applicants will be made aware of this plan when an offer to study a course is made
- Current students will be updated on the plan as part of induction exercise in each re-enrolment, and information regarding the plan's location on the website will be routinely provided in student handbooks
- The plan will be published on the staff intranet, and specific staff training activities will be undertaken
- The student protection plan will be referred to in the UoP Academic Regulations for course change and course closure procedures
- The annual review of the Student Protection Plan by the Academic Board and Board of Governors will take place after it has received comments from the Programme Committee, where there is Student Union and student representation.

As part of our quality assurance processes explicit guidance will be given to all Heads of Department, Programme and Module Leaders to be mindful of the requirements of the plan when reviewing programmes and modules. Programme Leaders will be required to state within validation and review documentations (from September 2018 onwards) the level of risk associated with programme closures and/or significant programme amendments and the measure in place to minimise those risks. Programme Leaders will also be required to state in amendment documents how such amendments will be communicated to current and prospective students.

Applicants will be informed of any significant material changes to their programmes as soon as possible prior to, or at the time, of making an offer.

Review of the Plan & Timeframes

The student protection plan will be reviewed annually by the Academic Board, which includes student representation in the form of programme reps and members of the Student Union, alongside the review of all other policies. Where amendments are suggested these will be discussed initially at Programme Committees in the Autumn term, to which all programme representatives are invited. Final approval will be given by Academic Board and any approved amendments will come into effect the next academic year, therefore all review and amendments will need to be completed by the end of the Spring Term. Students will be involved at all stages of future reviews.

Complaints & Access to Independent Advice

Students may raise a complaint regarding the way the plan is or is not being implemented. The Student Complaints Policy is published on the website, on Osteonet and referenced in all programme handbooks.

In the first instance an informal solution will be sought. It is anticipated that the President of the Student Union, following consultation with Programme Representatives and the general student body, will raise any concerns regarding actions under this plan with the Principal or Registrar. However, should this not resolve the issue students will have full access to all stages of the complaints procedure, including invoking a formal complaint.