# Student Protection Plan

**Provider's name:**
BCNO Limited, trading as the British College of Osteopathic Medicine (BCOM) and the European School of Osteopathy (ESO)

**Provider's UKPRN:** 1000911

**Legal address:** Frazer House, 6 Netherhall Gardens, London, NW3 5RR

**Contact point for enquiries about this student protection plan:** Dr Kerstin Rolfe (Principal)

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**Summary of the Student Protection Plan**

This Student Protection Plan relates to the BCNO Ltd which provides education courses and trades under the names of British College of Osteopathic Medicine (BCOM), the European School of Osteopathy (ESO) and ESO International.

As a registered provider of higher education, BCNO Ltd is required to publish a Student Protection Plan (SPP), which sets out how we will ensure that the quality of study will be maintained and how Students can continue to study even if a campus, or course closes.

This SPP is specific to our circumstances and sets out the measures BCNO Ltd has put in place to protect you as our student in the event that a risk to the continuation of your current or planned studies should arise due to our failure or a decision we take. This SPP has been approved by the BCNO Board, the regulator the Office for Students (OfS) and it addresses circumstances and risks specific to BCNO Ltd.

Summary of significant changes since the last version

a) Addition of loss of staff
b) Change in Likelihood for Programme closure and Institution closure

## What this document covers

This SPP applies to all students registered with BCNO Ltd and studying on programmes validated by University of Plymouth or Buckinghamshire New University or a BCNO self-validated qualification through ESO International.

## What this document does not cover

Risks to students' continuation of study due to students' own circumstances (e.g. due to personal reasons) are outside the scope of the SPP. BCNO Ltd has a number of policies and procedures in place to support students who have difficulty in continuing study as a result of personal circumstances. These can be found on the Virtual Learning Environment.

### Related Documentation

Please refer to the following documentation in conjunction with this document. Related documents are available on the website (https://bcnogroup.ac.uk/about-us/policies/) unless specified otherwise.

- Academic Regulations (University of Plymouth or Buckinghamshire New University)
- Compensation and Refund Policy
- Student Complaints and Appeals Procedure
- Study and Wellbeing Policy
- Student Handbooks (available on the VLE)
- Terms and conditions

## Introduction

This SPP sets out the actions the BCNO Ltd has in place to protect you as our student in the event that a risk to the continuation of your studies should arise. It has been approved by the Office for Students (OfS) and is available to both current and potential students at all levels of study.

The actions contained in this SPP are in addition to your protections under Consumer Protection Law and do not affect your consumer rights.

For specific guidance on how this SPP may relate to your personal circumstances, please contact Registry at the BCNO Ltd.

This SPP is reviewed annually and is an ongoing condition of registration with the OfS. The SPP is available on the BCNO website.

## Purpose

BCNO Ltd recognises that students invest significant amounts of financial resources, time, and commitment to their studies and in return, expect to receive value for money. BCNO Ltd 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.

The purpose of this SPP is to assure you and our regulator, the OfS, that BCNO Ltd has appropriate arrangements in place to ensure the continuation of study for all our students.

BCNO Ltd will take all reasonable steps to implement the provisions of the SPP if the risks set out in the plan materialise and we will inform the OfS of our actions in accordance with the OfS Regulatory Framework.
Students through their representatives will be informed as soon as possible should the SPP be activated and advice and guidance given where relevant on the Compensation and Refund Policy.

Our SPP covers all registered students of BCNO Ltd.

| |
|---|
| Students enrolled with ESO International |
| Students registered on a University of Plymouth Programme |
| Students registered on a BNU Programme |

## Principles

We commit to:

- Being open and transparent in our communication with you, should any risk to the continuity of your study arise
- Informing you of material curriculum changes affecting your study in a timely manner
- Taking reasonable steps to protect your studies should we discontinue or substantially change a module or qualification on which you are registered or enrolled
- Taking into consideration your needs and the impact that any proposed changes and protective measures may have on you
- Informing the OfS of any changes that may necessitate a review of this SPP or events, except for the closure of an individual course, that require implementation of the provisions of this SPP
- Seeking students' views on this SPP as part of our student feedback processes

## 1. An identification and assessment of the range of risks to the continuation of study.

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

1. Institutional Closure: BCNO Ltd is no longer able to operate or has decided to cease trading
2. Programme Closure or change in delivery: BCNO Ltd is no longer able to deliver material components of one or more of its provision
3. Programme or Module Amendment
4. BCNO Ltd is no longer able to deliver its programmes either on a permanent or temporary basis due to the revoking of its Study Route Visa licence.
5. The closure of buildings or sites
6. BCNO Ltd is no longer able to offer its provision due to the validating and/or accrediting professional bodies withdrawing validation
7. **Unforeseen departure of key members of staff**

**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. BCNO Ltd 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%).

BCNO Ltd 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, or Buckinghamshire New University
- **Extreme**: resolution would require input from the University of Plymouth, Buckinghamshire New University, and the Board of Trustees

## Risk 1: Institutional Closure

BCNO Ltd is a specialist independent Higher Education (HE) Institution which offers University level courses for aspiring osteopaths. The Group consists of the British College of Osteopathic Medicine (BCOM) (London), the European School of Osteopathy (ESO) (Kent) and ESO International. BCOM was founded 80 years ago and moved to its current location in Hampstead in 1953 when Frazer House became the permanent home.
The ESO was founded 70 years ago and moved to its new premises at Boxley House in 1996 and retained the site in the town centre where it runs a successful training clinic. The Group owns the freehold titles of all buildings.

BCNO has reciprocal agreements with other Osteopathic Educational Institutions to take students registered on RQ programmes if the situation arises where the institution has to close. BCNO will work closely with the University of Plymouth to support the students through this process. Buckinghamshire New University students are in their final year and therefore the risk is minimal.
Students would be informed at the earliest period possible. Students will be offered the appropriate support, and discussions will take place to ensure students are informed and are provided with the information they require to make informed decisions and timeframes provided to ensure students can make an informed choice for themselves.

BCNO Ltd also has a business continuity plan in respect of a major disaster.

## Risk 2: Programme Closure

BCNO Ltd believes that the risk of closure for our well-established programmes in Osteopathy probable. Though programmes are reviewed regularly to ensure that they stay up to date with the needs of the profession the market for osteopathy is reduced. This reduced demand has been seen following Brexit with increasing difficulty to attract EU students. If a decision is taken to close one or more programmes, there would be collaborative discussions between senior management and the validation body (University of Plymouth) to develop a programme closure strategy with indicative timetable and appropriate student support mechanisms...

From 2021, the ESO BNU validated programme is in teach-out, and is overseen by an Exit Strategy which protects students through bespoke provision for the remaining level 7.

Following BCNO Ltd making the strategic decision to close a programme due to insufficient enrolments, which makes it non-viable from an academic, student experience, resourcing or commerical 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 the BCNO Ltd not be viable due to immediate closure of the institution. In these cases, we will work with our validating partner (the University of Plymouth) and the students affected to develop the most effective solution, BCNO Ltd would honour the student fee and would apply the principles in the Compensation and Refund Policy on a case-by-case basis.

This SPP also covers all international programmes under the BCNO banner. Though the market overseas continues to grow.

## Risk 3: Programme or Module Amendment

Programmes and their associated modules are reviewed regularly as part of the Annual Monitoring process and at least every five years under period review (revalidation). Through these processes, both minor and major amendments could be made, which are intended to enhance the student experience and currency of the curriculum offer. 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 BCNO Ltd and the University of Plymouth have in place mechanisms to protect the student interest in this event.

## Risk 4: Loss of Student Route Visa Licence

BCOM and the ESO underwent a successful inspection of our recording and monitoring processes by UKVI (2018 and 2019, respectively). BCNO Ltd is 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. In merging, the BCOM and ESO bring together their pooled expertise and now manage this function centrally. BCNO has an excellent track record with UKVI, and the Admissions and Registry departments work 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, and our comprehensive attendance and progress monitoring

procedures, 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.

## Risk 5: The Closure of Buildings

It may be necessary to close a building on health and safety, academic, student, resource or commercial grounds. Such sudden closure or loss of building access 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. BCNO Ltd 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 its control due to a major incident which could result in temporary closure. Classrooms are available across sites, although a reduced service would be offered. Space for clinics and classrooms may be rented on a short-term basis in the local area if required. BCNO Ltd has in place a comprehensive Business Continuity Plan.

The risk that buildings may close due to reorganisation of the teaching/administrative facilities in line with the strategic plan to improve the teaching and learning experience is possible as parts of a building(s) may be unavailable or closed during the implementation of the improvements. However, improvements are planned outside term time to reduce impact on the teaching. Students are informed before any work commences unless it is an urgent repair.

## Risk 6: Withdrawal of Validation/Accreditation

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

## Risk 7: Unforeseen departure of key members of staff

BCNO Ltd has procedure in place for the unforeseen departure of key members of staff. If the loss of the staff member has an impact on students, this would be mitigated through:

- Engagement with students to explain the situation and advise on the activity underway to reduce any detriment, the timescales, and any remedial actions in place.
- Keep students informed of the progress.
- Provide additional support where required.
- Fill vacancies as soon as practically possible either internally or externally.
- No teaching time will be lost, and students will be consulted on changes to assessment schedules if impacted.

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

Note: BCNO Ltd Business Continuity Plan covers mitigating actions affecting business continuity, such as acts of terrorism and damage to buildings or equipment.

**Risk 1 Institutional Closure**
**Likelihood: Highly likely**
**Impact: Extreme**

The risk of not being able to operate due to financial instability prior to completing teach-out for the current students 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 BCNO Ltd 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 will 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**

**Likelihood: Highly Likely**
**Impact: Severe**

If BCNO Ltd 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 Senior Management Team and the HEI, the University of Plymouth/Buckinghamshire New University. Students will be consulted regarding any proposed changes, including exploring suitable alternatives. Students will be supported during their time studying at BCNO Ltd.

In the short term, should the programme be affected due to estate issues (< 2 months), emergency accommodation would 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.

BCNO Ltd 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 students at the earliest possible moment to assure that they will not be adversely affected by the decision and that they will be able to complete their studies.

Wherever possible BCNO Ltd will enable students to complete their programme of study ('teach out'). BCNO Ltd has sufficient cash reserves to oversee teach out of students. In doing so, BCNO in close partnership with the University of Plymouth/Buckinghamshire New University, 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 BCNO Ltd will consider whether there are options for students to change programmes within the Group or to transfer to complete their programme at another institution. Students would be supported in that decision.

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

If students have applied for a BCNO Ltd 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 practical 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 online learning where applicable;

- changes to the staffing of a programme, including the recruitment of alternative staff, where appropriate;
- offering and supporting students the opportunity to transfer to an alternative programme;
- Provide reasonable support to students to access a programme run by another provider, including making arrangements to transfer 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, death or leaving the Group, where possible BCNO Ltd will seek to fill gaps as quickly as possible, by assigning responsibility to other current members of staff from the wider Group with appropriate skills and experience or recruiting externally, to avoid disruption.

**Risk 3: Programme or Module Amendment**

**Likelihood: Unlikely for Courses with Enrolled Students**
**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 may 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 BCNO Ltd and the University of Plymouth/Buckinghamshire New University have in place mechanisms to protect the student interest in this event.

If major in-year changes are needed to the content of programmes, BCNO Ltd will use all reasonable endeavours to deliver our programmes 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 we 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.
- Relevant regulators e.g. PSRB is informed to ensure compliance with the awarded RQ

**Risk 4: Loss of Student Route Visa 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 Sponsor status be 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 BCNO;
- offering students the opportunity to postpone their application pending the resolution of the suspension (if they have not already commenced their travel to the UK)
- where the above is not possible, we would support students to transfer to an appropriate programme 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.

**Risk 5: The Closure of Buildings**

**Likelihood: Unlikely**
**Impact: Major**

The Group has in place a comprehensive Business Continuity Plan should a building be unable to be used for teaching.

Should BCNO Ltd have to close part or all of a campus or if it becomes unusable for student activity, we 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 online 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: Withdrawal of Validation/Accreditation**

**Likelihood: Unlikely**
**Impact: Major**

BCNO Ltd is aware of, and up to date with, the requirements needed to be accredited. Prior to the merger, both the BCOM and the ESO successfully underwent GOsC/QAA review in 2017 and 2018. BCOM also successfully underwent a 5-year Periodic Review by the University of Plymouth, with no conditions and only minor recommendations in 2018, and has processes in place to review and renew, as necessary. BCNO Ltd underwent professional review by the GOsC in 2022, with the outcome that all programmes hold ‘recognised qualification’ status.
If the programme loses its accreditation from the professional, statutory, or regulatory body, BCNO Ltd will consider measures to protect the student experience, such as:

- offering and supporting students with a 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. Communication with students about the Student Protection Plan

Should any of the risks identified in this plan happen and their impact on students is judged to be more than insignificant, then BCNO Ltd will act swiftly to offer students 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 partners.

BCNO Ltd 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/association to discuss the changes and providing advice and guidance on the proposed changes and the students' options. 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 the study or where the study is disrupted) in accordance with our Compensation and Refund Policy, which can be found on the website.

BCNO Ltd.’s Business Continuity Plan covers other mitigating actions affecting business continuity, such as acts of terrorism and damage to buildings or equipment.
In the event of any conflict between this Plan and our Compensation and Refund 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 Registry Team via email, followed by a face-to-face meeting and provided with detailed information, advice and guidance based on this Plan and the Compensation and Refund Policy, taking account of their individual circumstances.

BCNO recognise any change in the course or staff can be a time of stress and uncertainty for the students. BCNO will facilitate additional Student Support and remind students of the current provision both internally and externally of the support services available.
Students who may find this time particularly stressful will be in receipt of reasonable adjustments or known to staff additional support will be offered in line with current policies.

Students offered a place at BCNO on any of its courses will be sent a link to the current SPP and any activation of the plan. Applicants not yet registered will be informed of any changes and how this may impact their studies with BCNO. If needed, alternatives will be included, and advice and support will be provided on other alternative courses or providers.

Staff and students will be reminded annually of the SPP.

**4. Promotion and Review of the Plan**

This Student Protection Plan will be considered annually by the Academic Board and Board of Trustees (both include student representation) and is available to all stakeholders and prospective students via the BCNO websites. It is also available for staff and current students to view on our virtual learning environment and referenced in all our offers communications.

BCNO Ltd.'s Registry ensures 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 the 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 VLE, 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 Student Protection Plan is referenced in the Exit Strategy with Buckinghamshire New University
- The annual review of the Student Protection Plan by the Academic Board and Board of Trustees will occur after it has received comments from the Programme Committee, where there is student representation.

As part of our quality assurance processes, explicit guidance will be given to all Heads of Department and Programme Leaders to be mindful of the plan's requirements when reviewing programmes and modules. Programme Leaders will be required to state within validation and

review documentation (from September 2018 onwards) the level of risk associated with programme closures and/or significant programme amendments and the measures 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.

**5. 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 representatives, 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 the 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.

**6. 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, the virtual learning environments and referenced in all programme handbooks.

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