



College of Osteopaths Student Protection Plan 2019-20

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1. Purpose and Scope

- 1.1 This Student Protection Plan sets out the policies and procedures the College has in place to ensure the continuity and quality of your study, from your enrolment through to the completion of your studies. It tells you what measures the College will take in order to protect your interests and assure continuity of your study in the event of course, campus or College change or closure.
- 1.2 The Plan is reviewed and refreshed on a regular basis by the College in collaboration with our student body on an annual basis. Variations are agreed by the Board of Governors.
- 1.3 This Plan covers you if you are an applicant to, or current student at, the College at any level of study with our validating partner, the University of Derby (UoD). The UoD also has their own Student Protection Plan, on their website.

These two plans cover you and are related to the collaborative arrangements we have.

- 1.4 The measures contained in this Plan are in addition to your statutory rights, which remain unaffected. The College retains the right to make minor adjustments and improvements to programme and module content year-on-year, and these in themselves will not trigger student protection measures. We will take reasonable steps to avoid implementing change during an academic year or making changes close to the start of an academic year.
- 1.5 Should this Plan need to be triggered, a project team will be established to follow the necessary processes and timescales. The team will include senior staff from the College, the Partner University and at least one student representative.

2. Risk Assessment

- 2.1 The College considers potential risks to the continuation of your education regularly. We keep an institutional risk register to record, monitor and mitigate against the risks we identify. Any actions and risks are prioritised annually and on a continuous basis throughout the year. This allows us to update the impact levels and likelihood of each risk and implement new ways of reducing or overcoming risks.
- 2.2 The College's Board of Governors actively monitor risks and the register is scrutinised by the College's external auditors on an annual basis.

- 2.3 The key areas of the College's risk register include: People; External Agents; Resources; Health and Safety; Regulation and Compliance; Strategic Plan; Finance; and, Engagement. The register is presented to the College Board of Governors for approval annually and has been approved for 2019.
- 2.4 As a key part of this Plan, the College reports on risks we have identified that could result in a failure to provide you with continuity and quality of study. These are risks we take very seriously and consider regularly. As such we have in place mitigations to help to reduce any impact on you, and the broader student body, if any of these risks should eventuate.
- 2.5 Possible risks, and our assessment of the likelihood of them happening, are provided below:

2.5.1 Risk: The College becomes unable to operate / closes completely

It is our assessment that our current financial position means the risk we will become unable to operate is **low**. This is because:

- The College has a very good and stable financial performance as evidenced in its financial statements, submitted to the Office for Students (OfS) in 2019. We can call upon sufficient contingency and other funds to ensure ongoing sustainability.
- The College has steadily increasing student numbers and a positive move to new validation arrangements with the reputable University of Derby.
- The College also has business continuity plans in place to deal with any challenges relating to recruitment, which includes the option to extend recruitment and to run two entry points in the academic year, for example.

The risk that the College as a whole would become unable to operate is therefore low.

2.5.2 Risk: losing our validating partner

The College considers that there is a **low** risk of loss of our validating partner (University of Derby). This is because:

- Of the evidence of our recent engagement and partnership development, which has resulted in excellent working partnerships, the new validation arrangements and formal agreement of a broader Memorandum of Co-operation.
- The College have selected a good-quality partner following a process of financial and academic due diligence. These checks having been undertaken successfully on the new validating university reduces the risk of a partnership ending.
- Every collaboration agreement we enter also contains teach-out provisions to protect students in the event of a partnership ending. These provisions state that the College and the partner will teach-out the students affected.

2.5.3 Risk: losing our accreditation from the General Osteopathic Council (GOsC)

All providers of osteopathic education are required to have accreditation from the GOsC. This accreditation is referred to as a “Recognised Qualification” (RQ) and all osteopathic students must graduate from a programme that has RQ status. The College considers the risk of us losing our accreditation (RQ status) is **low**. This is because:

- The College is a specialist and experienced provider and has been providing high quality education and training, as well as integrated osteopathy services to the public since 1948.
- The RQ is monitored on an annual basis by the General Osteopathic Council. Their role is to identify any potential problems and work with us to resolve them with an action plan which is continuously monitored by the General Osteopathic Council’s Policy and Advisory Committee. This method ensures that any problems are addressed early and can be overcome.

2.5.4 **Risk: Reduction to quality that results in serious breach of standards and withdrawal of programme delivery or validation arrangements**

The College considers that it is highly unlikely, and therefore has a **low** risk that it would become responsible for serious breaches of standards that might result in withdrawal of programme delivery, validation and/or franchise arrangements. This is because:

- The College has been providing high quality education and training, as well as integrated osteopathy services to the public, and high-quality graduate osteopaths to the industry, since 1948.
- The College has ongoing registration with the General Osteopathic Council and quality partnerships with the Institute of Osteopathy, the National Council for Osteopathic Research (NCOR) and is a member of the Council for Osteopathic Educational Institutions (COEI). Our university partnerships ensure scrutiny due to their academic oversight and their role as a degree awarding body.

2.5.5 **Risk: The College is no longer able to deliver material components of its courses**

The College considers that the risk that we would no longer be able to deliver material components of our courses is also **low**. This is because of:

- Our partnered teaching and learning approach, which spans education providers, teaching clinics, industry, osteopathic organisations and private practice
- Our continuing engagement with our quality graduates, providing a cycle of engagement and delivery
- Our modules and practice, which are developed and taught by integrated teams of academic staff and industry, in practice, providing an excellent student learning experience as well as further mitigating risk in this area.

2.5.6 **Risk: Updating occurs to programme content, regulations or policies**

Particularly given our partnered approach, and recent changes to the regulation in higher education, the College considers it somewhat likely that programme content, regulations and policies will be updated from time to time, due to the ongoing commitment by the College, its validating partner and professional body to quality enhancement and assurance. Therefore we assess this risk as being **medium**.

- For example, we regularly review our academic provision through our Annual Monitoring Report process with the General Osteopathic Council. This is to maintain academic standards and to ensure our course is keeping up-to-date. These reviews may sometimes result in changes to course provision.

2.5.7 **Risk: Campus closure or service reduction**

The College considers the risk of any campus closure or reduction of service at our campuses to be **low**. This is because:

- The College has a steady increase in enrolments and a business plan to continue a steady growth.
- Part of our unique selling point is that we offer programmes in the north and south of England, as the only provider of osteopathy study covering the Midlands and North, and offering flexible provision which is particularly attuned to the needs of our mature student cohort.
- Partnerships with industry and the public health services evidence the growing need for osteopathy services, as an additional option to the allied health professions portfolio. The College is therefore confident of ongoing demand and increasing awareness and interest in osteopathy. As evidence to this demand, our clinics now serve 5,000 appointments annually.
- We have no foreseeable reasons for campus closure, and our well-established partnerships, planning systems and business planning makes it even less likely.

2.5.8 **Risk: the College does not proceed with an intake at a particular site**

In the unlikely event of low student numbers, which could affect your experience whilst studying with us, we could make the decision not to have an intake on a site. However, the College considers the risk of this happening as **low**, for the reasons stated in 2.5.7.

3. Risk Mitigation Measures

- 3.1 As we have described above, the College does not anticipate or foresee any significant risk to the continuity and quality of your study. Risks outlined above are considered generally to be low.
- 3.2 However, as part of this Plan the College wishes to bring to your attention two risk areas and related mitigation measures below, which provide further detail about the measures we have put in place to ensure that risk is continually managed and does not disrupt the continuity or quality of your education.

3.3 Risk mitigation measures for the medium risk area (3.3.1) and the area of validation dependency (3.3.2) are as follows:

3.3.1 Updating of programme content, regulations and policies

Programme content, regulations and policies will be updated from time to time due to the ongoing commitment by the College, its validating partner and professional body to quality enhancement and assurance. Changes to regulations and policies may be prompted by the validating partner or other partners and regulatory systems in which the College operates. To mitigate risk of disruption to your study, the College will:

- Seek to limit any disruption and the implementation of changes in-year and just before the start of the academic term.
- Consider any specific impact of changes by assessing impact on the student population, including any perceived differential impact on particular student groups, e.g. access and participation target groups and students with protected characteristics.
 - In particular, the College will ensure assessment of impact in relation to our mature, part-time learners (as our major cohort) and as such will ensure, in collaboration with our students, that any potential impact is considered and addressed in the context of particular concerns for our student characteristics.
- Ensure that any changes are thoroughly and timely considered by the Senior Management Team and Programme Committees, where students are also represented, providing student voice into this process.
- Apply new or revised policies / regulations to all students from the start of the academic term following approval by the Quality Review Board or Senior Management Team of the College.
- Implement a robust student communication plan, ensuring timely, accessible and clear information regarding any changes, the reasons for these changes and the potential impact on your study (if any).

3.3.2 Loss of our validation partner

As shown in the risk details above, this risk is **low**. However, given the dependent nature of this arrangement, the College considers that you should be aware of and assured by the following mitigation measures, which are in place:

- The existing relationship and Memorandum of Co-operation between the College and the University of Derby, signed by both parties at the start of the partnership, formalises the partnership more broadly and has established good relationships and engagement, which provide a positive and secure platform for ongoing Validation arrangements. It sets ongoing intentions to collaborate and partner, and with clauses for resolution of any disputes. The Memorandum also includes a section specifying the processes of renewal and termination. Should the above occur, the withdrawal or non-renewal will be in line with the College's agreement with the validating institution.

- Where the above occurs in line with the College's validation agreement with the University of Derby, current students registered with the University will normally be permitted to complete their intended studies at the College subject to normal maximum timescales. Maximum timescales are deemed to be the normal duration of the programme plus a further two years to complete your studies within the maximum registration period. This period includes 'catch-up' periods of study.
- The College would also attempt to see an alternative validator during this time for future cohorts. We consider particularly the lack of alternative part-time provision in the north, which more likely impacts more disadvantaged groups, as there are more areas of social deprivation and areas of lower participation rates in higher education in the north of England. The College therefore takes particular concern to mitigate any risk to ensure further disadvantage does not occur.
- The College will inform all future applicants prior to the next recruitment cycle, allowing potential applicants to source an alternative suitable programme. In the unlikely event that an applicant has accepted an offer following loss of any validation arrangements, the College's senior team will notify the applicant and ensure any financial payments made by the applicant are refunded.
- The University of Derby has a detailed closure process including an action plan, which ensures the closure is managed effectively and secures continuation of study for affected students. The action plan can be found at the following link: <https://www.derby.ac.uk/services/quality/collaborative-provision/> - Appendix 4-I. The closure plan details how student consultation will be managed, how students will be supported to complete their programmes of study and how the closure will be monitored and by whom, thereby ensuring that the student experience is not compromised during any teach-out. This information is available from the University of Derby partnership office.

4. Refund and Compensation Policy

- 4.1 Under the provisions of the Student Contract the College's Refund and Compensation Policy outlines the circumstances in which the College will refund your tuition fees and any other relevant costs, and provide any necessary compensation, in the event that the College can no longer preserve continuation of your study.
- 4.2 You can find the College's Refund and Compensation Policy on our website.
- 4.3 The Policy covers refunds to you, whether you are in receipt of tuition fee loans from the Student Loans Company (SLC) or if you pay your own tuition fees, or if you have a sponsor.
- 4.4 The Policy also covers details about payment of additional travel costs that may result from a change to location of your course. Compensation for relevant tuition and maintenance costs and lost time are also provided in the instance that the College is either not able to preserve continuation of your study; or, where you have to transfer course or provider.
- 4.5 We keep this Policy under review on an annual basis, and consider advice and guidance issued by official bodies. These bodies include the Office of the Independent Adjudicator (OIA), the

Competitions and Markets Authority (CMA) and the Office for Students (OfS). We also consider guidance from representative organisations such as IHE (Independent Higher Education) as well as our validating university. We periodically review the Policy following relevant case outcomes from the OIA as well as updates to legislation. This is so we can reflect good practice when reviewing the Policy.

- 4.6 In the unlikely instance of an occurrence that would trigger the need for refunds and compensation, the College assures you that it has sufficient financial reserves to refund and compensate you as appropriate. Reserves available for refund and compensation are factored into our annual budgets. Targeted growth in our retained cash reserves will cover ongoing cost estimations.
- 4.7 Where refund / compensation is required, the College will agree on a financial package with affected students to ensure you are not disadvantaged academically or financially. This will take into account those with protected characteristics or from different backgrounds.
- 4.8 Where the College is required to refund any student loan payments received, it will follow the guidelines by the Student Loans Company and action refunds through the 'change of circumstance' system whereby we change amounts required and this is then deducted from our next payment. With regards to refunding to students or sponsors, the College always confirms whether a student has a sponsor before refunding any payments directly to affected students.

5. Communication with our students

- 5.1 The College will ensure that the provisions of this Student Protection Plan are widely communicated to you, whether you are a current, or future, student.
 - 5.1.1 If you are an Applicant (future student): The College provides a range of information on its website about the programmes on offer, how to apply, fees and finance, and what it is like to be a student at the College. The Student Protection Plan and Refund and Compensation Policy are linked from our Student Terms & Conditions at the application stage, and will also be publicised on our website: <https://www.collegeofosteopaths.ac.uk/policies-and-procedures/>
 - 5.1.2 If you are a registered (current) student: This Student Protection Plan will be available to you via the College website, the Student Contract and the Regulations. If you are a returning student, you will also find it in your emails. In addition to this you'll find the link to the Plan and its provisions communicated via a number of our other student communication channels, including the Principal's Blog (at minimum quarterly intervals), and social media (at minimum you'll see references to the Plan at quarterly intervals).
 - 5.1.3 As detailed below, we will also ensure that our staff are aware of the Plan and its implications, so you can also ask staff for further advice or information if you require.
- 5.2 Communicating with our staff: The College will ensure that the staff are aware of the requirements and implications of our Student Protection Plan. This will be undertaken via the Principal's blog, Middle Management meetings and Staff Development activities, at regular intervals (minimum quarterly).

5.2.1 Staff will be aware of the implications of the Plan when any programme, policy or course changes are being considered and proposed, as it will be a standing item for the Board of Governors, Senior Management Team and Quality Review Board scheduled meetings, and addressed in relevant staff development and training.

6. Your Involvement in the development of the Student Protection Plan

6.1 Students are included, and play an important part, in the College/University Committees. In the future students will have the opportunity to comment on an amendments to the Protection Plan. We will review this Student Protection Plan by June 2020 in preparation for the next publication in September 2020 and students will be invited to submit their comments via their student reps at the Programme Committee. The Plan will subsequently be reviewed on an annual basis, in June-July.

6.2 Student involvement in the Programme Committee is by a student representative from each of the College campuses. The Committee meets three times per academic year, and both documented minutes and action items are taken into the Plan review meetings. If appropriate and if students at the Programme Committee are willing, a student representative(s) will be invited to the Plan review meeting, to offer further input and ensure that the discussion from the Programme Committee fully links into the review process of this Plan. In addition, there is the opportunity to feedback concerns, including any points about the Student Protection Plan, in the meetings between your student representatives and the Board of Governors and/or the College's Senior Management Team.

6.3 The review process will include a review of the associated risks detailed in the plan (via the College's risk assessment process) and will consider, against the broader context of the College, whether risks identified are deemed to have increased or decreased in impact or likelihood ratings. Mitigation measures will also be reviewed, with a view to identifying whether any further practices can be established to further mitigate any risk, as appropriate. Student comments and input will be considered in the context of risk and mitigation measures, and suggestions taken for strengthening the Plan in respect of content and measures; and, clarity, communications and accessibility. Any issues that have arisen will also be considered and addressed in the redevelopment of the Plan.

7. Activation of the Student Protection Plan

7.1 If it is necessary to implement the measures in our Student Protection Plan, a project team will be established with core members of the College and University of Derby and a member of the student body, to follow the necessary College/University processes and associated timescales. The consultation would be designed to help students and inform you if there are to be any material changes to your course. Students would be invited to attend a student briefing.

7.2 In this instance, the College would ensure that you are informed of any material changes to your course by communicating changes via the blog, and email, and will provide at least 90 days' notice ahead of any material changes.

7.3 To ensure that you are fully supported, as an individual student and as part of our collective student body, the College will:

- Inform students of services of our Education Support Officers (ESO). The details of these ESOs and their specific roles are available in the Course Programme Handbook. You will also be able to get their details from the teaching clinic Notice Boards.
- Signpost to inform you about how to access further independent advice for example, the University of Derby's Student Union
- Help you access support to develop a Learning Support Agreement to help you with your studies.
- Help you develop a financial plan.

7.4 If you are unhappy with the way we have implemented the plan they are entitled to make a complaint as per the **Complaints Procedure**, which is available under the Policies and Procedures tab on the College's main website.

The College of Osteopaths' Complaints Procedure aims to:

- Be easily accessible and support students with a straightforward, appropriate and effective process for resolving complaints;
- Resolve complaints informally at a local level wherever possible;
- To take complaints seriously but also to deal with them in a way that is appropriate to the issue complained about;
- Ensure a full and fair investigation
- Respect complainants desire for confidentiality wherever possible;
- Provide an effective response and appropriate redress when a complaint is upheld;
- Help us to keep on improving quality of what we do.

Examples of complaints include:

- standards of service
- actions or lack of actions by the College or its staff
- provisions of the College affecting individuals, students, customers or clients of any group

The College will:

- handle the complaint in a quick, polite and straightforward way
- investigate the complaint thoroughly and impartially
- endeavour to keep the complainant informed at all stages of the process
- ensure that students, in particular, are not disadvantaged in any way by reason of raising the complaint.

END

POLICY SIGN OFF AND OWNERSHIP

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VERSION HISTORY

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