

STUDENT PROTECTION PLAN 2018/2019

Introduction

The WKCIC Group is a large provider mainly for non HEFCE Further Education, but with a small proportion of Higher Education activity. Trading as The Capital City College Group (CCCG) it is an independent Corporation with exempt charity status formed under the Further and Higher Education Act 1992. The Group was formed on 1st August 2016 through the merger of Westminster Kingsway (WKC) and City and Islington Colleges (CIC). A training arm, Capital City College Training (CCCT), was launched on 23rd February 2017 to lead on Apprenticeship delivery. With effect from 1st November 2017, the College of Haringey, Enfield and North East London (CoNEL) joined the Group. The CCCG Board is our governing body. Although one corporation, the colleges have retained their brands, specialisms and community focus.

HE is delivered at the Victoria (76 Vincent Square, London SW1P 2PD), Soho (Peter Street, London W1F 0HS) and Kings Cross (211 Gray's Inn Road, London WC1X 8RA) sites of WKC; Centre for Health, Social and Child Care, (The Marlborough Building, 383 Holloway Road N7 0RN), Centre for Business, Arts and Technology, (444 Camden Road N7 0SP), and Centre for Applied Sciences, (The Angel, 311–321 Goswell Road, EC1V 7DD) sites of CIC and also the Tottenham Centre (High Road London, N15 4RU) and Enfield Centre (73 Hertford Road Enfield Middlesex EN3 5HA) sites of CoNEL. At present we do not deliver any provision overseas.

The total turnover for the Group in 2016-17 (CCCG and CoNEL published accounts) was £113,799,000. The total assets are £436,415,000 with Total Net Assets of 307,901. With these figures in mind, the Group believes that the risks of institutional financial failure is very low and the Education and Skills Funding Agency (ESFA) has rated our financial position as 'Good'. As one of the largest Further Education institutions in the UK, the Group has the financial resilience to be able to continue to offer courses to students.

Risk Assessment

Although The Group is in a strong financial position, no business exists without risks and the key risks are usually financial, operational, reputational and circumstantial/environmental risks. Risks are evaluated for materiality and probability and assigned an owner whose responsibility it is to ensure that the agreed mitigation is put in place. The Group and each of the colleges within the Group maintain a Risk Register, reviewing the potential major factors that could affect the Group's or Colleges' operations. This is reviewed by each College's Senior Management Team and by the Advisory Board within each College on a bi-monthly basis. These feed into the Group's Risk Register that is reviewed by the Group Leadership Team and the Corporation. This is a RAG rated document and is able to provide a framework about how the Group will test, review, adjust and update performance and risks.

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The Group, and each college within the Group, have business continuity plans in place. There is a Business Continuity Plan that the Estates Director has for the Group which details the business of the Group, identifying the assets (including people) and processes that are critical to delivering our business. Detailed responses include the initial response to an incident and the longer-term implementation of measures for a return to business as usual. It also considers continuity preparations and how to make the organisation more resilient to risk.

The Group's management of circumstantial or environmental risks such as disease, fire, floods and or Force Majeure are the same as for any major FE college. The Groups Disaster Recovery Plan ensures ongoing risk assessments, regular safety inspections and the maintenance of appropriate insurance and cash reserves to support business continuity in the event of such unforeseen circumstances.

The Group does not have any plans to close any of its sites. If any changes were to be made to close any site or to re-locate the delivery of any course to a different site within the Group's existing or newly-acquired centres, the impact on students would be minimal as all centres are located close to well-connected transport routes in London. The Group has 11 sites in North and Central London in relatively close proximity, allowing decant in emergency situations, minimising disruption to learners. No particular groups of students would be more affected by any changes; each site offers a full range of support for all students.

The risk of not being able to deliver whole courses or programmes due to staffing or resource issues is low. Each curriculum area has staff with a range of skills, experience and expertise that ensures students receive a positive experience. Each curriculum area has contingency plans in place to mitigate the impact of any loss of specific skill sets that are dependent on only one member of staff. Each area is also well resourced with specialist equipment and investment in these areas is on-going, with opportunities to bid to upgrade these available each year through the Group's budget planning process.

The risk of a course or programme cancellation is moderate. This may occur if the minimum number of students to enhance the student experience are not recruited or in situations where a strategic decision is made to discontinue a course or programme. In the event of insufficient student recruitment of viable student numbers, the students will be kept informed of the situation and the Group will ensure that there is a minimal impact on students. In situations where a decision is made to discontinue a course or programme, The Group is committed to teaching out those courses or programmes and offers to new entrants will cease to be made.

The risk that we are no longer able to deliver components of courses is moderate. A small number of courses have units or modules that rely on the specific skill set of one member of staff. The curriculum team have relationships with local employers who are willing to deliver specific aspects

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of a unit where the high level skills are covered by one specialist teacher; and other members of staff are able to support delivery by industry contacts. The Group's appraisal process is used to ensure existing staff members are accessing courses and events that minimise the impact to students in any changes in staffing. Budgets for staff development have been maintained during recent reductions in funding so that staff have up-to-date and wide-ranging technical and vocationally relevant skills. Existing staff work alongside these specialists so that they are familiar with the module descriptors and course content. Recruitment of new staff is focused on hiring people who have a wide range of relevant skills. There is no significant impact on students if a change of teacher is required.

There is a risk that some learners on courses with internal progression routes may choose not to continue to study at one of the colleges within the Group. This could result in very few learners remaining on the course, leading to a different experience for the students. In these circumstances, each course would be looked at to see if there were opportunities to bring, for example, HNC and HND student's together, covering topics or units where the content can reasonably be linked across teaching years.

The risk of our partner Higher Education Institutions (HEIs) losing their Degree Awarding Powers (DAPs) is low. The Office for Students (OfS) regulatory framework ensures that all HEIs are relentlessly monitored. The Group shall also continue to undertake thorough due diligence checks prior to going into a collaborative partnership; the outcomes of the initial due diligence are also monitored annually to assess further risks associated with education delivery.

Mitigation Measures

Prior to registration by the Office for Students (OfS) which is anticipated in September 2018, the Group has put measures in place to ensure that the existing students are not adversely affected by a decision not to include the Group on the register of HE Providers.

Proposals for a programme or course to be discontinued (either for strategic or operational reasons) are approved in accordance with the Course Closure procedure. Curriculum managers submit a request outlining the rationale for the closure and arrangements for 'teaching out' or transfer of affected students or applicants. The Group's committee ensures that the students are consulted and their interests are protected.

The Group ensures that there is a contingency plan for each collaborative partner which considers how best to allow students to continue their studies in the event of the collapse of a collaboration agreement. A 'teaching-out' arrangement is the preferred option as it is the one that has the best interest of the students. Transfers and in the worst case scenario (sudden closure) may also be considered.

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Refund and Compensation Arrangements

The Group operates a formal Refund Policy, a copy of which is included at Appendix 1. However, compensation arrangements are not currently formalised. In exceptional circumstances, requests for refunds that fall outside the refund policy criteria are considered by the Groups' Director of Financial Accounting and the applicable Director or Head of Faculty on a case-by-case basis in response to the circumstances presented. In the same vein, compensation will be considered on a case-by-case basis and awarded, without prejudice, in accordance with the Office of Independent Adjudicator's Remedies and Redress Leaflet (April 2018). The Group's refund policy is reviewed annually and will be updated to reflect the exceptional arrangements described above.

Communicating with Students

The Group and each of its constituent colleges will publish the Student Protection Plan on their websites as follows:

<https://capitalccg.ac.uk/homepage/annual-reports-compliance-statements/>

<https://www.conel.ac.uk/for-learners/267-higher-education>

<http://www.candi.ac.uk/courses/higher-education>

<https://www.westking.ac.uk/coursetype/higher-education/>

A summary of the Student Protection Plan and a link to the document will be included in all Course Handbooks, which are updated each year and provided to students for each year of their course.

The Group will continue to ensure that all academic and support staff involved in HE provision are aware of the implications of the consumer protection compliance in general and also the student protection plan (SPP) in particular through its committees (Board of Governors, the Group HE Strategy Board, the HE Group and the curriculum boards) and through the curriculum planning, course modification and closure of programmes and courses processes.

The Group's Student Protection Plan (SPP) will be reviewed on an annual basis in consultation with relevant student representative meeting at each of the component colleges and the Group's Students Union for their formal comments and approval. This will be approved by the Group's Board of Governors which has student representatives as members.

Each constituent college of the Group will inform every registered student of any editorial, minor or major changes or variations no later than six weeks of the term preceding the term in which the

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change or variation shall take place. In the case of changes due to circumstances beyond the College's control (e.g. illness, sudden departure or death of a key staff), registered students will be informed as soon as practically possible.

The Group will keep students informed through the College and Group digital channels, by formal letters and where possible, through face-to-face meetings designed to assist affected students with understanding the nature and implications of such events and the Groups response to it/them. The Group and Colleges will ensure that affected students are either provided with, or signposted to, independent advice as appropriate to the given situation.

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Appendix 1

Refunds Policy

Capital City College Group has a 'no refunds' policy, however, refunds may be considered if any of the following circumstances exist:

- The college terminates a course, which has already started
- The college is not able to provide an advertised course
- The college changes the time or location of a course from that advertised
- The college cancels an examination
- The college recommends a student transfers to a course with a lower fee
- The college has overcharged a student or assessed their fees incorrectly
- The college has not been able to organise suitable childcare for the duration of a course
- Medical conditions, certified by appropriate medical professionals, resulting in the student having to leave the college completely
- You notify the College, in writing, you are withdrawing at least 7 days before the course starts

If after enrolment you decide to withdraw from your course for any other reason you will not get a refund. If we have agreed for you to pay in instalments then you must pay all unpaid instalments immediately.

Refund applications will only be considered if received on a correctly completed form, available from all Learner Experience offices or Finance Office. Where refunds are declined the college may issue a credit note or voucher for another college course, as an alternative.

Where the college terminates a course, which has already started, you will receive a full refund of all amounts paid, however, all other refunds and credit notes will be subject to deductions for classes already attended, the examination fee where the college has already registered your entry, unpaid student membership fees, unpaid fees in respect of other programmes of study and an administration fee of £30.

For international students whose visa application, made outside the UK, is refused any deposits paid will be refunded less a £100 administration charge. Where the College believes the refusal is due to a UK Border Agency (UKBA) mistake then the refund will only be made on completion of a UKBA Administrative Review, initiated by the student.

If you have made your visa application from within the UK and have not received the UKBA's decision prior to the commencement of the course you must enrol and start your course to maintain your visa eligibility; however you do so at your own risk as no refunds will be made in the event your visa is refused. If you choose not to enrol and/or attend classes then your study offer will be withdrawn and your entire deposit forfeited. If your visa is refused before you start your course then you will receive a refund of any deposits paid less a £100 administration charge. If you start your course and your visa is refused the College may agree to support you in appealing the UKBA decision and in exceptional cases may consider a full or partial refund.

All UKBA decision letters should be forwarded to the International Office within 4 days of receipt. Deposits will not normally be refunded in any other circumstances. If you successfully obtain your visa but elect not to study at the College then you will forfeit your entire deposit.

(Last Updated: Nov-2017)

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