



# Student Protection Plan

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004/21	<ul style="list-style-type: none"> <li>Changed 'Heads of Department' to 'Senior Management Team' throughout</li> <li>Paragraph 6.2 i: Added words 'a course'...closure. In line 1</li> <li>Paragraph 9.8: Clarified wording to reflect that student opinions are sought in a meeting between student representatives/senior staff.</li> <li>Paragraph 9.16: Clarified wording</li> <li>Paragraph 11.2: Clarified appeals procedure wording and added student recourse to the Office for the Independent Adjudicator.</li> </ul>	14/1/21	J Bradbury



# Student Protection Plan



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## 1. Introduction

- 1.1 This plan clarifies what an applicant or student can expect if unanticipated problems occur, including if their course or institution were to close. It highlights the arrangements for informing and consulting with students so that their rights and the responsibility of Spurgeon's College (the College) is clear.

## 2. Purpose

- 2.1 It is important that the College has robust plans in place which protect higher education students if their course cannot be fully delivered or if it is necessary to change the content of their course.
- 2.2 This document describes:
- a. The exceptional circumstances that will give rise to a decision by the College to withdraw an unconditional or conditional offer of a place on a higher education course and the arrangements that will be put in place in such an eventuality.
  - b. The obligations of the College to applicants and current students in relation to the units/modules/Academic and Assessment Regulations that are offered on its higher education programmes and the arrangements that will be made if changes to the course content and delivery are required.
  - c. The arrangements to be put in place in the event of changes to the Awarding Body or validation arrangements for a course.
  - d. The arrangements required by removal of a provider's Student Sponsor License (the Home Office issued license which allows a provider to teach international students).
  - e. The exceptional circumstances that will give rise to closure of the College and the arrangements that will be put in place in such an eventuality.
  - f. The arrangements made if Higher Education provision was withdrawn at the College.
- 2.3 In such circumstance, the College will ensure clarity of options, timely notification and clear arrangements for consulting with students when changes occur through this policy and the policies listed in section 4.

## 3. Scope

- 3.1 The Student Protection Plan is triggered by material changes as set out in section 2, particularly those which could affect students' continued participation in their chosen programme of study.<sup>1</sup>
- 3.2 The Plan relates to all applicants and students on the College degree programmes. It also identifies arrangements which will be made with accrediting bodies, which in this instance are the University of Manchester or Liverpool Hope University programmes. It involves any member of staff providing Information, Advice and Guidance to prospective and current students. This therefore includes: professional

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<sup>1</sup> Programmes of study are constructed to enable students to progress through the credit levels and, on achievement of the learning outcomes and credit requirements associated with each stage of the programme, to qualify for a validated award.

(e.g. finance, reception, and admissions), academic (e.g. course leaders and lecturers) and senior management staff.

## 4. Related Documents

- College Risk Register and Disaster Recovery/Business Continuity Plan
- Risk Management Policy
- Higher Education Competition Markets Authority Policy
- College Admissions Policy<sup>2</sup>
- College Tuition Fees Policy<sup>3</sup>
- College Terms and Conditions Policy<sup>4</sup>
- Student Charter
- College Complaints Process<sup>5</sup>
- Higher Education Removal of Courses, Curriculum Revisions
- Competition and Markets Authority guidance on consumer law for UK HE providers (2015)<sup>6</sup>
- HEFCE statement of good practice on course change and closure (2015)<sup>7</sup>
- College Assessment Regulations (Undergraduate)<sup>8</sup>
- College Assessment Regulations (Postgraduate)<sup>9</sup>

## 5. Definitions

<b>Class:</b>	a regular meeting of a group of learners studying for a particular qualification or range of qualifications.
<b>Qualification:</b>	a programme of study leading to recognised certification.
<b>Current Student:</b>	is one that is enrolled in a current academic year.
<b>Course Closure:</b>	to no longer offer the course for an indefinite period.
<b>Course Suspension:</b>	to not offer the course for a specific period (normally until the following academic year).

## 6. Responsibilities

- 6.1 It is imperative that before a change as outlined in Section 2 is implemented that the consequences are fully considered. Such consequences may include, for example, interrupted student experience, financial considerations, market demand, resource implications, consumer protection (students) and reputational issues.
- 6.2 It is the responsibility of the Principal and Senior Management Team to:

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<sup>2</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Admissions-Policy-v1.Feb2019.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Admissions-Policy-v1.Feb2019.pdf)

<sup>3</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Tuition-Fees-Policy-Dec-2018.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Tuition-Fees-Policy-Dec-2018.pdf)

<sup>4</sup> <https://spurgeons.ac.uk/wp-content/uploads/Documents/Miscellaneous/Terms-and-Conditions-January-2019.pdf>

<sup>5</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Complaints\\_Procedure\\_Jan\\_2016.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Complaints_Procedure_Jan_2016.pdf)

<sup>6</sup> [www.gov.uk/cma-cases/competition-and-regulation-in-higher-education-in-england](http://www.gov.uk/cma-cases/competition-and-regulation-in-higher-education-in-england)

<sup>7</sup> Copy Available on request

<sup>8</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Assessment\\_rules\\_-\\_UG\\_UoM.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Assessment_rules_-_UG_UoM.pdf)

<sup>9</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Assessment\\_rules\\_-\\_PG\\_UoM.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Assessment_rules_-_PG_UoM.pdf)

- I. Determine whether the reason for a course closure is valid and acceptable. This must include consideration on how applicants/students will be supported;
- II. determine whether there should be a restriction on the number of classes on an academic pathway;
- III. determine whether the reason for removal of a course from the current College portfolio is valid and acceptable;
- IV. consult with students and staff on curriculum revisions and provide an opportunity to raise queries and concerns;
- V. agree and document the reasons for changes outlined in section 2 and complete the appropriate documentation (must complete the 'Request for Closure, Suspension or Substantial Change of Courses' form and submit to the Academic Board and Senior Management Team);
- VI. agree an action plan for managing the impact which must be drawn up with all internal and external stakeholders;
- VII. write formal communication to applicants/students after agreed action confirmed and maintain communication and student query responses during cessation process.

6.3 It is the responsibility of the Chief Operating Officer and the Senior Management Team if required, to:

- I. ensure that the course is removed from, or information amended, on the UCAS database and the College website;
- II. follow the College Admissions Policy in respect of any applicant holding an offer of a place;
- III. check and update internal and external publicised information;
- IV. follow the College Terms and Conditions Policy to be clear on the obligations to applicants and students;
- V. inform the College's professional and academic staff.

## 7. Risk Analysis

7.1 This plan is required to ensure that correct procedures are in place and followed by all involved in the closure or revision of courses and guidance offered to higher education students.

7.2 **Analyse risks of non-adherence to this policy:** The College is committed to the provision of comprehensive, open and transparent information ensuring accurate, relevant, and current procedures are followed enabling applicants and students to make an informed decision. Failure to have this policy in place or non-adherence may result in resource implications, financial considerations and inconsistency practices leading to dissatisfaction and poor reputation as well as failure to demonstrate the expected base line regulatory requirements of a HE provider.

7.3 **Staff training needed:** Induction and refresher training to be made available to staff as required and appropriate.

7.4 **Compliance** reduces the risks described above.

## 8. Diversity & Equal Opportunities Monitoring

8.1 This plan has had an impact assessment done.

## 9. Procedure

### A. Course closure or suspension

9.1 As outlined in the Terms and Conditions document the College will aim to deliver course provision as described in course handbooks, unit / module guides, website information and other available information. However, at times it may be necessary to change this provision either before or after a student enrolls.

9.2 Reasons for a suspension of a course could include:

- loss of key staff whose expertise was required or changes in staffing;
- insufficient enrolment and course take-up makes it unviable and detrimental to the student experience;
- restricted number of classes being offered in a particular curriculum area due to maximum room or resource restraints;
- developments in the subject and QAA benchmark revisions;
- to safeguard academic standards, for example in response to external examiner feedback.
- changes implemented by the Awarding or accreditation body (PSRB).<sup>10</sup>
- following student feedback.

9.3 Course suspension is agreed for one academic year or one intake through the process outlined in section 6. Where a course has been suspended for two consecutive years, the Principal and Senior Management Team should consider if it is appropriate to close the course.<sup>11</sup>

9.4 The decision to suspend a course will follow the process outlined in section 6.

- All planned course suspensions will be submitted to the College's Academic Board for approval to ensure that implications of removing a course of study are discussed. The Senior Management Team will be informed. Where necessary, Chair's Action will be sought when meeting schedules would delay the process.
- To ensure that restrictions on the number of classes offered in a particular programme pathway area are agreed by the Academic Director after consultation with the appropriate Programme Committee and the Principal and Senior Management Team.

9.5 In the unlikely event that the College: i) discontinues, suspends or does not provide a programme of study; ii) significantly changes the content of a programme, member of faculty delivering the course, method of delivery or method of assessment of a programme such that the overall learning aims and outcomes of a programme are fundamentally different; or iii) significantly changes the location at which a programme is taught, and any such change that may adversely affect the student, the College will:

- a. notify them at the earliest possible opportunity;
- b. seek to offer them a suitable replacement programme at the College, if they request the College to do so and for which they are qualified, or will seek to refer

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<sup>10</sup> Professional, Statutory and Regulatory Body.

<sup>11</sup> Spurgeon's College has never closed a programme without teaching it out.

- them to a comparable higher education institution offering a suitable replacement programme;
- c. facilitate their withdrawal of application, if they do not wish to accept the College's replacement programme or is unable to offer a replacement programme. Notification of intention to withdraw their application should be made in writing to the College;
  - d. make an appropriate refund of tuition fees and deposits paid in the event that they choose to withdraw and the College cannot offer a suitable replacement programme.

## **B. Change in course content or delivery**

- 9.6 In certain circumstances, the College may need to make changes to the previously advertised course content, structure and/or method of delivery of a course or individual modules offered after an applicant has accepted their offer, or as an enrolled student progresses. This may include discontinuing some units/modules.
- 9.7 Reasons for a change in a course structure or content could include:
- to meet the requirements of an accrediting body or PSRB;
  - to comply with legal, regulatory or governmental requirements;
  - to respond to sector good practice or quality enhancement processes, such as in response to student feedback;
  - to keep programmes contemporaneous by updating practises or areas of study;
  - to safeguard academic standards, for example in response to external examiner feedback;
  - because of circumstances outside of the reasonable control of the College such as an unplanned absence of a key member of staff or if an external provider is no longer available to contribute to a module / unit;
  - where insufficient numbers of students have chosen an optional module / unit making it unviable or where a member of staff whose expertise was required to run it is no longer available;
  - to abide by the revisions made by the Awarding Body (for example, the University of Chester, the University of Manchester and Liverpool Hope University).
- 9.8 It is possible that as a result of this, substantial changes in the methods of delivery of a course, such as the timetable, location, number of classes, methods and timings of assessments are required. The College will make all reasonable efforts to minimise any adverse effect the change may have on students and will endeavour to consult with potentially affected students as early as possible where it is able to do so. Students' opinions are sought through the fortnightly meeting in term time between the Student Representatives and the Principal and Chief Operating Officer, by gathering opinion at Staff-Student Liaison Committee meetings and through engagement with the President of the Student Body. Students also sit on key decision making committees: The College Council; Academic Board; the Equality, Diversity and Inclusion Group; the Access and Participation Plan Monitory Group; and other committees of the Board of Governors as appropriate. There is also a Student Governor on the governing body.

## **C. Awarding Body or validation changes**



- 9.9 Changes to the validation or Awarding Body of a course would normally be initiated for the next academic year unless there are circumstances outside of the College's control.
- 9.10 Reasons for changes to Awarding Body and validation agreements could include:
- as a result of periodic review or course re-approval process;
  - failure to gain course approval;
  - developments in the subject mean that changing to an alternative Awarding Body or validating partner is in the interests of students;
  - the validating partner has decided to cease to provide the validation for that course;
  - receiving an unsatisfactory outcome following a QAA review;
  - External Bodies (such as PRSB)<sup>12</sup> require changes, suspension or closure of a course;
  - closure of a validation partner or awarding body resulting in the withdrawal of the course;
  - on successful award of Taught Degree Awarding Powers (TDAP) the College would seek to validate its own provision and as such engagement with existing awarding/accrediting bodies would change. Students would be informed and consulted when this occurs;
  - post TDAP unsatisfactory judgements.
- 9.11 An action plan should be implemented to ensure existing students can complete their course even if their specific qualification has changed or been withdrawn and will not run in subsequent years. On rare occasions a course with enrolled students may no longer be accredited and the College will try and identify a suitable alternative course to transfer to or assist in finding an alternative provider.
- 9.12 The action plan should include;
- assessing the impact on course management and delivery;
  - formal communication to students, staff and notification to other stakeholders (e.g. external examiners, student's employers) to include the reasons for the decision;
  - managing the implications for progressing students who require to retake units/modules;
  - taking into account the needs of students who have intermitted their studies. Although, it should be noted that the College is unable to guarantee to students that the pathway for which they originally registered will still be available when they resume their studies (see paragraphs 9.1 – 9.10 above);
  - abiding by the policies and procedures of the Awarding Body.

#### **D. Removal of the College Student Sponsor Licence**

- 9.13 If the College's student sponsor licence is revoked by the Home Office it would no longer be allowed to support international students requiring a student study visa. A licence will be revoked if a higher education provider has its registration with the Office for Students removed. Students already enrolled and studying at the College

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<sup>12</sup> Professional, Statutory and Regulatory Body. The Baptist Union of Great Britain sets the national standards for ministerial recognition for accredited Baptist ministers. The Professional Ministry and Practice units of the College's BA are aligned with the 'Marks of Ministry' approved by BUGB.

may be allowed to continue until the expiry date of their Confirmation of Acceptance of Studies (CAS).<sup>13</sup> Any applicants who have yet to enrol will be informed, by letter or email, as soon as it is reasonably practicable. The College will refund any tuition fee and/or deposit that they have paid in advance and in accordance with the Tuition Fee Policy. Where possible, the applicant may be given advice on how to apply to an alternative provider.

## **E. Closure of the College**

- 9.14 Spurgeon's College is one of the oldest providers of higher education in the United Kingdom and has survived and flourished through the fluctuations of over 160 years of British history. If, however, in the exceptional circumstance that the College had to close, and the curriculum offer ceased, key measures as stated in the College Risk Register and Disaster Recovery and Business Continuity Plan would be invoked.
- 9.15 Exceptional circumstances could include, for example:
- a strategic decision by a provider or the College to close a campus and exit the market altogether;
  - damage to the building, critical infrastructure or key resources as a result of fire, criminal damage or accident.
- 9.16 In a situation where the Governors take the decision to close, the College will make arrangements for affected students to switch to a different provider. Students who have not completed their programmes of study may be eligible for an exit (or intermediate) award. In the case of students enrolled on a programme validated by a university partner, the validating partner will award eligible students when they leave a programme of study due to the closure of the College.
- 9.17 If students wish to transfer to another institution and have their credits accepted by a new institution, students will need to apply to the new institution for Advanced Prior Learning. The procedures vary from institution to institution. However, the general approach is that a student's new institution will map the units of study the student has taken at Spurgeon's College against the units on their course to ensure they are broadly equivalent. If they are broadly equivalent, they may award them credit. If they are not broadly equivalent, credit may not be awarded and therefore students might have to take some additional units.
- 9.18 It is entirely the decision of the institution to which students seek to transfer as to whether or not they are accepted onto their course. The College cannot influence another institution's decision.
- 9.19 Any entitlement a student may have for a refund will be determined in accordance with the College Tuition Fees Policy. In the case of the closure of the College and the subsequent transfer of students to alternative providers, the Board of Governors will publish appropriate compensation details for affected students.
- 9.20 In the case of a Baptist Union (BU) minister in training (MiT), the College would assist students in transferring to one of the other Baptist Colleges: Bristol Bible College; Regent's Park, Oxford; South Wales Baptist Bible College; or Northern

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<sup>13</sup> Further details can be found at <https://www.gov.uk/government/publications/student-sponsor-guidance>

Baptist College, Manchester. The College will work in consultation with the Ministries Team of the Baptist Union of Great Britain, Regional Baptist Associations and local churches with whom the MiT is ministering.

## **F. Closure of Higher Education provision**

- 9.21 If a decision were made to close the higher education curriculum offer there should be early and ongoing discussions with students. These should include informing students of the plans, and outline the measures that will be taken to safeguard their educational experience. All students affected should be met and not just student representatives. Where possible, meetings should be held when students are timetabled to attend College.
- 9.22 Where possible the admission cycle and academic calendar should be taken into account, allowing the best possible options for students to transfer to alternative providers. Arrangements will be made for affected students to switch to a different provider without having to start their course from scratch including help to transfer credits where possible. Any entitlement a student may have to a refund of fees will be determined in accordance with the College's Tuition Fee Policy. See Section 10 for information about how this is communicated to students.

## **10. Communication with Students**

- 10.1 The College is committed to the provision of comprehensive, open and transparent information ensuring accurate, relevant, and current procedures are followed enabling applicants and students to make informed decisions (see paragraph 9.5 above).
- 10.2 Students and applicants will be informed by the Director of Admissions and Practical Training. If an appointment is necessary, students can make an appointment by emailing the appropriate member of staff (email addresses are available via the College website). The College will send communications to students by email (sent to each student's Moodle email account) and by updates on Moodle. If an offer of study is withdrawn for any reason (outlined in paragraph 2.3 above) students will be informed as soon as it is reasonably practicable to do so; this communication will be a formal written communication emailed by the Director of Admissions and Practical Training.
- 10.3 Where changes are such to render it impossible for prospective students to study on their intended programme and/or with the intended financial support, we will endeavour to offer help to eligible applicants in securing a place elsewhere and/or liaise with UCAS with a view to allowing the applicant a substitute choice in their application.

## **11. Right of Appeal**

- 11.1 The College takes into account student interests in decision making and ensures that decisions are fair, accessible, transparent and explicit. Guidance is published through the Student Charter, the College's Terms and Conditions policy, and Admissions Policy. Adherence to the Competition and Markets Authority guidance on consumer law for UK HE providers (2015) also ensures that the guidance given

is accurate, clear, unambiguous and timely.<sup>14</sup>

- 11.2 Students who are dissatisfied with the College's handling of any of the procedures contained within this document may use the Student Complaints Procedure<sup>15</sup>. Where a decision is made to close all higher education courses or close down the site altogether it might not be possible for an applicant or student to submit a complaint. In such circumstances, a student has the right of appeal to the Office of the Independent Adjudicator (OIA) which provides an independent ombudsman service for students<sup>16</sup>.

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<sup>14</sup> For further information see, <https://www.gov.uk/government/publications/higher-education-consumer-law-advice-for-providers>

<sup>15</sup> [https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies\\_Procedures/Student-Complaints-Procedure.pdf](https://www.spurgeons.ac.uk/wp-content/uploads/Documents/Policies_Procedures/Student-Complaints-Procedure.pdf)

<sup>16</sup> <https://www.oiahe.org.uk/>