

## **Student Protection Plan 2023-24**

*To be reviewed annually in consultation with higher education students and officially revised by governors and senior staff at the final meeting of the College's Learning & Quality Committee (Wed 19 June 2024)*

### **1. Introduction**

1.1 This Student Protection Plan is applicable to Higher Education provision at City of Portsmouth College (CoPC) and covers all delivery regulated by the Office for Students (OfS).

1.2 Please note the following information:

The legal address of the HE provider is:  
CITY OF PORTSMOUTH COLLEGE  
Highbury Campus  
Tudor Crescent  
Portsmouth PO6 2SA

All enquiries related to this plan should be made to:  
Maria Vetrone  
Chief Operating Officer (COO)  
[maria.vetrone@copc.ac.uk](mailto:maria.vetrone@copc.ac.uk)  
02392 328 644

1.3 The purpose of this plan is to reassure current and prospective students that CoPC, as a provider of Higher Education (HE) programmes, is committed to upholding the interests of all learners and has the necessary arrangements in operation to protect the quality and continuation of all courses of study.

1.4 This Student Protection Plan (SPP) and associated documents are accessible to all students on the following page of the CoPC website – they are available under the 'Office for Students Documents' tab at: [www.city-of-portsmouth-college.ac.uk/about-us/our-policies](http://www.city-of-portsmouth-college.ac.uk/about-us/our-policies)

### **2. Risk assessment and mitigation**

#### **2.1 Determining Risk**

2.1.1 Every Higher Education provider is faced with potential risks to the courses made available to learners, depending on their particular situation and any altered circumstances that may arise during the delivery of a programme. Instances of change that occur can also impact to differing degrees on students with specific individual needs or learner characteristics.

2.1.2 An important context for the assessment of risk to HE courses at City of Portsmouth College is that all our programmes are either delivered in association with the University of Portsmouth or form part of the higher-level provision offered by Pearson. We do not have awarding powers ourselves, nor does the College have any strategic objective to acquire such authorisation in the foreseeable future.

2.1.3 This table below sets out the range and extent of risk to programmes as assessed by the College and the measures that would be implemented, should any of these possible issues come about in reality. Each identified risk is followed by an assessment of the impact (in italics) that this eventuality might have on students engaged in higher education study at CoPC at the time of the occurrence.

2.1.4 In our preparedness for identified risks and the diverse solutions we have determined to put in place, it is equally our belief that CoPC is able to cope effectively with unforeseen eventualities.

2.1.5 Please also refer to section 7 below with respect to Higher Education courses delivered at the College under subcontracted or franchised arrangements with the University of Portsmouth and the specific conditions and risk controls that apply.

<b>Risk Level</b>	<b>Identified Risk</b>	<b>Rationale for Risk Level</b>	<b>Proposed Mitigation</b>
Low	The College loses validation for one or more courses because the awarding body completely ceases to operate.	As major educational institutions it is highly unlikely that Pearson or the University of Portsmouth (UoP) would cease operation.	Contacts are maintained with other HEIs and in any such eventuality alternative validation could be available.
<i>Should one of the awarding bodies cease operation, students engaged in the programme would risk the qualification they ultimately obtain having been overseen by two distinct entities. However, a major collapse of this nature would see other providers ensuring that content covered could be matched against the learning aims of their own provision to facilitate a single award.</i>			
Low	The College loses validation for one or more courses due to particular programmes being made unavailable by the awarding body.	Courses delivered on behalf of the University of Portsmouth are distinct from provision at the University; however, faculty reorganisation could potentially lead to difficulties in the continuation of delivery.	Such changes would develop over a longer time period allowing the College to identify other UoP programmes or seek arrangements with another university.
		Pearson establishes unit structures for HNC/HND and could decide to eliminate specific units or a particular range of courses.	In the case of amendments, existing units would be replaced with alternative units following consultation with students. Should an entire group of HNC/HND units no longer be available, approval would be sought from the University of Portsmouth or another HNC/HND provider.  If neither solution is suitable, the College will make every effort to support individual students in finding alternative study with another provider.
<i>Given their own responsibility to students, any faculty reorganisation or other changes at UoP would by necessity be rolled out over an extended period. Similarly, Pearson would work on the principle that existing programmes could be completed. In both instances, time would allow CoPC students to make informed choices with support to transfer being available as required.</i>			
Low	The College is no longer able to deliver Higher Education at the designated campus.	Having reviewed the situation, CoPC deems the risk to be low of an event taking place on a particular campus that could interrupt delivery to students for a significant period.	The College has a business continuity plan, which outlines how any occurrence impacting on its ability to deliver courses to learners could be dealt with.
<i>Students might be required to travel to another campus within the city in order to continue their HE programme.</i>			

Low	The College is no longer able to deliver courses in one or more subjects due to severe staffing issues.	Succession planning is a regular management activity in terms of course delivery and it is our policy for courses not to have single person dependency.	All programmes are designed for modules/units to be taught by integrated teams of academic staff with a suitable skill mix. Additional temporary staff would be employed as necessary to maintain provision.
<i>Students could find that they were being taught by staff with different experience and expertise; however, the maintenance of quality would be the primary consideration in all changes in staffing of this nature.</i>			
Low	The College is unable to deliver courses effectively during a sustained period of industrial action.	Union activity at the College has not led to any closures during industrial disputes in recent times.	If industrial action necessitated College closure, sufficient VLE resources exist for valuable study and research to continue under management guidance for a significant duration.
<i>Students may miss regular contact with individual staff exercising their right to take industrial action, but forward notice would allow for remote materials to be identified and every effort would be made following the action to redress the course content.</i>			
Low	The College makes a strategic decision to close a course within the next three years.	In the College's strategic development plan the aim to increase HE provision is clearly indicated and course closures are therefore not envisaged in the near future.	Refer to section 2.2 below. In the unlikely need for CoPC to close a course franchised from UoP, the University would arrange for learners to continue their studies on similar provision at UoP.
<i>As all courses are of 1-2 year duration, students may in extreme circumstances be asked to join on-campus earlier than expected.</i>			
Moderate	The College as a whole is no longer able to operate due to financial instability.  [NB: The impact of HE on the College's financial stability is primarily positive; however, withdrawal from this area is not viewed as a strategic risk. Only factors associated with the College's FE provision could lead to financial collapse and this would occur over enough time to teach all HE to conclusion.]	The merger that created the City of Portsmouth College has rationalised FE provision in the city and promises a strong and stable financial future. For the current budget year, the ESFA assesses CoPC's financial status as 'Requires Improvement'; however, HE development is a strategic objective in dealing with this post-merger issue and will contribute significantly to CoPC's financial sustainability.	The ESFA will provide assurance that the College is sufficiently stable not to be in danger of complete closure. Higher education makes a relatively minor contribution towards whole College finances and any emerging risk of financial crisis would inevitably see the College revert to concentrating on its core FE activity, significantly in advance of complete collapse.
<i>Given the relatively low level of HE's contribution to College finances at present, this eventuality is more a risk to CoPC as a whole than to the impact it would likely have on students already engaged on higher-level courses.</i>			
Moderate	The College is no longer able to deliver courses in one or more subjects due to the availability of teaching space.  [NB: Unlike many educational establishments, CoPC is in the fortunate position of having verified a complete absence of RAAC concrete on any campus]	The strategic aim to grow HE could in the short-term place pressure on existing rooms and learning spaces; however, capital expenditure is already underway in line with detailed planning for the extension of HE-specific facilities.	CoPC lays particular importance on quality teaching spaces to meet individual needs. Priority for HE courses in timetabling and the ongoing strategy for campus development should be able to secure this goal for HE learners.

<i>Students may not enjoy the same facilities as they would encounter at a university; however, promotion of CoPC HE provision will be on the basis of alternative advantages to applicants and strategic development will also in time reduce this disparity..</i>			
Moderate	The College is no longer able to deliver courses in one or more subjects due to issues with IT infrastructure.	There are many reasons why a college may not be able to offer IT services, but most of these will be short term. Ransomware, however, could result in a loss of service for a longer period of time.	To combat ransomware, cyber-attacks and other issues, CoPC has security in place at many levels, incl. Next Gen Firewall, Anti-executable software, VLANs, Regular patching, Phishing simulations, PEN Tests, Microsoft A5 licences with advanced security options. All of these security measures are audited by an external company.
<i>Students face the possibility of IT issues in all educational settings, but extensive mitigations are in place to reduce the risk at CoPC.</i>			
Moderate	The College is no longer able to recruit or provide teaching for a certain type of student.  The College is no longer able to deliver a particular mode of study or provide the required teaching resources.	Different learners have specific, individual needs and, in some cases, this will involve the College in additional planning, resourcing and expenditure; however, the College's ambition remains to extend student numbers from all learner groups.	SLT regularly reviews the College's HE Strategy and the resources available to this area of provision, making appropriate funding allocations accordingly.
<i>In terms of teaching specific groups of students, it is the College's purpose to increase access to these groups and therefore priority is given to supporting their needs both in resources and staffing. The impact on students would be greater, were cuts to be made within the timeframe of a programme, although any reduction would seek to ensure existing learners are catered for effectively.</i>			
High	The College decides to discontinue a programme due to concerns over quality.	Whilst more imaginable than a strategic decision for course closure, constant monitoring and review of quality across all programmes should allow for remedial action before the need to discontinue teaching.	Refer to section 2.2 below.  In the unlikely event of a University of Portsmouth course needing to close, support would be sought from all HEI partners to address programme continuity.
<i>Students would be the first to be impacted by any diminution in quality and all are actively encouraged to raise issues perceived through course representatives and student voice activities or directly with tutors and management. It is the duty of the College, and through its franchised courses the University, to address any such matters with the utmost seriousness and urgency to ensure that standards of delivery are maintained and student satisfaction of HE provision at the College maximised.</i>			
	The College is no longer able to offer access to publicised external progression routes.	This would be a University of Portsmouth decision and largely beyond our control; however the regular HE Partnership Group meetings with the University would address this issue proactively.	Progression to degree top-up courses are an advantage of CoPC L4/5 provision; however, students are advised that course alterations precluding such progression may sometimes occur.
<i>Students would inevitably be disadvantaged by the decision of partner universities to break contractual agreements and preclude access to agreed progression routes; however, in all cases alternative options would be available to students to complete their studies, albeit in less favourable locations. The guarantee of progression to partner courses is always qualified with this proviso.</i>			

## 2.2 Continuity of Provision and College Commitments

2.2.1 City of Portsmouth College commits to deliver any programme to its normal conclusion for all students registered on an HE course. The fact that many of our learners, including mature students and those from low-income households, feel an attachment to the city and do not have the wherewithal to travel significant distances to study makes it vital that the College is able to uphold this commitment and we firmly believe that CoPC has the financial stability and institutional resolve to make this a reality.

2.2.2 City of Portsmouth College commits to ensure that an appropriate level of quality is maintained throughout the duration of all programmes. All our monitoring procedures, including our self-assessment review and action-planning processes, are informed by the OfS conditions of registration and have also been closely aligned to the QAA UK Quality Code.

2.2.3 City of Portsmouth College operates a clear process to protect the academic interests of students and takes trouble to clarify to students all circumstances, in which amendment to a programme of study or even course closure may be justifiable. As well as financial considerations, reasons to make changes or close courses include insufficient numbers to make the programme a valuable learning experience for students or the lack of key personnel without whom effective delivery cannot be assured.

2.2.4 Any decision not to run a course will always be taken by the Executive Leadership Team (ELT) and would normally only come about as a result of the regular reviews of application numbers and other determining factors when debating HE Strategy. At least 60 days' notice of alterations or course closure will be given in written form (email and/or letter) to all applicants, with the College endeavouring to suggest an alternative course of study or taking steps to mitigate the effects of the intended change.

2.2.5 In all eventualities highlighted in this Student Protection Plan, every effort will be made to inform students at the earliest possible opportunity. Consultations of student opinion will in most cases be directed through the regular programme committee meetings with group representatives with a six week period being the norm to harness views.

2.2.6 In all instances where communication is necessary with specific individuals or groups of students or is required from the College in response to student requests, this would be expected, as is stated in a range of HE policies and student documentation, to be undertaken within 10 working days. Whilst email contact with students will be the norm, certain policies require notification to be undertaken within this time frame by official letter.

2.2.7 Independent advice to support students in this circumstance will be made available, facilitated by the College's cooperation on CEIAG with Portsmouth City Council. The local authority works closely with the Portsmouth Education Partnership, the University of Portsmouth, the Royal Navy, and a wide selection of locally based businesses to assist learners toward appropriate study and employment opportunities.

2.2.8 Any amendments proposed by the College would also need to be appropriately communicated to the awarding body concerned. As part of their responsibilities, awarding bodies also monitor providers in the discharge of their duties and may in particular situations require a programme to be altered, suspended, or terminated in the collective interests of the students.

2.2.9 The Higher Education offer at City of Portsmouth College is deliberately being developed to meet the needs of the local community. Whilst there are a mixture of university and college providers across the Solent, CoPC wants the combinations and focus of study on our programmes to be such that it is not fully replicated elsewhere.

2.2.10 In all cases, the College commits to retain the course structure and content through to the culmination of the enrolled studies or, in the unlikely circumstance that it is not wholly replicable, to help students seek appropriate alternative provision should that be their preferred option.

2.2.11 In any of the above circumstances, a structured process of early and meaningful consultation will take place with the students involved. This reflects how the views of learners are systematically taken into consideration at CoPC. Through regular student voice activities, students are encouraged to participate in the development, implementation and evolution of their HE programmes, particularly where feedback from student reps suggests there is a desire for changes to the pattern of modules/units.

2.2.12 City of Portsmouth College also engages closely with other providers in the region with respect to the rationale and continuity of provision. On any occasion when course closure at local providers becomes an inevitability, we would work positively with the institution concerned to provide a viable alternative.

### **3. Refunds and compensation**

3.1 As outlined above, the situation should only arise very rarely that the College is not in a position to preserve continuation of study for an individual or small number of specific students. In this eventuality, however, the CoPC HE Refunds and Compensation Policy should be consulted for details relevant to the continuity of provision. It is readily accessible to students on the following page of the CoPC website under the 'Office for Students Documents' tab at:

[www.city-of-portsmouth-college.ac.uk/about-us/our-policies](http://www.city-of-portsmouth-college.ac.uk/about-us/our-policies)

3.2 The HE Refunds and Compensation Policy also deals with the following situations:

- the transfer of students to alternative courses both internally and externally, including where there is a cost differential in fee charges
- the financial implications of compensating students for maintenance and tuition fees
- procedures and refund arrangements in situations where a student withdraws from a programme for academic, personal, or other reasons

### **4. Arrangements for Student Transfer**

#### **4.1 Transfer to City of Portsmouth College**

4.1.1 In a spirit of collaboration with higher education partners, City of Portsmouth College welcomes applications from students wishing to transfer on to our courses from other institutions and actively supports their needs. No attempt is made to seek any competitive advantage or to promote our courses ahead of those already being studied; there is simply a readiness to meet the expressed desires of individual students. The relatively small number of such applications to transfer is in most instances due to students wanting to continue benefitting from local higher education.

4.1.2 In such cases, appropriate HE courses on offer at the College would be outlined and, as applicable, the situation regarding APL of completed modules/units investigated. A detailed comparison would be made of modules already studied and associated learning outcomes with those on the CoPC programme. If a direct equivalence of all learning outcomes is achieved, this would need ultimately to be articulated clearly to the awarding body; however, if the LOs/modules don't map across effectively, a general credit may also be given. Care is always taken to ensure students are fully aware of any effect on the final Award Classification (i.e. a general credit may reduce the overall degree classification).

## **4.2 Transfer to alternative provision**

4.2.1 The most common transfer of students from City of Portsmouth College to other higher education institutions comes in the form of progression to higher level programmes. Students may often advance to places on top-up courses at the University of Portsmouth or seek out further study at other providers.

4.2.2 HND graduates often elect to turn their Level 5 qualifications into full degrees by applying to join the third year of programmes at the University of Portsmouth and other providers in the wider vicinity. In all such cases, CoPC staff will engage in discussions with the receiving organisations to ensure that the coverage of learning outcomes is sufficient to allow a smooth and successful transfer to the new course.

4.2.3 Whilst a relatively rare occurrence on past experience, should any student decide to request a move to another institution mid-course, based on their perception of the provision on offer, potential threats to the CoPC course and/or their own individual needs, every assistance would be given. Detailed academic support and discussion would, as appropriate, lead to contact being made with possible new study destinations and give reassurance that the transfer is in the best interests of the student concerned.

4.2.4 Advice would also be offered as required regarding the most suitable of various options, but always in an independent, non-partisan fashion that takes into consideration the student's personal situation and motivations. Support towards making any move, in terms of application or APL evidence from completed modules/units, would also be made available, as would a constructive outline of any impact on qualification outcomes and/or financial implications.

## **5. Policy communication**

5.1 In order for current and prospective students to be appropriately informed about all aspects of HE provision at City of Portsmouth College, policies and procedures that may be of particular importance to them or have a profound effect on their situation, including this Student Protection Plan, are signposted during the application and enrolment process, as well as being fully accessible on the website throughout teaching programmes.

5.2 CoPC policies related to Higher Education are:

- up front, clear, accurate and comprehensive
- easily available, transparent, unambiguous, and written in plain language
- published on the College website
- able to be obtained in hard copy upon request

5.3 Policies relating to HE provision at City of Portsmouth College have been specially developed to be in line with the requirements of partner awarding bodies. This ensures that the College is able to meet its responsibility of delivering programmes in an appropriate fashion, whilst maintaining academic standards and providing a quality student experience that supports achievement for all.

5.4 All policies are regularly reviewed and updated based on new developments in HE regulatory frameworks and direct feedback from students. As required, differing arrangements for students following University of Portsmouth programmes and those on other courses (e.g. Pearson HNC/D) will be explained, with the context of policy reflecting the relevant guidance provided by both awarding bodies.

5.5 In the course of development and review, policies are shared with student representatives, with teaching teams and at management meetings before being agreed and officially implemented by the College's Senior Management Team and governing committees.

5.6 As an integral part of the admissions process, City of Portsmouth College always enables new students to access the Student Protection Plan. The College is determined to ensure that all students are aware of their rights and the measures in place to assist them. Attention is also drawn to these support mechanisms and the College's commitments made to students at representative meetings.

5.7 The whole Senior Management team and the Board of Governors are appraised of changes to higher education provision to be implemented and their implications for the College.

5.8 Staff, students and governors are directly engaged in reviewing documentation related to ongoing conditions of registration, as a means of ensuring that the College offers the best possible service and high-quality provision to its higher education students.

## 6. Complaints

6.1 City of Portsmouth College is fully committed to offering the best possible HE programmes and encourages attention being brought to any instance where it is felt this objective is not being met. A full and fair procedure exists for anyone wishing to express their dissatisfaction regarding a particular aspect of the service they receive from the College in relation to Higher Education.

6.2 The CoPC Comments, Complaints and Compliments Policy and Procedure is open, transparent, and available for use by all students at the College, irrespective of the course or level of study followed. It does, however, have an appendix specific to Higher Education that is shared with organisations involved in the delivery of HE at the College and which all learners on L4+ courses should consult carefully.

6.3 The Comments, Complaints and Compliments Policy and Procedure is accessible to students on the CoPC website via the 'Compliments & Complaints' tab at:

[www.city-of-portsmouth-college.ac.uk/about-us/our-policies](http://www.city-of-portsmouth-college.ac.uk/about-us/our-policies)

6.4 The procedure is designed to offer a high level of protection and has been implemented following detailed discussion with all members of the College's HE Partnership Group, including CoPC senior management and representatives of the University of Portsmouth.

6.5 The Comments, Complaints and Compliments Policy and Procedure outlines how a complaint may be raised and also to explain the precise fashion, in which such complaints will be handled. The College promises that all concerns will be taken seriously and that issues raised will be investigated thoroughly and fairly with complainants being informed promptly of any outcome and actions to be taken.

6.6 The HE-specific appendix to the Comments, Complaints and Compliments Policy and Procedure guides prospective complainants sensitively through a series of stages, which begin relatively informally and become more detailed and regulated as the process advances. Initially complaints will often be dealt with verbally, but requirements for the production of written statements at later stages are made explicit. At all levels, however, concerns are handled privately and confidentially, and information is only shared as is necessary in order to address the issue.



6.7 Clear guidelines are set out with regard to the reasonable timescales in which complaints need to be handled, as well as the written documents required for those complaints that progress to a more formal stage. The process is clearly signposted for students of all CoPC HE courses and the areas of responsibility that lie internally and with the University of Portsmouth for franchised programmes are fully outlined.

6.8 City of Portsmouth College ensures that all complaints are handled in a timely and fair manner and that appropriate action is taken in line with any decision arrived at. The effectiveness of the policy is closely monitored, and all conclusions are reflected upon for enhancement purposes.

6.9 If the outcome is still not considered to be satisfactory at the conclusion of this three-staged process, the complainant would be able to present their complaint to the Office of the Independent Adjudicator (OIA). This right is outlined in the appendix with the source of further information provided.

6.10 In making depositions about the quality of learning opportunities or other matters of concern, there is a guarantee of absolutely no risk of disadvantage to the complainant.

6.11 Alternative procedures are in place relating to academic appeals or disciplinary action.

## **7. Appeals**

7.1 City of Portsmouth College promises to treat all academic appeals seriously and, as part of offering high quality HE provision, is committed to offering an appeals process that is equitable, transparent and ensures proportionality. In order to achieve this aim, the Academic Appeals Procedure is made accessible to all HE students in a similar manner to the arrangements for complaints.

7.2 As with the complaints process described above, the Academic Appeals Procedure explains how an appeal can be made and how this will be dealt with fairly and confidentially. It confirms to students that any appeal may progress through various stages, which offer an appropriate level of independent scrutiny. Clear signposting also guides all students through admissible timescales, required documentation and the membership of panels established to assess the validity of the appeal.

7.3 The Academic Appeals Procedure is accessible to students on the CoPC website under the 'Office for Students Documents' tab at:

[www.city-of-portsmouth-college.ac.uk/about-us/our-policies](http://www.city-of-portsmouth-college.ac.uk/about-us/our-policies)

7.4 When the appeal procedure reaches its conclusion – either because the appeal is deemed to be invalid or a decision in response to the appeal is reached – any student having made an appeal submission has information on how a further review of the outcome may be requested from the OIA.

7.5 On each occasion that an appeal is initiated, the opportunity is taken to review the underlying causes of that appeal and to determine what measures might productively be implemented to improve the student experience and avoid similar instances occurring in the future.

7.6 In the circumstance where, following careful consideration of an application to join an HE course, a decision is taken not to offer a place, the College will communicate this conclusion to the individual concerned outlining the reasons and approaching the situation with sensitivity. If the applicant wishes to question this outcome, a process is available to consider their case in a fair and considered manner.

## **8. Specific Arrangements for University of Portsmouth Programmes**

8.1 Under the subcontracted or franchised arrangements for delivery of programmes, the University retains the ultimate discretion concerning all issues related to its courses offered at CoPC, including their content, structure, design, rules and regulations, quality and academic standards, and administration.

8.2 The University is responsible for the academic standards of all awards granted in its name and is accountable to the OfS for the students on franchised provision. It also retains oversight and maintenance of all aspects of finance, administration, and equality relating to these students.

8.3 The College commits to keeping the University's nominated Academic Contact informed of the progress of all matters concerning CoPC delivery, including any disruption to provision or possible delays, where this is pertinent to the course, partnership, or the student learning experience.

8.4 The University and CoPC will mutually ensure that they provide reasonable notice of proposed changes to any course, as well as amendments to related policies and regulations.

8.5 Should termination of a programme become necessary for whatever reason, the University and CoPC will work together to carry out their respective obligations under this plan on behalf of students, including the important duty of ensuring that the course is provided in full to its normal conclusion.

8.6 Following receipt of a notice to terminate from the College or where both partners mutually agree in writing to terminate a particular programme, no new students will be admitted onto the terminating course and CoPC will cease to promote, market, or advertise the programme concerned. The University and CoPC will jointly agree any termination arrangements applicable to the defined run-out period.