


Hull College Code of Practice	Status: proposed	
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Description	Whilst taking into account ongoing condition C3 of the registration with the Office for Students, the UK Quality Code (2018) and the regulations of partner awarding bodies, this Student Protection Plan makes clear the processes that must be adopted by Hull College in relation to the protection of students in relation to the continuation of studies and quality of study.	

Revision history

Version	Type	Date	History
1.0	new	November 2022	new

This policy applies to Hull College and incorporates all group provision. This policy applies to provision considered under the guidance of the Office for Students as ‘higher education’, wherever it is delivered by Hull College.

Further advice and guidance on the use and implementation of this document is available from the HE Quality Office.

Please use the following contact details

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Section 1 Introduction

1.1 Purpose

As a registered provider of higher education, Hull College must publish a Student Protection Plan which sets out how continuation and quality of study will be maintained if a potential risk to continued study for students materialises. This Plan outlines how Hull College will manage the risk associated with continuation of study, gives examples of what might prompt action and explains what the College will do to minimise the impacts of any problems associated with continuation or enrolment into study.

1.2 Programmes

Hull College holds Foundation Degree Awarding Powers, delivers validated and franchised provision through the university of hull, teacher education provision through the university of Huddersfield and delivers other Higher Education level qualifications awarded by bodies including Pearson.

1.3 History

Hull College has a track record of positive provider reviews carried out by the designated quality body, the most recent quality and standard reviews were undertaken in September by the Quality Assurance Agency.

1.4 Structure

The student protection plan is split into five parts:

- i. Identified risks to continuation of study and quality of study and their likelihood of crystallising.
- ii. Measures put in place by Hull College to protect students against identified risks.
- iii. Information about tuition fee refunds to students and compensation costs.
- iv. Communication with students about the student protection plan.
- v. Appendix 1 – Assessment of Risks to Continuation and Quality of Study.

The Student Protection Plan forms part of the Terms and Conditions as outlined in Hull College Student Contract found on our website.

Section 2 Identified risks to continuation of study and quality of study and their likelihood of crystallising.

2.1 Risk review and risk management

As part of this Student Protection Plan, Hull College undertakes an annual review of risks, their likelihood and impact to continuation and studies. A table showing these is available at Appendix 1.

The College has considered a range of risks that could have potential to affect our ability to be able to deliver our programmes and which may affect you as a student. Below the College have categorised the risks the College have identified and also offered some details to how the College will manage those risks before, during and after your studies

2.2 College's Approach to Risk Management

Risk Management Strategy forms part of the College's internal control and corporate governance arrangements. The strategy explains the College's underlying approach to risk management, documents the roles and responsibilities of the Corporation and its Committees. It also outlines key aspects of the risk management process, and identifies the main reporting procedures. In addition, it describes the process the Corporation will use to evaluate the effectiveness of internal control procedures to ensure that students are protected during their studies.

The College acknowledges that there is an element of risk exists in all activity it undertakes. The College's operates a risk threshold. Above this threshold, the College will actively seek to manage risks and will prioritise time and resources to reducing, avoiding or mitigating these risks. The Board of Governors will then agree the 'Risk Appetite' (what level of risk is acceptable) for the College and the appropriate level of risk mitigation activity.

2.3 Financial risk

The College has a five-year recovery plan, in place since March 2018 and backed with the support from the FE Commissioner and also the Transaction Unit, which will aims to achieve a strong and sustainable future for Hull College. These interventions are regularly reviewed by the FE Commissioner to ensure that targets identified in the Recovery Plan can be delivered. The risk that Hull College is unable to operate is high because our financial performance is under notice to improve from the Education and Skills Funding Agency. The college is working with the FE Commissioner on a range of measures and is confident that these measures will soon be removed. The college is a large further education provider that was judged 'Requires Improvement' in February 2022. In the period since a full new management team has been installed under the leadership of a new CEO/Principal who previously led a provider to Outstanding. Hull College is governed by the provisions of the Education and Skills Funding Agency in the event of a whole provider failure.

2.4 Risk to premises and infrastructure

- I. The College has business continuity plans to deal with natural disasters, terrorist attack or accidental events all of which could lead to loss of use for any of the premises.
- II. There is a low risk of disruption to the IT infrastructure which Hull College operates on. Planned disruption (e.g. due to a network upgrade) to Hull College IT infrastructure is notified in advance to students and the Hull College aims to not have planned disruption during busy periods of the academic year. Disruption can also be due to malicious attack on the IT network, the IT Services department of the Hull College maintains the network security systems and this risk is therefore assessed as low.
- III. Hull College has an established framework for consultation and negotiation with the recognised trade unions and remains highly committed to maintaining effective employee relations and working with trade union colleagues to achieve reasonable outcomes.

2.5 Programme Delivery

Hull College considers the risk of losing the power to award Foundation Degree's in the next three years is low. Hull College was awarded time-limited foundation degree awarding powers (DAPs) by the Privy Council on 1 January 2016, which the OfS extended to 31st December 2022, this order has now been extended until 31st March 2026 and permits the college to award Foundation Degrees until this date.

- I. Hull College considers the risk low that it will lose the validation of the main validating partner for degree programmes, the University of Hull.
- II. Hull College considers the risk low of losing the access to the validation of Teacher Education programmes by the University of Huddersfield.
- III. Hull College considers the risk low of losing the access to the validation of Higher National programmes by Pearson Education.
- IV. Hull College considers it unlikely that the campus site will close in the next three years

2.6 Curriculum Review

Hull College is highly likely to review the availability of Higher Education courses on offer. However, this is undertaken on an annual basis during the curriculum planning process and will also take into account the strategic targets and review of Higher Education courses, Hull College expects these to be ranging from minor to significant changes that are undertaken to meet the needs of students and the wider community served by the group. The changes would be based on Labour Market Information or other requirements of local employers and follows HCG HE05 Validation and Amendments of Programmes which is available from HERegistry@hull-college.ac.uk

The risk that Hull College is no longer able to deliver material components of courses is low because Hull College designs modules to be taught by integrated teams of academic staff, Hull College maintain an active recruitment programme and ensure all staff hold recognised teacher status with relevant degree awarding bodies.

There is a more moderate risk in in some courses that Hull College has/plans to have, where there is a niche/rare specialism of requirement for facilities. The risk exists either through loss of specialist staffing or access to specialist facilities. These programmes include Engineering and Construction.

3.0 Measures put in place by Hull College to protect students against identified risks

- I. Hull College is committed to completing the programme of study for all students who are enrolled onto a Higher Education course, as set out under the responsibilities for the corporation in HE01 Academic Regulations, available on the website.
- II. For Degrees awarded by Hull College, if Hull College decides to close a course, Hull College will teach out² that programme and maintain a suitable cash reserve that allows this to happen.
- III. For programmes of study where Pearson Education is the awarding body, where Pearson have removed programme or centre approval (under their policy), Hull College will co-operate with Pearson as set out under section 8 'Learner assistance' of their policy. This includes learners retrieving certificates and assistance in finding an alternative provider.
- IV. For Degrees validated by the University of Hull, the University sets out its procedures for ending a partnership in Chapter IX: Review, Renewal and Termination of Partnerships and Activities ([available here](#)). As a partner to Hull College the University will produce an Exit Strategy to ensure that the termination of the collaborative partnership will not detrimentally affect the students on validated programmes, including ensuring the implementation of a teach out² procedure.
- V. For Degrees validated by the University of Huddersfield, the University sets out its procedures for ending a partnership in their Collaborative Provision Handbook ([available in Section O here](#)). The University will produce an Exit Strategy to

ensure that the termination of the collaborative partnership will not detrimentally affect the students on validated programmes, including ensuring the implementation of a teach out² procedure.

- VI. In the event that Hull College decides to not run a particular programme of study where an applicant has accepted an offer from us to enrol, Hull College endeavours to find a similar course (should that exist) at Hull College, and it remains a suitable choice for the student. If Hull College does not offer a suitable alternative, Hull College will provide the student with suitable information, advice and guidance on alternative providers and courses, and compensate the student for any reasonable losses incurred.
- VII. In the event that Hull College can no longer validate a programme, where possible Hull College will seek to ensure that programme closure is through the process of teach out² in the first instance, allowing as many students as possible to complete their enrolled programme of study. Where this is not possible, Hull College will support students in transferring to another provider, including ensuring that students can transfer to an alternative provider by providing those students with the credits for the modules completed with Hull College.
- VIII. Hull College will give students a minimum 90 days' notice when Hull College needs to make material changes to their course.
- IX. The impact of 3.9 is that all validated courses must have changes approved 90 days before delivery commences, this deadline is set annually by the HE Registry Office and is normally the second Friday in June.
- X. Hull College will give a minimum 90 days' notice of intent to close a course or campus at Hull College.
- XI. Where Hull College has lost key staff/or facilities for those courses that are considered niche/rare in the provision (as identified in section 2.14 above), Hull College will endeavour to replace key staff and facilities as soon as possible using the established policies and procedures. Where this is not possible, or Partnership chooses to close one of those programmes or facilities, Hull College will undertake to support students (as detailed in section 3.8 above) to move to another provider to complete their studies.
- XII. Hull College maintains a Policy & Guidelines for Managing an Incident & Crisis covering actions such as acts of terrorism, damage to buildings and equipment.
- XIII. Industrial Action. Hull College has an established framework for consultation and negotiation with the recognised trade unions and remains highly committed to maintaining effective employee relations and working with trade union colleagues to achieve reasonable outcomes. In the event of industrial action occurring, Hull College will take all reasonable steps to ensure that normal operations are maintained. Hull College will take all reasonable steps to maintain the student experience and ensure that students are not negatively impacted by that action.
- XIV. IT Infrastructure failure or IT upgrade. Hull College continues to maintain and invest in IT infrastructure used to support learning and business functions. In addition to the Policy & Guidelines for Managing an Incident and Crisis, Hull College IT department also maintains ongoing communication with students and staff to ensure planned upgrade works do not disrupt learning, or to keep users updated on resolutions to IT issues. Where IT failures have affected student learning and assessment, Hull College has HE10 Reasonable Adjustments and Short Extensions which Hull College will use to mitigate issues caused by IT failure.

4.0 Information about tuition fee refunds to students and compensation costs

- For students at Hull College the statements on Higher Education Fees, Funding (including refund statement) and HE Bursaries can be found on [this webpage](#).
- For those students identified in Section 2 for whom there has been identified an increased risk of course closure or disruption, Hull College will ensure that sufficient

funds are in place by 1 August of each Academic year. The figure required will be risk assessed based on the maximum amount of tuition fee that could be refunded on those courses identified as at risk and using an average of the pay outs that might be expected due the disruption course closures can cause.

5.0 Communication with students about the student protection plan.

5.1 Hull College will review this student protection plan by February 2024, or sooner if there is a significant change in circumstance. The SPP will be available to the HE Student Senate and the HE Student Focus Group at ERC who will review the document on an annual basis to ensure that the plan is relevant, appropriate and that student input has been sought.

5.2 Hull College will publicise the Student Protection Plan to current and future students by 1 August of each academic year.

5.3 Hull College will publish the Student Protection Plan to current students by publishing the document on the public website and will be introduced to current students at induction each academic year.

5.4 For applicants to Hull College, the Student Protection Plan will be available on the website and will be included in the Student Contract sent to each applicant during the admissions process.

5.5 The SPP also be available on the internal SharePoint site for staff to access and will be introduced to staff as part of the Community and Practice project which aims to involve staff in the development and implementation of policy that affects their practice in Higher Education. Hull College will ensure that staff are aware of the implications of the student protection plan when they propose course changes, by 31 August of each academic year.

5.6 If Hull College needs to implement the Student Protection Plan, this will be communicated via email to students and applicants and via student course/departmental meetings as may be required. Students will be supported both collectively and individually by the Learner Services department.

5.7 Hull College will put in place arrangements with relevant student advisors within the student support department, the student engagement officer and with relevant external agencies, to ensure that students have access to independent advice such as the Citizens Advice Bureau if there is a need to implement the measures in the student protection plan.

5.8 Hull College has a full complaints policy and procedure which higher education students can use for any queries or concerns around this plan. The policy can be found [here](#) and the complaints form found [here](#).

²'Teach out' refers to a phased method of which a closure of programme will operate, which allows affected students to complete their programme of study before closure takes effect.

Risk Type	Risk	Risk Description	Potential Material Impact to Students	Likelihood (1 is Low, 4 is high)	Impact (1 is Low, 4 is high)	Risk Level (1 is low, 16 is high)	Mitigating Actions where risk is above moderate.	Date of next review
Continuation	Provider failure	Hull College ceases to operate.						
Continuation	Loss of validating powers	Hull College no longer able to award Foundation Degree's						
Continuation	Loss of validating partners	Hull College no longer able to award qualifications awarded by partner validating bodies.						
Continuation	Campus closure	Hull College campus is closed						
Continuation	Variation in Foundation Degree Awarding Powers	Hull College is awarded further awarding powers which are probationary, conditional or time limited						
Continuation & Quality	Course changes	Hull College makes a material change to a course either through						

		modification or replacement.						
Quality	No longer being able to deliver a material component of a course.	Loss of key teaching staff, inability to recruit new staff with required specialisms. (see SPP 2.12)						
Quality	No longer being able to deliver a material component of a course.	Rare/niche provision or new provision requiring new specialist staff or resources. (see SPP 2.12)						
Quality	IT Infrastructure failure	Planned upgrade work or repairs to the network.						
Quality	IT Infrastructure failure	Malicious attack against IT Network						
Quality	IT Infrastructure failure	Staff absence due to industrial action or inability to access campus						

		due to industrial action.						
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