

Annex D: Student protection plan

Provider's name: EKC Group

Provider's UKPRN: 10006570

Legal address: Ramsgate Road, Broadstairs, Kent. CT10 1PN

Contact point for enquiries about this student protection plan: Lauren Anning, Director of FE & HE Experience.

Student protection plan for the period 2021/22

1. An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise

The risk that EKC Group as a whole is unable to operate is very low because our financial performance is continually monitored and there are robust processes and accountabilities in place to effectively manage financial performance. This is reviewed monthly at Senior Executive meetings. Our financial health has been endorsed as 'good' by the Education Skills and Funding Agency.

We have comprehensive insurance arrangements in place in the unlikely event that the Group is unable to provide education and learning to our students for any reason. We have robust Business Continuity Plans which cover continuation of teaching and learning in the event of significant adverse events, and we test aspects of the plan on an annual basis. We also have a strong risk management culture and continuity of education is covered in our risk register. The register is reviewed on a termly basis by an internal committee and is also subject to scrutiny by the governing body Audit Committee.

Our Risk Management processes are fully embedded, and any internal and external audit is driven by the risks identified in the Risk Register. The risk register and management processes have been subject to review by our internal auditors and the Education and Skills Funding Agency and have been endorsed. The risk that we are no longer able to deliver programmes is very low. This includes the very low risk that one of our validating partners terminates a contract.

All of our programmes are currently validated by the University of Kent or Pearson. The Group has a long tradition of delivering BTEC qualifications, including at HE level. The Partnership Agreement with the University of Kent has been in place since 2018, provisions are made in the agreement for the case of programme closure or termination of the agreement which aim at ensuring that students can finalize their started degree programmes.

All but one of our HE programmes are delivered on a full-time, face-to-face basis. While there are deliberations to implement blended learning models using the practices developed during the Coronavirus pandemic, these will be carefully developed with the help of experienced partners with a view to sustainability. Whenever a decision will be made to introduce or discontinue a particular mode of study, this will be implemented so as not to affect current students in that mode.

However, the Group does advise HE applicants that it reserves the right to not run certain programmes where it is deemed that the programme is not viable. This would be the case if a very low number of students is recruited in a particular subject area. The HE Group

considers student applications in its meeting in spring, following the UCAS application deadline and scheduled application interviews. Late applications will then be monitored by the HE Group, based on data provided by the HE Information Officer, until June when any courses that are not indicating recruitment of at least 8 students will be discussed. A decision to discontinue a programme will be taken latest by the beginning of the Clearing Process, by the HE Group upon recommendation by the relevant College Principal. Applicants will be immediately contacted. As detailed in the Group's HE Admissions Policy, we undertake to communicate the decision to students at the earliest opportunity. The Policy can be accessed on our website:

https://www.ekcgroup.ac.uk/sites/default/files/he%20admissions%20policy_nov%202020.pdf

The risk that we are no longer able to deliver material components of courses that are already running is moderate. This concerns in particular the loss of staff in our teaching areas, in particular where provision is delivered only by a small number of teaching staff. We have therefore adopted a recommendation from the HE Group that every subject area should be taught by at least 2 qualified lecturers. Furthermore, we maintain a cover policy to ensure continuity of provision and continue to develop and nurture links with our partner higher education institution so that we can address any gaps in provision and provide a seamless experience for our students.

Another very low risk is that we are unable to continue delivery at one of our colleges. This may be temporary, or even more unlikely a full closure of a college. As all of the colleges have been operating for a long period and are well established in their particular location, this is highly unlikely. However, in line with the above-mentioned possibility that a programme would be closed, this could mean that students would be offered a place in the same or a similar programme at a different college location. In these cases, students will be supported closely.

2. The measures that you have put in place to mitigate those risks that you consider to be reasonably likely to crystallise

If we are unable to deliver courses within the EKC Group in the next three years we will invoke our Business Continuity Plan and Communications Plan to ensure current and prospective students are kept informed of our position. This includes being able to transfer our HE students to other sites should one or more of our other campuses become inoperable for a period of time or in case we will not be able to run a course at one of our campuses any longer.

Students would receive individual support. There are also student bursaries in place to help students with additional travel costs in such a case, where appropriate. We also have an arrangement with Canterbury Christ Church University that enables us to utilise their facilities for business continuity reasons.

EKC Group operates a diversified education and training offer and this is key in mitigating the financial and operating risk to our relatively small HE programmes. Our core business is further education to 16,000 students across 6 sites, and Apprenticeship provision with c.1,500 apprentices in learning.

All our provision is funded through grant agreements, contracts, and loans facilities with the Education and Skills Funding Agency. The risk that we are not able to deliver any material components of courses already running relates mostly to the risk of staff loss in a particular area. As already stated we have in place a cover policy to mitigate the risk of

staffing losses. We also have the flexibility to transfer staff to other sites as an interim measure, where that expertise exists.

We also have formal agreements with recruitment agencies to quickly access their banks of interim lecturers and managers. In order to prevent that such a situation arises, there is a recommendation that each course is taught by at least 2 qualified lecturers. As stated above the Group advises HE applicants that it reserves the right to not run certain programmes where it is deemed that the programme is not viable.

As detailed in the Group's HE Admissions Policy, we undertake to communicate the decision to students at the earliest opportunity, and no later than the beginning of clearing during each academic year. We update our website and the UCAS website accordingly. Both are continuously monitored by the HE administrative team, which includes the HE Information Officer. In case a decision has been made to not offer a course by the above date, all students concerned are contacted individually, through both email and phone to ensure a personal service. We provide the students with information about similar courses at other providers as well as with information about which steps to take for the UCAS, and if relevant, Student Finance England, application.

We are committed to continue a course where students have already started on it. In the unlikely case that this will happen, we will not do so without ensuring a teach out, i.e. all students can complete their course here or, upon agreement with the individual student, transfer to another course without being disadvantaged.

3. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

The Group's Fees Policy, which is published on our Group website, articulates the circumstances in which we grant refunds:

<https://www.ekcgroup.ac.uk/sites/default/files/Fees%20Policy%202021-22.pdf>

A refund will be automatically paid in case we have to close or cancel a course. There is also provision for when students withdraw. Students who withdraw from a course will be refunded in line with the liability periods stated in the Fees Policy.

In all cases, a 14-day cooling off period after the beginning of the course is in place during which a full refund will be given. In addition to the above full refund, in case of course closure or cancellation, we also consider on a case-by-case basis refunds in the unlikely cases of site closure or change of delivery method.

In all cases, upon application by the student, we will also consider payment of additional travel or maintenance costs, for example, when travel to a different site is necessary or when additional costs such as childcare costs arise.

We also decide on a case-by-case basis on compensation requests for loss of time, additional maintenance or travel costs or when enrolment in a different course incurs higher tuition fees.

Students can contact the HE Information Officer or the Finance Departments for all questions (HigherEd@eastkent.ac.uk). HE income represents approximately 2% of our overall income and we have sufficient cash reserves which would be sufficient to provide refunds and compensation for those students for whom we have identified an increased

risk of non-continuation of study. We do not consider that we require specific insurance to cover this risk given that the probability is low, and the student numbers are relatively few.

4. Information about how you will communicate with students about your student protection plan

We will publicise our student protection plan to current and future students on our Group website and on our VLE. We will ensure that staff are aware of the implications of our student protection plan when they propose course changes at the point of the decision being taken to not run a course. Our communication plan will be implemented. We will further develop our student protection plan in collaboration with our HE Students through our HE Group and our HE Student Representatives.

We will review the Plan via the HE Group on at least an annual basis. We will inform our students if there are to be material changes to their course by contacting them on their preferred means of communication as well as publishing information on the course information pages on our Group website. We will give students notice when we need to make material changes to their course.

If we need to implement the measures in our student protection plan, we will ensure that those students receive priority information, advice and guidance to support students collectively and individually.' Our Careers Advisers are qualified to level 6 in careers guidance and the Group has the Matrix accreditation which ensures standards for sound independent advice