



Student Protection Plan

Provider's Name: Caspian School of Academics

Provider's UKPRN: 10086359

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Student Protection Plan for the period [2023-2024]

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 Student Protection Plan (the Plan) sets out what measures the Caspian School of Academics (CSA/the School) has in place to protect its students, in the event that a risk to the continuation of studies arises. This plan is reviewed annually by the Senior Management Team and is an integral part of wider risk management strategy of the School. This plan is implemented with other parts of the risk assessment and management strategy.

The policy is written in line with the Office for Students (OfS) guidelines and regulations under the requirements of the Higher Education and Research Act (2017) to develop and maintain a Student Protection Plan (SPP) in order to ensure the continuity of studies of current and future students in the event of discontinuation in operations. CSA main aim is to protect the quality of study for its students. This Student Protection Plan builds on the School's senior management team and is intended to assure potential learners that appropriate measures are in place to guard continuance of their studies with us.

In order to help further minimise any risks to students, CSA, which was established in June 2020, has taken in consideration a number of factors which may pose a risk to students' completion of their studies. In addition to higher education provision, the School offers provision at further education level as training for learners in business and finance. Each aspect of provision, both further and higher education can provide financial support to the continuity and protection of student interests. The further education business element includes the streams of revenue from:

- Contracts with local employers
- Self-funded students seeking to gain professional qualifications.

In preparing the Student Protection Plan for 2023/2024, CSA has undertaken a risk assessment. This formed part of the School's ongoing risk management process. The reason is to identify risks likely to pose a potential threat to quality, standards and security of the education provision.

The School has included the following types of events in the Student Protection Plan which has involved the School taking into consideration a wider range of risks as shown in the list below:

1. **Company ceases to operate/financial risk**
2. **Discontinuity of Course(s)**
3. **Closure of Campus/change of Location**
4. **Withdrawal of partnerships and/or approval by awarding bodies**
5. **Risks of an Academic nature including loss of staff and inability to recruit staff**
6. **Risks arising from compromised reputation**
7. **IT Failure**

Our plan sets out the nature of risks, along with examples of events that may pose a potential risk and explains what actions the School may take in order to minimise the impact of these events.

The CSA student protection plan of sets out what students can expect to happen should a course, campus, or the School close. The purpose of the plan is to ensure that students can continue and complete their studies, or can be compensated if this is not possible. Our Student Protection Plan is easily available to current and prospective students and seeks to address specific risks to the continuation of study in a proportionate way.

We have divided the risk into the following three categories;

1. Low: an event may occur only in exceptional circumstances (possibility at less than 10%)
2. Medium: an event may occur (possibility between 30-50%)
3. High: an event is expected (possibility at more than 90%)

We have also classified impacts as:

- a. Minor: would be resolved through day-to-day activity
- b. Moderate: would be resolved through a dedicated and designated team
- c. Extreme: would be resolved through input from Senior Management or an external/third party.

The measures that we have put in place to mitigate the identified risks are those that we consider to be reasonably likely to protect the student interest.

1. Company ceases to operate/financial risk

It is our assessment that our current financial position means the risk we will become unable to operate is low. Our financial performance is currently outstanding, courses are well planned and resourced in advance through robust development planning and portfolio building processes chaired by the Board of Governance. Over the three years of trading, we have maintained our further education course provision,

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and with the introduction of higher education provision, our current business plan projections are for growth. This is also documented as part of the commentary submitted by our accountants. The School keeps sufficient funds in reserve and has sufficient bank overdraft facilities to protect us in the event of a financial crisis.

We rate the medium- and long-term financial strength of the School as good. This judgment is based on:

- Positive balance sheets
- Strong financial health rating
- Our self-assessment judges us as good across all areas of current provision
- The development of new partnerships with universities
- A growing portfolio of full-cost programmes

We identified no risks likely to crystallise that would mean we were no longer financially sustainable.

We have business continuity plans in place to deal with challenges relating to recruitment. These include strategies for extending the recruitment cycle to pick up students who may not have been in time to make applications to other providers.

2. Discontinuity of Course(s)

We consider the risk of our students being unable to complete their courses to be **low**. The risk we will be unable to offer courses attracting sufficient numbers of students to make them viable is also low, with demand always exceeding available places for the courses being offered, based on local market intelligence and focusing on re-engagement of non-traditional learners.

CSA's awarding bodies visit and audit CSA regularly and any (if any) issues identified are addressed immediately to the satisfaction of the awarding body. Nevertheless, it may be the case that an awarding body stipulates operating a particular course under a probationary validation or subject to stipulated conditions. CSA undertakes the commitment to work closely with this awarding body in order to meet the given conditions according to requirements and hence maintain low risk in the operation of any course(s).

The performance of all our course teams is monitored through a monthly performance review process against an agreed set of key performance indicators. This covers education and financial performance measures. Additional support is put in place for those students for whom a specific support need is identified.

The risk to an individual module not running is low for a compulsory module and medium for an optional module. In most cases optional modules are chosen by the course team in advance of the year of study commencing. The risks to students being unable to complete their studies because of a module not running are low.

The most likely cause of discontinuation is through a course closure. This is likely to occur when a course reaches the end of its marketability due to a trend of falling recruitment or changes within the field of study, or if the awarding body withdraws the programme. We believe this unlikely as our curriculum plan covers areas of high demand – Education, Business and Health & Social Care. If this were to happen, there would be ample opportunity to give applicants and students notice of the change. This would coincide with a replacement by a new course within the same subject area as the closed course. We have a commitment to the teach-out of the curriculum to the students registered on the closed course.

Our plan for dealing with the closure of a course includes arrangements for communicating with applicants who accepted a place. Applicants who accepted a place on a course which is then closed, but have not commenced study, will be offered advice and support and any appropriate refunds. This is to help them decide whether to transfer to a different course with us or to seek a suitable alternative through another provider. Where they choose another provider, we will work with that student to broker the transfer.

We would also work closely with students who are on a course closed to new applicants. This is to ensure they are supported in their studies so they can complete their qualification. In some cases, this support might include a transfer to another course with similar learning outcomes and credit transfer would be applied. The risks to students being unable to complete their studies on courses closed to new applicants are low.

The risks we are no longer able to deliver material components of our courses is low. We have protection mechanisms in place for the students affected. The School makes any material change in accordance with the School's Change Management Policy. A key requirement of the Change Management Policy is a requirement to consult the students affected by the change.

We regularly review our academic provision through our termly and Annual Course Monitoring process. This is to maintain academic standards and to ensure our courses keep up-to-date, and meet awarding body and/or validating partner requirements. These reviews may result in changes to course provision. We have Course Modification procedures and agreed timescales to inform students of such changes.

The risk we decide to discontinue a course before students have completed is very low as we would plan such a change to allow current students to complete their studies. We would also take steps to minimise the impact on their studies and fully consult with the Student Committee.

The risk we do not have the staff to teach your course is low. We successfully recruit qualified staff to teach on our courses. We provide programmes to support and develop our staff. We work to ensure our teaching staff have, or study for, teaching qualifications. The School also has a bank of skilled and well qualified sessional teachers to provide a further layer of cover if needed. Additionally, we have a number of employers who are happy to provide expert input to sessions.

Considering staffing requirements forms part of our processes for approving new courses and modules. There is an annual planning process where we consider teaching requirements based on courses to be

offered and numbers of students planned. This means we are able to identify and take action relating to staffing in advance of the new academic year, and each new cohort intake.

3. Closure of Campus/change of Location

It is our assessment that the risk we are unable to operate at Ilford campus is low. CSA has in place a legally binding agreement to rent premises for providing education. The premises are situated in a building in central Ilford which rents facilities to training providers and agreements are in place to ensure the premises remain available for teaching and learning. We have confirmed leases can be extended as needed. CSA has invested heavily to ensure the facilities it rents are able to support the delivery of high-quality learning and teaching of all of our students. We currently have no plans to leave our current sites. However, in the future, if this were to change then, special consideration would be given to the individual needs of our students.

In case of temporary disruption to learning caused by a short-term issue with the building, we have an option to rent out external rooms at nearby buildings. All rental agreements require the landlord to give 6 months notice, so in the unlikely event that we are required to move, there is ample time to find alternative premises, which are readily available in the area in which CSA operates.

In the event that a safety or security incident occurs, the School's Emergency Planning and Business Continuity Framework is brought into effect. In addition, we have contingency plans in place relating to Covid-19. In the event of emergencies that impact students, communications would be managed through business continuity plans to provide information on the available access to our facilities, including a transfer to online delivery as needed.

We have comprehensive insurance cover in respect of all risks, including property and business continuity, to ensure it has sufficient resources to sustain the provision of education in the event of a serious incident at the campus.

4. Withdrawal of partnerships and/or accreditation by awarding bodies

This risk that an awarding body may withdraw their accreditation or validation is judged to be low. This is because the School is fully aware of and up to date with the requirements needed in order to be accredited by such bodies. We have processes in place to regularly review and renew such accreditation. We will work with our awarding organisations in order to mitigate against and reduce any risk of a particular course withdrawal. Our staff are highly experienced in the management of awarding body and university partnerships.

If in the very unlikely event that an awarding body withdraws its accreditation, the School would have an option to 'Teach Out' to its current students and would work out the details with the partner/awarding body. Any prospective closure, in case of withdrawal, would be done systematically and through a phased process so that all affected students can complete their studies.

5. Risks of an Academic nature

Risks of an academic nature are judged to be low. This is because of the tight internal controls on student performance and a hierarchy of quality monitoring and support through the School. Self-assessment and quality improvement planning are embedded in the teaching delivery and program management models, with data systems to ensure information on student progress is readily accessible, timely, accurate and utilised appropriately by all staff. Regular updates on student performance are provided to the Senior Management Team.

6. Risks arising from compromised reputation

Risks of compromised reputation are judged to be low. CSA knows that managing reputational risk begins with recognising that reputation is a matter of perception. Our overall reputation is a function of our reputation among our various stakeholders - students, employees, employers, regulators, awarding bodies, and the community in which we operate. Our strong positive reputation among our various stakeholders results in a strong positive reputation for the School overall, which is effectively monitored and managed.

7. IT Failure

The risk students will be unable to complete their course because of a failure of IT infrastructure is low. We have operational, tested and robust IT business continuity arrangements in place including internal staff and with external professionals. IT crisis simulation exercises are run each year to ensure we can address risks to the continuity of our systems.

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

1. Company ceases to operate/financial risk

Risk: The School is no longer able to operate due to poor financial performance or lack of financial viability.

Likelihood: very unlikely and the risk level is LOW Impact: Extreme

Rationale: CSA has a good prospect and its expected financial performance is reflected in the projections, business plan and commentary submitted by our accountants. The shareholders are committed to raising and providing funds in case of any such financial crises. The School will also keep an adequate financial reserve and has sufficient bank overdraft facilities to protect against short to medium term financial performance shortfalls. As mentioned in the introduction in order to help further minimise any risks to students, CSA has a Further Education arm to its business which can provide financial support to the Higher Education business element when needed.

We have business continuity plans in place coupled with the support from our shareholders, Directors and Board members. Such inside support would continue to allow students to either complete their studies or to be transferred at an appropriate point to another provider. Our balance sheet and reserves provide a stable

based for the School and we plan to generate positive net cash flow from operations in both further and higher education provision for the foreseeable future.

2. Discontinuity of Course(s)

Risk: Low as alternative courses may be identified and introduced to meet student needs. The risk that School may not be able to deliver a full programme due to lack of staff is covered by a pool of associate lecturers. Staff turnover or non-availability of other resources is planned for.

Likelihood: As notice periods require awarding bodies and organisations to inform providers/partners of any anticipated course closure and to ensure teach out arrangements are in place. This means the risk level is LOW.

Impact: Minor to moderate as alternative programmes would be identified for new intakes and teach out would be provided.

Rationale: The School may make a strategic decision to close a programme because of any or all of the following factors:

- i. insufficient enrolments which render the course non-viable from an academic, student experience or resourcing perspective;
- ii. the course has been superseded in the School portfolio by another programme;
- iii. the course no longer aligns with the School's mission. In such cases and where possible, the School will offer existing students a choice of two options:
 - a. To continue with their programme which will be 'taught out' to allow students to complete;
 - b. To facilitate students in taking forward credit to other programmes at the same level, or to finding an alternative provider who will support students to complete their studies.

Once a programme is established and the School has developed an understanding of the demand for places, business decisions linked to the delivery of these programmes each year will reflect on historical patterns of recruitment. Should a decision be taken to cease to offer an established programme it will be based on the pattern of recruitment and will be made in good time to ensure that current students have the opportunity to complete their programmes and prospective students receive clear communication regarding the School's decision to close the programme, in line with our student protection plan.

We have a continuous staff development programme to ensure that we grow expertise in potential shortage areas. We operate a progression planning system to ensure that trained staff are available throughout the taught provision of the School. In the event of staff shortages, we would look to recruit temporary staff if we were not able to cover this for our pool of associate lecturers. Temporary staff would be extensively supported by our outstanding practitioners to ensure consistent quality of delivery.

3. Closure of Campus/change of Location

Risk: All or part of our Campus is closed or not fit for study for a shorter or longer period of time.

Likelihood: very unlikely and the risk level is LOW

Impact: Moderate as rental agreements are in place

Rationale: The School has signed a proper and professional/legal rental agreement for the premises that it uses for providing education. Therefore, it is highly unlikely that the School is asked to change its premises or discontinue its operations. The premises are well maintained, and its risk assessments are fully completed and regularly monitored. Appropriate health and safety measures and appropriate policies are in place to ensure that it is highly unlikely to face a risk of closure or discontinuity.

In case of temporary disruption due to a sudden damage to the premises, the School has an option to rent external rooms at a nearby School as well as suitable accommodation in the nearby. In unusual circumstances of losing the rental of the premises, the School will use the time before the premises are handed back to find other appropriate premises for the delivery of programmes.

CSA has no plans in future to close down its current site. The response to any associated problem would depend on the nature of the event. In all cases special consideration would be given to the individual needs of the students.

4. Withdrawal of partnerships and/or accreditation by awarding bodies

Risk: Awarding bodies may withdraw their accreditation from the School or any partners withdraw their validation.

Likelihood: very unlikely and the risk level is LOW

Impact: Moderate

Rationale: The School is fully aware of and up-to-date with the requirements of its awarding bodies and the School and has processes in place to regularly review and update its systems and to provide data to meet approval and partnership requirements. The School has an appropriate and current Quality Assurance policy, processes and diagram, along with a designated lead for the quality assurance process. A Standardisation Committee also monitors and advises on partnership and awarding body requirements and monitors the outcomes of centre visits and inspections by external bodies including Ofsted, City and Guilds, and other awarding bodies. Feedback from external examiners and external quality assurance visits are monitored by Programme Managers, Academic Board and the Standardisation Committee and actions for enhancement included in programme and whole School action plans.

The School will seek to work with a range of awarding organisations and partnerships in order to mitigate against and reduce any risk of a particular course withdrawal. The Principal and senior management team are experienced at managing partnerships with awarding bodies and Universities alike.

Our stakeholders also carry out their due diligence checks linked to the School's compliance and standards regularly including undertaking audits that ensure our processes and procedures are robust and meet awarding body and organisation requirements. In the unlikely event that an awarding body or partner withdraws its accreditation, the School would take forward a 'Teach Out' option for its current students. Any prospective course closure, in case of withdrawal would be done systematically and through a phased method so that all affected students can complete their studies. We understand that the circumstances

leading to the need to teach-out are exceptional and would be managed and delivered in a way to ensure student learning is not adversely affected.

5. Risks of an Academic nature

Risk: Change of course, amendment, suspension or updates

Likelihood: periods of notification are required to protect current students and the risk level is LOW
Impact: Minor

Rationale: An ongoing commitment to quality assurance and enhancement at CSA and oversight its validating partners and/or awarding bodies means that, as required, programme content, regulations and policies are updated. Communications with awarding bodies and where appropriate partner organisations ensures that statutory requirements and timelines for changes and updates are met. Oversight of compliance with standards is maintained through the operational committee structure including the Standardisation Committee, the Academic Board and the programme team meetings. Programme managers are key points of contact in ensuring all teaching and support staff are aware of impending changes and implementation dates.

Where updates or suggestions for amendments to content are made, for example substitution of modules, changes to module contents or assessment activities, these will be discussed by Academic Board which includes student representation, before being passed to the awarding body. Meetings are also held with relevant student cohorts to gather their feedback.

Changes to regulations and policies may be prompted by awarding bodies and will be considered by the Standardisation Committee and Academic Board. Revised regulations shall only apply to students enrolling after implementation of agreed revisions unless changes are not deemed significant. As a result, different regulations may apply to different cohorts on a programme and will be documented in the Programme Handbook for each individual cohort.

New or revised policies shall apply to all students from the start of the academic term following approval by the School's Academic Board, with a proviso that for the remainder of the current academic year, no student may be treated disadvantageously in comparison with the previous policy.

The recruitment strategy accounts for all planned events (redundancies, restructuring, end of contracts) and unplanned events (unexpected death, illness etc.). In either case, an impact assessment would be carried out immediately and gap filled with the help of multiple methods as explained above.

The School keeps all key teaching and learning resources on its VLE in the form of course outlines, lesson plans, lecture notes and presentation slides, articles and case studies etc. Such resources are safely kept online with only authorised access to staff and students, wherever applicable. The website and VLE have a regular back up through the School server. In the case of needing to change IT supplier, the management of the School would manage the structure and timing of such change in order to ensure minimum or no disruption to studies. Management would also consider alternate means of delivery during the implementation by making best use of alternate or unaffected systems. In the case of third-party

involvement, management would work to minimise or manage disaster recovery systems jointly.

6. Risks arising from compromised reputation

Risk: Negative Publicity, incident at the School / Accusation of staff member

Likelihood: The School has clear a complaints policy procedure and grievance policy for dealing with complaints and seeks to address issues in a timely way and the level of risk is Low.

Impact: Minor the School works to ensure all materials are clear, current and accessible, and that staff and students are valued.

Rationale: The School is keen to ensure that students are provided with a good quality learning experience. Regular student surveys are completed and student have access to a clear complaints procedure to allow the School to address concerns in a timely matter. Any threats to the School's reputation will be addressed as a matter of priority, and as appropriate, legal advice will be sought to address any inaccurate or threat to reputation information.

Negative Publicity.

The School understands the sensitivity of negative publicity and has put in place staff responsible for ensuring that marketing and business development activities are closely monitored and that website documentation is accurate. All published information about CSA provision is reviewed by Academic Board and authorised by the Principal.

7. IT Failure

Risk: Backup systems are in place along with internal and external IT expertise so the level of risk is seen as Low.

Likelihood: Very unlikely for any length of time, so the level of risk is low.

Impact: Low due to backups and professional support.

We have a fault-tolerant, cloud-based, IT Infrastructure. Contracts are in place to assure the continuity of our IT services, with robust IT business continuity arrangements. In addition, all students and staff will receive text messages informing them about any problems with or interruption to the IT system through a group messaging facility.

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 Caspian School of Academics has a comprehensive policy for refunds and compensation which is reviewed annually and is available to student through website links: <https://caspianschool.ac.uk/wp-content/uploads/2024/01/Procedure-8.2-Fee-Refund-and-Compensation.-October-2023.pdf>

The refund policy applies to all students who either pay their own fees or have their fees paid by an employer or a sponsor, and student will be entitled to a full refund of fees. Where students have their fees paid through access to loans provided through the Student Loans Company, students cannot claim any

refunds from the School, though they must notify the Student Loans Company as soon as any change occurs in their student status. In all cases the School will seek to ensure that students are treated fairly.

Students who have to incur additional travel costs will also receive compensation from the School to cover costs as appropriate. In most cases other local providers are available to offer students the opportunity to continue with their studies.

The School does not operate any student bursaries at the present time.

The School has sufficient financial reserves which will allow for compensation to be paid to the very small number of students who do not receive student loans.

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

The Student Protection Plan (SPP) will be available to students on the School's website and through the VLE. At the time of drafting the SPP, no HE students had been recruited, however, FE level students have been provided with a draft and their comments noted.

If any changes are made to the Student Protection Plan as a result of ongoing feedback or the need to meet sector requirements, these changes will be fully debated by the Student Committee prior to changes being finalised. The updated plan will also be reviewed by the Standardisation Committee, the Senior Leadership Team and the Academic Board.