

Student Protection Plan - ThinkSpace Education 2020-21

17th February 2021

Introduction

ThinkSpace Education (TSE) is an online postgraduate higher education provider with 206 students in 30 countries. We are committed to ensuring that all students achieve the best outcomes from their studies, and we will make every effort to protect the student interest and ensure continuity in the event of unforeseen events that may put their success at risk. As an online provider, the nature of the risks is sometimes different. Some events which would cause major disruption to a bricks and mortar university are much less significant to us and vice versa.

This document, the Student Protection Plan (SPP), sets out TSE's analysis of the risks facing the institution, the impact of that risk on the quality of education for students, and the steps we have taken to mitigate that risk.

As TSE is a validated partner of the University of Chichester (UoC), students enrolled directly with TSE (all those not in receipt of a UK postgraduate student loan), are covered by this SPP and not that of the UoC. Students receiving a UK student loan are directly enrolled as members of the UoC and are covered by the UoC SPP.

However, in all matters, we work closely with the UoC to ensure our institutional policies are complementary. We have consulted closely with the UoC on the strategies laid out in this SPP and both the UoC and TSE clearly understand their respective responsibilities in ensuring student continuity. Any issue or event that triggers the TSE SPP would inevitably involve close consultation with the UoC. Likewise, any issue or event that triggers the UoC SPP would require close collaboration with TSE. As such, TSE monitors updates to the UoC SPP and, where necessary, will reflect their changing assessment of risk in our own SPP.

This SPP is designed to reflect the sector advisory guidance within the CMA UK Higher Education Providers - Advice on Consumer Protection Law (March 2015), the requirements of the UK Quality Code for Higher Education - Part C, and The Equality Act 2010. It is also designed to meet the requirements for the CMA Student Protection Plan. It further takes account of the additional guidance issued by the Office for Students (OfS June 2020).

Who does the student protection plan apply to?

This SPP applies to any student currently undertaking a postgraduate degree course at ThinkSpace Education, not in receipt of a UK student loan. Those students in receipt of student loans, are enrolled directly with the UoC under a subcontracted arrangement, and are covered by the UoC SPP.

Applicants who have accepted an offer of a place, but have not yet started their course, will also be informed if the SPP is triggered. We will explain the changes that will affect them, and if necessary, offer suitable alternative arrangements, for example deferral for a year, or signposting towards alternative courses or providers.

Students who have had their registration terminated (either voluntarily, by programme completion, as a result of disciplinary action, academic misconduct, or non-payment of tuition fees), are not covered by this SPP.

What is covered by the Student Protection Plan?

This SPP relates to risks in the following areas, which could trigger action of the SPP:

- 1 Institutional failure resulting in the closure of TSE
- 2 Closure of part or all of our validating institution, the UoC, through institutional failure; withdrawal of validation; loss of partner status; loss of degree awarding powers by UoC.
- 3 Course closure by TSE (or by the UoC).
- 4 Major changes during the year to course content.
- 5 Continuation of the Covid 19 pandemic.
- 6 Catastrophic loss of infrastructure, buildings and premises.
- 7 Technical failure of web servers, loss of data and other technical issues.
- 8 Loss of key staff.

Not covered in the SPP are minor adjustments and improvements to programmes, modules, location or timetable, changes to supervision, tutors, or course materials. Students should also reasonably know what to expect should an instance requiring initiation of the SPP arise, and the detailed precautionary and operational modelling we have taken to underpin this SPP provides assurance that we have appropriate plans in place to ensure fair and responsible protection for students. These measures are in addition to the protections available to students under consumer protection law and do not affect their consumer rights.

How would the SPP be triggered?

If any significant risk to continuation of study begins to appear likely, the Principal will alert the Chair of the Board of Directors (the governing body of TSE) and a meeting of the Board will be convened to assess the risk. The Board will consult with student representatives, staff representatives, consultants, and stakeholders relevant to that particular risk, who may also be invited to attend relevant meetings of the Board.

Consideration of the risk, and its potential impact and likelihood, will lead to a Board decision of whether or not to trigger the SPP. The outcome of that meeting could be to trigger the SPP, not to trigger the SPP, or to continue closely to monitor the issue and keep it under review. The final decision on whether or not to trigger the SPP will be taken by the Board of Directors.

If the SPP is triggered, consultation and discussion will continue with student representatives and our UoC colleagues, ensuring communication with both students and our validating partner is clear, prompt, and transparent, and that intended actions, impacts and resolutions are clearly understood from early in the process.

1. Risk assessment

TSE began delivering higher education courses 2015, but as an institution TSE has been offering non-degree courses on music for television and film since 1995, with accreditation by the Open and Distance Learning Quality Council in 2000. All TSE courses have been provided by distance learning.

Our students are typically non-traditional learners. The average age is 37 with half studying part time. The majority of students are in some form of employment, continuing to work alongside their studies. Students may take an intermission of up to 2 years at any stage during their course as described in the University Academic Regulations. Students are able to change from full to part-time, or vice versa at specified points in the year. This level of flexibility is one of the factors contributing to our exceptionally high graduation rate, currently 95%.

TSE currently has 8.2 staff FTE who cover academic and technical management, support and course development. Tuition is largely undertaken by 50 external, part-time, freelance teaching staff who are largely working professional practitioners. No one individual tutor is essential to course delivery.

Until March 2019, TSE was a division within Music for Television Ltd (MFTV), a company providing music to the film and television industries. With the growth of the education side of the business, and the needs for different governance arrangements necessary for the delivery of HE, in March 2019 education operations were demerged into a separate company under common ownership, ThinkSpace Education Ltd (TSE). All other aspects of course delivery, including staffing, remain exactly the same.

Potential risks to continuity of study

1 - Institutional closure of TSE

TSE has operated profitably from the first year it started delivering degree courses. Its development and growth have been funded out of profit with the initial investment coming from income from music composition and music royalties. The institution has recruited successfully with student numbers growing year on year from 15 students in year one to 206 today.

The institutional attitude to risk continues to be cautious and prudent. The company has never taken on debt or looked for any other form of external finance.

As an online alternative provider, TSE has a different risk profile to traditional bricks and mortar institutions. Many risks are less significant. TSE has a low and very flexible cost base that can expand or contract relatively easily to allow for changes in recruitment. Our teaching staff are predominantly working professional practitioners who teach part-time on a casual basis with no ongoing contractual commitments. Our students come from 30 countries which means we are not dependent on any one country for our recruitment.

TSE also provides non-degree courses which account for around a third of our turnover, offering an alternative source of income in the event of a significant change in the market for postgraduate courses.

TSE has always been profitable and sustainable. In the two years TSE has been operating as a separate limited company, our liquidity, as of October 2020, has grown to 471 days which provides substantial reserves to support TSE through a lengthy period of unforeseen difficulties.

The flexibility of our provision allows us to respond quickly to changes in demand. We do not have a large permanent staff to support, nor do we have extensive physical premises, so any significant downturn in demand for our courses could be managed without any risk of institutional failure.

Acceptance of online course provision has grown significantly during the pandemic and as a specialist online institution we are well placed to offer courses designed to be delivered online.

We continue to add additional courses each year with the strategic aim of diversifying our provision which in turn reduces risk of a downturn in any one subject area.

Taking all of the above into account, we believe the risk of TSE institutional closure is therefore considered **very low**. However, clearly the impact of this risk on students, if unmitigated, would be **very high**. Mitigated, as explained below, we believe the impact would be **moderate**.

Detailed scenario planning underpins our consideration of this particular risk and a range of robust mitigating actions and measures are in place, including highly effective quality and standards processes.

We have looked at two main scenarios; managed withdrawal from the market, and sudden institutional failure with little or no warning.

Managed Withdrawal

A very substantial and sustained negative change to the market for online higher education in our sector, or major changes to the regulatory environment which threaten our long-term sustainability, are the kind of risks that might trigger a managed withdrawal. Where it becomes clear that the long-term viability of TSE is in question, management would need to consider winding down and closing operations. At the moment, all the signs are very positive. Despite the current pandemic there is no indication of any likely dramatic negative change to the market for online higher education or further change to the regulatory regime that might make this necessary, so we assess this risk as very low.

If managed withdrawal from the market became necessary, TSE would first consult with our University partners and stop recruiting new students. The teaching out period would last two to three years, allowing all students to complete their courses. Existing students, including those on intermission, would be informed of the decision. Any students who wished to transfer to other courses or institutions would be allowed to do so. Those students who are unable to complete their studies in the time available might be able to claim compensation or a refund of fees as set out in our student contract, but our aim would be to teach out the vast majority of students.

Managed withdrawal is more likely to be the result of long-term trends rather than short term events, but the process could be triggered and implemented in a matter of 2-3 months if required.

The cost of winding down operations and teaching out would be met by continuing income from both degree students and non-degree courses without tuition. The flexibility of our cost base means that we could reduce costs in line with reducing student numbers.

Roughly half of TSE permanent staff are involved in course development or marketing, so TSE would, in consultation with the employees, reduce staff numbers if absolutely necessary, leaving just those needed to manage and deliver the programs during the withdrawal period.

We value the loyalty and dedication of our employees, upon which this business has been built, and would only reduce staff numbers if there was absolutely no alternative. We would endeavor to offer voluntary severance in the first instance and keep staff on while they searched for alternative employment. If all other options had been exhausted, we would turn to compulsory job losses as a last resort.

The majority of students pay for their courses in monthly installments, using an interest free payment scheme. This means that income would continue to flow during the teaching out period, covering the institutional and staffing costs. Detailed financial calculations on market exit are included in our Business Plan.

As our teaching faculty are almost entirely engaged on a casual freelance basis, the gradual reduction in teaching and marking would be sustainable throughout the teaching out period. A large proportion of lectures are recorded and made available on video so this facility would continue at little or no cost to TSE. As we are already a distributed organization, the remote part-time working model means managed withdrawal could be achieved with minimal impact on the student experience.

Our financial agreement with the UoC includes a minimum annual fee. This already allows for a phased market withdrawal and a reducing minimum annual payment.

Managed withdrawal would mean that we would fulfill our obligations to students who would therefore have no need and no grounds for claiming compensation or a refund.

We envisage a teaching out period of up to 3 years (the length of our longest part time schedule) by which time all our students would have completed their studies.

Throughout this period, income would also continue to flow from our non-degree courses which do not require any teaching, income that currently accounts for a third of turnover. This would continue to underpin our ability to deliver our degree programmes during the teaching out period. As such we assess the mitigated impact on students as moderate.

Sudden Institutional Failure

The sudden failure of the institution with little or no warning, could be triggered by an unforeseen policy, financial, or legal event that would bring about the rapid closure of the institution, in such a way that managed withdrawal is not an option. As noted above, our approach to growth and risk has been cautious. We are well advised by specialist teams of education lawyers and accountants. Having taken all reasonable precautions, we conclude that the risk of this is very low. However, the impact on students would be very high.

Were this to happen, students would be transferred to the UoC who would manage the teaching out period and deliver our courses. Under our contract with the UoC, should we be unable to deliver our programmes, all course materials and online resources would be transferred to the UoC. The UoC would be given full administrative access to our virtual learning environment (VLE), support and training in its use, allowing students to continue to access their course materials. TSE freelance tutors, at the UoC's discretion, would continue to teach and mark work, and income would continue to be received from monthly installment payments and non-degree course courses which do not require tuition. This income would be more than adequate to ensure the continued employment of key staff to supervise the transition and teaching out period.

All students already have access to downloadable versions of their course materials including all the video lectures, project material and course text.

Clearly the unforeseeable nature of this risk makes detailed disaster planning difficult as each scenario would be different. However, TSE has taken all reasonable steps to make the process of continuing to deliver our courses after sudden institutional failure possible.

Students on Intermission

The status of students on intermission in the event of institutional or course closure will be dealt with on a case-by-case basis. Technically, as they are not registered with the UoC, they are not covered by this agreement. However, each student will be contacted and asked to recommence and complete their course as soon as possible. If they are unable to do so, they may be transferred onto a different course, an alternative institution, or might be eligible for a refund or compensation under our debt policy depending on their individual circumstances.

TSE holds insurance to cover compensation or refunds to students in the event of institutional failure subject to terms and conditions.

Overall, taking both possible scenarios into account, we assess the risk of institutional closure or market exit as **very low**. The unmitigated impact on students would be **very high** but the mitigated impact is **moderate**.

2 - Closure of The University of Chichester

The UoC is a stable institution that has been established for a very long time, since 1839 when it was originally established as a teacher training college. TSE is aware that UoC has been operating in deficit in recent years and monitors its annual financial statements. The risk of the whole university closing is rated as **low** in the University's own SPP and TSE's Board of Directors will continue to keep this risk under review. This includes consideration of UoC's Audited Financial Statements and any changes to their SPP.

Closure of a key department

If a department of the UoC were to close, but the University as a whole continued to function, TSE would, in the medium term, be able to continue to deliver courses. This risk also seems unlikely. TSE recently transferred from the music department to creative digital technologies, a new department set up to exploit a £35 million investment in the university technology park in Bognor Regis. As an area of growth, it is not likely to be subject to closure. This risk must be seen as **very low**.

Loss of partner status

TSE had its partnership and all programmes reapproved for a further five years in February 2019 so loss of partner status or validation, in the short or medium term seems extremely unlikely. Both the UoC and TSE carried out full risk assessments, including financial viability and maintenance of academic standards, when agreeing to renew the partnership. As outlined above, our recent QAA Higher Education Review outcomes showed that we met the appropriate standards and were commended for our student enhancement opportunities. TSE's ability to recruit both students and staff depends on reputation, based on high academic standards, comprehensive regulations, and excellence in application and recruitment processes.

It is conceivable that changes in UK higher education or at the UoC may make validation, in general, less attractive to the university so we believe this risk is **low**.

Mitigation

In the event of the closure of the UoC, closure of a key department or loss of partner status, TSE would seek validation elsewhere. It is unlikely that any of the above would happen without some warning although recent challenges facing higher education show how quickly circumstances can change. While we have a close and fruitful relationship with our university partners, it is only prudent to explore possible alternative validation arrangements in the event of that the UoC were, for whatever reason, no longer able to continue to offer degrees to our students. Given our track record, including exceptional graduation rates, our commendation at Higher Education Review, the distinctive nature of our courses, financial sustainability and method of delivery, we do not believe finding an alternative validating partner would present an obstacle that threatens student continuity.

So, the overall risk of this happening we rate as **low** but the impact on students unmitigated would be **very high** and mitigated, **moderate**.

3 - Course Closure

We currently have no plans to close any of our courses. All our courses are functioning well and our student numbers are growing. However, as the higher education market and the needs of the industries we serve evolve, it is possible one or more courses could be withdrawn at some point in the future. Therefore, this risk in the medium to long term is assessed as **medium**.

It is important to distinguish between closing a course completely and evolving a course into something better. All higher education institutions strive constantly to update and improve their course provision, and this is central to our ethos and outlook.

In the event of the complete closure of a course where no obvious alternative TSE course exists, we would consult closely with our university partners and stop recruiting. Current students, including those on intermission, would be informed of the plan and given the option of completing their studies as normal or transferring to another TSE course.

As described above under managed withdrawal, due to the nature of our course delivery and teaching arrangements, we would continue to teach existing students until they had completed their courses.

The risk that we are no longer able to deliver material components of our courses is extremely low. We design our modules to be taught by teams of staff rather than any one key individual. Almost all of the course delivery occurs online, and we have a faculty of part-time tutors who are trained to provide webinars, one-to-one tutorials, and mark student assignments. All that could be maintained without impacting students while teaching out a course scheduled for closure. So, although the likelihood in the long term is **medium**,

and the unmitigated impact would be **high**, because of the steps we have taken to mitigate the risk, the impact on students would be **low**.

4 - Major changes during the year to course content

As discussed above, all our courses are regularly reviewed and enhanced. However, in order to make a major change to the course content, under UoC academic regulations, TSE would be required to seek full programme reapproval. Therefore, there is no way TSE could do this without the specific approval of the UoC which would be very unlikely if the change was likely to have a negative impact on students. TSE is further aware of its responsibilities to students and potential students under the Competition and Markets Authority (CMA) guidelines. Therefore, the risk of major changes during the year, impacting students is assessed as **low**.

Minor changes happen regularly, for the purposes of improving quality and clarity of our educational materials, and the UoC have a specific minor change process to which TSE adheres for this purpose.

Occasionally we make changes to specific pieces of course content. Where for example some project material is no longer available, due to licensing or legal reasons, we substitute another piece of similar content that fulfills the same function. For this reason, we try, where possible, to avoid relying on any one piece of software. Our courses closely reflect contemporary professional practice so, if a particular piece of software was no longer available for example, it would be an issue that affects the whole industry not just TSE.

In the event that major changes are necessary or desirable, we would seek to either teach out the students on the original course or module, starting a new intake with the new materials, or else give them adequate time and support to transfer to a newly developed course. The nature of our provision means we can, and have in the past, taught students on old and new versions of a module simultaneously. Occasionally, changes in UoC policy or regulations necessitate a change in our courses. However, UoC policy is that changes of this nature should not adversely impact current students. Our student representatives and the wider student body are always consulted in the event of planned changes to courses in order to seek their input and feedback and minimise disruption to study.

So we assess the risk of this happening as **low**, unmitigated the impact would be **moderate** and the mitigated impact on students as **low**.

5 – Covid 19 pandemic

While the Covid pandemic has had a major impact on bricks and mortar institutions, as a purely online provider the negative repercussions for TSE have thus far been very limited. We nonetheless need to take account of the potential risk from a lengthy continuation of the disruption caused by the pandemic if new variants to the virus make a return to normality in the immediate future, impossible.

Financially, TSE is in a stronger position than ever with our largest ever intakes in September 2020 and January 2021. It is not unreasonable to assume that were the pandemic to continue for several years, online education would, if anything, become more popular. TSE has adapted quickly to remote working with all the staff working from home for the last year. Teaching has always been online and so it has had very limited impact on the student experience. The most obvious negative impact is in new course development, and the production of new course materials. While this might slow potential growth into new subject areas, it only has a limited effect on our current students. We have contingency plans for creating course materials remotely and while it is slower and more expensive than operating face to face, it is a solution should the pandemic persist for years rather than months.

The wider repercussions for the economy as a whole, and higher education in particular, does pose a risk to the stability of the whole sector. However, should it be necessary, our uniquely flexible business model means we can contract in size without any risk to the business or the student experience. The international nature of our student body, all of whom study from home and don't need to travel, means we are not dependent on the domestic economy. In addition, our liquidity and our diverse sources on income mean we are better able than most to withstand a prolonged economic downturn.

So, although the likelihood of a protracted pandemic is **medium**, the unmitigated impact would as an online provider would be **low** but because of the steps we have taken to mitigate the risk, the impact on students we assess as **very low**.

Given our successful provision of our courses throughout the current pandemic, we do not believe we need to take any further mitigating action but will continue to keep this under review.

6 - Disruption of premises e.g. due to fire, flood, or other circumstances.

As an online provider, TSE does not rely on a bricks and mortar campus to deliver its courses, and the impact on students of the total loss of our offices would be limited. Risks of disruption to premises are similar to risks for any other institution, such as disease, fire, flood, force majeure. Mitigation includes ongoing risk assessment, regular safety inspection of the premises, and maintenance of appropriate insurance to ensure business continuity in the wake of such events. While the risk of some kind of interruption to the physical infrastructure in the long term we assess as **medium**, the actual impact on students would be **very low**.

Our courses are provided through our VLE. All teaching is done online. This means that even if there were a fire or flood at TSE premises, the students would still be able to access their course materials, submit assignments, and have assignments marked by tutors, because all these activities happen remotely and do not rely on a physical building. Full time staff can work from anywhere with an internet connection, so by working from home, all student services would continue without interruption.

Since March 2020, all staff have worked remotely. There are currently no plans for the staff to return to the office after the pandemic is over. Consequently, the office is only used for meetings, storage and filming video tutorials. As such, disruption of the physical

infrastructure would have an even more limited impact on course provision than before the pandemic.

7 - Disruption of online resources

As a distance learning provider, our campus is online and so the risk to our web services and our data is one we take extremely seriously. While the complete loss of online services for a prolonged period of time we assess as **very low**, some kind of significant technical failure is rated as **medium**. However, we believe the steps we have taken would minimize the impact on students and mean any loss of access would be relatively brief, limiting the impact on continuity of study.

All our web services and data are backed up regularly. By maintaining multiple copies of both web software and data, we minimise the risk of a significant loss. The front-end web site and VLE are hosted on Linode and Siteground. Both these services operate daily, weekly and offsite backup regimes so there is almost no chance that the whole site and data, including the backups, would be lost. Student course work and our video tutorials are hosted on Amazon Web Services (AWS) which claims a 99.999999999% reliability. AWS operate a comprehensive automated backup policy. All our course materials, videos and text are also stored locally on physical drives.

We have occasionally had to restore files from backup, including significant parts of the VLE. This has sometimes led to outages of a few hours. The loss of a small amount of data, for example student work uploaded after a backup and within hours of a failure, is possible. However, the process of restoring from a backup has always gone smoothly and demonstrates the system works effectively.

Consequently, we assess the risk of losing large amounts of data due to technical failure is **very low**

In terms of the risk of data loss through unauthorised access or hacking, we take all reasonable steps to protect the data of our students. We use OpenVAS for penetration testing on both WordPress and VLE parts of the website. Servers are given restricted access using SSH keys. We are also using a non-standard port for SSH (the only way into the server), which mitigates the vast majority of automated attacks which try to access port 22. We ensure that our software is regularly updated, and security patches are applied as soon as they are available. Ubuntu updates are run on all servers every week. Wordpress is updated with every new version. Staff passwords are managed using Dashlane and all follow best practice for secure passwords.

Only a very limited number of staff have access to sensitive data. We also try to ensure that we don't store any more data than absolutely necessary online. We don't for example store any student credit card information and we have no access to their passwords. However, while we take all reasonable precautions and follow the guidelines issued by the Information Commissioner, no web service is completely secure, so we assess the risk as **medium**. Unmitigated, the impact on students could be **moderate** but the mitigated impact on continuity of study as **low**.

8 - Loss of a key staff member or group

The risk of the loss of a key member of staff, as in all institutions is a real one, and we assess the risk as **medium**.

The risk is mitigated by having a clear plan in the event of the loss, planning for succession and making arrangements for other staff to deputise in the event of sudden departure or incapacity. Our risk management is focussed on maintaining continuity of study for students immediately after an unexpected loss of a key member of staff and before a new member of staff can be recruited.

In the event of the permanent or long absence of a key member of staff, other members of staff have been informed that they would deputise and are kept informed of what they need to know in order to perform that function.

Principal and CEO: Chief Technology Officer would deputise

Course Manager: Assistant Course Manager and Student Support Manager would deputise

Student Support Manager: Assistant Course Manager and Course Administrator would deputise.

Chief Technology Officer: Lead software developers would deputise.

Our teaching staff are all working creative professionals and we already have built in redundancy as they regularly become unavailable for a period of time while they are working on a large project. As such, no programme relies on any one member of faculty for its delivery.

All key staff are aware of these arrangements and take active steps to make sure their deputies are aware of their responsibilities. We maintain standard operating procedures, "how-to wikis" and other resources to help those taking on new responsibilities at short notice.

While the loss of a key member of staff would inevitably cause some disruption, we have taken reasonable and proportionate steps to minimize any impact on students and their course of study.

So we assess the risk as **medium**. Unmitigated the impact would be **high** but due to the steps we have already taken we believe the mitigated impact on students we assess as **low**.

Summary Table

	Risk to continuity of study	Likelihood of risk occurring	Unmitigated impact on students	Mitigated impact on students
1	Institutional failure resulting in the closure of TSE	Very Low	Very High	Moderate
2	Closure of part or all of our validating institution, the UoC.	Low	Very High	Moderate
3	Course closure by TSE (or by the UoC)	Medium	High	Low
4	Major course changes during the year to course content	Low	Moderate	Low
5	Continuation of the Covid 19 pandemic	Medium	Low	Very Low
6	Catastrophic loss of infrastructure, buildings and premises	Low	Very Low	Very Low
7	Technical failure of web servers, loss of data and other technical issues	Medium	Moderate	Low
8	Loss of key staff	Medium	High	Low

Specific considerations for vulnerable groups

With due regard to the Equality Act 2010, TSE is aware that certain groups of students may be more at risk of non-continuation of study as a result of the crystallization of any of the above risks. As per the duty the Equality Act places on higher education institutions, TSE will ensure that the specific protected characteristics of our student body are taken into account when making decisions likely to affect their continuation of study and that, where required, specific mitigation is put into place to ensure that all students are treated equitably and fairly.

Refund and Debt Policy

TSE sets out its policy on refunds and compensation in the Refund and Debt Policy and the Student Contract. This policy is published online and is publicly available to everyone including all applicants and students. It clearly sets out the circumstances under which students may be liable to claim compensation or a refund on all or part of their fees.

These documents are drawn up having taken detailed advice from our specialist education lawyer, Matthew Wyard, and are reviewed annually to ensure compliance with current legislation including the Competition and Markets Authority. This refund and debt policy is underwritten by a specialist educational insurance policy.

Communication with students

TSE is committed to ensuring that our assessment of the range and level of risk to the quality and continuation of higher education provision is shared with enrolled and prospective students. To support the SPP, regular reviews by enrolled students and/or student representatives will be undertaken, with feedback obtained and used to develop the policy further in a continuous quality improvement loop.

We commit to sharing the SPP by:

- Publishing a summary of this student protection plan on our website at **www.thinkspaceeducation.com** for all current and potential students.
- Including the SPP summary in the information booklet 'Introduction to Your Postgraduate Degree' which is given to all students at enrolment.
- Referring to our plan on our application form, and during application and induction processes
- Including review of the SPP by our governing body, which student representatives also attend.
- TSE will continue to ensure that its academic and administrative staff are aware of the implications of consumer protection compliance in general, and this student protection plan in particular, through regular meetings with staff and students.
- TSE will ensure that staff are aware of the implications of the SPP when changes to courses are proposed, by including reference to it within the approval and minor change procedure.
- The SPP will be reviewed annually in consultation with students and by the governing body.

TSE has worked with current students in the development of the SPP by:

- Seeking feedback from current students before submission of the SPP to the Office for Students
- Including student review and discussion of the plan into each feedback cycle
- Discussion of the SPP at meetings of Board of Directors, which a student representative attends.

In the event that the SPP needs to be implemented, TSE has in place the following arrangements to ensure that any students affected are notified and supported to meet their individual needs and preferences:

- To continue to deliver courses as normal wherever possible.
- To contact all students, including those on intermission, to inform them of the developments, their likely impact and to keep them informed.
- Give students affected by a course closure a minimum of 28 days notice, with clear guidance about plans to teach out the course and our support arrangements.
- Inform students if there is to be any material changes to their course
- Ensure that key personnel are informed and available to support the different needs and preferences of students affected by any material change
- Invite affected students to an online meeting with key senior management responsible for HE at a convenient time for open discussion relating to changes to their courses
- Publicise the proposed meeting details to students via the virtual learning environment and email, to maximise opportunities for students to attend
- Complete and publish minutes taken at the meeting after they have been checked by student representatives to confirm that they are fair and accurate before publishing.
- In the event that students wish to complain about the way in which the SPP has been implemented, they will be facilitated to follow the TSE complaints policy, and/or referred on to the UoC if appropriate.