

Student Protection Plan for 2020-21

Provider's name: Kaplan International Pathways (see Annex for Colleges) **UKPRN:** 10082570

Legal address: Palace House, 3 Cathedral Street, London SE1 9DE, United Kingdom.

For enquiries about this student protection plan please email pathways@kaplan.com

1.0 Introduction

- 1.1 As a registered provider of higher education in the UK we are required to publish a Student Protection Plan which explains how continuation and quality of study will be preserved for current and potential students should a risk to their continued study arise
- 1.2 When you accept an offer and register for a Kaplan International Pathways programme, we fully expect to be able to deliver that programme to completion of your studies. However, in rare circumstances, factors may occur that mean this delivery will no longer be possible. Due to our rigorous processes and planning we believe there is a very low likelihood of this happening.
- 1.2 We have been delivering programmes for over 15 years and we are experienced in preserving continuation and quality of study for students. This plan is intended to assure current and future students that we have processes and procedures in place to protect continuation of study.
- 1.3 In the event that any of the risks should arise we are committed to working closely with our students, our partner Universities, and the Office for Students to ensure our students are protected through the change process.

2.0 Structure of the Plan

- 2.1 The table on pages 2 and 3 of this document identifies the risks that could apply to our provision along with an assessment of the impact and likelihood of the risk arising.
- 2.2 The table also contains a rationale of why we have assessed the identified risks are very unlikely, unlikely, or very low.
- 2.3 The remainder of the document provides information regarding established and overarching processes that we have in place to ensure continuation and quality of study for our students, and information about the practical aspects of how the Student Protection Plan will operate.

Risk	Impact	Likelihood	Mitigation
<p>The risk of being unable to operate or to decide to cease trading.</p>	<p>Severe</p>	<p>Very Unlikely</p>	<p>The risk that the Kaplan International Pathway Group would be unable to operate is very unlikely because the Kaplan International Pathways Group has substantial financial resources to support continued operation. We have established processes and procedures in place such as the establishment of an Incident Management Group led by Senior Management in the event, we are affected by extreme external factors such as terrorist activity, pandemic, and severe adverse weather conditions.</p> <p>Where possible any Kaplan Pathway College ceasing operation will be managed in such a way to ensure that students can complete their studies at an alternative Kaplan Pathway College or at the host university. In the event that is not possible will seek to support students in transferring to other programmes or institutions.</p>
<p>The risk that one of our partner Universities terminates a partnership agreement.</p>	<p>Moderate/severe</p>	<p>Very unlikely</p>	<p>Kaplan has long term agreements in place with all Partner Universities often lasting for 10 or more years. All of our agreements have strong governance in place and regular reviews to ensure any decisions around the renewal of agreements are made well in advance and clauses to protect the continued study of students without disruption. We have well established working relationships with our partners where any arising issues can be discussed and managed. Our agreements contain provisions to enable a facilitation of student teach out wherever possible.</p>
<p>The risk that one of our Student Visa licences is suspended or revoked by the UKVI.</p>	<p>Severe</p>	<p>Unlikely</p>	<p>Kaplan has a strong track record with regards to Student Visas and high levels of compliance monitored by our central compliance team. We closely monitor this area of activity reporting through to our Senior Management Team, to partner universities and to our parent company, Kaplan Inc.</p> <p>In the unlikely event that a Student Visa licence is suspended or revoked, for the Kaplan Pathways Colleges that are on individual embedded Student Visa licences we would arrange for students to be transferred to another college that offers a similar course to ensure that students can complete their studies at an alternative Kaplan Pathway College or at the host university. For KIC London on the master licence, we would apply the same principle if the master licence was suspended or revoked; we would endeavour to transfer the students from this colleges to another Kaplan pathways college. In the event that is not possible we will seek to support students in transferring to other programmes or institutions.</p>

<p>The risk that we may close any of our courses.</p>	<p>Moderate</p>	<p>Low</p>	<p>From time to time we recognise that either ourselves or one of our partner universities may take a strategic decision to close a course or programme. Where this occurs, we take all reasonable steps to give a maximum amount of notice to prospective students. We may also choose not to run a course for a specific intake if there are insufficient student numbers. If this is the case, we would give students the option of transferring to another college or course or deferring to the next intake point or a full refund. We would not take such a strategic decision once a programme has commenced. Any course cancellations by a College need to be approved by the Chief Operating Officer and one other Senior Management Team member.</p>
<p>The risk that one of our partner Universities closes or changes any of its courses.</p>	<p>Moderate</p>	<p>Low</p>	<p>From time to time we recognise that one of our University partners may take a strategic decision to close or materially change one of its courses or programmes onto which a Kaplan student is due to progress. Where this occurs, we take all reasonable steps to give a maximum amount of notice to affected students. Kaplan will communicate with the partner University and try to honour existing offers as much as possible. We may give students the option of transferring to another degree programme or allow withdrawal and a full or partial refund. When a degree has been withdrawn by the partner University, an internal approval and oversight will also be carried out at Kaplan before changes are actioned by Admissions team. This internal approval involves the Chief Operating Officer (UK Colleges) and one other Senior Management Team member approving the changes.</p>
<p>The risk that we lose the ability to deliver our online courses due to failure of technology.</p>	<p>Moderate</p>	<p>Very unlikely</p>	<p>All our awards are delivered through a customised virtual learning environment (VLE). The risk that we may lose the ability to deliver courses via our VLE is unlikely as it is hosted in public cloud, built to be highly available, scalable and backups are performed regularly. The infrastructure is fully monitored and managed at all times.</p>

3.0 Refunds

- 3.1 All the provisions we make to refund students and grant compensation are set out in our terms and conditions which are made widely available to students. Refunds before enrolment are dealt with at section 4.1 of the terms and conditions, Refunds after enrolment are covered in section 4.2 and Refunds and Compensation under this Student Protection Plan are set out in section 4.3. Where appropriate a compensation plan will be put in place as relevant to the particular circumstances. In addition we provide further guidance to students on the Refund Application Form which can be found on our website. A link to this form can also be found at paragraph 4.4.3 of the terms and conditions.
- 3.2 We consider refunds and compensation to be a remedy of last resort and we are committed to using our best endeavours to ensure all students are able to continue and complete their studies with us.

4.0 General Communication

4.1 We will communicate the provisions of our Student Protection Plan to relevant stakeholders in the following ways:

4.2 New Students:

- Publication on the Kaplan International Pathways website.
- A link to this Student Protection Plan can be found at paragraph 4.3.1 of the Terms and Conditions. You will receive the Terms and Conditions with your offer letter.

4.3 Current Students and Staff:

- It will be available to all current students and staff via the Virtual Learning Environment (VLE), and available on the Kaplan International Pathways website.

5.0 Review of the Student Protection Plan

- 5.1 The plan will be reviewed by Senior Management Team on an annual basis. The review will include consultations with College teams and through feedback received from staff and students as well as being referenced in staff/student forums. Comments will be considered by the Senior Management Team when finalising the annual review.

5.2 An updated version of the Student Protection Plan will be made available to current students via the virtual learning environment and to prospective students on the Kaplan International Pathways website.

6.0 Implementation

6.1 If any of the risks that we have identified within the plan do arise we will endeavour to act quickly and provide as much notice as is practicably possible to affected students. As part of that response we will provide advice and guidance through our College Services and/or Admissions teams in the first instance.

6.2 The nature of the advice and guidance that is provided will vary according to the nature and severity of the risk that has arisen.

6.3 Each student will be allocated a designated named contact who will be their main point of contact throughout the implementation process, and we will involve affected students as much as is reasonably practicable in the implementation of the Student Protection Plan.

6.4 If affected students are dissatisfied about the way that we are implementing the plan they can submit a complaint using our formal complaints process which is detailed in our Complaints Policy. The Complaints Policy is available on our website and on our virtual learning environment.

6.4 If any event arose within our control where we could no longer deliver a programme, we would provide students with a notice period. This notice period would be dependent on the specific circumstances of the programme closure, but we would endeavour to manage any programme closure in a timely manner. Kaplan International Pathways would take reasonable steps to provide a notice period that enables students to complete their studies or transfer to a suitable alternative programme. In these circumstances we would also:

- Create a plan to work with and support students affected, including communications.
- Meet with affected students individually and collectively at the earliest opportunity to share reasons for the situation. Collective meetings would be held. Individual students would also be entitled to have representation and support at individual meetings.
- Set out the actions Kaplan International Pathways would take to identify alternative provision.
- Provide students with support from our College Services or Admissions teams, including tailored support depending on the specific needs of a student.
- Signpost the availability of independent advice from UKCISA
- Provide written information to confirm the position.
- Make provision for further face-to-face meetings.
- Provide timescales in which students may wish to submit formal responses that were dependent on the specific circumstances and designed to be in students' interests.
- Confirm the process for any formal complaints about the implementation of the Student Protection Plan.

- Make provision for any financial compensation that is relevant to any significant impact arising from transfer of programme or provider or other relevant costs.

ANNEX - List of Kaplan Pathways Colleges

(Registered at Palace House, 3 Cathedral Street, London SE1 9DE, United Kingdom)

- ✦ **Glasgow International College**, Kaplan Glasgow Limited (Company number: 05976922)
- ✦ **Bournemouth University International College**, Kaplan Bournemouth Limited (Company number: 08291927)
- ✦ **University of Brighton International College**, Kaplan Brighton Ltd (Company number: 07331979)
- ✦ **Kaplan International College London**, Kaplan International College London Limited (Company number: 06533974)
- ✦ **University of Liverpool International College**, Kaplan Liverpool Limited (Company number: 06217892)
- ✦ **Nottingham Trent International College**, Kaplan NT Limited (Company number: 05268287)
- ✦ **University of West England, Bristol's International College**, Kaplan UWE Limited (Company number: 08102562)
- ✦ **University of Nottingham International College**, Kaplan Nottingham Limited (Company number: 10199220)
- ✦ **University of Essex International College**, Kaplan Essex Limited (Company number 10846169)