



COLLEGE OF MEDICINE & DENTISTRY  
32-34 COLMORE CIRCUS  
BIRMINGHAM, B4 6BN  
UNITED KINGDOM  
T +44 (0)121 345 9833  
E [CONTACT@CMD.ORG](mailto:CONTACT@CMD.ORG)  
W <http://www.cmd.org>

## Student Protection Plan for the Period 2024-2025

### College of Medicine and Dentistry (CoMD)

#### Introduction

This Student Protection Plan ('**this Plan**') provides assurance to you (our current and future students) that we have in place appropriate arrangements to protect the quality and continuation of study for you all. This Plan sets out our approach to protect your interests in a transparent and clear way. This Plan ensures that procedures are in place to protect your interests and that you have redress to the Office for Students (OfS) if you feel that this Plan is not addressing risks satisfactorily.

We actively support and encourage widening participation in higher education and are aware that students studying with us may have differing needs, circumstances and are from diverse cultures. We are committed to promoting Equal Opportunities and this Plan considers the possible needs of different students sharing particular protected characteristics as defined in the Equality Act 2010. This Plan provides the actions we are taking to address these risks.

#### Key features of the Plan

In summary, the key features of this Plan are as follows:

- a) Provision of a Risk Register Assessment underpinning support for your continued study;
- b) A statement of our Financial Performance demonstrating a low risk of inability to operate successfully;
- c) A Business Continuity Plan which sets out how we would act to support your continued study in the event of unforeseen or surprising circumstances occurring;
- d) A Refund and Compensation Policy in the event that CoMD was no longer able to preserve continuation of study;
- e) A policy on effective communication of this Plan on our website and via other appropriate means of communication;
- f) Ensuring that students with differing needs circumstances or characteristics are appropriately supported.

**1. An assessment of the range of risks to your continued study accounting for your differing needs, characteristics and circumstances and an assessment of the likelihood that those risks will crystallise (Low, Moderate or High)**

#### Risk 1

**The risk that CoMD as a whole will be unable to operate is very low.** This is because CoMD has a plan for its shareholders to invest further capital in the business to ensure continued financial viability. Further, business risks are closely monitored and addressed at CoMD through its Risk Register to ensure the continuation of the business and your studies. The Risk Register assesses, addresses and mitigates possible uncertainties and is designed to ensure the continuation of the business [\[See Risk Register\]](#). Our Risk Register covers the following areas:



- Student Recruitment
- Student learning experience
- Financial Risks
- Human Resources
- Property and Estates
- Attendance
- Board of Directors
- Senior Leadership Team
- Statutes and Regulations
- External Policy Context
- Curriculum Change
- Information Resources.

It is measured in terms of the likelihood of the risk happening which is expressed as:

- Red (High Risk)
- Amber (Medium Risk) and
- Green (Low Risk).

The Risk Register is reviewed every six months by the Senior Leadership Team (**SLT**) . A robust Student Protection Plan now further strengthens the Risk Register and safeguards your interests as a student.

Your teaching is delivered in partnership with our validating partner, Ulster University (**UU**). Your registration status with UU is that of a ‘fully registered’ student and CoMD’s contract with UU includes a commitment from UU to “teach out” students in the event of termination. As such, you have the added protection from UU that you will be able to complete your studies in the highly unlikely event that CoMD ceases to operate its business.

### **Risk 2**

**The risk that we would fail to continuously deliver at the Colmore Circus campus (or an alternative site) in Birmingham is low** with little or no risk to students as we have leases which the landlords have confirmed they are happy to extend. We have previously expanded our physical facilities by the addition of 4,400 square feet in the building and we are willing to expand the campus by leasing additional space, as necessary to meet student demand and the changing needs of the business.

### **Risk 3**

**The risk that we may be unable to deliver material components of our courses is low to medium** because our modules are developed in-house by CoMD and our staff who have been closely involved in the development of the courses are also experts in the field. The courses also include some specialist content and we draw on the pool of visiting faculty if needed. We also have state of the art simulation facilities including a fully functional cadaveric lab.

Further, whilst our courses are approved by UU, we are reliant on our relationship with UU (or another degree awarding body partner) to deliver our courses. As such, in the longer term, CoMD intends to apply for its own Degree Awarding Powers (**DAPs**) to allow it to deliver its courses independently from a degree awarding body partner.

**2 (a). The actions we have put in place to mitigate risks to your study that we consider are reasonably likely to crystallise**

#### **Risk 4**

**The clearest risk we face at CoMD at present is the future of our accredited courses with UU e.g. UU could change its strategy on validation and accreditation.**

**Mitigation:** We need to achieve DAPs which will allow us to deliver our courses independently from a degree awarding body partner to mitigate the risk in the long term.

**Action: Achieve full OfS registration (which has now been done), build new collaborative validations, increase the range of delegated authority and move towards DAPs.**

Other risks, some indirect, include the following:

#### **Risk 5**

**Failure to recruit enough students.**

**Mitigation:** Our courses have clear unique selling points which make them attractive to students. Further, we invest significantly in our marketing and recruitment functions to ensure we are able to attract and on-board viable cohorts of students.

**Action: To focus strategic and recruitment plans on a greater number of UK and International students by developing, reviewing and delivering courses which remain competitive in terms of price and academic, and clinical content, and by enhancing our marketing and recruitment function.**

#### **Risk 6**

**Failure to achieve an adequate level of student retention that puts course continuation into jeopardy.**

**Mitigation:** This is mitigated by using fingerprint technology to ensure student attendance and ensuring that non-attendance and non-engagement are followed up with a dedicated student monitoring and attendance report.

**Action: CoMD is taking control of admissions from UU to help ensure suitable students are recruited. CoMD also has an attendance policy that is monitored on a weekly basis and its learning and teaching strategy ensures assessment meets preferred learning styles whilst maintaining the appropriate academic level. Students falling behind in terms of attendance and engagement are contacted to arrange meetings with course leads to put support measures in place. Attendance and engagement is also a standing item for student meetings with their personal tutors.**

#### **Risk 7**

**Failure to maintain and/or improve teaching, learning and assessment quality.**

**Mitigation:** This is mitigated by robust quality assurance and enhancement systems, procedures, policies and practices, quality and standards monitoring by external bodies (such as the OfS and QAA) and an on-going oversight by the Teaching, Enhancement and Quality Committee (TEQC) and the Academic Council.

**Action: CoMD has recently reviewed its learning and teaching strategy and is reviewing and revising its quality procedures in preparation for validation by UU and its DAPs application.**

#### **Risk 8**

**Failure to ensure adequate student representation across CoMD, to support student study.**

**Mitigation:** CoMD ensures that it has sufficient student representation across CoMD's committee structure.

**Action: CoMD has achieved positive internal student feedback in its system of student representation and continues to focus on monitoring, evaluation and review of the student representation system.**

#### **Risk 9**



**CoMD's facilities fail to provide appropriate resources to support the student learning experience.**

**Mitigation:** This is mitigated by the TEQC which ensures sufficiency of learning resources through updating IT skills, improving the VLE and increasing the library stocks. Additionally, any proposals to develop any new courses must include a review of the resources and highlight if there is a need for additional resources including facilities and other teaching resources to support the student learning experience.

**Action:** CoMD has put student resources as a fixed item on agendas of all relevant committees including the Staff/Student Liaison Committee. Issues and actions are then reported to the SLT to deliver the necessary outcomes.

#### **Risk 10**

**Failure to recruit and retain staff to deliver to the requisite standards.**

**Mitigation:** This is mitigated by the operation of a staff recruitment system that begins with a person specification and job description followed by interview with experienced members enabling us to recruit qualified and subject specialist staff. Staff enjoy a relatively modest size team, close working with the Dean and opportunities for their voices to be heard by the SLT.

**Action:** High quality staff are recruited through our offer of sound staff development opportunities and attractive terms of employment.

#### **Risk 11**

**Failure to have in place measures and mitigations to address unforeseen risk e.g. a major fire, necessitating loss of building.**

**Mitigation:** This type of unforeseen outcome is mitigated by an insurance policy and the development of a Business Continuity Plan (see 2(b) below).

**Action:** CoMD's Board of Directors will continue to monitor and ensure measures are put in place to protect against unforeseen risks.

**Overall,** CoMD operates a Risk Register, employing the traffic light system and has undertaken a thorough review of all potential risks to its operations. The SLT reviews the Risk Register every 6 months, reporting annually to the Governing Board and the Board of Directors.

**Action:** The Risk Register is monitored periodically by the SLT enabling risks to be identified and quickly negated.

### **2 (b) Measures we have put in place to mitigate a major risk to your study**

Whilst CoMD has a Risk Register it has also produced a Business Continuity Plan [\[See Business Continuity Plan\]](#). The Business Continuity Plan addresses business continuity in the event of a major disruption to your studies. A typical example of such a disruption would be if the CoMD campus became suddenly, without warning, unavailable, or where there were any unforeseen long-term situations that affected CoMD's ability to teach you.

## **Business Continuity Plan**

### **Introduction**

This Plan is to be used to assist in the recovery of CoMD in general and your studies in particular, in the event of a major disruption to the business. A major disruption is defined by CoMD as a significant incident threatening personnel, buildings or the operation of the business and requires special measures to be taken to restore activity to normal, as quickly as possible. For example, where a fire destroyed most of the building or the foundations and rendered the building suddenly unsafe. **CoMD acknowledges its responsibility to maintain the quality of all students' studies in the event of an unexpected major incident.**



CoMD operates a Risk Register to cover all other academic and personal risks to student learning, staffing, learning resources etc. However, CoMD also has measures in place that guard against an event that would bring a potentially catastrophic disruption to your studies. CoMD believes that a disruption of up to five days to your learning is manageable by normal measures through implementing a model encouraging a short period of self-study. However, in the event of a major disruption, CoMD has a contingency plan to deal with this issue, minimising the overall disruption to staff and students.

### **1.1 Aim**

The aim of the Business Continuity Plan is to set out the responsibilities and actions to be taken by CoMD to quickly and efficiently re-instate the business operation in the light of a major disruption. The primary goal would be to ensure little or no disruption to studies.

### **1.2 Objectives**

The objectives of the Business and Continuity Plan are to:

- Provide for continuity of the activities essential to the business.
- Reduce to a minimum the disruption to students, staff, and services restoring them to an acceptable level.

### **1.3 Scope of the Document**

The Business and Continuity Plan sets out details of the recovery measures to be taken in the event of a major disruption to the key activities of the business.

### **Activation of the Plan**

The SLT will be responsible for the activation of the Business Continuity Plan. At the point the plan is activated, all staff and students are to be immediately informed. All staff members will be contacted and advised of the current situation and what their role will be in the recovery phase. You will be contacted through your student representatives, or individually, where possible and you will be kept up to date with actions taken, as they are delivered.

### **Action to be taken**

CoMD has an insurance policy that would cover us financially enabling us to rent another premises in the event of a major disruption. Further, CoMD shareholders have committed to a further share capital investment, to provide extra funds for compensation to those students we have identified as an increased risk of non-continuation of study.

### **Students with differing characteristics or circumstances in the event of major disruption**

CoMD will ensure that the temporary premises are equipped with resources that will enable access for students with disabilities as well as providing learning resources appropriate for the whole range of student disabilities.

**3. We provide information for you about the policy we have in place to refund tuition fees and any other relevant costs. This also covers compensation, where necessary, in the event that we were no longer able to preserve your continued study**



The Refund and Compensation Policy provides clear and transparent information about a refund and/or compensation in the event of our inability to maintain continuation of study. The policy has been approved by the Office for Students and is available on the CoMD website/via the following hyperlink [\[See Refunds and Compensation Policy\]](#). The Academic Council has also evaluated the policy prior to approval by the Board of Directors and Governing Body. Its aim is to give you full protection under the Consumer Rights Act 2015 for refunds and/or compensation, where reasonable. The policy covers the following areas:

- Refunds for students who pay their own tuition fees;
- Refunds for students whose tuition fees are paid by a sponsor;
- The payment of additional travel costs for students affected by a change in the location of their course;
- Compensation for maintenance costs and lost time where it is not possible to preserve continuation of study; and
- Compensation for tuition and maintenance costs where students have to transfer courses or provider.

### **Delivering financial implications of the Refund and Compensation Policy**

We have cash reserves which would be sufficient to provide either a refund or compensation to the students to whom we have identified an increased risk of non-continuation of study.

#### **4. This section provides information on our policy on how we communicate to our students about the Student Protection Plan**

We publicise our Student Protection Plan to current and future students in the following ways:

- On the CoMD website;
- Copies made available at the time of admission; and
- Copies made available at student induction with attention drawn to the Plan during the question and answer session.

We will ensure staff are aware of the implications of this Plan through initial staff development. It will be the responsibility of each Head of Department to make staff aware of the implications when changes are being proposed. This is monitored by the Academic Council, which signs off changes to the Plan.

The Plan is tabled at Staff/Student Liaison Committee meetings for comment and student representatives are also present when the Academic Council receives the Plan. It is part of the terms of reference for a student representative to inform their constituents of any important issues and it is always checked at Academic Council that this has occurred.

If this Plan needs to be actioned, we will inform you if there are to be material changes, with an immediate meeting of all students with the SLT. At the meeting we will explain how changes are to be implemented and there will be an opportunity for consultation with you covering the effect of the material changes. Dates of change will be agreed and then confirmed in writing to all students. In the event of termination of an accredited course, there will be clear instructions as to the 'teach out' arrangements for the course. We will endeavour to give students a minimum of 30 days' notice prior to a material change being enacted. At the same time, the Dean will inform all members of the Academic Council and Governing Body.

If material changes need to be made and/or this Plan implemented, we will ensure the following:



- a) Each student is individually supported by a personal tutor who will give clear and continuous advice on the effect of the changes and/or implementation of this Plan;
- b) The tutor will help the student make effective choices to mitigate the effect of the changes and/or implementation of this Plan;
- c) Compensation will be agreed, where appropriate, as swiftly as possible;
- d) Students will have access to the respective departmental heads and Senior Leadership Team;
- e) Full advice will be provided about choice of new options where appropriate; and
- f) Substantial advice and support will be given by personal tutors and senior academics if the student needs to find an alternative course with another provider.

#### **5. Protecting students with differing circumstances, characteristics and needs**

The Student Protection Plan ensures that students with disabilities, whatever the nature of these, will be protected through continuous review so that learning resources and physical resources will be appropriate to support you. CoMD will also ensure that continuous access to CoMD and your studies is of paramount importance and will respect differing needs and circumstances. In this way, CoMD will continue to encourage students with disabilities that CoMD is a welcoming and supportive place to study.

**6. Access to all documents cited in this Student Protection Plan is available through the hyperlinks in this Plan, CoMD's website and the Academic Quality office (upon request).**

**Document owner: Academic Council**